

Peer Review Report

Western
Renewables Link

June 2025



Fire Risk Consultants
PO Box 12, Glengarry VIC 3854
0487 790 287
www.fireriskconsultants.com.au

Disclaimer and Information Statement

This report is issued by Fire Risk Consultants Pty Ltd and the information in this report is current as at the date of publication. Any Bushfire Emergency Plan or Bushfire Response Plan is current only at the date of issue as it is up to you to maintain the Australian Standard AS3959:2018 (or equivalent) and AS3745:2018 (or equivalent) for the property and/or building. Failure to maintain the property and/or building to these standards may compromise an insurance policy if currently covering any of your assets or those of any third party that may be consequentially affected due such failure. If not insured, and if you are seeking insurance, this report may not influence the decision of any insurer not to offer cover. To the extent permitted by law, Fire Risk Consultants Pty Ltd will not be held liable for any claims, demands, costs or expenses for any personal injury, property damage or death arising out of failure by you to maintain the property and/or building to AS3959:2018 (or equivalent) and AS3745:2018 (or equivalent).

The information and/or the recommendations contained in this report have been compiled and based on the information, records, data and any other sources of information supplied by you. Whilst we have exercised all due care and skill in compiling the report, you should confirm the accuracy and reliability of the information and material we have relied upon in producing the report. This report may also contain information, systems or data which is the property of Fire Risk Consultants Pty Ltd and Fire Risk Consultants Pty Ltd has in no way waived or altered in any way its ownership right, or provided consent for use by the report recipient, unless expressly provided in the report.

Any fire safety work, including but not limited to planned burning, back burning and/or fire suppression, on any property or building is specifically excluded from this report.

*Where the term “**Bushfire prevention and mitigation related activities**” (or words to that effect) are used, this is to be defined as the clearance of vegetation in accordance with the Victorian State Government guidelines, including clearing and maintenance of existing fire breaks and/or fire access for fire fighters under electricity pylons and properties that have been constructed to Australian Standard AS3959 and/or the National Construction Code.*

Contents

- 1 Introduction4
- 2 Peer review outcomes.....4
 - 2.1 Peer Review scope.....4
 - 2.2 Outcome of the Report Peer Review.....4
 - 2.2.1 Methodology4
 - 2.2.2 Existing conditions and impact assessment findings.....5
- 3 Conclusion6
- Appendix A7
- Appendix B9

1 Introduction

Fire Risk Consultants (FRC) have been engaged to undertake a peer review of the Bushfire Impact Assessment for the Western Renewables Link project (the Project). The FRC review team consisted of Graeme Taylor and Mark Potter, who were both involved in the assessment and peer review of the report. Their experience is outlined in Appendix A.

The *Western Renewables Link EES Technical Report K: Bushfire Impact Assessment* (the Report) (29 May 2025), prepared by Jacobs, has been reviewed and, where required, feedback provided.

FRC was instructed in January 2025 by White & Case to undertake a peer review on the Report. Our instructions are included in Appendix B to this report. Specifically, we are asked to address the following matters:

- The scope of our peer review role in the preparation of the impact assessment report.
- Our views in relation to the methodology adopted in the impact assessment, including consideration of the appropriateness of the assumptions and limitations applied.
- Our views in relation to the impact assessment findings.
- Our views in relation to the Environmental Performance Requirements.
- Our views in relation to whether the impact assessment adequately addresses whether the relevant evaluation objective in the Scoping Requirements for the Project can be met.

We have been involved in the project since May 2021, having reviewed and provided feedback on the existing conditions assessment and development of proposed EPRs and mitigation measures.

2 Peer review outcomes

2.1 Peer Review scope

Our involvement in the Project commenced in May 2021. The scope of our peer review involved the following:

- Review of the EES Scoping Requirements with a particular focus on fire and bushfire related matters.
- Review of iterations of the Report throughout its preparation and when required, the provision of feedback.
- Participation in peer review meetings with the author of the Report.
- The assessment of the Report to meet the EES Scoping Requirements.

