



Bushfire
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Bush Fire Emergency Management and Operations Plan

SOLAR FARM DEVELOPMENT

Lot 8 DP 1244273, Five Mile Creek Road, Gundagai



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Summary

BEMC Pty Ltd was engaged by Dhaval Patel to complete a Bush Fire Emergency Management and Operations Plan for the proposed Solar Farm development at Lot 8 DP 1244273, Five Mile Creek Road, Gundagai, NSW.

The risk of bush fire impacting on the site was assessed within the Bush fire Assessment Report. It considers bush fire threat from all direction surrounding the site is possible. The highest level of risk from a fast-moving grass fire is from the north, north-west and west of the site.

At risk developments, such as this facility that have sensitive equipment and generate power require a greater degree of planning and coordination to ensure staff and community safety.

This Bush Fire Emergency Management and Operations Plan outlines the management of hazard reduction and ignition management and prevention strategies to enable adequate preparation and emergency management response before and during a grass fire event.

The document has been prepared in accordance with AS3745:2010 Planning for emergencies in facilities and NSW RFS Development Planning – A guide to developing a Bush fire Emergency Management and Evacuation Plan. The structure is concise and succinct to allow the reader to absorb the salient elements and focus on the operational practicality of the emergency arrangements.

The significant Bush Fire Emergency Management and Operations Plan actions are:

- On '*Total Fire Ban*' days no vegetation management or hot works will be undertake unless notification and approved through s99 by NSW RFS is obtained. Only general maintenance works that do not require mechanical machinery that can create an ignition source will be permitted during '*Total Fire Ban*' days.
- Hazard reduction within the designated Assets Protection Zone (APZ) should be maintained to NSW RFS APZ standards.
- Ignition management and prevention procedures within this report undertaken.
- Preferred emergency management procedures are evacuation to site to the south towards Gundagai if safe.

A copy of this plan should be available for staff and contractors and a copy provided to the Emergency Service to assist in their pre-incident planning. Individuals identified in this plan have the responsibility to annually review and maintain the plans relevance to the site characteristics as change occurs.

This plan should be reviewed by a qualified Bushfire consultant every 5 years.

1 TABLE OF CONTENTS

2	Introduction	5
2.1	OBJECTIVES OF BUSH FIRE EMERGENCY MANAGEMENT AND OPERATIONS PLAN.....	5
3	Statutory Requirements.....	7
3.1	Commonwealth.....	7
3.1.1	Environment Protection and Biodiversity Conservation Act 1999	7
3.2	New South Wales.....	7
3.2.1	Environmental Planning and Assessment Act 1979.....	7
3.2.2	Rural Fires Act 1997	7
3.2.3	National Parks and Wildlife Act 1974.....	8
3.2.4	Biodiversity Conservation Act 2016.....	8
4	Bush Fire Operational Plan	9
4.1	Strategies to reduce ignition.....	9
4.2	Strategies to suppress unplanned fires.....	11
4.3	Strategies to minimise potential spread of bushfires.....	12
4.4	Bushfire Mitigation treatments	13
5	Bushfire Emergency Management Procedures	14
5.1	Pre-Emptive Closure	14
5.2	Shelter.....	14
5.3	Evacuation.....	14
5.4	Emergency procedures	15
5.4.1	Pre-emptive closure.....	15
5.4.2	Evacuate.....	15
5.5	Decision triggers.....	15

TABLES

Table 1	Ignition Risk and Actions	10
Table 2	Activities and Fire Danger ratings	11
Table 3	Summary of Permanent Advantages	12
Table 4	Bush fire Action statement	13

FIGURES

Figure 2	Emergency Management Escape Route (Six Maps, 2020).....	6
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2 INTRODUCTION

BEMC Pty Ltd was engaged by Dhaval Patel to complete a Bush Fire Emergency Management and Operations Plan for the proposed Solar Farm development at Lot 8 DP 1244273, Five Mile Creek Road, Gundagai, NSW.

The risk of bush fire impacting on the site was assessed within the Bush fire Assessment Report. It considers bush fire threat from all directions with the highest level of risk from a bush fire is from the north and west.

