JOHN HOLLAND

INLAND RAIL
ILLABO TO STOCKINBINGAL PROJECT

Bushfire Emergency Plan

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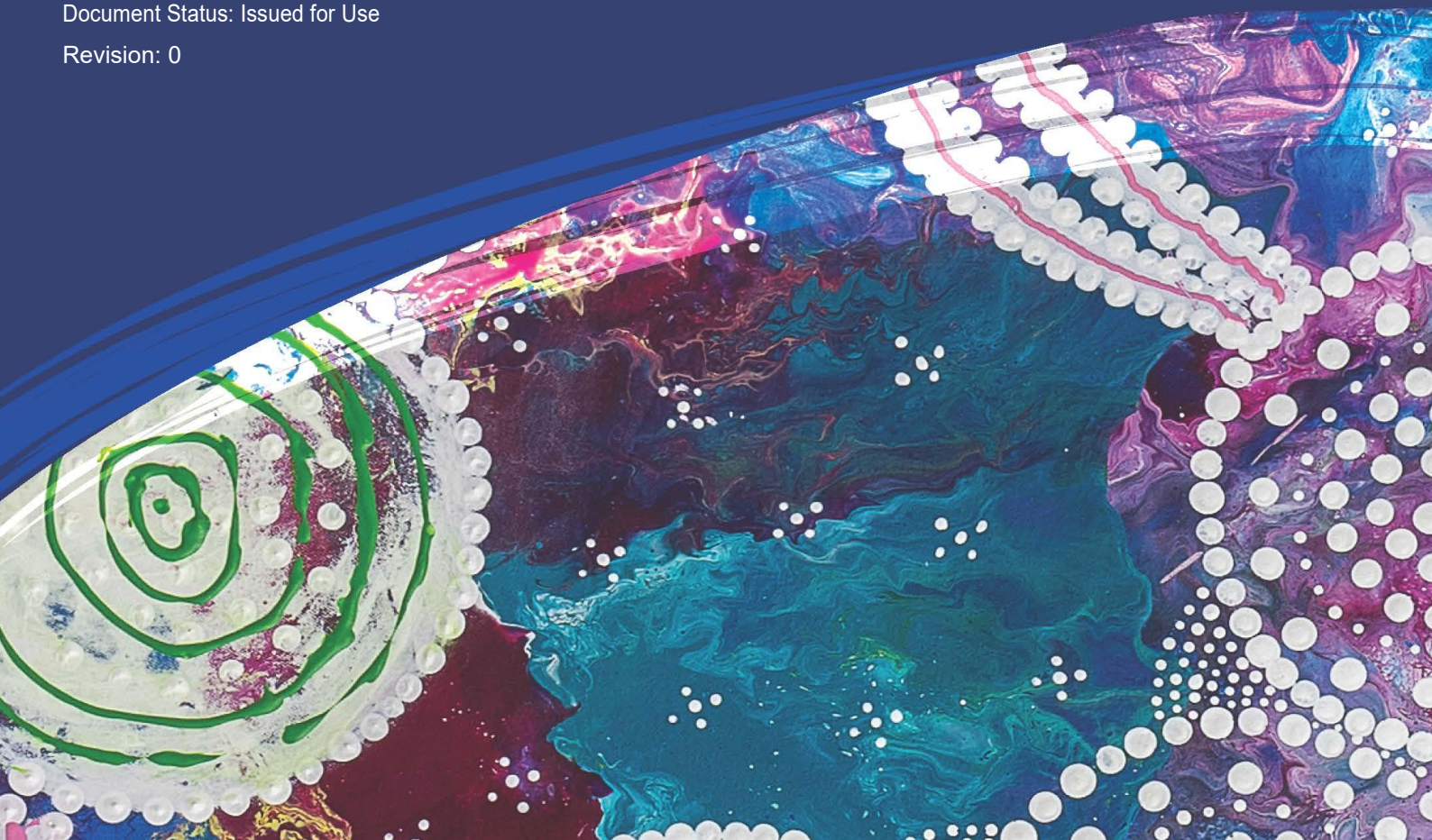

Document Control

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Signature **Date**	JOHN HOLLAND Document Number 5-0019-220-PMA-00-PL-0065 Revision 0 **Approved** Mr Daniel Lidbetter - John Holland Pty Ltd Oct 1, 2025, 12:51 PM GMT+10:00 This review has been completed using Aconex Workflow for the Inland Rail - Illabo to Stockinbingal (I2S) Project.	JOHN HOLLAND Document Number 5-0019-220-PMA-00-PL-0065 Revision 0 **Approved** Mr Andy Robertson - John Holland Pty Ltd Oct 2, 2025, 11:10 AM GMT+10:00 This review has been completed using Aconex Workflow for the Inland Rail - Illabo to Stockinbingal (I2S) Project.

1 Revisions and Distribution

1.1 Revisions

Draft issues of this document are identified as Revision A, B, C etc. Following acceptance by the document approver, the first finalised revision will be Revision 0. Subsequent revisions will have an increase of "1" in the revision number (1, 2, 3 etc.).

Revision History

REVISION	DATE ISSUED	DESCRIPTION
A	10/12/2024	Issued for Review
B	3/7/2025	Issued for Review
C	9/09/2025	Issued for Review
0	1/10/2025	Issued for Use

1.2 Distribution

The controlled master version of this document is available for distribution as appropriate and maintained on the document management system being used on the project. All circulated hard copies of this document are deemed to be uncontrolled.

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2.1 Compliance Roadmap

The following section provides a tabular representation of the project requirements as described in the conditions of approval and a reference link to detail how I2S intend to comply.

2.2 Minister's Conditions of Approval – CSSI-9406

The primary NSW CoA relevant to the development of this Plan are listed in Table 2-1.

Table 2-1 Primary NSW CoA

CoA No.	Condition Requirements	Document Reference
E121	Prior to commencing construction, the Proponent must develop and implement a comprehensive Bushfire Emergency Plan and detailed emergency procedures for the infrastructure, in consultation with RFS and FRNSW and provide a copy of the plan to the local Fire Control Centre. The plan must:	This Plan
	(a) be consistent with: (i) RFS's Planning for Bush Fire Protection 2019 (or equivalent); (ii) RFS's Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; (iii) the Fire and Rescue NSW Act 1989; (iv) the Work Health and Safety (WHS) Act 2011	Section 2
	(b) identify the fire risks and hazards and detailed measures for the CSSI to prevent or mitigate fires igniting, including risks associated with the revegetation within the rail corridor;	Section 5
	(c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site	Section 8.2 Appendix D
	(d) list works that should not be carried out during a total fire ban;	Section 7
	(e) include availability of fire suppression equipment, access and water;	Section 5
	(f) include procedures for the storage and maintenance of any flammable materials;	Section 5.6
	(g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;	Section 8.4.5 Section 5.2 Appendix B
	(h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	Section 5.1 Appendix A
	(i) include location of hazards (physical, chemical and electrical) that may impact on firefighting activities and procedures to manage identified hazards during firefighting activities;	Section 4 Section 5.6
	(j) include details of the location, management and maintenance of any Asset Protection Zone (including maintaining the Asset Protection Zones at a height of 100 mm or less at the construction compounds and temporary workforce accommodation facilities) and who is responsible for the maintenance and management of the Asset Protection Zone;	Section 5.1
	(k) include bushfire emergency management planning;	Section 5

		Section 6 Section 7.1
	(l) Include details of the how RFS and FRNSW would be notified, and procedures that would be implemented, in the event that: (i) there is a fire on-site or in the vicinity of the site; (ii) there are any activities on site that would have the potential to ignite surrounding vegetation; or (iii) there are any proposed activities to be carried out during a bushfire danger period that have the potential to ignite surrounding vegetation.	Section 9.4.2.1 Appendix D Section 9.4.2.2

2.3 Updated Mitigation Measures

The primary Updated Mitigation Measures (UMMs) relevant to the development of this Plan are listed in Table 2-2.

Table 2-2 Updated Mitigation Measures relevant to this Plan

Ref.	Issue	Mitigation Measure	Timing	BEP Reference
HS-3	Bushfire	Detailed design and construction planning would maintain appropriate access during construction and operation, ensuring local roads allow emergency access, first-response firefighting, access to water supply for firefighting purposes and safe evacuation routes.	Detailed Design / Pre-Construction	Bushfire Assessment
HS-4	Flood and Emergency Response	A flood and emergency response plan would be prepared and implemented as part of the CEMP. The plan would include measures, processes and responsibilities to minimise the potential impacts of construction activities on flood behaviour and bushfire risk as far as practicable. It would also outline measures to manage emergency responses during construction.	Detailed Design / Pre-Construction	This Plan Flood and Emergency Response Plan
LP-13	Bushfire Risk	The flood and emergency response plan (mitigation measure HS-4) would include measures to minimise the potential for bushfire risks.	Construction	Section 5
HS-6	Bushfire	The construction contractor would develop procedures to manage hot work/high fire-risk activities, including observation of local fire authorities and emergency services directives, checking extent of worksite vegetation prior to hot work, and ensuring appropriate firefighting equipment and trained personnel are available. The construction contractor procedures would comply with the ARTC Safety Management System.	Construction	Section 5.5 Section 6 Section 7
HS-7	Bushfire	The ARTC Engineering (Track and Civil) Code of Practice—Section 17 Right of Way: Vegetation Management (ARTC, 2013) would be implemented to minimise fire risk within the rail corridor, which includes specifications for vegetation management/fire hazard reduction within the corridor. Local fire authorities (including the Rural Fire Service) and local emergency services would be	Construction	Section 5 Section 3.11

		consulted to confirm that appropriate operational actions are taken, such as providing feedback on the firefighting vehicles accessibility, fire prevention plans and cooperation on burning-off activities.		
AHR-1	Fire Risk Management	The construction contractor would provide appropriate firefighting equipment, including fire extinguishers, water carts and hoses, are available at the accommodation camp.	Construction / Operation	Section 5.1

2.4 Environmental Requirements

In accordance with NSW CoA A5, references in the terms of this Plan to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in at the date of the Infrastructure Approval (SSI-9406).

2.5 Bushfire Emergency Mitigation and Management Measures

In accordance with the CoA, mitigation measures will be implemented with the aim of achieving specific measures and requirements to address contract specifications, CoA and REMMs in relation to bushfire emergencies. These measures are outlined in Table 2-3.

Table 2-3 Bushfire Emergency mitigation and management measures

Ref	Measure / Requirement	Timing / Frequency	Responsibility	Reference / Source
BE01	JH will ensure that detailed design and construction planning would maintain appropriate access during construction and operation, ensuring local roads allow emergency access, first-response firefighting, access to water supply for firefighting purposes and safe evacuation routes. Access for emergency vehicles is detailed in the emergency response procedure in Appendix D of this Plan.	Detailed Design / Pre-Construction	Project Environment and Sustainability Manager, Design Manager	UMM HS-3
BE02	JH will prepare and implement a flood and emergency response plan as part of the CEMP. The plan will include measures, processes and responsibilities to minimise the potential impacts of construction activities on flood behaviour and bushfire risk as far as practicable. It will also outline measures to manage emergency responses during construction.	Detailed Design / Pre-Construction	Project Environment and Sustainability Manager, WHS Team	UMM HS-4
BE03	The flood and emergency response plan (mitigation measure HS-4) will include measures to minimise the potential for bushfire risks.	Construction	Project Environment and Sustainability Manager, WHS Team	UMM LP-13 UMM HS-4
BE04	JH will develop procedures to manage hot work/high fire-risk activities, including observation of local fire authorities and emergency services directives, checking extent of worksite vegetation prior to hot work, and ensuring appropriate	Construction	Project Environment and Sustainability Manager,	UMM HS-6

Ref	Measure / Requirement	Timing / Frequency	Responsibility	Reference / Source
	firefighting equipment and trained personnel are available. The procedures will comply with the ARTC Safety Management System and be implemented for all hot work/high fire-risk activities during construction of the Project.		WHS Team	
BE05	The *ARTC Engineering (Track and Civil) Code of Practice—Section 17 Right of Way: Vegetation Management* (ARTC, 2013) will be implemented by JH to minimise fire risk within the rail corridor, which includes specifications for vegetation management/fire hazard reduction within the corridor. JH will consult with local fire authorities (including the Rural Fire Service) and local emergency services to ensure appropriate operational actions are taken, such as providing feedback on the firefighting vehicles accessibility, fire prevention plans and cooperation on burning-off activities.	Construction	Project Environment and Sustainability Manager, WHS Team	UMM HS-7
BE06	JH will ensure that appropriate firefighting equipment, including fire extinguishers, water carts and hoses, are available at the accommodation camp.	Construction / Operation	Project Environment and Sustainability Manager, WHS Team	UMM AHR-1
BE07	Emergency protocols and procedures will include: • details of traffic management measures to be implemented during emergencies • design and management measures to address the potential environmental impacts of an emergency situation. • training programs to ensure that all staff are familiar with the plan.	Construction	Project Environment and Sustainability Manager, WHS Team	EIS Appendix E, Table E-1 – item 15.

Note: References assigned to each measure are for the purpose of identifying the mitigation measure only.

2.6 Relevant Legislation and Guidelines

The primary legislation, guidelines and standards relevant to Bushfire Emergency management are presented in Table 2-4. This Plan has been prepared in consideration of and is consistent with this documentation.

Table 2-4 Principal legislation and guidelines relevant to Bushfire Emergency Management

Legislation	• *Fire and Rescue NSW Act 1989* • *Work Health and Safety (WHS) Act 2011* • *Work Health and Safety Regulation 2017 (NSW) (WHS Regulation 2017)* • *Rural Fires Act 1997* • *Environmental Planning and Assessment Act 1979 (NSW) (EP&A Act)* • *Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act)* • *State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP) (formerly SEPP 33)*

	• *Heritage Act 1977 No 136 (NSW)* • *Local Government Act 1993* • *State Emergency and Rescue Management Act 1989 No 165 (NSW)* • *Public Health Act 2010 No 127 (NSW)* • *Protection of the Environment Operations Act (1997)*
Guidelines and Specifications	• Code of Practice: How to Manage Work Health and Safety Risks • AS 1715 - Selection, Use and Maintenance of Respiratory Protective Devices • AS 1716 - Respiratory Protective Devices • Safe Work Australia - Workplace exposure standards for airborne contaminants • WHS&R Planning (JH-MPR-WHS-001) • Managing SQE Risks (JH-MPR-SQE-006) • Risk Management – Pre-Contracts (JH-MPR-RCC-002) • Planning for Bushfire Protection 2019 (RFS, 2018) • Planning for Bushfire Protection 2022 (addendum) (RFS, 2021) • Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (RFS, 2014) • Environmental Health Risk Assessment: Guidelines for Assessing Human Health Risks from Environmental Hazards: 2012 (enHealth 2012a) • Applying State Environmental Planning Policy 33 (SEPP 33): • Hazardous and Offensive Development Application Guidelines (DPE 2011) • Health Impact Assessment Guidelines (enHealth 2017) • Health Impact Assessment: A Practical Guide (NSW Health 2007) • Riverina Bushfire management Plan (Bush Fire Coordinating Committee – Policy No 1/2008)

Relevant provisions of the above legislation are identified in the register of legal requirements included in Appendix A1 of the CEMP.

2.7 Terms and Abbreviations

Term / Abbreviation	Definition / Expanded text
Act	(Comcare) Work Health & Safety Act
AHD	Australian Height Datum
AMS	Activity Method Statement is a planning process to determine detailed methodology which breaks down and analyses individual WRA work elements). Also referred in industry as Work Method Statement (WMS), Work Pack and/or Safety Activity Pack.
APZ	Asset Protection Zone (APZ) is a fuel reduced area surrounding a building or an item of value. Fuel reduced means just that; a reduction in the available vegetation sufficient to reduce the impact of bushfire. It does not mean the total removal of all vegetation and yes, some trees can remain. For forest vegetation the APZ can be made up of an Inner Protection Area (IPA) and an Outer Protection Area (OPA).
ARTC	Australian Rail Track Corporation
BEP	Bushfire Emergency Plan
BFPL	Bush Fire Prone Land

Term / Abbreviation	Definition / Expanded text
BoM	Bureau of Meteorology
CCS	Community Communication Strategy
CEMP	Construction Environmental Management Plan
Class 1, 2 & 3	JH incident classification systems (refer to JH-MPR-SQE-010)
CoA	Conditions of Approval
CSSI	Critical State Significant Infrastructure
CWMP	Construction Waste Management Plan
DPHI	Department of Planning, Housing and Infrastructure
EMIS	Environmental Management Information System
Environmental Assessment Documentation	• Inland Rail – Illabo to Stockinbingal Environmental Impact Statement (ARTC 2022) • Illabo to Stockinbingal Project Response to Submissions (ARTC 2023) • Response to Submissions – Appendix E - Biodiversity Development Assessment Report version 12 (IRDJV, June 2024) • I2S – Mitigation Measures (Inland Rail, April 2024) • Illabo to Stockinbingal (SSI-9604) Additional and Appropriate Measures for Box Gum Woodland Impacts (Inland Rail, June 2024) • Technical and Approvals Consultancy Services: Illabo to Stockinbingal – Box Gum Woodland Gum Flat Rehabilitation Opportunity (IRDJV, June 2024)
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ER	Environmental Representative
FDR	Fire Danger Rating
FRNSW	Fire and Rescue New South Wales
HSC	Health & Safety Committee
HSE	Health, Safety and Environmental
HSMA	(Comcare) Health and Safety Management Arrangements
HSR	Health & Safety Representative
IC	Incident Controller
IMS	(John Holland) Integrated Management System
IN	Improvement Notice
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
IRPL	Inland Rail Pty Ltd
I2S	Illabo to Stockinbingal
JHG	John Holland Group

Term / Abbreviation	Definition / Expanded text
km	Kilometres
LGA	Local Government Area
L	Litre
Material Harm	is harm that: (a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or (b) results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).
m	Meters
NSP	Neighbourhood Safer Place
NSW	New South Wales
PHA	Plant Hazard Assessment
PIRMP	Pollution Incident Response Management Plan
PPE	Personal Protective Equipment
RFS	NSW Rural Fire Service
SDS	Safety Data Sheet
SEARs	Secretary's Environmental Assessment Requirements
Start card	Worker situation awareness (Take 5) risk assessment
STP	Sewage Treatment Plant
SWMS	Safe Work Method Statement
TOBANs	Total Fire Bans
TRA	Task Risk Assessment or equivalent (e.g., JSA)
UMMs	Updated Mitigation Measures
VMS	Variable Messaging Signs
WG	Work Group
WHS	Work Health & Safety
Work	Any physical work for the purpose of the CSSI including construction and low impact work but not including operational maintenance work
Worker	In the context of John Holland controlled workplaces, worker refers to John Holland workers, contractors and any person engaged to participate in work activities at the workplace.
WRA	Workplace Risk Assessment
WTP	Wastewater Treatment Plant

3 Introduction

3.1 Context

This Bushfire Emergency Plan (BEP or Plan) has been prepared to address the requirements of the Minister's Conditions of Approval (CoA), specifically CoA E121, the measures listed in the Environmental Assessment Documentation and relevant legislation (see Section 2).