2.2 Outcome of the Report Peer Review

2.2.1 Methodology

Through reviewing the iterations of the Report, FRC have determined that the methodology utilised is reasonable and supports the assessment of the fire related matters listed within the EES Scoping Requirements.

The assessment methodology included the analysis of existing conditions which sourced data from reputable sources and undertook analyses that determined the likely impact from the Project. Following a recommendation from FRC, the analysis includes the use of the Phoenix Bushfire Model (Appendix B of the Report) that is utilised by the Victorian fire agencies for the assessment of bushfire risk. In our opinion, it is critical to utilise the best available technology to assess the pre and post development impact of the Project.

The Phoenix model outlines the likely bushfire spread across the landscape pre and post the Project. It demonstrates that the Project will have a positive effect on the management of bushfires under lower fire danger conditions.

We note the large footprint of the project, and the challenges associated with the assessment of bushfire risk for this type of development. The Report considers these challenges including the variable vegetation types, potential bushfire behaviour and the assessment of the landscape impact on bushfire behaviour.

2.2.2 Existing conditions and impact assessment findings

The Report has considered this effectively and utilised appropriate data and information to inform the existing conditions analysis as well as the impact assessment. The assumptions and limitations listed within the report in our view relates to the assessment and are effective and reasonable.

The key impacts include:

- Fire ignition risks during the construction phase of the project.
- Impacts on fire suppression ability in relation to access and egress changes.
- Ability to continue vegetation management activities.

The analysis also addressed Clause 13.02-1S of the relevant Planning Schemes (Section 10.1 of the Report). Whilst it is acknowledged that the Clause 13.02-1S policy was not developed specifically for this type of development, it does relate to the proposal to establish temporary workers accommodation facilities.

It is noted that the recommendation, listed as an EPR, to develop a Bushfire Management Plan specifically for the temporary laydown and workers accommodation facilities is included within the Report and outlines the need to address the Clause 13.02-1S policy as part of the plan development.

Following our assessment of the Report, we support the following project controls (EPR's) recommended within the report:

- Construction Bushfire Management Plan for the transmission line component of the project that outlines the management of bushfire risk during the projects construction phase and includes vegetation management requirements, firefighting water supplies, firefighting vehicle access and activities to be undertaken during the fire danger period and elevated fire danger days.
- Bushfire Management Plans for the construction and operations phase of the Lexton and Ballan temporary laydown areas and temporary construction workforce accommodation facilities.
- Construction Emergency Management Plan that includes the management structure to respond to emergencies that occur during the construction phase and emergency response procedures for the identified hazards.

-
- Notification to fire agencies of the location and operational status of the infrastructure.

The different plans will enable the ongoing management of bushfire risk for the relevant components of the Project. The plans reflect the different risk profiles and will enable the ability to effectively manage the bushfire risk for each component of the Project during the different phases of the Project.

We believe the Report adequately addresses the relevant evaluation objective in the Scoping Requirements for the Project. It is also noted that AusNet are required by legislation and the electrical safety regulator, Energy Safe Victoria, to maintain Bushfire Mitigation and Vegetation Management Plans as part of their safety management systems for the operations phase of the project.

This is consistent with the process that is undertaken for existing transmission line networks.

3 Conclusion

This peer review report has considered the Western Renewables Link Bushfire Impact Assessment Report prepared by Jacobs. The Report acknowledges that much of the landscape of the proposed development is considered bushfire prone.

The review process has determined that the methodology adopted in the Report is reasonable, appropriately sourced, and effectively addresses the fire-related requirements outlined in the EES Scoping Requirements.

Despite the challenges posed by the project's large footprint, the assessment successfully integrates relevant data and considers potential bushfire risks and recommends appropriate management measures.