At risk developments, such as this solar farm require a greater degree of planning and coordination to ensure the facility is protected from a bushfire event and does not contribute to bush fire ignition and spread.

This Bush Fire Emergency Management and Operations Plan has been prepared in accordance with:

- AS3745:2010 Planning for emergencies in facilities.
- NSW RFS Development Planning – A guide to developing a Bush fire Emergency Management and Evacuation Plan.
- NSW Rural Fire Service, Planning for Bushfire Protection 2019 (PBP 2019).

The structure of this report is concise and succinct to allow the reader to absorb the salient elements and focus on the operational practicality of the emergency arrangements.

2.1 OBJECTIVES OF BUSH FIRE EMERGENCY MANAGEMENT AND OPERATIONS PLAN

This Bush Fire Emergency Management and Operations Plan is developed to meet the bushfire planning requirements NSW Rural Fire Service, Planning for Bushfire Protection 2019 and has two principle elements.

1. In detailing the measures to prevent and mitigate, a series of strategies will be established to protect the facility and neighbouring landowners from a bushfire ignition off and on the site. This includes:
 - Igniting management and prevention.
 - Strategies to reduce ignition.
 - Strategies to suppress unplanned fires.
 - Strategies to minimise potential spread of bushfires.
 - Bushfire Mitigation treatments.
 - Appropriate works programming on fire danger days.

The document will also identify the operations that may be carried out on days of Total Fire Ban and any prohibited activities or exemptions that are notified by the Commissioner of the NSW RFS under the Rural Fires Act s.99. and requirements to notification of the local NSW RFS Fire Control.

2. To establish Bush fire Emergency Management procedures in the event of a bush fire, the following objectives are determined:
 - Notification procedures and Key Stakeholders.
 - Decision triggers for shelter-in-place and evacuation.

A copy of this plan should always be available for staff and visitors. A copy shall be provided to the Emergency Service to assist in their pre-incident planning. Individuals identified in this plan have the responsibility to annually review and maintain the plans relevance to the site characteristics as change occurs.



Figure 1 Emergency Management Escape Route (Six Maps, 2020)

3 STATUTORY REQUIREMENTS

Fire management activities within the study area are constrained by numerous legislations, plans and guidelines.

3.1 COMMONWEALTH

There is no commonwealth legislation specific to fire management, although commonwealth conservation legislation is relevant to bushfire management principles.

3.1.1 Environment Protection and Biodiversity Conservation Act 1999

The Commonwealth *Environment Protection & Biodiversity Conservation Act 1999* (EPBC Act) stipulates that approval from the Commonwealth Environment Minister is required if a development is likely to have a significant impact on matters considered to be of national environmental significance.

The Commonwealth Heritage List, established under the EPBC Act, comprises natural, Indigenous and historic heritage places on Commonwealth lands and waters or under Australian Government control. The nine matters of national environmental significance (MNES) are; World heritage properties, National heritage places, Wetlands of international importance (often called 'Ramsar' wetlands after the international treaty under which such wetlands are listed), Nationally threatened species and ecological communities, Migratory species, Commonwealth marine areas, The Great Barrier Reef Marine Park, Nuclear actions (including uranium mining), A water resource, in relation to coal seam gas development and large coal mining development.

3.2 NEW SOUTH WALES

The site is located in NSW and several pieces of NSW legislations that are relevant to this facility.

3.2.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the principal planning legislation for the state, providing a framework for the overall environmental planning and assessment of development proposals in NSW.

3.2.2 Rural Fires Act 1997

The objectives of the Rural Fires Act 1997 (RF Act) are to provide for:

- The prevention, mitigation and suppression of fires;
- Coordination of bush firefighting and prevention;
- Protection of people and property from fires; and
- Protection of the environment.

The RF Act outlines the responsibilities of landowners to manage their land for bush fire protection and provides a mechanism for the approval of hazard reduction works, through the issue of a bush fire hazard reduction certificate. Section 63 specifies that it is the duty of the owner or occupier of land to take the notified steps (such as any listed in a bush fire management plan) and any other practicable steps to prevent the occurrence of bush fires on, and to minimise the danger of the spread of bush fires on or from, that land.