3.2 Project Description

The Project is located in south-western New South Wales (NSW) in the Riverina region (refer to Figure 3-1). Illabo is a small town located at the southern end of the alignment 16 kilometres (km) north-east of Junee in the Junee Local Government Area (LGA). Stockinbingal is situated at the northern end of the project, approximately 20 km north-west of Cootamundra in the Cootamundra–Gundagai Regional LGA. The major towns surrounding the project are Wagga Wagga, about 50 km to the south, Young to the north-east and Cootamundra to the east.

The Project comprises a new rail corridor to connect Illabo to Stockinbingal. The alignment branches out from the existing rail line north-east of Illabo and travels north to join the Stockinbingal–Parkes Line west of Stockinbingal. The route is predominantly used for agriculture. The project includes modifications to the tie-in points at Illabo and Stockinbingal to allow for trains to safely enter and exit the Illabo to Stockinbingal section of Inland Rail. The alignment also crosses several local and private roads, watercourses and privately owned properties. No major towns are located within the project site between Illabo and Stockinbingal.

The Project will include a total extent of approximately 42.5 km, including 39 km of new, greenfield railway which will incorporate the following key features:

- single track standard gauge on a combination of existing ground level embankments and within cuttings
- new bridges and road overpasses
- crossing loop and maintenance siding
- new level crossings, stock crossings and upgrades to existing level crossings
- new major stormwater diversion and minor drainage works associated with installation and upgrades to culverts.

The Project will also include upgrades to approximately 3 km of existing track associated with tie-in works and construction of an additional 1.7 km of new track to maintain the existing rail network connections. Road upgrade works will also be undertaken to re-align approximately 1.4 km of Burley Griffin Way to provide a road-over-rail bridge at Stockinbingal. Re-alignment of Ironbong Road will also be completed to allow for safe sight lines. A temporary workforce accommodation camp will also be constructed to house the workforce for the duration of the Project. Key features of the Project are shown on Figure 3-2 with detailed section mapping, which should be referred to for emergency response, provided in Appendix A.

A detailed Project description is provided in Section 2 of the CEMP.

3.3 Statutory Context

The project was declared to be Critical State Significant Infrastructure (CSSI) in 2021, requiring approval under Division 5.2 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). In accordance with the Secretary's Environmental Assessment Requirements (SEARs) (dated 30 April 2021), an Environmental Impact Statement (EIS) was prepared by Australian Rail Track Corporation (ARTC) in August 2022. The EIS was exhibited by the Department of Planning, Housing and Infrastructure

(DPHI) for a period of six (6) weeks, commencing on 14 September 2022 and concluding on 26 October 2022.

Following public exhibition of the EIS, ARTC prepared a Submissions Report to respond to submissions and describe Project design refinements.

Approval for the Project was granted on 4 September 2024 by the Minister for Planning (application number SSI-9406) and was subject to a number of CoA.

The project was determined to be a controlled action under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (EPBC Referral 2018/8233). The Project received controlled action approval from Department of Climate Change, Energy, the Environment and Water (DCCEEW) (EPBC Referral 2018/8233) on 28 October 2024.

3.4 Scope of the Plan

The scope of this BEP is to describe how bushfire risk and emergencies will be managed during construction of the Project. This Plan has been prepared under and consistent with the CEMP, considering relevant sensitive land uses and construction activities.

This Plan is applicable to all activities during construction of the Project, including all areas where physical works will occur or areas that may be otherwise impacted by the construction works, and under the control of John Holland Group (JHG). All JHG staff and sub-contractors are required to operate and comply with the requirements of this Plan and related environmental management plans, over the full duration of the construction program. A copy of this BEP will be kept on the premises for the duration of construction.

3.5 Plan Purpose

This BEP provides a comprehensive strategy for the management of bushfire emergencies during construction of the Project. Site-specific emergency procedures for the infrastructure are included within this plan to assist in the safety of all construction personnel as well as the local community, site operations and the built environment.

This plan is structured to address the following:

- Risks posed by bushfires on or surrounding work sites (see Section 4)
- Bushfire prevention and mitigation measures (see Section 5)
- Bushfire awareness (see Section 6)
- Bushfire preparedness actions (see Section 7)
- Emergency response in the event of a bushfire including evacuation (see Section 8).

These stages and the information presented are consistent with the requirements of the NSW RFS Development Planning – A guide to developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS 2014).

This Plan shall be updated as required to allow arrangements to remain effective and efficient. This plan applies to all employees, subcontractors, suppliers and visitors to the Project.

3.6 BEP Objectives

The key objective of the BEP is to allow avoidance, mitigation and management measures relevant to the management of bushfire emergencies to be implemented.

To aid in achieving this objective, all CoA, UMMs and licence / permit requirements relevant to bushfire emergency management are described, scheduled and assigned responsibility as outlined in:

- Environmental Assessment Documentation
- Infrastructure Approval CoA (SSI-9406)
- All relevant legislation and other requirements described in Section 2 of this Plan.

3.7 Performance Outcomes

The Secretary's Environmental Assessment Requirements (SEARs) identify a number of desired performance outcomes for the Project. These desired performance outcomes outline the broader objectives to be achieved in the design, construction and operation of the proposal. There are no desired performance outcomes relating to bushfire emergency management identified within the SEARs (SSI-9406 – 30 April 2021).

3.8 Plan preparation, endorsement and approval

The BEP has been prepared to satisfy the NSW and Commonwealth CoA's in relation to the management of bushfire emergencies during construction of the Project, particularly NSW CoA Condition E121.

This Plan will be reviewed by the Inland Rail Pty Ltd (IRPL) Senior Environmental Advisor (or delegate) to confirm it is consistent with, and incorporates, all relevant elements of the CEMP, prior to implementation. Construction of the Project will not commence until this Plan is submitted to the NSW RFS following consultation, is endorsed by the Environmental Representative (ER), and provided to the Planning Secretary for approval. This Plan will also be circulated to all local Fire Captains within the rail corridor area.

3.9 Project wide Emergency Response Plan

Requirements for consultation and coordination with residents, councils, and other relevant stakeholders, including the State Emergency Service (SES) are included in the Project Emergency Response Plan (JH ref: 5-0019-220-PMA-00-PL-0032). This document provides Project specific bushfire response requirements as agreed between the contractor (John Holland) and the client (Inland Rail) to enable an emergency onsite to be managed in accordance with both contractor and client system requirements.

The procedure will be further developed during the detailed construction planning phase and will be updated, when required, during the project to confirm that management, mitigation, and evacuation routes are relevant to the activities being undertaken and the access/egress locations.

Emergency planning and awareness training will be undertaken for the Project and will include but not be limited to development of a communication protocol, both internal and external stakeholders, during bushfire emergencies and other potential environmental emergencies.

3.10 Interactions with other management plans and strategies

The BEP has the following interrelationships with other management plans and documents:

- Safety Management Plan (JH-PLN-WHS-002), which provides the framework for managing safety including the safety requirements associated with the use of herbicides and pesticides. Safety Data Sheets and product labels will also be referenced prior to application of herbicides and pesticides.

- Quality Plan describes the process for managing non-compliances, non-conforming work practices and initiating corrective / preventative actions or system improvements in accordance with the process outlined in the CEMP.
- WHS&R Management System Manual (JH-MAN-WHS-001)
- WHS&R Planning (JH-MPR-WHS-001)
- John Holland Responsibility & Accountability Matrix (Section 9.1)
- Managing SQE Risks (JH-MPR-SQE-006)
- Risk Management – Pre-Contracts (JH-MPR-RCC-002)
- People Capability (JH-MPR-HRT-020)
- HSMA – Health Safety Management and Consultation Arrangements (JH-MPR-WHS-004)
- Emergency Response Plan (5-0019-220-PMA-00-PL-0032)
- Workplace Risk Assessment (5-0019-220-PRK-00-RA-0001-Internal Rev A)
- Monitoring and Review (JH-MPR-SQE-002)
- Workplace Hazard Identification and Inspection (JH-MPR-WHS-006)
- Project Construction Environmental Management Plan.

3.11 Consultation

The BEP was prepared in consultation with Rural Fire Services (RFS) and Fire and Rescue NSW (FRNSW). These stakeholders were provided a copy of this Plan on 4 August 2025 All comments received were considered and the BEP updated accordingly.

Key matters raised by stakeholders and how they have been addressed are outlined in this Plan including consultation evidence in accordance with NSW CoA E121 and A10. A summary of the comments received and how they were considered is provided in Appendix C.

Ongoing consultation between IRPL, JHG, neighbouring Projects (if applicable), stakeholders, the community and relevant agencies regarding the management of bushfire emergencies will be undertaken during the construction of the Project as required. The process for the consultation will be consistent with the Community Communication Strategy (CCS).

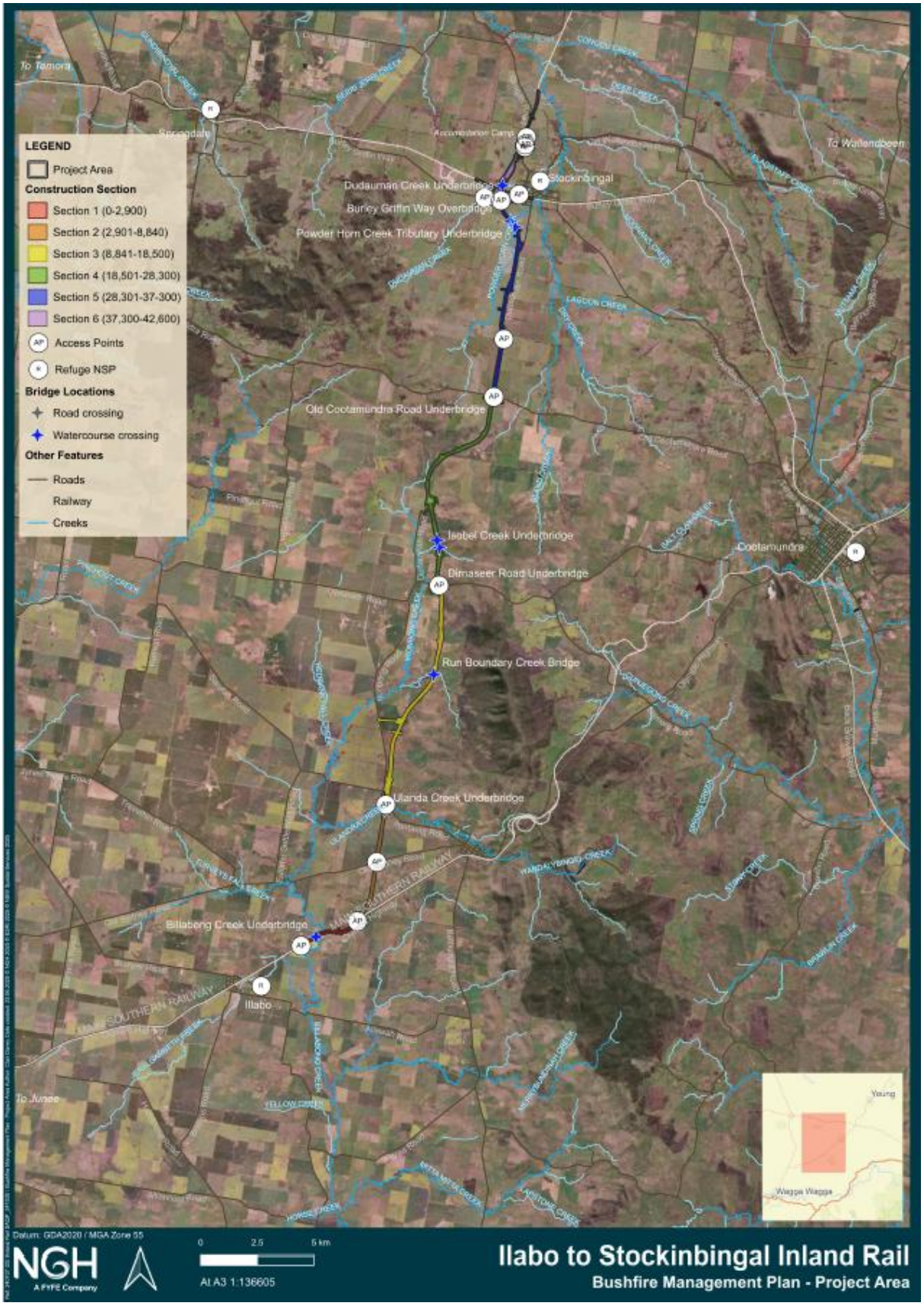
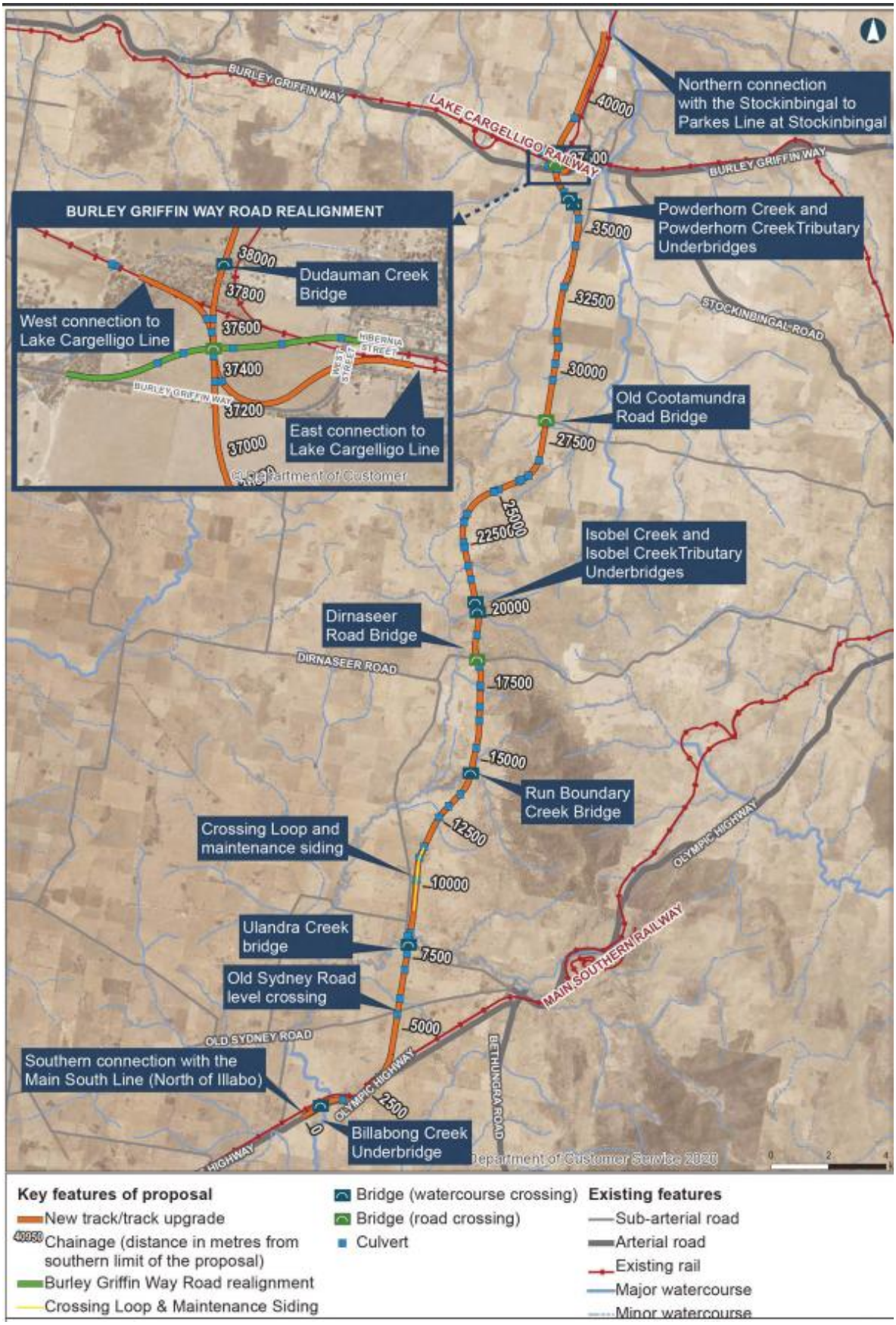


Figure 3-1 Project Area



(Source: Illabo to Stockinbingal - Environmental Impact Statement, 2022)

Figure 3-2 Key Project Features

4 Bushfire Risks and Hazards

The risk of bushfire is considered in terms of environmental factors that increase the risk of fire (landscape fire risk, vegetation (fuel quantity and type), topography, climate and weather), specific activities or infrastructure components that can potentially increase ignition risks, as well factors which may increase the consequence of bushfires.