The assumptions and limitations presented in the Report are deemed appropriate and align with the scope of the assessment. Furthermore, the impact assessment's recommendation to develop a Construction Bushfire Management Plan, Bushfire Management Plans for temporary sites such as the workers accommodation and laydown areas, and the Construction Emergency Management Plan, provide an appropriate structure to mitigate bushfire risks. This is appropriate considering the management of bushfire risk during construction, in a bushfire prone environment, is a key consideration for this type of project.

Overall, FRC supports the conclusions of the Report, acknowledging its comprehensive evaluation of existing conditions, fire hazards, and necessary management strategies.

The outlined measures ensure that bushfire risk is effectively considered throughout the construction and operational phases of the project.

Appendix A

Graeme Taylor Owner & Managing Director



Graeme Taylor is the founder and Managing Director of Fire Risk Consultants. He has extensive strategic and operational management experience with a strong focus on leadership and critical decision making in an emergency management environment. Graeme provides support to agencies, local government, industry, asset Land Managers and Traditional Owner Groups before, during and after emergencies. He is able to lead the development of risk reduction and fire protection planning, including fuel modification and management. He prides himself on his ability to promote planned burning as an effective risk reduction method. Alongside this, he also assists in preparing communities and other stakeholders for natural disasters.

Qualifications

- Diploma of Applied Science – Fire Technology (University of Ballarat);
- Certificate IV in Firefighting (Supervision);
- Certificate III in Public Safety (Fire & Emergency Operations);
- Certificate IV in Training & Assessment;
- Nationally accredited Fire Investigator;
- Nationally accredited Prescribed Burning Officer;
- Level 2 Incident Controller;
- Level 2 Operations Officer.

Experience

Graeme has extensive experience in State fire policy, planning, incident management and operational services, in particular for fire at large events. He brings first-hand experience in leadership roles for major emergency incidents in Victoria. Since 1996, these events have included the Longford gas explosion, multiple Gippsland floods and the 2009 Black Saturday Fires.

Graeme has excellent knowledge of State and local government emergency management and fire planning arrangements and provisions, including the Bushfire Management Overlay. He also has excellent community engagement and stakeholder management skills, including dealing with fragile communities post natural disaster. His highly developed project management skills enable him to manage complex emergency events, in conjunction with making an efficient and effective early transition from response to recovery. His project management and engagement skills can be demonstrated through key initiatives he has been involved in including:

- Working with numerous large asset managers in several key industry areas across Australia, helping to protect their assets from fire
- Providing expert advice to Government, fire agencies and land managers across the continent on managing bushfire risk and implementing risk mitigation works
- Implementing a significant planned burn program in northern Australia on Defence land
- Working with fire affected communities in the Bunyip 2019 bushfire in eastern Victoria in community recovery
- Reviewing fire operations, suppression strategies, fire response and capability for Victoria's largest plantation forestry company
- Developing risk assessments bushfire mitigation plans for the renewable energy sector on wind and solar developments across Australia
- Working with organisations to prepare for and respond to bushfire

Fire Risk Consultants Pty Ltd
PO Box 12, Glengarry, VIC 3854
www.fireriskconsultants.com.au

ABN: 38 620 191 826
PH: 0487 790 287
graeme@fireriskconsultants.com.au

Mark Potter

Risk and Emergency Planning Lead



Mark Potter is a proven executive with experience in providing leadership across complex and diverse roles. He has a strong background in developing internal and external relationships, operating in complex and technical environments, leading teams through significant change and steering strategy into action.

Qualifications

- Graduate Certificate Performance Based Building Design and Fire Codes (Victoria University of Technology)
- Advanced Diploma of Public Safety (Community Safety)
- Certificate II in Public Safety (Firefighting Operations)
- Gippsland Community Leadership Program (Committee for Gippsland)
- Executive Consequence Management Course (Barrington Centre and Emergency Management Victoria)
- Organisational Leadership (Mission Command Solutions and Country Fire Authority)
- CFA Strike Team Leader
- Level 3 Public Information Officer, Situation Officer and Level 2 Incident Controller

Experience

Within the emergency management sector, Mark has extensive experience in leading the development, assessment and testing of all aspects of emergency management plans. This experience includes Major Hazards Facilities, Latrobe Valley Coal Mines, Gippsland Regional Strategic Fire Management Plan, Bushfire Management Overlay and the Gippsland Emergency Management Plan. Mark has performed in roles including Chair – Gippsland Regional Strategic Fire Management Planning Committee, Project Manager – Latrobe Valley Coal Mines Emergency Management Project, member of the Gippsland Emergency Management Planning Committee and the State Fire Management Planning Committee. His experience extends across the ability to undertake, participate or assess risk management plans that identify the relevant risks for treatment plans to be developed.