The RF Act also provides for the formation of fire management committees and the preparation of fire management plans which includes

- (a) a plan of operations, and
- (b) a bush fire risk management plan.

The RF Act also provides provisions for bush fire suppression and hazard reduction works including interaction with the *Environmental Planning and Assessment Act 1979*, *National Parks and Wildlife Act 1974*, *Biodiversity Conservation Act 2016* and the *Local Government Act 1993*. . The ongoing maintenance of Asset Protection Zones are recognised under 100C of the RF Act and is supported in 2.8(1)(d) of the BC Act. Any clearing of vegetation within the site to allow the development to occur may require assessment under the BC Act.

Section 44 of the RF Act provides for the appointment of bush fire suppression control to the Commissioner of the RFS particularly in declared emergency situations. In these situations, environmental provisions of the above Acts are covered by the RF Act. Further to this, Section 100C of the RF Act specifies that the carrying out of emergency or managed bush fire hazard reduction work cannot be prohibited by the above Acts when carried out in accordance with a bush fire hazard reduction certificate. The Bush fire Environmental Assessment Code (BEAC) (RFS 2006b) provides an approach for the provision of bush fire hazard reduction certificates by the RFS under the RF Act.

The document will also identify the operations that may be carried out on days of Total Fire Ban and any prohibited activities or exemptions that are notified by the Commissioner of the NSW RFS under the RF Act. Section 99 of the RF Act requirements notification to the local NSW RFS Fire Control when operations are carried out on days of Total Fire Ban. The Commissioner, through the local NSW RFS Fire Control can provide exemptions to any prohibited activities on Total Fire Ban days.

3.2.3 National Parks and Wildlife Act 1974

Aboriginal and cultural heritage sites are protected under the *National Parks and Wildlife Act 1974* (NPW Act), as well as protected flora and fauna species.

3.2.4 Biodiversity Conservation Act 2016

The NSW *Biodiversity Conservation Act 2016* (BC Act) aims to protect and encourage the recovery of threatened species, populations and communities listed under the Act. The BC Act is integrated with the EP&A Act and requires consideration of whether a development or an activity (such as mechanical hazard reduction) is likely to significantly affect threatened species, populations and ecological communities or their habitat.

4 BUSH FIRE OPERATIONAL PLAN

The Bushfire Operations Plan (BOP) sets out the work and activities that will be undertaken within the site to prevent and mitigate bush fire events. Implementing the bushfire management works and activities listed in this plan is dependent upon the financial, human and equipment resources being available.

If the implementation of bushfire management activities identified in this BOP are implemented with fewer resources than estimated, the balance of the resources will be allocated to implementing other high priority bushfire management activities not listed in this BOP after discussion with the Emergency Services Agency.

Fire management attempts to coerce fire into a desired regime using three primary strategies:

1. Hazard Reduction through mechanical (slashing) fuel reduction.
2. Fire suppression, and
3. Ignition management and prevention.

Hazard reduction and ignition management and prevention of fire outbreaks are the primary focus of fire control strategies within this document.

4.1 STRATEGIES TO REDUCE IGNITION

The key personnel responsible for reporting and monitoring fire hazards and for the prevention of fire are:

- All Employees of DPCM Pty Ltd and Contractors have a general duty of care to observe and report fire hazards within the site.
- DPCM Pty Ltd Facility Manager is responsible for overall monitoring of fire hazard within site.

The key to minimising fire ignition is to increase the awareness of the risks of ignition. The Gundagai Hilltops Bush Fire Risk Management reports the region has on average 97 bush, grass, and scrub fires per year, of which 2 on average can be major fires. The main sources of ignition in the Gundagai Hilltops Bush Fire Risk Management area are:

- Harvesting operations and farm machinery.
- Lightning.
- Escape from legal and illegal burning operations.
- Accidental.

Table 1 documents the actions required concerning the identified ignition causes to help prevent fire ignition. These strategies are especially important during the fire season when weather patterns are conducive to the spread of fire.