4.1 Landscape bushfire environment

Bush fire prone land (BFPL) comprises land that can support a bushfire or is likely to be subject to bushfire occurrence. The NSW Bush Fire Prone Land dataset is prepared in accordance with the Guide for Bush Fire Prone Land Mapping (BFPL Mapping Guide) (NSW RFS 2015). It provides BFPL maps for each LGA in NSW. The vegetation categories for bushfire-prone land are summarised in Table 4-1.

The Project is located within and near areas mapped as BFPL and areas not mapped as bush fire prone but containing vegetation which would meeting the criteria (as per Table 4-1). As such the entire project area, except for a small area within Stockinbingal, is bush fire prone and can support fast moving grassfires and higher intensity bushfires in woodland areas. Grazed grasslands and non-irrigated crops fall under Category 3 and are considered BFPL.

Table 4-1 Vegetation Categories for Bushfire Prone Land

Vegetation Category	Description	Associated Vegetation
Category 1	Considered to be the highest risk for bush fire. This vegetation category has the highest combustibility and likelihood of forming fully developed fires including heavy ember production.	Areas of forest, woodlands, heaths (tall and short), forested wetlands and timber plantations.
Category 2	Considered to be a lower bush fire risk than Category 1 and Category 3 but higher than the excluded areas. This vegetation category has lower combustibility and/or limited potential fire size due to the vegetation area shape and size, land geography and management practices.	Rainforests and lower risk vegetation parcels. These vegetation parcels represent a lower bushfire risk to surrounding development and consist of: • remnant vegetation • land with ongoing land management practices that actively reduce bush fire risk.
Category 3	Vegetation Category 3 is considered to be medium bushfire risk vegetation. It is higher in bushfire risk than Category 2 (and the excluded areas) but lower than Category 1.	Grasslands, freshwater wetlands, semi-arid woodlands, alpine complex and arid shrublands.

4.2 Vegetation

Vegetation within most of the study area has been cleared for agricultural land uses, however, several patches of remnant vegetation remain. Vegetation (as described in the Biodiversity Management Plan and Chapter 10 of the Project EIS) within, and in the vicinity of, the project area falls with the vegetation classification of grassland and woodland. Grazed grassland and non-irrigated crops meet the criteria for BFPL and fall within the grassland vegetation class (Category 3).

Grassfires are most likely when grasslands are fully cured and ungrazed. Characteristically they have a higher rate of spread than other bushfire types and can cover large areas. Potentially they can occur and impact life and property with little or no warning.

Woodland fires can be slower moving but due to the greater fuel loads can burn at higher intensities. Bushfires in woodland can be more difficult to control due to the greater potential for spotting, restricted access and the greater number of resources required for control.

Both these vegetation classes adjoin the project area and can represent a significant risk to personnel and assets. Generally spreading from the west under drier north-west, west to south-west winds, the western side of the project area containing grasslands and woodlands is most susceptible to potential fire impacts.

4.3 Topography

The slope of a site can also influence the rate of spread of fire, with a doubling of the rate of spread for every slope increase of 10 degrees.

A bushfire hazard downslope of a site would pose a greater risk than upslope of a site, as the bushfire would travel upwards with a corresponding increase in flame height and intensity. The southern portion of the Project area is situated within flat to generally sloping terrain at an average elevation of 280 m Australian Height Datum (AHD). The central portion of the study area passes through a saddle, with moderately undulating slopes with a maximum elevation of 480 m AHD. The northern portion of the study area is situated within a flat, gently undulating terrain which leads into the village of Stockinbingal. The topography of the study area is associated with the Bethungra Range located to the east of the southern section as against the relative flatter areas between Old Cootamundra Road and Stockinbingal. These three sections present different challenges when it comes to fire control. In the more undulating parts of the project area fire control is more difficult than in the flatter areas. Parts of the project area with downslope areas to the west are the most susceptible to bushfire impacts.

4.4 Climate

Temperatures for the region range between an average minimum temperature of 1.2 degrees Celsius (°C) in July and average maximum temperature of 32.0°C in January (Bureau of Meteorology (BoM – Cootamundra Airport (073142) Climate Statistics (BoM 2025[1]) Temperatures frequently reach 40°C and above from December to February, when bushfire risk is highest. The average number of extreme heat days (above 35°C) is approximately seven days per year. An average of 623 millimetres (mm) of rainfall occurs in the region each year (BoM 2025).

Changes in climate conditions are anticipated for the future which includes potential increase in average temperatures, increased intensity of extreme rainfall events, decrease in average rainfall, increase in extreme weather events (including the number of days of elevated fire danger).

4.5 Fire Danger Period (bushfire season)

The fire danger period runs from 1 October to 31 March in Cootamundra-Gundagai Regional Council area, and 1 November to 31 March in the Junee Shire Council Area, unless adjusted by the NSW RFS. During this period the bushfire risk is elevated, and additional procedural controls are applied in responses to forecast fire weather ratings.

The project is located within two Local Council Areas and two different fire districts:

- The northern section is located within the Cootamundra-Gundagai LGA which is in the RFS South West Slopes Zone and the Southern Slopes Fire Weather District

[1] Source: http://www.bom.gov.au/climate/averages/tables/cw_073142.shtml

- The southern section is located within the Junee Shire Council LGA which is in the RFS Riverina Zone and the Eastern Riverina Fire Weather District.

Fire Danger Rating (FDR) forecasts are issued throughout the bushfire season, with preparedness responses to be applied by the project detailed in Section 7. Due to the Project area being located across two Fire Weather Districts, two different FDRs may be issued. In such scenario, the most severe FDR is to apply to the whole Project area.

4.6 Construction Activity Bushfire Risks

Key construction activities of the Project that could increase bushfire risk include:

- General construction activities including hot works and sparks from rock contact with heavy plant
- Activities and materials at ancillary facilities
- Use of vehicles, plant, equipment, fuels, and chemicals with ignition risk
- Storage of flammable and hazardous substances
- Changes to access or alterations to existing fire trails
- Clearance of vegetation including mulching machinery and mulch piles
- Accidental ignitions.

Further details of Aspects and Impacts are included in the Aspects and Impacts Register provided in Appendix A2 of the CEMP.

4.7 Potential Offsite Bushfire Impacts During Construction

The Project is located within and near bush fire prone land and without the application of mitigation measures has the potential to increase bushfire occurrence. Unmitigated or accidental ignition may result in:

- Increased occurrence and magnitude of bushfire
- Potential loss of property
- Potential loss of life
- Loss of vegetation, habitat, and fauna
- Delay in response times and/or access for emergency services including fire crews
- Commercial impacts through delays to construction.

Bushfire prevention and mitigation measures that will be implemented to address these risks are provided in Section 5.

5 Bushfire prevention and mitigation measures

5.1 Asset Protection Zones and Vegetation Management

5.1.1 APZ Dimensions

Asset Protection Zones (APZ) are established to protect personnel and assets. They provide a fuel reduced buffer zone between a bushfire hazard and buildings, which is managed progressively to minimise fuel loads and reduce the potential radiant heat, flame contact and ember impacts.

APZs are required around the perimeter of all temporary and permanent structures including the accommodation camp, temporary and permanent site offices, signalling huts and any other buildings (as classified under the National Construction Code (Australian Building Codes Board 2022)).

APZs and the associated Bushfire Attack Levels (BAL) (as per AS3959:2018 Construction in bushfire-prone areas (Standards Australia 2018 (AS3959:2018 and the PBGL)) have been calculated as part of a Bushfire Assessment Report for the project (NGH 2025). Indicative APZ dimensions are listed in the table below with the APZ for the accommodation camp shown in Figure 5-1 with the location of tanks, dams and connection points for emergency services to connect in the instance that are fire occurs are shown in Figure 5-2The APZ must be wholly within the approved project boundary (which includes the rail corridor). Vegetation management/removal is not permitted outside the project boundary.

Table 5-1 Asset Protection Zones

Building type	Minimum APZ width (m)	Comments
Temporary workforce accommodation camp	51 m	As a minimum a 50 m APZ can be provided for the accommodation camp adjacent to grassland, this can be considered to meet the requirements of PBP (NSW RFS 2019), and no further bush fire protection measures identified in PBP are required (NSW RFS 2019).
Temporary and permanent site offices, signalling huts and any other buildings located within grassland and slope>0 to 5 degrees	11 m	The 11 m APZ is based on structures being constructed to the requirements of BAL29. Larger APZs are required for buildings constructed to lower a lower BAL class.
Temporary and permanent site offices, signalling huts and any other buildings (within woodland and slope>0 to 5 degrees)	13 m	The 13 m APZ is based on structures being constructed to the requirements of BAL29. Larger APZs are required for buildings constructed to lower a lower BAL class.

5.1.2 APZ Maintenance

Within the APZ maintenance should start from the commencement of construction and be maintained throughout each bushfire season so that:

- Tree canopy cover is less than 15% at maturity
- Tree canopies must be separated by 2 to 5 m
- No trees should overhang or touch the building

- Lower limbs of trees are removed up to 2 m above ground
- Shrubs must not be located under trees and should be well spaced to avoid continuous fuel
- Grass should be kept short (<10 cm) and mown regularly
- Leaf litter, woodchip and debris must be cleared frequently.

APZ maintenance should occur in accordance with Appendix 4 of PBP (NSW RFS 2019) and the NSW RFS Standards for Asset Protection Zones (NSW RFS 2015). Maintenance activities will be undertaken by an experienced contractor selected by JH using the process for selecting and onboarding contractors described in the CEMP. All contractors will complete necessary site inductions and any specific training requirements prior to maintenance works commencing.

5.1.3 Vegetation Management

Landscape and rehabilitation would primarily be guided through the Inland Rail Landscape and Rehabilitation Strategy. As stated in the Environmental Assessment Documentation, small tracts and groupings of tree plantings would be implemented where appropriate, with rehabilitation efforts implemented to achieve at a low maintenance landscape.

Bushfire risks associated with the rehabilitation of the rail corridor will be considered during detailed design, to address potential impacts from bushfire and meet ARTC requirements for operation of the rail corridor. The implementation of APZs and associated maintenance efforts will also be applied to areas of revegetation where appropriate. Mitigation and management measures are presented in Section 2.5.

5.1.4 Building maintenance

The following preparatory maintenance activities should be conducted for all temporary and permanent buildings prior to the bushfire season (1 October, unless declared earlier) and monthly throughout the bushfire period:

- clear all leaf litter, woodchips, sticks and debris (<6 mm diameter) from:
    - gutters
    - garden beds
    - roofs
    - external decks
- confirm all external walls, eaves and roofs are sealed and painted and any window fly wires or screens are repaired – this will reduce the potential for ember attack
- service fire extinguishers, and
- conduct testing of fire hose reels and alarm systems, where installed.

5.1.5 Building Construction

All temporary and permanent buildings must comply with the requirements of the NCC and AS3959:2018.

5.2 Onsite and Offsite Emergency Provisions

5.2.1 Evacuation arrangements

All vehicle access routes traverse bush fire prone vegetation which can support higher intensity bushfires. Attempting to evacuate at the last moment through these areas during a bushfire may be extremely dangerous, with fatal consequences.

All evacuations must be managed in accordance with the instructions of the Site Manager, Incident Controller, fire warden or their delegate. Personnel may be directed to a works assembly area (see Section 5.2.2) to await instructions to evacuate to an offsite Neighbourhood Safer Place (NSP) (see Section 5.2.3), or seek refuge accommodation camp until a bushfire passes (see Section 5.2.4).

5.2.2 Assembly areas

Access points, accommodation camp and project compounds provide gathering points for personnel in the locality of their works area. These locations area shown in Figure A-10-1 in Appendix A. They serve as the initial coordination point for personnel prior to mobilisation from the works area to an assembly area or an offsite NSP.

5.2.3 Neighbourhood Safer Places

An NSP is an evacuation area where personnel can seek refuge. Each location in NSW is confirmed as suitable by the NSW RFS. The closest refuge NSPs to the project area are listed below and shown in Figure 3-1:

- Stockinbingal Recreation Ground - Corner of O'Brien Street and Dudauman Street, Stockinbingal
- Illabo Rest Area - Olympic Highway (near Crowther Street), Illabo
- Fisher Park - Corner of Murray Street and Bourke Street, Cootamundra
- Springdale Public Hall Building - Burley Griffin Way, Springdale.

5.2.4 Refuge of Last Resort Option

A refuge of last resort option, in the event of not being able to safely evacuate off site and there being no other safer alternative, may be inside the temporary accommodation camp kitchen / dining room. This facility should be prepared for this purpose including building maintenance (see Section 5.1.3), removing any flammable items away from windows and doors, closing all windows, doors and blinds, and sealing vents and gaps (such as under doors).

5.2.5 Helipad

The temporary workers camp carpark apron west of the refuse stowage may provide a suitable location for a helipad (34°28'49.60"S, 147°52'37.00"E). All helipads should be established and maintained in accordance with the *Advisory Circular AC 91-29 v1.3: Guidelines for helicopters – suitable places to take off and land* (Civil Aviation Safety Authority 2023)

5.3 Plant and Equipment

All items of plant used during proclaimed high fire danger periods that could discharge sparks must be fitted with spark arresters where practical. A hot works permit process will be implemented by JH during construction. This permit process will prevent JH and sub-contractors from cutting, welding, grinding or other activities likely to generate fires in the open on days when there is elevated fire danger. In days declared as total fire ban hot works will not be allowed. All persons will be briefed that

a Total Fire Ban (TOBAN) has been issued and any hot work permits will be suspended for that day. Vehicles will not be driven or idled in areas of long grass on fire ban days. Preparedness requirements in relation to forecast fire danger are detailed in Section 7.

When there is a risk of fire being caused by work such as welding, thermal or oxygen cutting, heating or other fire producing or spark producing operations, JH will provide training to all personnel in fire prevention, fire safety and basic firefighting skills. JH will provide all personnel and vehicles involved in such activities with firefighting equipment. Firefighting equipment will be connected to a static water supply/fire water trailer for assistance in controlling fires around the compound.

JH does not authorise fires to be lit within or adjacent to the construction site. This requirement will be included in the project induction. Burning of any material on the Construction Site, including disposal of cleared and grubbed vegetation by burning off, is not permitted.

During periods defined as high or extreme fire danger JH will maintain an adequate supply of water for firefighter purposes. Waters carts, sediment basins, water tanks and water fill points to supply water.

During the design and construction phase, all work areas must have access to the appropriate level of firefighting equipment. Due to the nature of the construction work, fire extinguishers will be required to fight the following fires:

- Ordinary Combustibles (dry grass, wood, paper etc)
- Flammable and Combustible Liquids (petrol, etc)
- Flammable gases
- Electrical Equipment.

An assessment of the suitability of firefighting equipment will be made for each site and JH will provide appropriate equipment is made available based on these assessments. AS 2444 provides details on the various types available and their use and effectiveness for various types of fire. Bulk storage of fuels, oils or other products may have specific requirements for provision of firefighting equipment and will be implemented in accordance with the relevant Act or Australian Standard.

5.4 Water Supply

An adequate supply of water is essential for firefighting purposes. Suitable water supply arrangements shall be provided for firefighting that meet the NSW RFS requirements as confirmed in the bushfire assessment report for the project (NGH 2025). JH will confirm that any water sources are maintained at the appropriate capacity prior to and during each bushfire season. Non-reticulated water supply will be provided by JH in the form of water storage tanks located at the accommodation camp and some compounds or ancillary facilities as required (see Table 5-2). The project has multiple 1,000L mobile trailers on site with firefighting capability along with water carts servicing the project for water and dust suppression requirements. On-site stored supply of water for firefighting may be required for areas deemed as high risk based on activity or proximity to bushfire prone land.

During a bushfire emergency, any source of available water may be used. As such, water holding structures such as tanks and dams can be considered as long as they are accessible, reliable and adequate.

5.5 Management of High-Risk Works

For each site the following controls shall be implemented for high-risk works:

- Site specific and scope specific Activity Method Statements (AMS) and Task Risk Assessments (TRAs) shall include the potential bushfire risk and document control measures
- Designated shelter area for site personnel in the event of bushfire
- Establish fuel storage areas
- Plant and Equipment Safe Area
- Fire Protection equipment as appropriate to the site as determined by the site-specific risk assessment. This may include fire carts, fire hoses, fire extinguishers, fire blankets and personal protective equipment.
- First aid equipment and trained personnel
- Detailed site maps indicating the location of the IPA, OPA, APZ, site emergency assembly area, fuel storage areas, location of fire protection equipment (hoses, extinguishers etc)
- Site specific Emergency Response Plan in place and drills undertaken in accordance with the plan
- Any applicable permits (i.e. hot works permits) will be obtained prior to completion of work tasks.

5.6 Hazardous and Flammable Material Storage

Any above-ground building containing flammable liquids and explosive materials must be constructed to a minimum of BAL12.5 construction standard, AS3959:2018, to provide for enhanced ember protection.

JH will store flammable substances in designated areas that are away from vegetation, buildings, and ignition sources. JH will use appropriate storage containers in well-ventilated areas to minimise the build-up of vapours. All substances will be stored and handled in accordance with the Safety Data Sheet (SDS) and applicable SafeWork guidance and be kept away from ignition sources such as flames and sparks.

Inspections of storage areas will be undertaken to inspect for any signs of leaks, damage, or improper storage practices. Adequate firefighting equipment, as well as spill kits, will be located near any stored flammable substances and throughout the site including site vehicles and plant. The location of hazards that may impact on firefighting activities across the project during construction are shown in the table below. All four compounds detailed in Table 5-2 below will have a portable fire pump, including two hoses of appropriate length to be used for protection from fire as well as a dust suppression tool.

Table 5-2 Construction compounds (Hazardous and Flammable Storage)

Construction Compound No. (as defined in Chapter 8 of the EIS)	Proposed activities
7	Stockpile, laydown, site offices, water tank farm (up to 6 x 30,000 litres), fuel storage (40,000 litres).
11	Stockpile, laydown, site offices, fuel storage (40,000 litres), water tank farm (up to 6 x 30,000 litres).
18	Stockpile, laydown, fuel storage (5–10,000 litres), 1,000 litre water trailer, site offices.