Mark has belief in the importance of developing relationships and partnerships internally and externally of an organisation. His background in the development of strategic relationships and partnerships across multiple jurisdictions provides him the ability to utilise these networks to develop strategies and identify opportunities that will benefit any organisation.

Fire Risk Consultants Pty Ltd
PO Box 12, Glengarry, VIC 3854
www.fireriskconsultants.com.au

ABN: 38 620 191 826
PH: 0487 790 287
graeme@fireriskconsultants.com.au

Appendix B

WHITE & CASE

22 January 2025

By email

Graeme Taylor and Mark Potter
Fire Risk Consultants Pty Ltd
graeme@fireriskconsultants.com.au
mark@fireriskconsultants.com.au

Dear Mr Taylor and Mr Potter

Western Renewables Link Project — Peer Review Report

AusNet Transmission Group Pty Ltd (**AusNet Services**) has been selected by the Australian Energy Market Operator (**AEMO**) to design, build, own, operate and maintain the Western Renewables Link Project (formerly known as the Western Victoria Transmission Network Project) (**Project**). We have been engaged to act as legal advisors to AusNet Services in relation to the Project.

Preparation of the EES

AusNet Services is currently preparing an environment effects statement (**EES**) for the Project in accordance with the EES Scoping Requirements issued by the Minister for Planning dated November 2023. A copy of the EES Scoping Requirements is attached as Schedule 1 for your convenience.

This letter sets out our instructions to you to provide peer review opinion and advice in relation to bushfire matters associated with the Project.

Request for peer review report

We request that you prepare a peer review report which may be annexed to the Bushfire Impact Assessment and included in the EES.

The purpose of your peer review report is to comment on whether, in your view, the Bushfire Impact Assessment for the Project, and any other relevant parts of the EES, adequately address the EES Scoping Requirements, all relevant legislation, standards and guidelines and demonstrate that the relevant evaluation objective in the EES Scoping Requirements can be met.

Please ensure your peer review report addresses:

- the scope of your peer review role in the preparation of the impact assessment report;
- your views in relation to the methodology adopted in the impact assessment, including consideration of the appropriateness of the assumptions and limitations applied;
- your views in relation to the impact assessment findings;
- your views in relation to the Environmental Performance Requirements; and
- your views in relation to whether the impact assessment adequately addresses whether the relevant evaluation objective in the Scoping Requirements for the Project can be met.

11/25/2022 15:57
ASIA_36257634_v1 [36257634_1.docx]

White & Case
Level 32, 525 Collins Street
Melbourne VIC 3000
Australia

GPO Box 2756
Melbourne VIC 3001
Australia

T +61 3 8486 8000

ABN 17 847 592 731

whitecase.com

In preparing your peer review report, you must comply with the guidelines included in the Guidance Note for Ethical Practice in Undertaking Peer Reviews' published by the Environment Institute of Australia and New Zealand Inc, a copy of which is attached to this letter at Schedule 2.

Please complete your peer review report by Wednesday, 29 January 2025.

Please do not hesitate to get in contact with the undersigned should you have any questions with respect to the above or attached.

Yours sincerely



Michelle Keen
Partner

T +61 3 8486 8018

E michelle.keen@whitecase.com

Attachments:

Schedule 1 – EES Scoping Requirements for the Project dated November 2023

Schedule 2 – Guidance Note for Ethical Practice in Undertaking Peer Reviews