



Hume Food Organics and Garden Organics Facility

Bushfire Risk Assessment

City and Environment Directorate

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1. Introduction

1.1 Background

The Australian Capital Territory (ACT) Government is working to reduce waste to landfill and increase resource recovery. The strategic direction for the management of waste in the Territory is set out in the 'ACT Waste Management Strategy 2011-25' (ACT Government, 2011). The strategy commits the ACT Government to minimise organic waste going to landfill and recovering organic waste resources. It also sets a target of increasing the rate of resource recovery to over 90 percent by 2025, with no recoverable waste sent to landfill.

The Federal Government also has a target of halving the amount of organic waste sent to landfill for disposal by 2030, as set out in the 'National Waste Policy Action Plan' (DEE, 2019).

A waste feasibility study was established in mid-2015 to identify a pathway towards achieving the ACTs waste management targets and examine options to drive better resource recovery. In 2018, the ACT Government released the final recommendations from the study as the 'Waste Feasibility Study: Roadmap and Recommendations Discussion Paper' (ACT NoWaste, 2018). Key recommendations from this were to identify a site and establish an organics progressing facility to process food organics and garden organics (FOGO) and the implementation of a kerbside FOGO collection.

The 'ACT Climate Change Strategy 2019 to 2025' (ACT Government, 2019) also identifies FOGO collection for all households and the investigation of organic waste processing as key priorities. An opt-in FOGO collection pilot is currently underway in the ACT (Belconnen), which has so far diverted more than 480 tonnes of material from landfill (ACT Government, 2022).

There is currently no processing facility within the ACT that can accept and process FOGO material. ACT NoWaste is therefore proposing to develop a new FOGO facility (the 'proposal') in Hume to strengthen the Territory's circular economy and help meet Territory and Federal Government landfill diversion and resource recovery targets.

The proposal is defined as the construction and operation of a new FOGO facility with the capacity to receive up to 70,000 tonnes per year of FOGO for in-vessel composting.

1.1.1 Approval and assessment requirements

This Bushfire Risk Assessment (BRA) has been prepared by GHD Pty Ltd (GHD) as part of the environmental impact assessment (EIS) for the proposal. The EIS supports the application for approval of the proposal and to address the requirements provided by the ACT Department of Environment, Planning and Sustainable Development Directorate dated 7 June 2022.

The proposal is subject to approval by the planning and land authority within the Environment, Planning and Sustainability Development Directorate.

The BRA is to support specific requirements of a Development Application and comments from the ACT Emergency Services Agency (ESA) so that the proposed future land use is in an appropriate location to minimise the risk to life and property from bush fire attack.

1.2 Purpose of this report

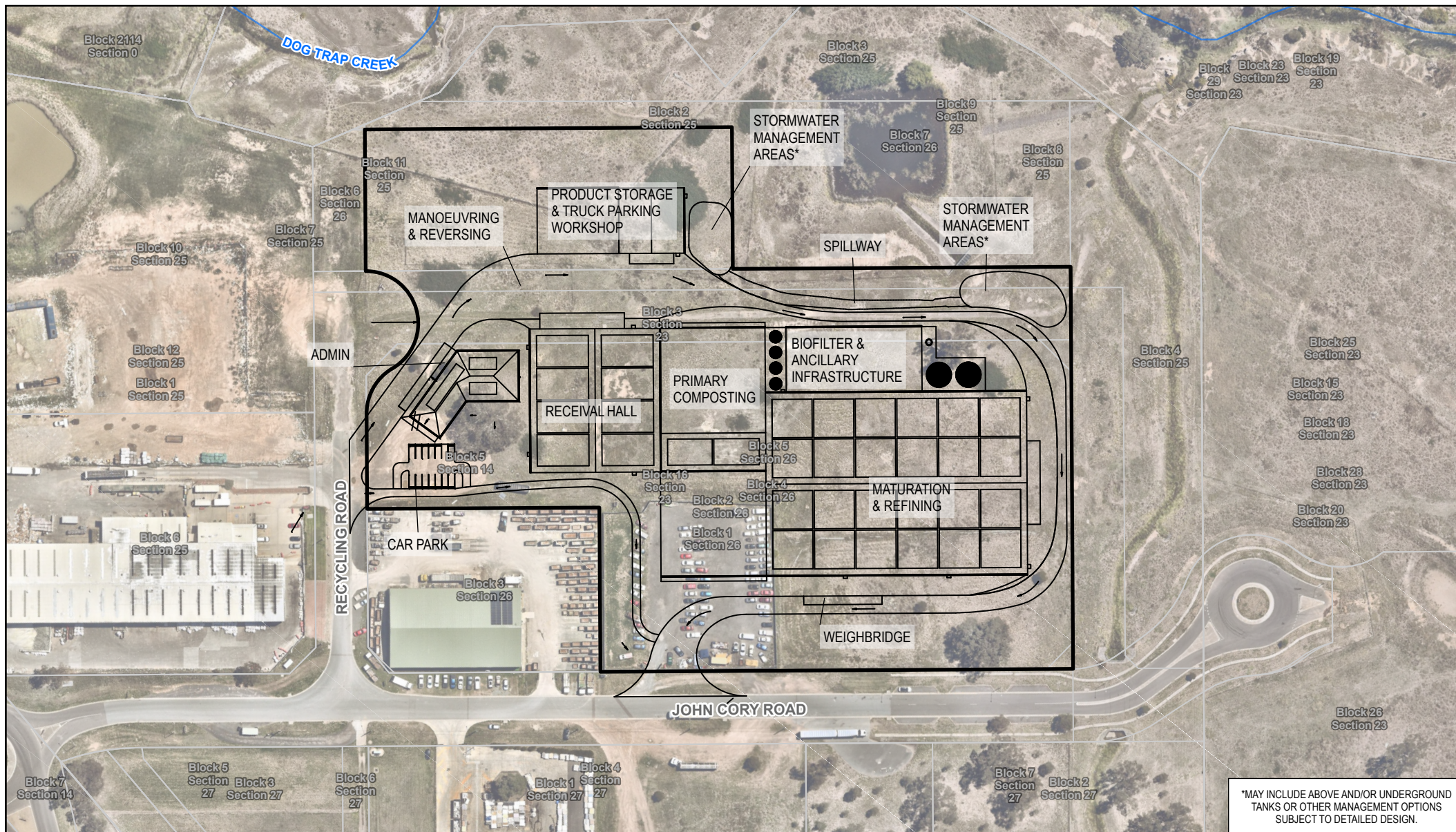
The BRA addresses the bushfire risk and the potential impact of potential development in the identified areas upon the wider infrastructure network to assess the appropriateness of the proposal in the bush fire hazard context, particularly regarding the risk of and from recovered materials fires. This BRA assesses the strategic implications for bush fire mitigation and management.