Construction Compound No. (as defined in Chapter 8 of the EIS)	Proposed activities
25	Stockpile, laydown, site offices, fuel storage (5–10,000 litres), water tank farm (up to 6 x 30,000 litres), rail welding location.

Figure 5-1Accommodation Camp – Asset Protection Zone

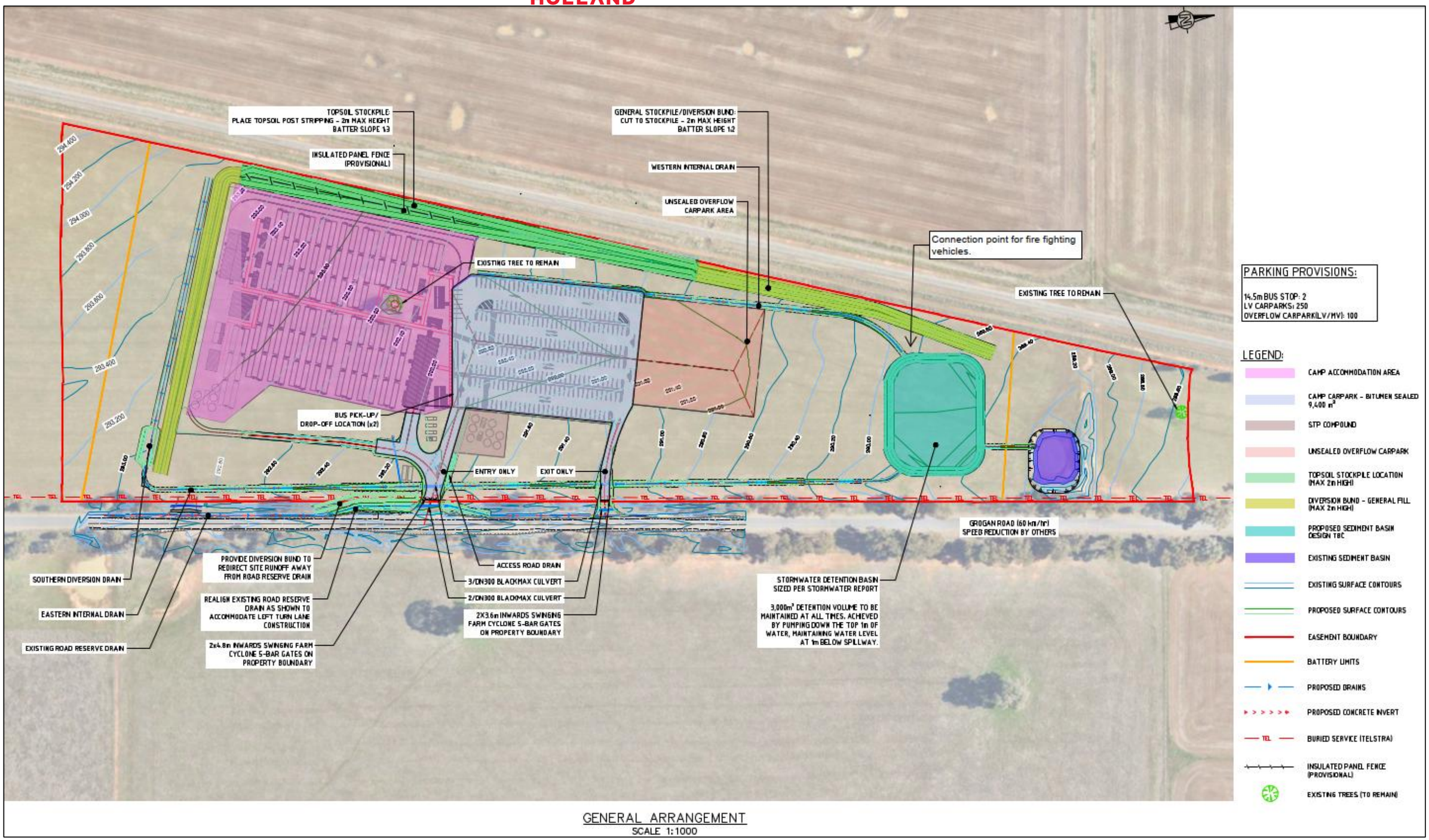


Figure 5-2 Site layout with water access locations

6 Bushfire awareness

6.1 Site induction and training requirements

All project personnel, including contractors working on site will undergo site induction training and pre-start briefings relating to bushfire awareness and management. The induction training and pre-start briefings will address elements including:

- Existence and requirements of this sub-plan
- Site features and locational information (see Appendix A)
- Emergency and incident response training
- Authorised permit acceptance training
- Plant onboarding and maintenance
- Site housekeeping requirements and expectations
- Applicable and relevant legislative requirements
- Roles and responsibilities for management of bushfire emergencies
- Procedure to be implemented in the event of an emergency warning being issued or an incident
- Personal bushfire awareness responsibilities (see Section 6.2)
- Mitigation and management measures relevant to bushfire.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in the management of bushfire emergencies (refer to Table 6-1). Daily pre-start meetings conducted by the Superintendent / Site Supervisor will inform the site workforce of any relevant environmental issues that could potentially be impacted by, or impact on, the day's activities.

Table 6-1 Training responsibilities relevant to this Plan

Training	Role required / Delivery Method
Emergency Response Plan awareness training	WHS Manager and Foreperson via Project Induction and toolbox talks
Hot works permitting process	WHS Manager via Project Induction or specific training requirements
Bushfire Emergency Plan awareness training	Safety Manager, Project Environment and Sustainability Manager via Project Induction or toolbox talks

Further details regarding staff induction and training are outlined in the CEMP.

6.2 Personal bushfire awareness responsibilities

Construction personnel, including subcontractors, should be aware of the following important information regarding fire safety housekeeping within ancillary facilities, compounds and across the Project:

- Know the location of all project access points and potential evacuation routes to the nearest towns with a Neighbourhood Safer Place refuge area (see detailed section maps in Appendix A)
- Be familiar with the location of the different construction sections (Sections 1-6), construction compound locations and ID number, bridge infrastructure naming and local road names adjoining the project (see detailed section maps in Appendix A)

- During the bushfire season know the fire danger rating for the day and weather conditions for the following days. Forecast hot dry windy conditions are associated with elevated fire danger.
- Have access to the NSW RFS Hazards Near Me app with an established 'watch zone' of the Project area
- Firefighting appliances should only be used in an emergency and NEVER removed, operated or tampered with for amusement or malicious purposes
- First attack firefighting equipment such as extinguishers and fire hose reels should only be operated by persons who are competent in their use, providing it is safe to do so and only for the specific types of fires for which they are designed
- Extinguishers or any other fire detection, suppression or safety equipment that appears to be faulty, missing or in any other way suspect should be immediately reported to the Safety Advisor
- Items must not be stored around fire extinguishers or in the fire hose reel cabinets
- In terms of fire prevention, site workers will be informed of the site rules including designated smoking areas and putting rubbish in designated bins through the site induction process identified in the CEMP.

6.3 Fire Danger Ratings

NSW RFS provides information on both fire danger ratings and declared total fire bans on the RFS website. This information is available in real time and provides forecast condition assessment which can assist in bushfire emergency planning.

Fire danger ratings provide an indication of the consequences of a fire, if one was to start. The higher the fire danger, the more dangerous the conditions. TOBANs may also be declared on days where fire danger ratings are elevated based on prevailing and regional weather conditions.

The project is located within two different Fire Weather Districts. Cootamundra-Gundagai LGA which is in the Southern Slopes Fire Weather District and Junee Shire Council LGA which is in the Eastern Riverina Fire Weather District. Fire danger rating forecasts (including TOBANs) are issued throughout the bushfire season on the NSW RFS website (https://www.rfs.nsw.gov.au/about-us/our-districts/mia/fire-information/fdr-and-tobans).

The Site Manager will communicate fire danger ratings to all personnel on a daily basis for the day and following days. The preparedness responses to be applied by the project in response to these ratings are detailed in Section 7. A Fire Danger Rating Sign will be installed at the camp.

7 Bushfire preparedness actions

7.1 Assess Fire Danger and Notify Personnel

The Site Manager or delegate must complete the following tasks daily throughout the bushfire season:

- Check the Fire Danger Rating for the Southern Slopes and the Eastern Riverina Fire Weather Districts at 6am each day as per Section 6.3
- If a TOBAN is issued implement the necessary controls (Section 7.2)
- Monitor fire danger weather warnings and change in weather conditions on the Bureau of Meteorology (BoM) website over the next four days. Take note of forecasts for:
    - changes in Fire Danger Rating (http://www.bom.gov.au/nsw/forecasts/fire-danger-ratings.shtml)
    - increases in wind or temperature
    - reductions in humidity
    - significant changes to wind direction or speed and
    - potential for lightning
- Monitor fires within 20 km of the project area on the NSW RFS Hazards Near Me app or website (https://www.rfs.nsw.gov.au/fire-information/fires-near-me)
- Determine the fire preparedness works and Fire Danger Index (FDI) works code by 6am each day (see Table 7-1)
- Consider the merits of leaving worksites early (Section 7.3) on days where the FDR is HIGH and winds and temperature are forecast to increase significantly and humidity drop in the afternoon
- Notify personnel of relevant weather forecasts and direct the implementation of the applicable fire preparedness (as per Table 7-1)
- Consistently monitor the following media for fire warnings and bushfire emergency alerts:
- ABC local radio (ABC Riverina 89.9FM)
    - NSW RFS website and/or Hazards Near Me app
- Notify personnel of any official emergency alert issued for the site (as required); and
- Direct initiation of response actions when an emergency warning is issued (Section 8.3).

The bushfire preparedness measures for all project works within the bushfire season are presented in Table 7-1.

Table 7-1 Fire preparedness in response to Fire Danger Rating

Fire Danger Rating and NSW RFS preparedness description	Project fire preparedness requirements during the bushfire season
MODERATE *Stay up to date and be ready to act if there is a fire*	• Inductions and briefings must include ignition prevention and response actions

Fire Danger Rating and NSW RFS preparedness description	Project fire preparedness requirements during the bushfire season
	• Maintain an adequate supply of water for firefighter purposes. Waters carts, sediment basins, water tanks and water fill points i.e. water bores stand pipes will be used to supply water • Fires are not lit within or adjacent to the construction site • Training will be completed for all personnel in fire prevention, fire safety and basic firefighting skills. All personnel and vehicles involved in such activities with firefighting equipment. • A hot works permit process will be implemented during construction. This permit process will prevent contractors from undertaking cutting, welding, grinding or other activities likely to generate fires in the open on days when there is elevated fire danger. • All items of plant used during proclaimed high fire danger periods that could discharge sparks must be fitted with spark arresters where practical • Project Managers will confirm adequate supplies of fire response equipment, including fire extinguishers are maintained at each ancillary facility at all times. Quantities of equipment will vary depending on the construction stage and shall be reviewed regularly by the Project Manager.
HIGH *Be ready to act.* *There's a heightened risk. Be alert for fires in your area.* *Decide what you will do if a fire starts.* *If a fire starts, your life and assets may be at risk. The safest option is to avoid bush fire risk areas*	As for MODERATE, plus: • Site supervisors and Project Manager is to maintain an hourly 'listening watch' for fire warnings and changes in weather conditions • If a TOBAN is issued all persons will be briefed that a TOBAN applies and any hot work permits will be suspended for that day • If a Harvest Safety Alert is issued, stop operations, assess conditions, and only resume operations if safe to do so • In case of a towed mobile water unit, the towing vehicle must remain attached • Consider suspending hotworks after midday.
EXTREME *Take action now to protect your life and property.* *These are dangerous fire conditions.* *Check your bush fire plan and ensure that your property is fire ready.* *If a fire starts, take immediate action. If you and your property are not prepared to the highest level, go to a safer location well before the fire impacts.* *Reconsider travel through bush fire risk areas.*	As for HIGH, plus: • Vehicles will not be driven or idled in areas of long grass • Consider suspending work early within the Project area • All works within or adjoining (<30m) dry combustible vegetation (including grass) is suspended.
CATASTROPHIC *For your survival leave bush fire risk areas.* *These are the most dangerous conditions for a fire.*	As for EXTREME, plus: • No haulage and other vehicle usage should be encouraged • All work must be suspended within the Project area.

Fire Danger Rating and NSW RFS preparedness description	Project fire preparedness requirements during the bushfire season
Your life may depend on the decisions you make, even before there is a fire. *Stay safe by going to a safer location early in the morning or the night before.* *Homes cannot withstand fires in these conditions.* *You may not be able to leave, and help may not be available.*	

7.2 Total Fire Bans (TOBAN)

The following activities will not be carried out during TOBAN periods:

- Lighting, maintaining or use of a fire in the open, or to carry out any activity in the open that causes, or is likely to cause, a fire.
- General purpose hot works (such as welding, grinding or gas cutting or any activity that produces a spark or flame) are not to be done in the open.

Fire danger ratings and total fire bans are determined each afternoon for the following day and posted to the NSW RFS website at: https://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans. This information will be regularly reviewed by JH personnel in accordance with preparedness requirements (see Section 7.1).

Where an exemption for hot works during a TOBAN is required for works (i.e. in the event of an emergency), JH will undertake the following for exemptions relating to *Building construction or demolition* detailed at: https://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans/schedule-of-standard-exemptions-to-total-fire-bans

1. obtain the authority to undertake the fire is lit, maintained or used in a manner which will prevent the escape of the fire, and
2. adequate firefighting equipment is provided at the site of the fire to prevent the escape or spread of the fire, and
3. if the work is to be carried out above the normal ground or floor level—the area below the work free of all combustible material and the fire is prevented from falling to that area, and
4. the person in charge of the work has notified the FCC during business hours, or to State Operations (Operational Communications Centre) after hours
5. the person in charge of the building or demolition work complies with any direction or additional condition which may be imposed by the NSW Rural Fire Service or Fire and Rescue NSW, which may include a direction that the proposed fire is not lit.

7.3 Leaving early

Leaving early is always the safest option on higher fire danger days and/or where fires are burning within the region. Leaving early may mean that staff stay offsite, or schedule works earlier and only critical personnel attend the worksite (as determined by the Site Manager). Leaving early is a planned

decision to leave well before a bushfire has the potential to threaten the project area. Leaving early might be considered:

- When Extreme or Catastrophic Fire Danger is forecast
- Staff are not physically or mentally prepared to stay and shelter in place if a fire occurs
- Dry lightning storms coupled with hot windy weather is forecast
- Remote work areas are not defendable from bush or grassfires under the conditions forecast, or
- An emergency services authority recommends leaving early

Leaving early is not fleeing at the last minute in response to a bushfire advancing on the project area. A decision to leave at the last moment can be fatal.

8 Emergency response in the event of a bushfire

8.1 Fire and Incident Emergency Controller

In the event of an emergency the Site Manager or their delegate will function initially as the person in charge of the emergency until replaced by responding external fire authority Incident Controller (IC). The replacement will occur on the arrival of the external fire authority IC and following a handover briefing.

The IC shall notify necessary parties of the existing bushfire in accordance with Section 8.4. The information in Section 5.2 and the nature of the existing bushfire threat should inform the Incident Action Plan and any decision to evacuate.

In the event of ignition on site the IC shall consider the deployment of trained personnel to provide a rapid response first attack fire control (See Section 8.5) if safe to do so.

8.2 Bushfire Emergency Response

Should an active bushfire, spotfire or smoke be detected in the project area the actions in Figure 8-1 should be applied. Agricultural burns will occur along the project alignment throughout the construction period. Not all fires located near the project are a threat and education should occur so site personnel are not alarmed by agricultural burns occurring close by.

8.3 Emergency Alert Issued

Should a formal emergency alert be issued by fire authorities for the project area the actions in Table 8-1 must be applied. It is noted that emergency alerts may be issued by text or through the media directly from fire authorities to persons within the alert areas.

Table 8-1 Emergency alert response

Alert Level and Description	Project response action
Advice	• Business as usual

Alert Level and Description	Project response action
A fire has started. There is no immediate danger. Stay up to date in case the situation changes.	• Site manager or delegate to monitor ABC local radio and NSW RFS Hazards Near Me website/app to confirm the local bushfire situation • All work units and contractors are to follow the directions of the Site Manager or delegate and remain within communication contact and near a means of transport.
Watch and Act There is a heightened level of threat. Conditions are changing and you need to start taking action now to protect you and your colleagues.	• In addition to the steps above, seek further instructions for your supervisor or the Site Manager (or delegate) • If safe move to the nearest Project assembly area. Close all windows and remove all combustable materials from the building surrounds • Determine any individuals that are non-essential and initate go-early actions if safe and approved the site manager/IC.
Emergency Warning **An Emergency Warning is the highest level of Bush Fire Alert. You may be in danger and need to take action immediately. Any delay now puts your life at risk.**	• All personnel to listen to ABC local radio to Emergency Warning evacuation location issued by emergency services • Proceed early to evacuation location if safe and route is clear and approved by IC • If offsite evacuation is not possible shelter in place at the temporary accomodation camp dining room or within a project site building or if it safe to do within a vehicle in an area cleared of vegetation • Personnel must not self evacuate if an Emergency Warning is issued • Fleein panic responses and last minute evacuations into uncertain fire situations can be deadly.

8.4 Communications

8.4.1 External

Updates on bushfire threats from external authorities can also be actively sourced by project representatives on days of fire danger in accordance with Project bushfire preparedness actions (see Section 7). Should JH identify the occurrence of a fire on-site or within the vicinity of the site, the Site Manager will notify NSW RFS and FRNSW using 000.

All Site offices will have the following to facilitate external communications:

- UHF Radio for communication with the local Bush Fire Brigade
- A list of all the appropriate UHF numbers for these Brigades
- Site number and address for easy communication for any 000 call.

8.4.2 Internal Notification

The Site Manager will communicate bushfire threats to the site emergency wardens. All staff are instructed to report any signs of bushfire threats to their direct supervisor immediately.