Table 1 Ignition Risk and Actions

Ignition Risk	Actions
Deliberate / Arson	<p>Promoting cooperative surveillance programs with fire agencies and community.</p> <p>Promoting staff, community education and awareness programs.</p> <p>Limiting public access during severe and catastrophic fire weather conditions.</p> <p>Cooperatively assist NSW Police and the Rural Fire Service to investigate all fires believed to have been deliberately lit.</p>
Camp fires	<p>Promoting staff, community education and awareness programs.</p>
Debris Burning	<p>Ensure neighbours obtain appropriate permits to implement Debris burns.</p>
Machinery use	<p>Maintain high level of employee awareness (e.g. toolbox talks).</p> <p>Ensure adequate buffer zone between activities and fuel source.</p> <p>All hot work activities to have a spotter and a fire extinguisher within work zone when required.</p> <p>Hot works to be avoided during total fire bans or on FDR days of Very High or greater.</p> <p>Do not undertake mechanical clearing works on Extreme and Catastrophic fire danger days</p> <p>Removal of some visual rocks before slashing.</p> <p>Avoid driving on/through long grass (vehicle exhaust systems are known to igniting grass fires)</p>
Electrical & lightning	<p>Liaise with electricity providers to ensure maintenance of powerlines.</p>

4.2 STRATEGIES TO SUPPRESS UNPLANNED FIRES

Fire suppression actions start from the time the fire is detected until it is extinguished. The solar farm facilities priorities in bush fire suppression operations are:

- The safety of all staff and visitors.
- The effective protection of human life, facility and community assets.
- Reduces ignition potential on site to acceptable levels.

Table 2 Activities and Fire Danger ratings

Element	Low/Moderate	High	Very High	Severe	Extreme	Catastrophic
Preparedness for ignition	Assessing the required level of day to day preparedness by monitoring Fire Danger Indexes and synoptic conditions on a continuous basis throughout the fire season. Identifying pre-emptive incident management and ensure staff are aware of response procedures.					
Response to ignition	Identify triggers and implement appropriate actions within the Bush fire emergency management and evacuation procedures					
Minimise hot works through appropriate work scheduling	No requirements	If deemed appropriate. Hot works should be accompanied by a spotter and a fire extinguisher.	If deemed appropriate. Hot works should be accompanied by a spotter and a fire extinguisher.	If deemed appropriate. Hot works should be accompanied by a spotter and a fire extinguisher.	No hot works	No hot works
Minimise vegetation maintenance activities through appropriate work scheduling	No requirements	No requirements	No requirements	If deemed appropriate. Vegetation management should be accompanied by a spotter and a fire extinguisher.	If deemed appropriate. Vegetation management should be accompanied by a spotter and a fire extinguisher.	No vegetation maintenance activities
Bush fire PPE and Firefighting equipment.	No requirements	No requirements	Ensure equipment is functional and readily available	Ensure equipment is functional and readily available	Ensure equipment is functional and readily available	Ensure equipment is functional and readily available

On 'Total Fire Ban' days no vegetation management or hot works will be undertake unless notification and approved through s99 by NSW RFS is obtained. Only general maintenance works that do not require mechanical machinery that can create an ignition source will be permitted during 'Total Fire Ban' days.

4.3 STRATEGIES TO MINIMISE POTENTIAL SPREAD OF BUSHFIRES

A range of permanent, natural and point fire control advantages exist to minimise the potential for the spread of bush fires in and around the site. The following sections define the different advantages, their characteristics and considerations.

Table 3 summarises the control advantages in and around the site. DPCM Pty Ltd will ensure the solar farm facility effectiveness of fire control advantage infrastructure on site is maintained to minimise the potential for the spread of fires from or into and from the property. In general,

- Priorities the maintenance of Asset Protection Zones and the perimeter fire trail;
- Maintain Assets Protection Zone to standards in accordance with NSW RFS, specifically management of the ground and shrub growth, and lower tree branches under the tree line for a minimum of 2m height.
- Point advantages such as water availability and access locations are maintained.