8.4.3 Project Wide Notification

Project wide communication of bushfire threats via:

- Air Horn (Site Evac)
- Mobile phone

- Landline telephones
- UHF radio
- VHF radio
- Emails

8.4.4 Accommodation Camp Emergency Alarm

In the event of an emergency possibly requiring evacuation of all non-essential personnel and potentially all personnel to a safe place, notification will be initiated via the emergency alarm. The alarm is to be activated by any person upon discovering an emergency.

The activation procedure for the emergency alarm is specific to each site (office sites and construction sites) and must be reliably communicated to all staff or visitors (at site induction, pre-start meeting, exercises, notice boards)

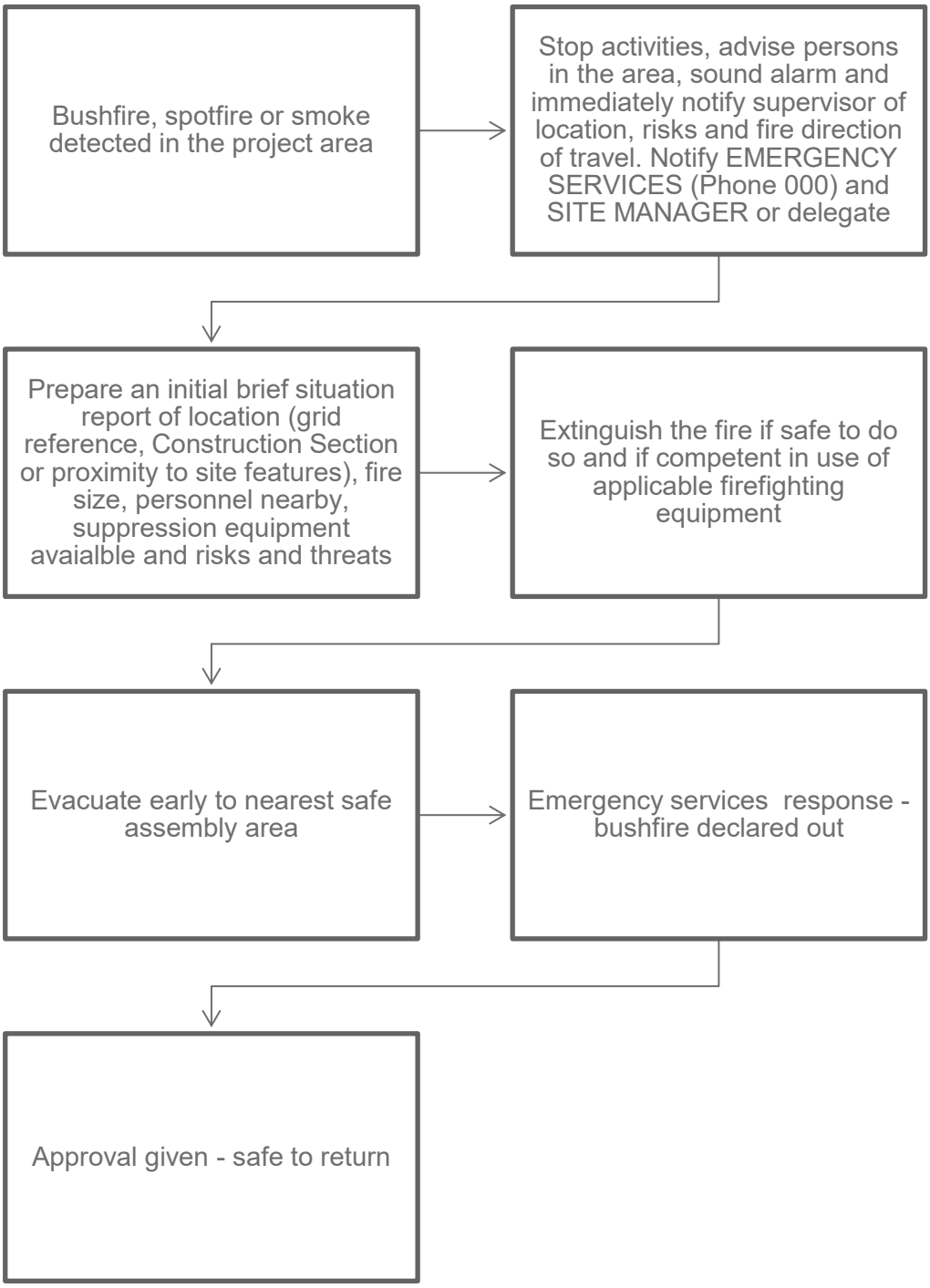


Figure 8-1 Fire reporting procedures and actions

8.4.5 Emergency Contacts

Emergency contact details for stakeholders and agencies are provided in Appendix B and are located at every site compound and the workers accommodation facility.

8.4.6 Communication with Affected Parties

Ongoing communication with affected parties described in Table 8-2 may be undertaken for the duration of the Project. All communication will be undertaken in accordance with the CCS.

Table 8-2 Communication with affected parties

Affected Party	Interest	Potential Communication Methods
New South Wales Rural Fire Service (NSW RFS) Fire & Rescue NSW (FRNSW)	Emergency Response	• Any partial or total road closures required during construction • Any impacts to evacuation routes and alternatives to be provided • Emergency response measures that minimise disruptions to road access and flood evacuation routes.
	Occurrence of fire on site or in the vicinity of the site	• Immediate notification to be undertaken by JH personnel
	Notification of works (e.g. changes to access routes)	• Provide advanced warning of works affecting access / evacuation routes to allow for better preparation and response. • Prohibited works to be undertaken on a total fire ban or during a bush fire event (exemptions).
Relevant Councils (Junee and Cootamundra–Gundagai)	Evacuation Routes	• Any partial or total road closures required during construction. • Any impacts to evacuation routes and alternatives to be provided.
	Infrastructure management	• Bushfire management strategies, potential impacts on infrastructure, and mitigation measures.
Local residents and businesses	Evacuation Routes	• Any partial or total road closures required during construction • Any impacts to evacuation routes and alternatives to be provided.
	Notification of works (e.g. changes to access routes)	• Provide advanced warning of works affecting access / evacuation routes to allow for better preparation and response.

8.5 Fire Fighting Precautions

Small fire equipment may be used in bushfire threat situations to control burning embers. Small fire equipment (e.g., portable extinguishers) shall be located at all project sites at clearly marked points

and each item of plant on site must carry a 9 Kilograms (kg) fire extinguisher. Project personnel shall be instructed in the identification and correct use of this equipment so that on-site responses to small fires are as effective as possible.

Different fire extinguishers are recommended for each type of fire. Some may be rated for multiple types of fire. These include:

- CLASS A: fires (wood, textiles, rubbish) use foam or water.
- CLASS B: fires (grease, motor vehicle, flammable liquids) use foam, dry chemical, carbon dioxide or vaporizing liquid.
- CLASS C: fires that involve electrical components. Caution: never use a water-type extinguisher on live electrical equipment.

Fire protection equipment requirements for each site (e.g. fire hoses, 16 Litre (L) knapsacks) shall be determined by the site specific Risk Assessment.

Personal safety fire protection equipment for each site (e.g. P2 masks, gloves) shall be determined by the site specific AMS and TRA for each task and site set up.

8.6 Post Fire Emergency Response

Following bushfire being declared out within the Project footprint and the IC from the emergency services agency managing the fire approving access to the fireground, a post fire safety assessment can be conducted. This initial response will determine whether or not it is safe to return to work. A safety walk through of the construction work areas will be conducted by the Construction Manager and Supervisors (or delegates), in conjunction with the Environment and Sustainability Manager and Safety Manger. The team will assess the following:

- Likelihood of fire damage to access roads, buildings, infrastructure and construction works
- An assessment of trees and other hazards which may have been impacted by fire
- Determine whether risk of bushfire has reduced and the fire is appropriately extinguished
- Power boxes and electrical equipment. The power is to remain off until assessed by the electrician.

Once it is deemed safe to return to work by Construction Manager / supervisors in conjunction with IRPL personnel, the following will be undertaken:

- Any equipment, materials or debris destroyed by the bushfire will be disposed of in accordance with the Construction Waste Management Plan (CWMP) if damaged beyond repair/use
- Check mulch stockpiles for smoulder, fire or losses.
- Restore erosion and sediment control devices as per the CSWMP
- Assess and remove potentially dangerous trees by an appropriately accredited arborist
- Temporary onsite structures or partly constructed structures should be checked for damage prior to entering them or continuing work

- Make good any damage to partially constructed works or temporary works caused by the event. This includes clearing away of debris, sedimentation and blockage of uncompleted and structures, as well as repairs required.

9 Compliance Management

9.1 Roles and Responsibilities

The Project Team's organisational structure and overall roles and responsibilities are outlined in CEMP. Implementation of this plan is the responsibility of the JH Project Environment and Sustainability Manager (or delegate). Roles and responsibilities specific to the management of bushfires and bushfire emergencies are presented in Table 9-1.

Table 9-1 Roles and responsibilities specific to this Plan

Role	Responsibility
Construction Manager	• Maintain evacuation routes, including existing fire trails
Supervisor	• Maintain emergency response equipment in accordance with manufacturers specifications and maintenance schedule • Support emergency response efforts and provide resources to assist firefighting operations
WHS Manager	• Confirm dangerous goods are stored appropriately • Confirm TOBAN's are communicated with the construction team • Confirm inspections are undertaken prior to and during TOBAN events
Project Environment and Sustainability Manager	• Enable review of Bushfire Emergency Plan occurs annually • Enable inspections are undertaken prior to and during TOBAN events
Fleet / Plant Coordinator	• Maintain plant and equipment in accordance with manufacturers specifications and maintenance schedule. • Where practicable, confirm plant and equipment are fitted with appropriate spark arrestors

Additionally, the Responsibility & Accountability Matrix presented in Table 9-2 translates action requirements which must be completed by the responsible incumbent in accordance with minimum task timing. Minimum task timing is provided in the second column of the matrix. Each Safety Critical position for this workplace is shown in the corresponding matrix and shows the Primary and Support function responsibility and accountability requirements.

Table 9-2 Responsibility and Accountability Matrix

Workplace Safety Management Plan Activity ***P = Direct Responsibility for leading or performing the task*** ***S = Provides assistance and support to the person directly performing the task***	**Minimum Task Timing**	**Client**	**Supervisor**	**HR Coordinator**	**WHS Manager**	**Workplace / Project Manager**	**Site Manager**	**Emergency Coordinator**	**Site Personnel**	**Health & Safety Rep. (HSR)**	**Health & Safety Committee- HSC**
Monitoring the implementation of this plan in association with the Project Safety Coordinator			S		S	P	S	S			
Monitoring the implementation of this plan.			S		P	S	S	S			
Ensuring site specific risk assessments are undertaken.			S		P	S	S	S			
Training in relation to this plan, in consultation with the Training Coordinator			S		P	S	S	S			
Completion of site bushfire risk assessments			S		P	S	S	S			
Form part of the Incident Response Team (IRT) and coordinate their site response to assist the site supervisor			S		P	S	S	S			
Inspection of bushfire control measures			S		P	S	S	S			
Identification of required equipment and resource			S		P	S	S	S			
Monitoring the implementation of this plan at their specific site in association with the Project Manager and Project Safety Coordinator			S		P	S	S	S			

Workplace Safety Management Plan Activity ***P = Direct Responsibility for leading or performing the task*** ***S = Provides assistance and support to the person directly performing the task***	**Minimum Task Timing**	**Client**	**Supervisor**	**HR Coordinator**	**WHS Manager**	**Workplace / Project Manager**	**Site Manager**	**Emergency Coordinator**	**Site Personnel**	**Health & Safety Rep. (HSR)**	**Health & Safety Committee- HSC**
Direct liaison with the RFS and Police for the purpose coordinating the site evacuations;			S		S	S	S	P			
Communicate with site Incident Management Team (IMT)								P			
Liaise with RFS in the case where emergency response is required on Parkes WTP & STP								P			
Form the Incident Response Team (IRT) and coordinate their site response			P	S	S	S	S				
Notification of the Incident & Emergency Planning Committee (IEMT) point of contact			P	S	S	S	S				
Notify external emergency services if necessary			P	S	S	S	S				
Confirm fire protection equipment is good condition and ready for use			P	S	S	S	S				
Coordination of fire protection activities if necessary			P	S	S	S	S				

Primary = P, Support = S

9.2 Monitoring and Inspections

Inspections of mitigation measures, and activities which have the potential to increase ignition risk will occur for the duration of the Project. Requirements and responsibilities in relation to monitoring and inspections are documented in the CEMP. Monitoring will include but not be limited to weekly environmental inspections (refer to Table 9-3).

The Project will review the work or activity as soon as practicable and, where possible modify the work or activity to prevent any recurrence. Lessons learnt will be communicated to relevant personnel in toolbox talks.

Table 9-3 Monitoring, Inspection and Reporting Requirements

Type	Frequency	Standards	Location	Reporting	Responsibility
Construction site layout inspection	Periodic inspections during site establishment	Pre-construction site layout and access inspections to confirm emergency access is maintained and sites layouts minimise fire risk.	Site-wide	Pre-construction inspection report	Construction Manager Supervisor
Weekly Workplace Inspections and Observations	Once a week to confirm the ongoing adequacy of this Plan	Weekly inspections will include inspection of the environmental controls and mitigation measures outlined in Section5 of this Plan. Workplace inspections should be conducted by all line management with the assistance of workers (particularly HSR and/or DHSR) and members of the Health and Safety Committee (HSC) to check all fire controls are being implemented effectively and to identify potential fire risks, including: • Plant and Equipment inspections • Storage and handling of hazardous substances • Hot Works Permit in place where ignition risk exists. Communications available for current fire risk rating and associated emergency response.	Site-wide	Weekly environmental inspection	Project Environment and Sustainability Manager (or delegate) WHS Manager

All environmental monitoring equipment (if required) will be maintained and calibrated according to the manufacturer's specifications, and appropriate records will be kept. Non-conformance reporting protocols detailed in the CEMP.

9.3 Non-Compliance and Non-Conformance

9.3.1 Environmental Non-compliance

An environmental non-compliance is defined as one or more of the following:

- An occurrence, set of circumstances or development that is a breach of the Project Approval

- For auditing purposes, the independent auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit (Independent Audit Post Approval Requirements [DPHI, 2020])
- Failure to implement for the duration of construction the CEMP and CEMP sub-plans (Condition of Approval D8).

Where environmental non-compliances are identified, they will be communicated to the IRPL Project Environment Team. IRPL will report via Appendix 1 of the CoA (written notification requirements) where required. This will then be recorded in the Project database. An environmental action list will be developed and issued to the relevant Project team personnel for implementation and close out.

Actions will be assigned an implementation priority in a collaborative way by the Project Environment Team based on the environmental risk. Timeframes will be set to enable any damage incurred to be rectified and any chance of recurrence is eliminated as soon as practicable. Following corrective action, the Project Environment Team will close out the non-compliance.

IRPL will notify the Secretary of any non-compliance as follows:

- Notification of a non-compliance will take place via the Major Projects Website within seven days of the Project being made aware of the non-compliance
- The notification will identify the CSSI (including the application number) and the name of the CSSI, set out the condition/s that is non-compliant, the nature of the breach; the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

A non-compliance that has already been notified as an incident does not need be notified as a non-compliance. The ER will include environmental non-compliances within the Environmental Representative Monthly Report.

9.3.2 Non-conformances and Opportunities for Improvement

A non-conformance is the failure to comply with an environmental requirement, standard or procedure, but does not include non-compliances as defined in the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020).

A non-conformity is an established process under AS/NZS ISO14001 Environmental Management Systems and is defined therein as non-fulfilment of a requirement of the ISO14001 standard or additional EMS requirements that an organisation establishes for itself. This Sub-plan has been prepared in accordance with the JHG EMS. The JHG EMS is certified as complying with the requirements of AS/NZS ISO 14001:2016.

Where non-conformances/improvement opportunities are identified, they will be communicated to the Project Environment Team. This will then be recorded in an environmental action list that will be issued to the relevant Project team personnel for action. Actions will be assigned an implementation priority in a collaborative way by the Project Environment Team based on the environmental risk. Timeframes will be set to enable any damage incurred to be rectified and any chance of recurrence is eliminated as soon as practicable. Following corrective action, the Project Environment Team will close out the non-conformance.

Where a non-conformance/opportunity for improvement is raised as part of an inspection, audit, or an incident or complaint investigation, the inspection, audit, incident, or complaint report will be used to close out the non-conformance/opportunity for improvement.

9.3.3 Corrective and Preventative Actions

Corrective and preventative actions will be appropriate to the significance of the effects of the non-conformances encountered, including the environmental impacts. Information will be captured in the Project's adopted management software, including the nature of non-conformances, any corrective or preventative actions taken, and outcomes.

The Project Environment Team will be responsible for investigating, tracking, communicating, and closing out non-conformances, and implementing corrective and preventative actions. Higher level non-conformances will require the Project Director to review and close out. Actions will be assigned to the relevant supervisory staff for action.

Continuous learning and improvement are integrated into all aspects of the Non-conformance management process to capture, in real time, findings that can be incorporated to improve operational effectiveness. Any member of the Project team, including subcontractors, can contribute and provide suggestion to any required or appropriate preventative actions.

The Project Environment Team will also complete periodic reviews of environmental non-conformance records to identify trends and root causes and suggest preventative actions that are warranted at an organisational level. Trends relating to environmental non-conformances will also be discussed in regular Project meetings, including with the ER and IRPL, where recurring issues may indicate the need to take preventative actions.

9.3.4 Communicating Corrective and Preventative Actions to staff

The following mechanisms will be used to communicate lessons learned:

- Site improvement notices.
- Pre-start meetings.
- Toolbox talks.
- Project meetings.
- Reporting.

The Project Environment Manager will be responsible for review and approval of material for discussion and presentation of lessons learned. This will confirm that the material is fit-for-purpose, and readily understandable and implementable by our personnel, contributing to continual improvement for the Project, IRPL, and broader industry.