Table 3 Summary of Permanent Advantages

Control Advantage	Type of Zone	Characteristics and Considerations
Asset Protection Zones	Permanent	Cleared areas immediately adjacent to assets that provided an area of low flammable materials. Undertaken within the first month of fire season. Completed in accordance with NSW Rural Fire Service, Standards for Asset Protection Zones. NSW Rural Fire Service, Sydney.
Roads, Track and Trails	Permanent	Roads, tracks and trails may be used as control lines for containing a low intensity fires. Fire crew safety and probability of success will be assessed against track characteristics such as width, overhanging limbs, passing bays, bridges, turn-around areas.
Other Areas cleared of flammable materials	Permanent	Other cleared areas that act as advantages include roads that will impede the progress of a fire.
Drainage lines and rivers	Natural	The effectiveness of drainage lines depends upon whether it is saturated or has a bed of sand or stones that will impede fire crossing rather than vegetation litter. Drainage lines are unlikely to contain high intensity fires under severe conditions due to the likelihood of ridge top spotting.
Recent (<3yr) fire history	Natural	Recently burnt areas can be used for containment. Their effectiveness is limited by their depth, the level of fuel reduction, the vegetation type, the recovery time for fuel loads, and the spotting distance of approaching fire
Vehicle water points	Point	Vehicle based firefighting can draw water from numerous hydrants or dams within rural and semi urban areas.
Fire detection lookouts	Point	Detection can also be gained from vantage points on the hilltops throughout the landscape

4.4 BUSHFIRE MITIGATION TREATMENTS

The bush fire mitigation treatments are strategic in nature as they prioritise protection of life and property. The principle elements of the Bushfire mitigation treatments are:

- Establishing and maintain landscape maintenance schedules.
- Making representations to the District BFMC.
- Implementation of the Bush fire Operations and Evacuation Plan; and
- Establishing a staff and visitors education program.

Table 4 Bush fire Action statement

Period	Trigger	Issue	Action	Responsibility
Preparation	Planning requirement	Risk assessment	Review Maintenance schedules for landscaping and ground maintenance Review site 'fire hygiene' and treat as required	Facility Manager
Preparation	Planning requirement	Response capacity	Contact local rural fire brigades and NSW Fire and Rescue and undertake familiarisation of the facility	Facility Manager
Preparation	Planning requirement	Response capacity	Maintain inspection of APZ and aesthetic tree row within APZ	Facility Manager
Preparation	Planning requirements	Risk assessment	Undertake annual review of Operations plan and hold fire scenario training and simulation as required for new staff.	Facility Manager
Preparation	Planning requirements	Evacuation	NSW RFS and Local Emergency Management Officer to recognise the Evacuation area within this emergency response documentation	Facility Manager
Response	Severe – Extreme – Catastrophic Fire Danger Index	Evacuation response triggered	Unlock all emergency service access gates	Facility Manager
Response	Confirmed bushfire event	Hazardous materials	Ensure all hazardous materials are protected and secured.	Facility Manager
Recovery	Following passage of fire	Site Safety	Contact utility providers to re-establish services.	Facility Manager
Recovery	Following passage of fire	Facility safety	Contact RFS to establish notification to re-enter site to undertake access and tree safety assessments. And engineers to undertake assessment of solar panel onrstructure,	Facility Manager

5 BUSHFIRE EMERGENCY MANAGEMENT PROCEDURES

Procedures for both sheltering and evacuation should be developed, with one identified as the Primary Action to be followed during a bush fire. In this case, shelter-on-site is not a feasible emergency management options due to the lack of appropriately designed structure. Furthermore, the site will not be occupied, and people present on-site will be only for maintenance and operational requirements.

Emergency services may decide to evacuate areas for public safety. For this reason, procedures to evacuate are required to ensure the necessary planning and coordination arrangements are in place.

An important factor when planning for emergency procedures is that under intense conditions it is common for people to behave irrationally and this may increase the time taken to move people.

5.1 PRE-EMPTIVE CLOSURE

The lead time for a planned closure varies depending on weather patterns, but every attempt is made to give the facility and attending staff as much notice as possible to prepare and respond.

Once the decision that the facility is to undertake pre-emptive closure, information needs to be disseminated quickly and clearly identifying the expectations of staff.

Potentially, between declaration of the closure and the day of closure, weather conditions improve sufficiently to remove the need to close and the facility can therefore stand down its pre-emptive closure plans. Triggers for these decisions need to be clear and concise.

Due to the location of the site, pre-emptive closure for the facility are possible.

5.2 SHELTER

Facilities with sheltering as their Primary Action will have evacuation procedures in case they can no longer shelter, or emergency services call for a pre-emptive evacuation due to catastrophic or extreme bush fire conditions. Shelter-on-site is not possible for this facility as no build structure is provided for shelter purposes.

5.3 EVACUATION

Facilities with evacuation as their Primary Action that have no shelter-on-site mechanisms will have clear and concise decision triggers for staff to follow. Pre-emptive site closures become more critical in these situations ensuring staff are not placed in any danger when they are required to consider shelter as a emergency response option.

Safe access arrangements for people to evacuate an area whilst emergency service personnel are accessing the same area to suppress a bush fire are essential. Alternative access/way out routes will also assist if part of the road system is cut by bush fire or bush fire related activities, such as fallen tree of firefighting appliances.

Evacuation can be by foot or vehicle, or both depending on the availability and location.

5.4 EMERGENCY PROCEDURES

This section details the specific emergency management considerations for the facility and determines the appropriate decision triggers to be used within the Bushfire emergency management framework.

5.4.1 Pre-emptive closure

The facility does not offer any shelter-on-site options. Staff attending the site to undertake maintenance and operational management should be undertaken only when a bush fire will not impede evacuation from the site.

Evacuation from the site is via Five Mile Creek road, which is surrounded by grasslands. The travel distance to the Hume Highway is 1.7km which enables crews to depart the site and arrive at safe refuge within 5 minutes. This ability to quickly relocate to enables staff to attend the site on day of severe fire danger days.

Pre-emptive site closure should occur on extreme and catastrophic fire danger days.

5.4.2 Evacuate

The principle Primary Action for this facility is Evacuation.

Once staff are satisfied that all people have evacuated the site, an assessment should be performed to establish an off-site meeting point that is considered safe in terms of air quality (smoke), ember attack and further ignition potential. Notification of this off-site meeting point should be relayed to management.

Three options for consideration depend on the dominate weather and fire direction. Evacuating vehicles can travel north and south on the Hume Highway or relocate to the Highway service centre (shell petrol station and associated facilities) immediately to the south of Five Mile Creek Road.

Relocating to the Highway service centre offers protection, although hazardous materials (fuels) also present further ignition sources. Relocation to this site should consider the safest location away from other hazard and ignitable materials.

Relocating south to Gundagai township, approximately 6km south is the preferred option if the road is clear of hazards and access is secured and reliable. Relocating to the north can be considered only if egressing south is assessed as unsafe.

5.5 DECISION TRIGGERS

Developing a clear set of triggers will increase the ability to react quickly and make decisions when a bush fire event occurs. The following table provides the Triggers to be implemented prior and during a bush fire event.

Awareness of trigger events are initially determined by knowledge of Daily Fire Danger Categories and the predominant weather (specifically wind) conditions. It is essential that staff maintain daily awareness of these categories to ensure they are informed and aware of trigger requirements.

Category	FDI	Wind Direction	Confirmed Ignition (<5km)	Action	Bush fire specific arrangements	Responsibility
Extreme and Catastrophic	>74	All directions	No	Monitor Fire Near Me, undertake preliminary preparations	Consider pre-emptive closure, delay management works to following days with lower FDIs.	DPCM Pty Ltd
			Yes	Implement emergency management arrangements	Notify fire authorities and DPCM Pty Ltd management Evacuate site Leave access gates unlocked Program to return to site (following day) to re-establish access controls (lock gates)	DPCM Pty Ltd
Low to Severe	<74	All directions	No	Monitor Fire Near Me Undertake preliminary preparations	Normal Operations	DPCM Pty Ltd
			Yes	Determine if maintenance work can be safely completed prior to leaving site. If fire I within 1km of site implement emergency management arrangements and evacuate site.	Notify fire authorities and DPCM Pty Ltd management Evacuate site Leave access gates unlocked Program to return to site (following day) to re-establish access controls (lock gates)	DPCM Pty Ltd