9.3.5 Non-conformance Close-out

Where a non-conformance is detected, a report will be raised in project databases. Non-conformances will be documented with the following information:

- Date raised and by whom.
- Description of the system deficiency (non-conformance).
- Cause and proposed remedy and action to prevent recurrence.
- Reinspection information.
- Date closed and by whom.

Details included in non-conformance reports will be specific to the event that has taken place (e.g. specific reference to the CoA where a non-conformance has been identified). The Project Environment Manager will sign-off on completion of agreed actions to signify close-out.

9.4 Incident Response

9.4.1 Incident Classification

In the event of an environmental incident associated with a bushfire emergency, the Project will implement classification, notification, and reporting requirements in accordance with JHG's Project Environmental Incident Procedure.

The Project Environment Manager (or delegate) will be responsible for investigating, tracking, communicating, and closing out non-conformances, and implementing corrective and preventative actions. Higher level incidents will require the Project Director to review and close out. The IRPL Environmental Manager, JHG Environmental Team, and the ER, will provide supporting functions as required and agreed (refer to Section 9.1).

In the event of an incident, the Project will undertake notification requirements as detailed in Table 9-4.

Table 9-4 Incident Notification

Report only	Notifiable
• Verbally notify IRPL of incidents immediately, followed by written notification to IRPL and the ER within 24 hours of the incident • If required, IRPL will notify the EPA and relevant authorities immediately	• Verbally notify IRPL of incidents immediately, followed by written notification to IRPL and the ER within 24 hours of the incident. • IRPL to notify the EPA and relevant authorities immediately. • Prepare an incident notification / non-compliance report and submit to IRPL and the ER within 48 hours. • Prepare an investigation report and submit to IRPL and the ER within 7 days.

Environmental incident reports will include lessons learnt and proposed measures to prevent the occurrence of a similar incident. All efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident.

9.4.2 Incident Notification and Reporting

In accordance with CoA A34, the Planning Secretary will be notified via the Major Projects Website immediately after the Proponent becomes aware of an incident. The notification must identify the SSI and set out the location and nature of the incident.

Subsequent written notification will be provided to the Planning Secretary in accordance with CoA A35 as follows:

- In accordance with CoA Appendix A, a written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under Condition A34 or, having given such notification, subsequently forms the view that an incident has not occurred.

- Written notification of an incident must:
  - (a) identify the CSSI and application number;
  - (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
  - (c) identify how the incident was detected;
  - (d) identify when the Proponent became aware of the incident;
  - (e) identify any actual or potential non-compliance with conditions of approval;
  - (f) describe what immediate steps were taken in relation to the incident;
  - (g) identify further action(s) that will be taken in relation to the incident; and
  - (h) identify a project contact for further communication regarding the incident.

- Within 7 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

- The Incident Report must include:
  - (a) a summary of the incident;
  - (b) outcomes of an incident investigation, including identification of the cause of the incident;
  - (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
  - (d) details of any communication with other stakeholders regarding the incident.

The Project will maintain and provide all records of the environmental incidents and regulatory action to the IRPL Project team.

9.4.2.1 Notification and Reporting to the agencies

JHG will notify the EPA of any pollution incidents on or around the site via the EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the POEO Act. The circumstances where this will take place include:

- Where the incident involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- Where the incident results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations).

JHG will prepare a Pollution Incident Response Management Plan (PIRMP) prior to construction in accordance with EPL requirements. IRPL will notify the RFS and Fire NSW as soon as practicable upon becoming aware of a bushfire emergency that is declared by the Project under the terms of this Plan.

9.4.2.2 Notification to RFS and FRNSW

JHG will notify the RFS and FRNSW in accordance with CoA E21 (l). The notification process and triggers for notification are presented in Table 9-5 below.

Table 9-5 Notification to RFS and FRNSW

Notification Trigger	Requirement	Notification Timing	Responsibility	Recipient
Active fire observed on site or near site (within 1km)	Notification in the event that there is a fire on-site or in the vicinity of the site.	Immediately upon becoming aware of the event	Project Environment and Sustainability Manager (or delegate)	RFS FRNSW
Planned activities on site with a high fire risk or greater	Notification that there are any activities on site that would have the potential to ignite surrounding vegetation.	Prior to planned works commencing	Project Environment and Sustainability Manager (or delegate)	RFS FRNSW
Planned activities on site with a moderate to extreme fire risk during declared bushfire danger periods	Notification in the instance there are any proposed activities to be carried out during a bushfire danger period that have the potential to ignite surrounding vegetation.	Prior to planned works commencing	Project Environment and Sustainability Manager (or delegate)	RFS FRNSW

Emergency contact information for relevant agencies and authorities are provided in Appendix B.

9.4.3 Incident Investigation

Where required, due to the severity or ongoing nature of the incident, investigations will be conducted and action plans established to reduce the potential for that the event to occur again. Environmental investigations will include:

- Identification of the cause, extent, and responsibility of the incident.
- Identification and implementation of the necessary corrective action.
- Identification of the personnel responsible for carrying out the corrective action.
- Implementation or modification of controls necessary to avoid a repeat occurrence of the incident.
- Recording of any changes in written procedures required.
- Advising the relevant government agencies if any substantial pollution has occurred.

Information will be captured in site databases. Where there are lessons learnt from the investigation or current procedures are identified as being ineffective, the CEMP will be revised by the Project Environment Manager to include the improved procedures or requirement.

9.5 Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub plan, CoA and other relevant approvals, licenses, and guidelines. These audits will be undertaken at planned intervals to provide information on whether the Project:

- Is meeting its compliance obligations.
- Conforms to this sub-plan.
- Determines if this Sub-plan is effectively implemented and maintained.

The approach to internal and independent audits, including audit requirements and the auditing schedule and management of environmental incidents are detailed in the CEMP.

9.6 Reporting

Reporting requirements relevant to the management of bushfire emergencies and associated activities are identified in Table 9-6. Requirements and responsibilities for reporting are further described in the CEMP.

Accurate records will be maintained substantiating all construction activities associated with the Project or relevant to the conditions of approval, including measures taken to implement this Plan. Records will be made available to DPHI upon request, within the timeframe nominated in the request.

Table 9-6 Reporting Requirements

Report	Requirement	Timing	Responsibility	Recipient
Incident reporting	Environmental incident classification, notification, and reporting in accordance with the JH Environmental Incident Procedure.	Following occurrence of an incident in accordance with the CEMP	Project Environment and Sustainability Manager (or delegate)	IRPL Relevant Regulatory agency (as applicable)
	Environmental incident notification to the Planning Secretary that causes or threatens to cause material harm as defined within the CoA.	As soon as possible and no later than 24 hours after becoming aware in accordance with the CEMP.	Project Environment and Sustainability Manager (or delegate)	IRPL DPHI
Complaint Reporting	Complaint management and reporting in accordance with the Project CCS and CEMP.	As specified in the CEMP and CCS	Project Environment and Sustainability Manager (or delegate)	IRPL

10 Review and Improvement

10.1 Continuous Improvement

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives, and targets for the purpose of identifying opportunities for improvement.

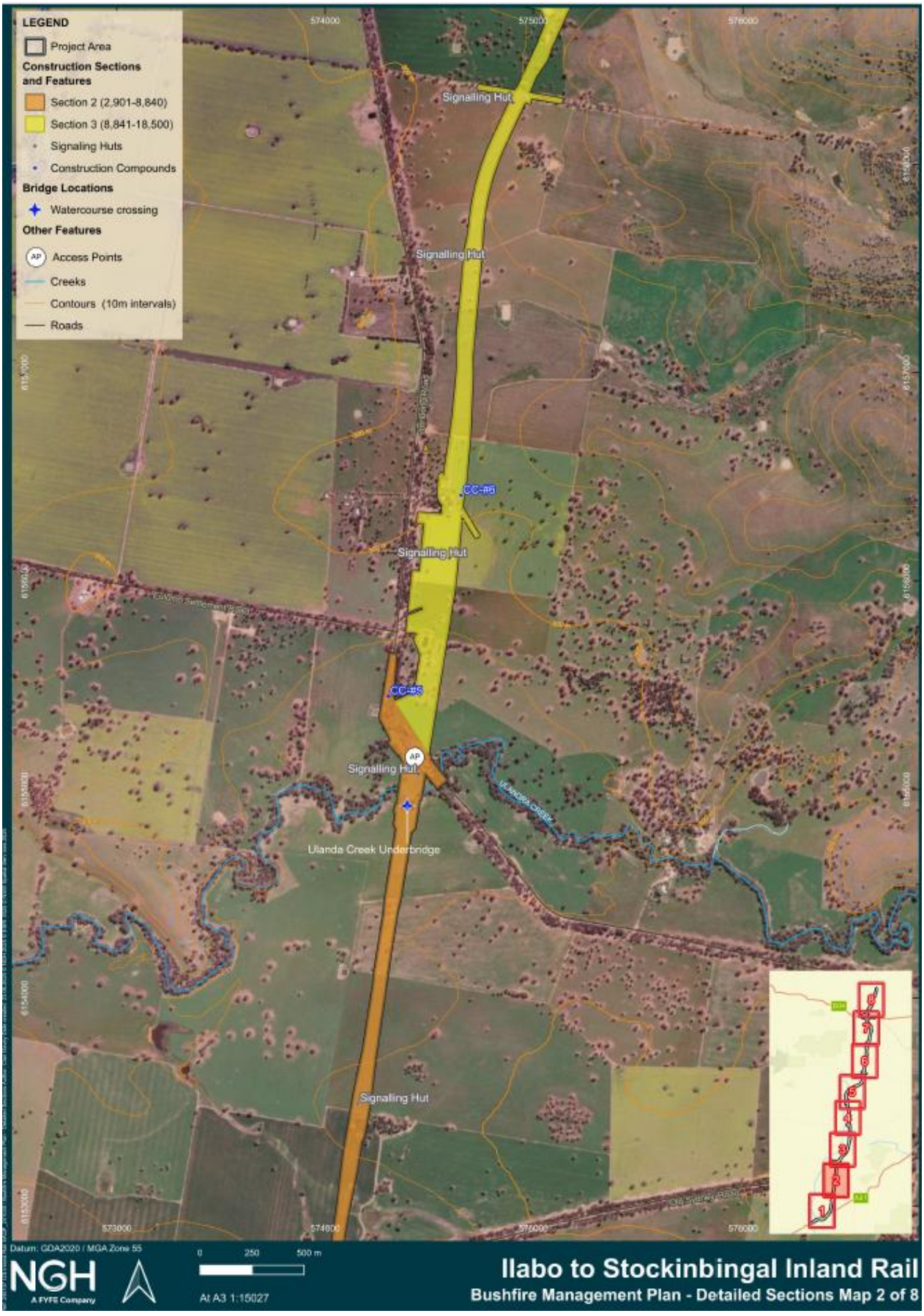
The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-conformances and deficiencies
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies
- Verify the effectiveness of the corrective and preventative actions
- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets.

The Project Environment Manager (or delegate) is responsible for ensuring stage-specific environmental risks are identified and included in the Project risk register and appropriate mitigation measures implemented throughout the construction, as part of the continuous improvement process. The process for ongoing risk identification and management, plan amendments and version control during construction is outlined in the CEMP.

Appendix A – Detailed Section Project Maps

Figure A-10-1 Detailed Sections Project Maps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Project Area
Construction Sections and Features
Section 2 (2,901-8,840)
Section 3 (8,841-18,500)
Signaling Huts
Construction Compounds
Bridge Locations
Watercourse crossing
Other Features
Access Points
Creeks
Contours (10m intervals)
Roads
Signalling Hut
Signalling Hut
CC-#6
Signalling Hut
CC-#5
Signalling Hut
Ulanda Creek Underbridge
Signalling Hut
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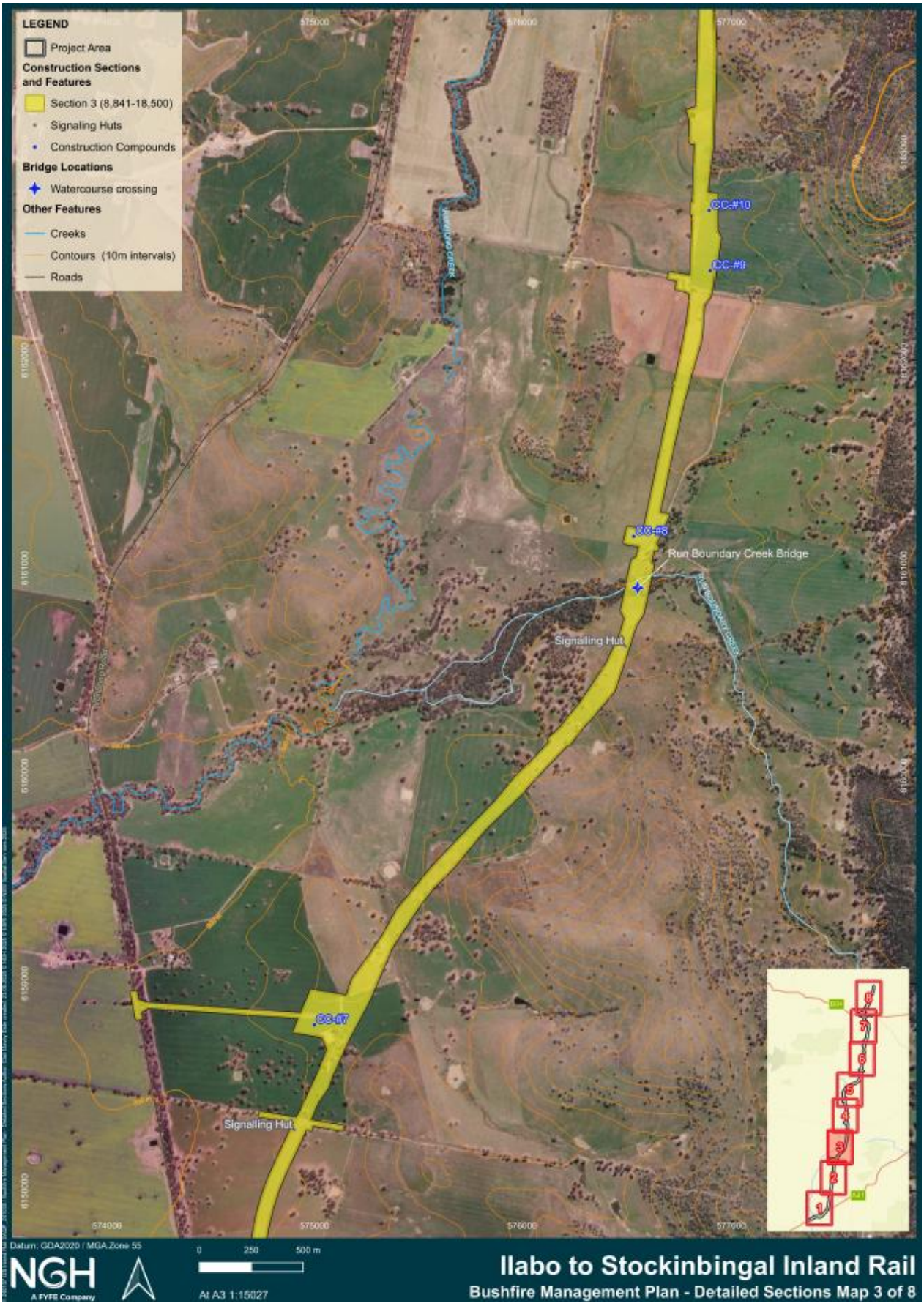
At A3 1:15027
NGH
A FYFE Company
Ilabo to Stockinbingal Inland Rail
Bushfire Management Plan - Detailed Sections Map 2 of 8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Construction Sections and Features
Section 3 (8,841-18,500)
Signaling Huts
Construction Compounds
Bridge Locations
Watercourse crossing
Other Features
Creeks
Contours (10m intervals)
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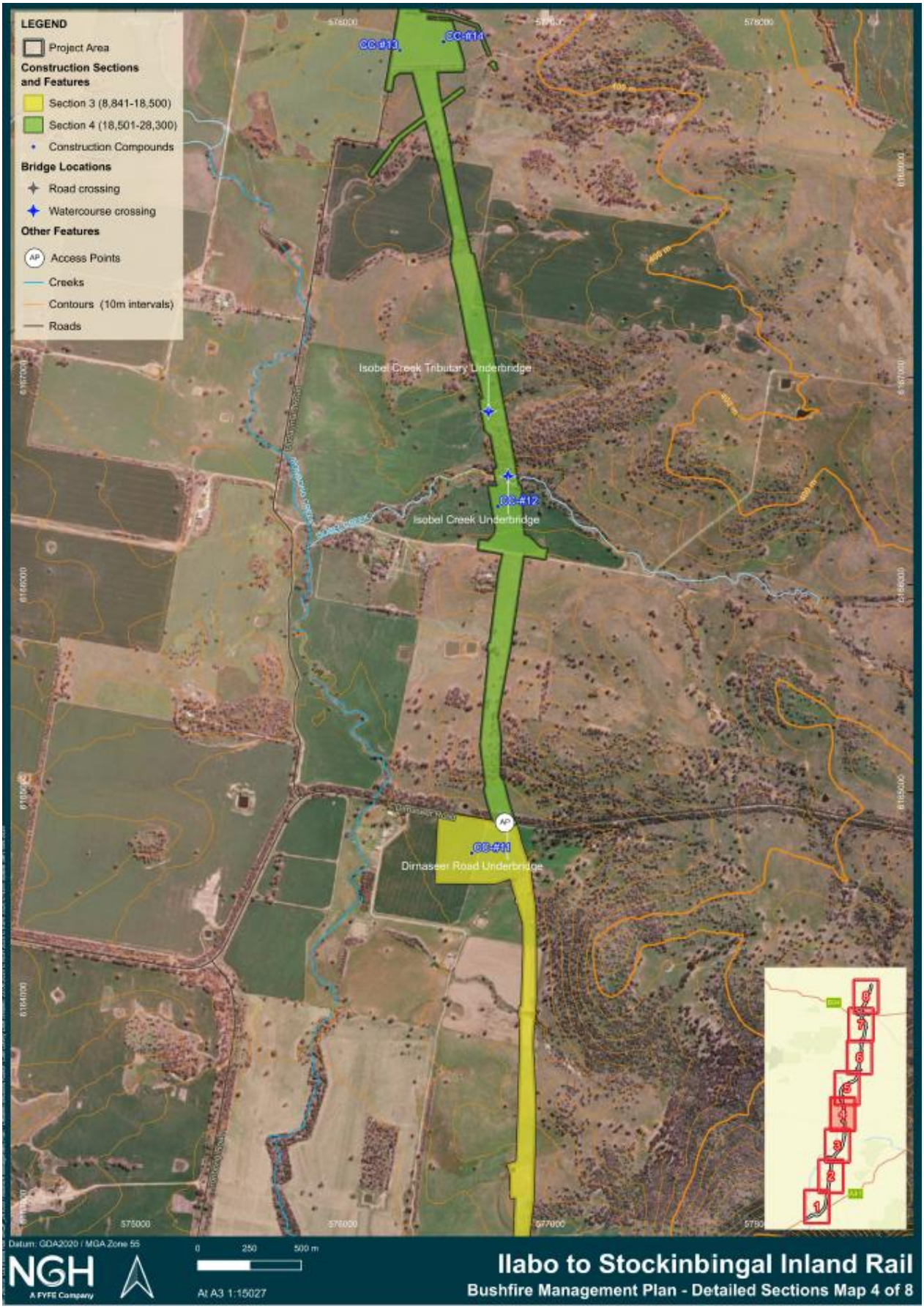
A FYFE Company
Ilabo to Stockinbingal Inland Rail
Bushfire Management Plan - Detailed Sections Map 3 of 8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Project Area
Construction Sections and Features
Section 3 (8,841-18,500)
Section 4 (18,501-28,300)
Construction Compounds
Bridge Locations
Road crossing
Watercourse crossing
Other Features
Access Points
Creeks
Contours (10m intervals)
Roads
CC-#13
CC-#14
CC-#12
CC-#11
Isobel Creek Tributary Underbridge
Isobel Creek Underbridge
Dirnaseer Road Underbridge
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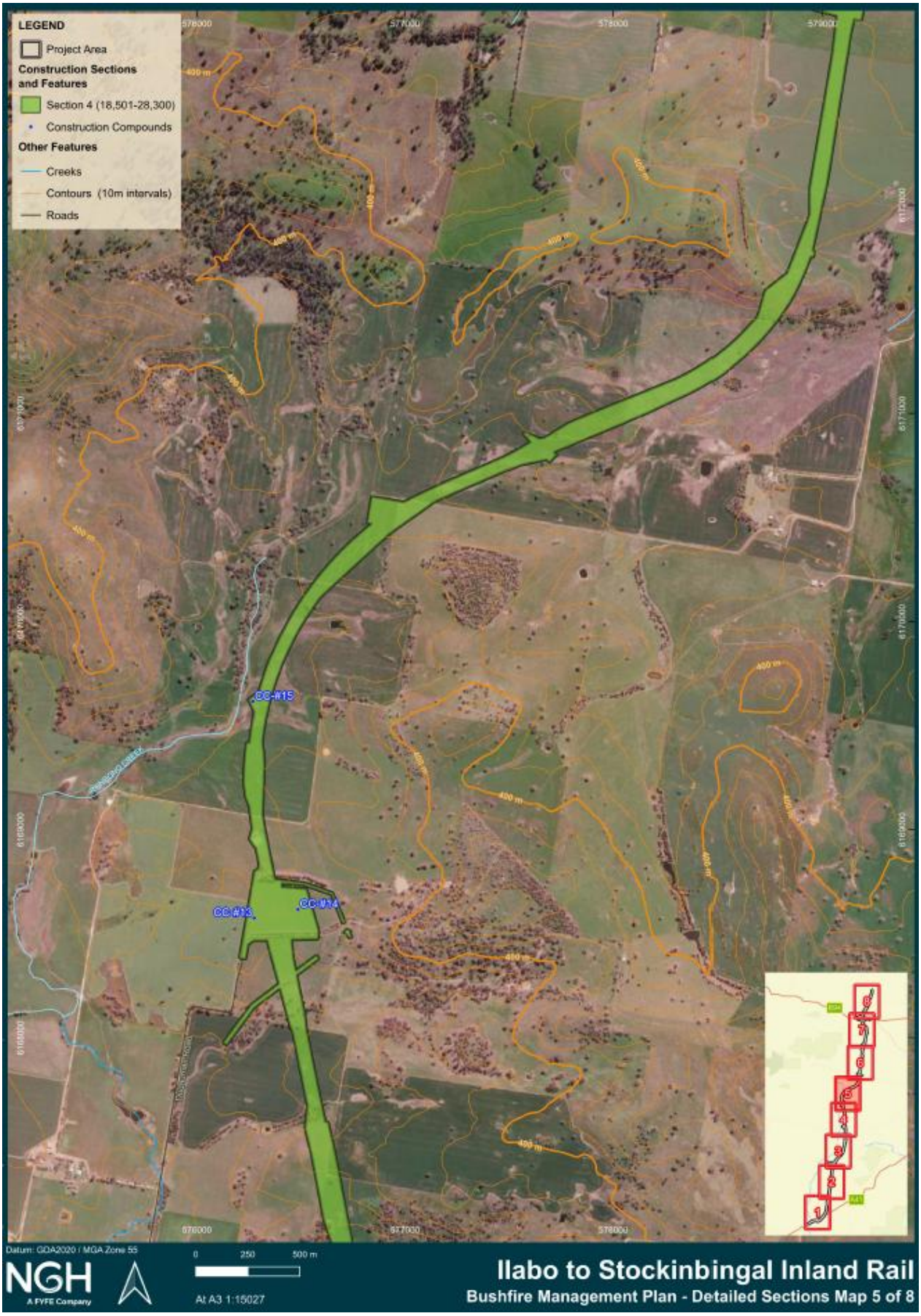
A FYFE Company
Ilabo to Stockinbingal Inland Rail
Bushfire Management Plan - Detailed Sections Map 4 of 8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Project Area
Construction Sections and Features
Section 4 (18,501-28,300)
Construction Compounds
Other Features
Creeks
Contours (10m intervals)
Roads
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CC-H14
CC-H13
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A FYFE Company
Ilabo to Stockinbingal Inland Rail
Bushfire Management Plan - Detailed Sections Map 5 of 8


LEGEND
Project Area
Construction Sections and Features
Section 4 (18,501-28,300)
Section 5 (28,301-37-300)
Signaling Huts
Construction Compounds
Bridge Locations
Road crossing
Other Features
Access Points
Creeks
Contours (10m intervals)
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Signalling Hut
CC-#21
CC-#20
CC-#19
CC-#18
Old Cootamundra Road Underbridge
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CC-#17
Datum: GDA2020 | MGA Zone 55
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NGH
A FYFE Company
Illabo to Stockinbingal Inland Rail
Bushfire Management Plan - Detailed Sections Map 6 of 8


LEGEND
Project Area
Construction Sections and Features
Section 5 (28,301-37-300)
Section 6 (37,300-42,600)
Signaling Huts
Construction Compounds
Bridge Locations
Road crossing
Watercourse crossing
Other Features
Access Points
Refuge NSP
Railway
Creeks
Contours (10m intervals)
Roads
Dalgarman Creek Underbridge
Burley Griffin Way Overbridge
Signalling Hut
CC-#27
CC-#28
CC-#25
Powder Horn Creek Tributary Underbridge
Powder Horn Creek Underbridge
CC-#24
Signalling Hut
CC-#23
Datum: GDA2020 / MGA Zone 55
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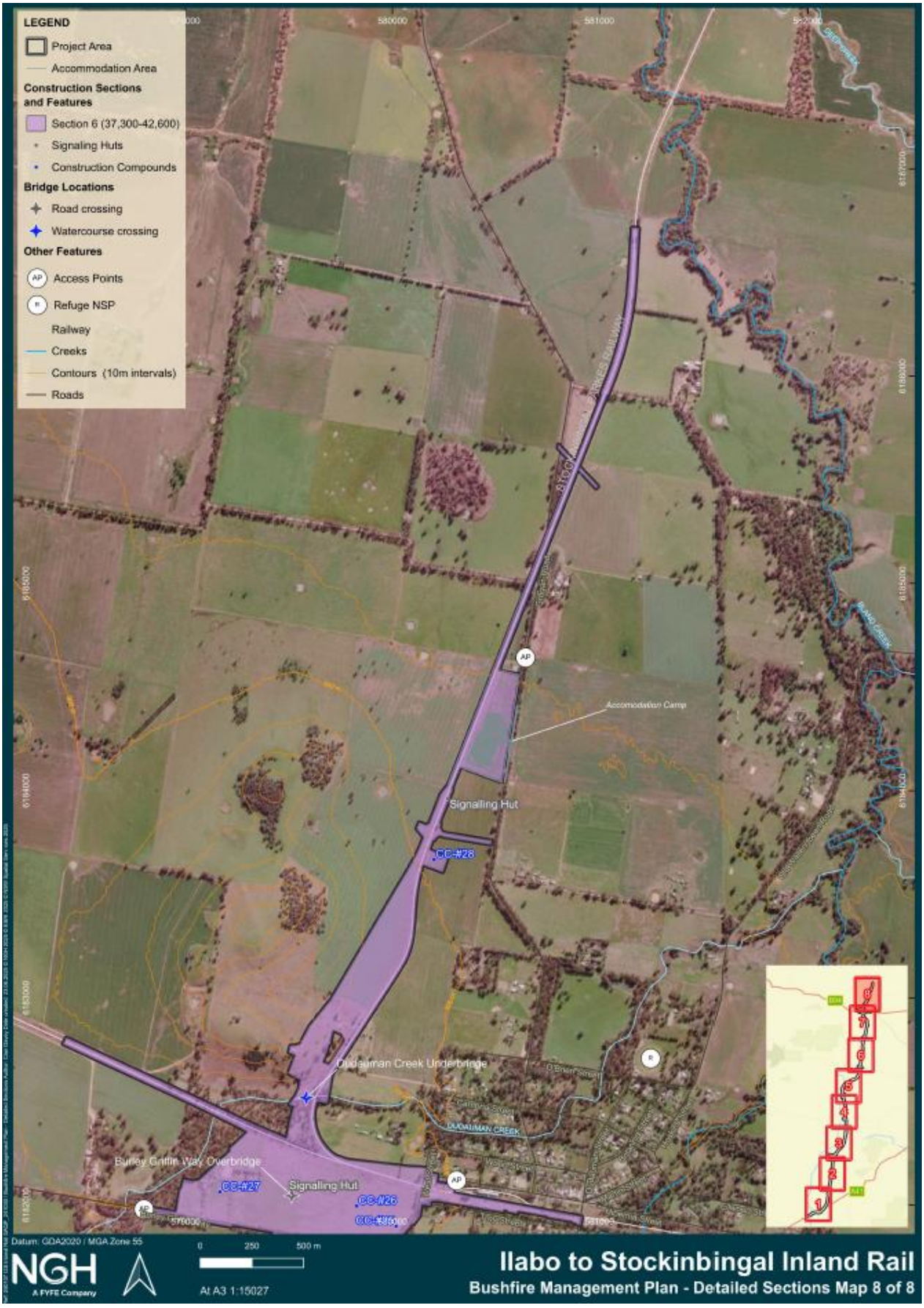
At A3 1:15027
Ilabo to Stockinbingal Inland Rail
Bushfire Management Plan - Detailed Sections Map 7 of 8


LEGEND
Project Area
Accommodation Area
Construction Sections and Features
Section 6 (37,300-42,600)
Signaling Huts
Construction Compounds
Bridge Locations
Road crossing
Watercourse crossing
Other Features
Access Points
Refuge NSP
Railway
Creeks
Contours (10m intervals)
Roads
Accommodation Camp
Signalling Hut
CC-#28
Dudauman Creek Underbridge
DUDAUMAN CREEK
Burley Griffin Way Overbridge
CC-#27
Signalling Hut
CC-#26
CC-#25
Datum: GDA2020 / MGA Zone 55
0
250
500 m
At A3 1:15027
NGH
A FYFE Company
Ilabo to Stockinbingal Inland Rail
Bushfire Management Plan - Detailed Sections Map 8 of 8

Appendix B –Emergency Contacts

Stakeholder	Contact Details
Police	000 - emergencies only 02 6922 2599 – Wagga Wagga District Command
Ambulance	000 - emergencies only 131 233
Fire and Rescue NSW	000 -emergencies only 1300 729 579
NSW Rural Fire Service	000 - emergencies only 1800 679 737
SES	132 500
EPA	131 555 – Hotline 24 hours
NSW Health	02 6080 8900 – Hotline 24 hours
Safe Work NSW (work cover)	13 10 50 – Hotline 24 hours 02 6042 4600 – Office hours only
Relevant Councils	Junee - 02 6924 8100 – Office hours only Cootamundra–Gundagai - 1300 459 689
Water NSW	02 6024 8880 – Office hours only
DPI Fisheries	02 6042 4200 – Office hours only 1800 043 536 - Hotline 24 hours
DPI Agriculture	02 6938 1999 - Agricultural Institute, Wagga Wagga
JHG Project Director	0429048268
JHG WHS Manager	0483308737

Appendix C – Consultation Records

NSW RFS

Date	Details of Engagement / Attempted Engagement
17/02/2025	Email from JHG representatives to the Rural Fire Service (RFS) Planning & Environmental Services team requesting the correct contact details and consultation on the draft I2S Bushifre Emergency Management Plan.
27/02/2025	Email from RFS Development and Assessment (south) team advising of the correct contacts from RFS – South West Slopes who will be assisting in the reviewing the Plan (South-West Slopes team cc'd into this email). JHG response to all parties confirming that the draft plan will be provided when ready in the coming months.
4/08/2025	Email to RFS representatives by JHG to provide a copy of the draft Bushfire Emergency Plan for review and comment.
8/08/2025	Email and comments attached provided by the RFS-Group Captain (Southern area of the Project) received by JHG.
14/08/2025	Email and comments attached provided by the Operational Officer (Riverina Zone) received by JHG.
14/08/2025	Email and comments attached provided by the RFS-District Manager (South-West Slopes) received by JHG.
9/9/2025	Provision via email of the updated Rev0 (this Plan) document to the RFS team with evidence of comments being addressed in the form of a track changes, clean version and comments sheet compiling comments received via email from RFS representatives.

Section	Comment	Project response	Status
3.8	The project will not commence until this Plan is submitted to the local Fire Captain and NSW RFS following consultation. Question what do you mean by the 'local fire captain' ? as there are at least 5 local fire captains???	The formal consultation process between JHG and RFS has been engaged via the South-West Slopes area team earlier this year. Given the discussions held between the Cootamundra, Stockinbingal and Illabo RFS Captains on this Plan and the Temp Accommodation Facility Plan, JHG have noted that this Plan should be provided to the leaders within the local RFS to ensure that a copy is available to those representatives who have jurisdiction in and around the construction footprint of the I2S Project.	Addressed (subject to RFS confirmation that no further comment on this item).
4	The word 'landcape' needs to be changed to landscape in the 2nd line.	Typo amended.	Addressed (subject to RFS confirmation that no further comment on this item).
4.2	In the 1st line a semicolon ';' is used instead of a comma ','	Typo amended.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
4.3	The topography of the study area is associated with the Bethungra Range located to the south-east, which is generally flat between Old Cootamundra Road and Stockinbingal. This wording is wrong. I suggest you change it to this. A bushfire hazard downslope of a site would pose a greater risk than upslope of a site, as the bushfire would travel upwards with a corresponding increase in flame height and intensity. The southern portion of the Project area is situated within flat to generally sloping terrain at an average elevation of 280 m Australian Height Datum (AHD). The central portion of the study area passes through a saddle, with moderately undulating slopes with a maximum elevation of 480 m AHD. The northern portion of the study area is situated within a flat gently undulating terrain which leads into the village of Stockinginbal. The topography of the study area is associated with the Bethungra Range located ~~to the south-east~~, to the east of the southern section as against the relative flatter areas between ~~which is generally flat between~~ Old Cootamundra Road and Stockinbingal. These three sections present different challenges when it comes to fire control. In the more undulating parts of the project area fire control is more difficult than in the flatter areas. ~~In more undulating parts of the project area fire control is more difficult than the flatter sections.~~ Parts of the project area with downslope areas to the west are the most susceptible to bushfire impacts.	Updated as recommended.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
4.5	This section needs rewording. The fire danger period runs from 1 October to 31 March, in Cootamundra-Gundagai Regional Council area, and 1 November to 31 March in the Junee Shire Council Area, unless adjusted by the NSW RFS. During this period the bushfire risk is elevated, and additional procedural controls are applied in responses to forecast fire weather ratings. The project is located within 2 Local Council Areas and 2 different fire districts. • The northern section is located within the Cootamundra-Gundagai Local Government Area which is in the RFS South West Slopes Zone and the Southern Slopes Fire Weather District. • The southern section is located within the Junee Shire Council Local Government Area which is in the RFS Riverina Zone and the Eastern Riverina Fire Weather District. Fire danger rating forecasts are issued throughout the bushfire season, with preparedness responses to be applied by the project detailed in Section 7.	Updated as recommended.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
5.1.1 - 3rd par	APZs and the associated Bushfire Attack Levels (BAL) (as per AS3959:2018 Construction in bushfire-prone areas (Standards Australia 2018 (AS3959:2018 and the PBGL)) have been calculated as part of a Bushfire Assessment Report for the project (NGH 2025). Indicative APZ dimensions are listed in the table below with the APZ for the accommodation camp shown in Figure 5-1 with the location of tanks, dams and connection points for emergency services to connect in the instance that are a fire occurs are shown in Figure 5-2 The APZ must be wholly within the approved project boundary (which includes the rail corridor). Vegetation management/removal is not permitted outside the project boundary. Note: Figure 5-2 • Doesn't show any connection points for fire fighting vehicles – where as in the section above it is saying that it does!!! • Should have a road access to the retention basin so that fire fighting vehicles can fill up – if it has water in it. • No visual inclusion of a water tank/s needed to aid fire fighting vehicles in the event of a fire within/near the camp	Figure 5-2 has been updated with the location of the fill up point for fire appliances from the detention basin. Please note, the road is shown in blue connecting the area around the basin to the car park and overflow car park.	Addressed (subject to RFS confirmation that no further comment on this item).
5.3	A hot works permit process will be implemented by JH during construction. Maybe this sentence should be replaced with The hot works permit process will be banned by JH during construction. This permit process will prevent JH and sub-contractors from cutting, welding, grinding or other activities likely to generate fires in the open on days when there is elevated fire danger. In days declared as total fire ban hot works will not be allowed. Reason: Your wording indicates that Hot Works will be allowed then the next sentence is saying that it will not!!	It means that hotworks are allowed except for on days with elevated fire danger. Nothing changed for now.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
Table 5.2	Shows the proposed activities that will be undertaken at the 4 compounds. As Compound 18 will be storing fuel along with a site office I feel that it is important that a water supply site , be it 1 – 30,000lit tank, for the benefit of the personal at the site. All of these 4 compounds should also have a fire fighting pump plus 2 hoses, of appropriate length, to be used for protection from fire as well as a dust suppression tool for your workforce during the hot dry summer months.	Table 5-2 has been updated to note that water tanks will be installed as part of the requirements for each site. Site 18 where this is not proposed will have access to a 1000L water trailer.	Addressed (subject to RFS confirmation that no further comment on this item).
6.3	The 3rd paragraph needs rewording to include Junee Shire The project is located within 2 different Fire Weather Districts. Cootamundra-Gundagai Local Government Area which is in the Southern Slopes Fire Weather District and Junee Shire Council Local Government Area which is in the Eastern Riverina Fire Weather District. Fire danger rating forecasts (including TOBANs) are issued throughout the bushfire season on the NSW RFS website (https://www.rfs.nsw.gov.au/about-us/our-districts/mia/fire-information/fdr-and-tobans).	Updated as recommended.	Addressed (subject to RFS confirmation that no further comment on this item).
7.1	7.1 Assess Fire Danger and Notify Personnel The Site Manager or delegate must complete the following tasks daily throughout the bushfire season: • Check the Fire Danger Rating for the Southern Slopes Fire Danger Rating Area and the Eastern Riverina Fire Weather Districts at 6am each day as per Section 6.3 • If a Total Fire Ban is issued implement the necessary controls (Section 7.2) Table 7-1 need to include 'harvest ban days' in high Catastrophic – should only include Consider suspending work for the day within the project footprint. No haulage and other vehicle usage should be encouraged.	Updated as recommended.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
8.4.1	All Site offices will have the following • UHF Radio for communication with the local Bush Fire Brigade • A list of all the appropriate UHF Numbers for these Brigades • Site Number and Address for easy communication for any 000 call • Fire fighting equipment connected to a water supply for assistance in controlling fires around the compound Figure 8-1 notify 000 box to be the 2nd box and not the 5rth.	First three dot points added, last dot point added to Section 5.3 as not related to communications. Figure 8.1 amended.	Addressed (subject to RFS confirmation that no further comment on this item).
A2. Pg 63	Members of the IMT will review the NSW RFS website to determine fire danger ratings and total fire bans at the start of each week (https://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans) to receive bushfire warnings. Catastrophic conditions are typically issued several days before the event is anticipated. Fire danger ratings are issued with varying lead-times, depending on the weather situation. Weather warnings and the 'fires near me' page of the RFS website will be monitored daily during construction (https://www.rfs.nsw.gov.au/fire-information/fires-near-me). Note; Fire danger ratings and total fire bans are NOT determined week by week BUT day by day. Some other conditions may be determined a few days out but it is USUALLY determined the afternoon before and in some cases the morning of. Bush fire ratings can very hour by hour. The only part of the above statement that I would class as correct is the last sentence.	Amended to: "Members of the IMT will review the NSW RFS website to determine fire danger ratings and total fire bans at the start and end of each day (https://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans) to receive bushfire warnings. Catastrophic conditions can be issued up to several days before the event is anticipated. Fire danger ratings are issued with varying lead-times, depending on the weather situation. Weather warnings and the 'fires near me' page of the RFS website will also be monitored daily during construction (https://www.rfs.nsw.gov.au/fire-information/fires-near-me)."	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
General	The only other thing that needs to be added is the inclusion of 'Harvest Ban Days'. These are something unique to agriculture in this region and are not covered by the usual conditions as specified in Table 7-1. These days occur when the Harvest Matrix fulfils certain conditions in relation to Humidity, Wind and Temperature. When this happens, Primary Producers cease any harvesting operations to minimise the risk of a fire starting. Farmers are notified the evening before that the next day may be a 'Harvest Ban Day' however this ban won't occur until the various conditions are meet. Depending on the Matrix this day only occurs when the matrix is meet. The length of time that the Ban is enforced depends on the conditions. This could be a couple of hrs or half a day. Grain Harvesting Guide A very simple tool, the Grain Harvesting Guide enables farmers to measure their local weather conditions and determine if they should continue or delay harvesting operations due to fire risks. The Grain Harvesting Guide has been adopted following its successful implementation by the South Australian Country Fire Association. Trialled across Southern NSW in collaboration with NSW Farmers and the Australian Customer Harvesters, it received very positive responses from farmers who supported its adoption more broadly. You can pick up a Grain Harvesting Guide Sticker from your local Fire Control Centre.	Harvest Ban Days added to Section 7.1.	Addressed (subject to RFS confirmation that no further comment on this item).
7.1	For Catastrophic FDR – It should state "All work must be suspended within the project footprint", for extreme FDR it should state "Consider suspending work for the day within the project footprint"	Updated as recommended.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
7.1	Installing Fire Danger Rating Sign at the camp could assist with communication to project personnel, you can purchase manual or electronic signage either permanent or temporary	Section 6.3 has been updated to confirm that a sign will be installed at the Stockinbingal camp.	Addressed (subject to RFS confirmation that no further comment on this item).
8.1	The wording around incident controller might need some consideration, the first arriving officer on scene would assume control of the incident, maybe using another word to describe the person in charge of the emergency from the project team may reduce confusion.	Updated to: "In the event of an emergency the Site Manager or their delegate will function initially as the person in charge of the emergency until replaced by responding external fire authority Incident Controller (IC). "	Addressed (subject to RFS confirmation that no further comment on this item).
8.4.1.4	Would also like to see mentioned that controlled agricultural burns will occur along the project alignment throughout the construction period, not all fires located near the project are a threat and education should occur so site personnel are not alarmed by agricultural burns occurring close by.	Added to Section 8.2	Addressed (subject to RFS confirmation that no further comment on this item).
General	Works occurring near the Stockinbingal Village on heightened fire danger days should be avoid, if fires was to start just west of the village we could see properties under threat quiet quickly. This village has had fast moving grass fires reach the village in the past. I have attached a photo of that fire for you information	There are many assets in the landscape susceptible to grass fires and the existing mitigation measures and controls (including hot work controls) should limit the likelihood of this occuring.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
4.5	The Junee LGA is located within the Eastern Riverina Weather District; however, this is not reflected in your plan. Operationally, this means there is potential for two different Fire Danger Ratings (FDRs) to be issued for your worksite, as it spans two weather districts. The likelihood of this occurring is medium to high, given the significant differences in vegetation types between the districts, which often results in a higher FDR being issued for the Cootamundra–Gundagai LGA. Example: Bethungra may be at HIGH while Stockinbingal is at EXTREME, which would trigger a TOBAN. Additionally, there is a permanent variation to the Bush Fire Danger Period (BFDP) for the entirety of the Riverina Zone, running from 1 November to 31 March.	Section 4.5 amended to include both fire districts, fire danger periods, and FDR scenario.	Addressed (subject to RFS confirmation that no further comment on this item).
5.1.2	Add a reference to the RFS document Standards for Asset Protection Zones (attached).	Added.	Addressed (subject to RFS confirmation that no further comment on this item).
5.2.3	There is a real chance the Illabo NSP will be relocated to the Illabo RFS station, located opposite the current rest area utilised as an NSP. Should this occur, we will provide notification so that your emergency management plans can be updated accordingly.	Noted	Addressed (subject to RFS confirmation that no further comment on this item).
5.2.4	Apply an APZ setback distance to any emergency assembly area where people may seek refuge in the event of a bushfire, in cases where evacuation or movement to a shelter building is not possible.	Noted and confirming that there is already an APZ around the temporary accommodation camp kitchen / dining room.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
6.2, 7.1	The NSW RFS Fires Near Me app is now called Hazards Near Me. Workers and contractors should be required to establish a watch zone within the Hazards Near Me app.	Name updated and watch zone requirement added.	Addressed (subject to RFS confirmation that no further comment on this item).
7.2	For the requirement “4. the person in charge of the work has notified the RFS of the proposed fire”: Notifications should go to the relevant Fire Control Centre (FCC) during business hours, or to State Operations (Operational Communications Centre) after hours.	Amended to: "4. 4. The person in charge of the work has notified the FCC during business hours, or to State Operations (Operational Communications Centre) after hours"	Addressed (subject to RFS confirmation that no further comment on this item).
8.4.1.1	If a bush or grass fire develops to the point where a Major Fire Update (MFU) is issued, these can be found on the RFS website.	Noted.	Addressed (subject to RFS confirmation that no further comment on this item).

Section	Comment	Project response	Status
General (additional consideration - Bethungra Range access)	As noted in the BEP, the area east of Ironbong Road and the worksite rises sharply from 320 m ASL to 720 m ASL, forming the Bethungra Range. The BEP also acknowledges the heightened risk of fires in the Bethungra Range during the construction phase. While there have been no significant fires in the range in recent years, historical records and local knowledge indicate that fires in this terrain have been extremely difficult to manage, primarily due to limited access. Once a fire becomes established in the range, containment is often the only viable management option. Accordingly, I request that the project team consider undertaking additional works to ensure adequate accessibility to the Bethungra Range east of the proposed rail corridor, that would enable Category 1 fire tanker access. Several unnamed tracks lead east from the proposed corridor, one of which is almost entirely situated on Crown land. With input from local captains and the group officer, this track could be assessed for improvement. I have informally contacted Crown Lands, and they are open to discussions about works being undertaken on their track, subject to agreement from all relevant parties.	The existing procedural controls during the construction phase are designed to limit the potential for fires to start and spread to these areas without the need for additional construction of trails.	Addressed (subject to RFS confirmation that no further comment on this item).

FRNSW

Date	Details of Engagement / Attempted Engagement
26/02/2025	Email from JHG to Fire NSW Safety (Unit team inbox) requesting contact details of the correct team and contact details for Fire NSW staff to review the draft Bushfire Emergency Management Plan. Subsequent email from Fire Safety unit administration team requesting JHG fill out an application form which formally requests review of the Plan.
7/03-2/04/2025	Various emails between March and April from both JHG and the Fire Safety Unit requesting clarification on the scope of the review requested by JHG and the nature of the Bushfire Plan. Fire Safety NSW requested further information on the nature of the Plan, specifics on the I2S Project and clarification as to why Fire NSW would be required to review a Bushfire Plan (indicating it is within the scope of the RFS to fulfil this obligation).
9/04/2025	Email from Fire NSW (Safety Liaison Unit) confirming that Fire NSW would not be formally reviewing the Plan. JHG provided a response via email stating that a copy of the final Plan would be provided to the local Fire Control Centre in accordance with Condition E121.
9/9/2025	Provision via email of the updated Rev0 (this Plan) document to the RFS team with evidence of comments being addressed in the form of a track changes, clean version and comments sheet compiling comments received via email from RFS representatives.

Comment Raised	Project Response	Where addressed	Status
Nil	NA	NA	NA

Appendix D – Emergency Management and Evacuation Protocol

A1. Incident and Emergency Planning Committee

Upon the issuing of a bushfire emergency warning from the RFS website, JHG will:

- Establish and maintain internal and external communicate lines
- Notify site personnel
- Prepare the site
- Coordinate response during the approaching bushfire including potential evacuations
- Oversee bushfire recovery and re-open the site.

The members of the Incident and Emergency Planning Committee and incident Management Team (IMT) are detailed in Table A-1.

Table A-10-1: Incident and Emergency Planning Committee members

EMT Member	Name and Contact Details	Role	Focus area
Project Director	Justin McCarthy	IMT Chair	Overarching coordination and decision making. Re-opening the site.
Construction Manager	Tim Cook	IMT Member / Alternate chair	Site preparation, response, recovery and re-opening the site. Direction of preparation, response and site recovery activities. Relay site events back to the EMT
Superintendent	Greg Murdoch	IMT Member / Alternate chair	Assists the Construction Manager with co-ordination of response.
Safety Manager	Kevin Hasler	IMT Member / Alternate chair	Confirm personnel safety during response activities
Traffic Manager	Luke McGoldrick	IMT Member / Alternate chair	Confirm temporary traffic arrangements are in place to minimise impact on evacuation during bushfire response activities
Environment and Sustainability Manager	Andy Robertson	IMT Member / Alternate chair	Monitor and report to the EMT on changes in the forecast observations Manage environmental issues associated with the bushfire.
Community and Stakeholder Engagement Manger	Jenny Williams	IMT Member / Alternate chair	Implementation of external notification protocol
IRPL Project Manager	Michael Matthews	IMT Member / Alternate chair	Implementation of IRPL / ARTC notification protocols

A2. Monitor bushfire warning services

Members of the IMT will review the NSW RFS website to determine fire danger ratings and total fire bans at the start of each week (https://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans) to receive bushfire warnings. Catastrophic conditions are typically issued several days before the event is

anticipated. Fire danger ratings are issued with varying lead-times, depending on the weather situation. Weather warnings and the 'Hazards Near Me' app will be monitored daily during construction (https://www.rfs.nsw.gov.au/fire-information/fires-near-me).

The Safety Manager is responsible for ongoing monitoring of the bushfire status and informing the IMT on changing conditions.

A2. External notification protocol

When the Hazards Near Me App or notification through other means indicates that the risk of approaching bushfire at the site is imminent, communication and consultation with the organisations identified in Section 8.4.5 of the BEP. must be undertaken as and when required in accordance with the Project Communication and Stakeholder Engagement Strategy and Project Incident Management Plan.

The Community and Stakeholder Engagement Manger, in conjunction with the JH Project Director, is responsible for implementation of the external notification protocol and maintaining records of all external communications.

A3. Internal notification protocol

In the event of bushfire warning, inform all site staff well in advance of the bushfire event and confirm bushfire emergency procedures including evacuation procedures.

The Construction Manager, with assistance from the Project Managers, is responsible for the internal notifications and communications throughout the event.

A4. Preparation of the site prior to bushfire event

Project Managers will provide adequate supplies of fire response equipment, including fire extinguishers are maintained at each ancillary facility at all times. Quantities of equipment will vary depending on the construction stage and shall be reviewed regularly by the Project Manager. In the event of a bushfire it is unlikely that extinguisher will be utilised with the priority being to evacuate personnel from the site.

The following actions will be considered by the IMT prior to an anticipated bushfire event, if time allows:

- Confirm all utilities (e.g. gas, electricity water) connected to the site office have been put to the OFF position and main valves closed, if safe to do so
- Secure all items in ancillary facilities that may become hazardous

The Superintendent is responsible for the coordination of the actions to protect and secure the site. The Safety Manager is to assist with these non-routine activities to confirm they are completed safely.

A5. Evacuation

All workers and visitors will be briefed on emergency procedures in the site induction and periodically during toolbox talks to enable them to be prepared for a bushfire event. Should evacuation of the site be ordered, it is essential site personnel on site are familiar with the evacuation procedure and routes described in this procedure.

The decision by the IMT to advise or direct people to evacuate should be considered whenever there is a potential need to move people to a safer place. The decision process of the IMT should take into consideration where an evacuation has already been instigated, whether by an emergency service (e.g. RFS / SES), members of the public or site personnel self-evacuating. During a bushfire event, the

site office will serve as an emergency assembly area where workers will gather before an evacuation order is issued.

Where practical, existing Variable Messaging Signs (VMS) on the Project will be offered to the SES to be updated to notify of temporary traffic arrangements to minimise impact on bushfire evacuation routes and traffic capacity.

Following any decision to evacuate, site personnel and emergencies services will be notified of the following:

- The decision to evacuate
- Type of evacuation (full, partial or shelter in place)
- The stages of withdrawal (if applicable)
- Evacuation routes and any heavy or oversized equipment to be removed from site
- Confirmation of roads that are closed or areas where movement is restricted based on a review of:
  - TfNSW Live Traffic (www.livetraffic.com)
  - NSW Hazards Near Me near me website (https://www.rfs.nsw.gov.au/fire-information/fires-near-me)
- Location of any potential hazardous materials and how these have been secured or protected (if time allowed).

A6. Bushfire recovery

Site inspections would be undertaken as soon as allowable (given safety requirements). The site inspection will include a review of any potential bushfire damage, and of material which may have been lost during the event. Records would be retained of post-fire inspections and actions undertaken in response to the event and be provided to IRPL.

The following list of actions will be undertaken by the Project Managers / Superintendents when returning to site if works bushfire affected:

- Assess damage to access roads prior to entering
- Recertification of temporary works.
- Do not turn power back on until all electrical equipment on site has been checked and certified by a qualified electrician
- Check material stockpiles for erosion and losses
- Maintain and repair any damaged or at capacity erosion control structures/ devices
- Check water and waste water systems on site. Water systems may need to be repaired. Clean up any ponded water (from firefighting) around site to prevent the spread of waterborne disease
- Check construction materials/equipment and record any that were damaged
- Prepare an incident report on the event in accordance with the Environmental incident classification and reporting procedure. Include information on how the site was evacuated and document the resulting damage to the site.
- The Project Director will re-open site only when it is deemed safe to continue work.