1.3 Proposal location and indicative concept layout

The proposal is located on Block 5, Section 26 Hume, off John Corey Road on Territory Land in the ACT. The proposal site is in proximity to a number of industrial facilities. ACT Skip Hire is on the adjacent block to the south. Further south on John Cory Road the Soft Landing Mattress Recycling facility is located. The Mugga Lane Landfill is located approximately 200 m northwest of the site.

Figure 1 shows the site proposed for the FOGO facility, including an indicative concept layout configuration to accommodate these operations (subject to detailed design and final vendor process selection). In total, this area comprises approximately 4.3 hectares (ha) of land. The indicative concept layout includes:

- Receival hall
- Primary composting tunnels and tunnel hallway
- Maturation and refining hall
- Product storage shed
- Odour management system
- Ancillary supporting infrastructure including:
 - Administration building
 - Machinery shed/workshop
 - Weighbridges
 - Access roads and pavements
 - Hardstand parking



*MAY INCLUDE ABOVE AND/OR UNDERGROUND TANKS OR OTHER MANAGEMENT OPTIONS SUBJECT TO DETAILED DESIGN.

- Legend**
- Proposal site
 - Cadastre
 - Proposal site layout
 - Watercourses

Paper Size ISO A4
 0 20 40
 Metres
 Map Projection: Transverse Mercator
 Horizontal Datum: GDA 1994
 Grid: GDA 1994 MGA Zone 55



Transport Canberra and City Services
 Hume Food Organics and Garden Organics Facility
 Bushfire Report

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Site detail plan

FIGURE 1

1.4 Scope

This report has been prepared in accordance with the recently legislated ACT Bushfire Management Standards (BMS) 2023 and Strategic Bushfire Management Plan 2019-2024 (SBMP v4) addressing the following:

- Bush fire landscape assessment.
- Land use assessment.
- Access and egress.
- Emergency services.
- Infrastructure.
- Adjoining land.

GHD proposed the following scope to address the requirements of the report:

- Site inspections to collect site information and data.
- Preparation of the assessment based on review of on the project description and a desktop assessment, including:
 - Assessment of the risk profile of the site and the impact of siting on Asset Protection Zones (APZs).
 - Identification and prioritisation of mitigation measures appropriate for proposed use and development type.
 - Assessment of the existing road network to evaluate the capacity to deal with evacuating site users and responding emergency services.
 - Consideration and analysis of the increase in demand for emergency services responding to bush fire, and the ability of emergency services to carry out fire suppression because of the proposed development.
 - Identification and prioritisation of issues associated with infrastructure and utilities, particularly water for firefighting.
 - Assessment of the impact on adjoining land owners and their ability to undertake bush fire management.

1.5 Limitations

This report: has been prepared by GHD for City and Environment Directorate and may only be used and relied on by City and Environment Directorate for the purpose agreed between GHD and City and Environment Directorate as set out in section 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than City and Environment Directorate arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer section 1.6 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

GHD has prepared this report on the basis of information provided by City and Environment Directorate and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

Accessibility of documents

If this report is required to be accessible in any other format, this can be provided by GHD upon request and at an additional cost if necessary.

1.6 Assumptions

The following assumptions have been made for the preparation of the report:

- Information on the vegetation is based on preliminary ecological a mapping published on ACTMapi.
- The layout on which this assessment is based has been provided by the client.
- It is assumed that the proposal site be managed lands and not revert to vegetated state unless otherwise specified.

1.7 Relevant documentation

In undertaking this bushfire risk assessment, the following has been considered:

- *Planning and Development Act 2007.*
- *Emergencies Act 2004.*
- ACT Strategic Bushfire Management Plan 2019 (SBMP v4).
- ACT Bushfire Management Standards 2023 (BMS).
- Australian Standard 3959-2018 (AS 3959-2018) Construction of buildings in bushfire-prone areas.

2. Bushfire assessment

2.1 Siting and landscape context

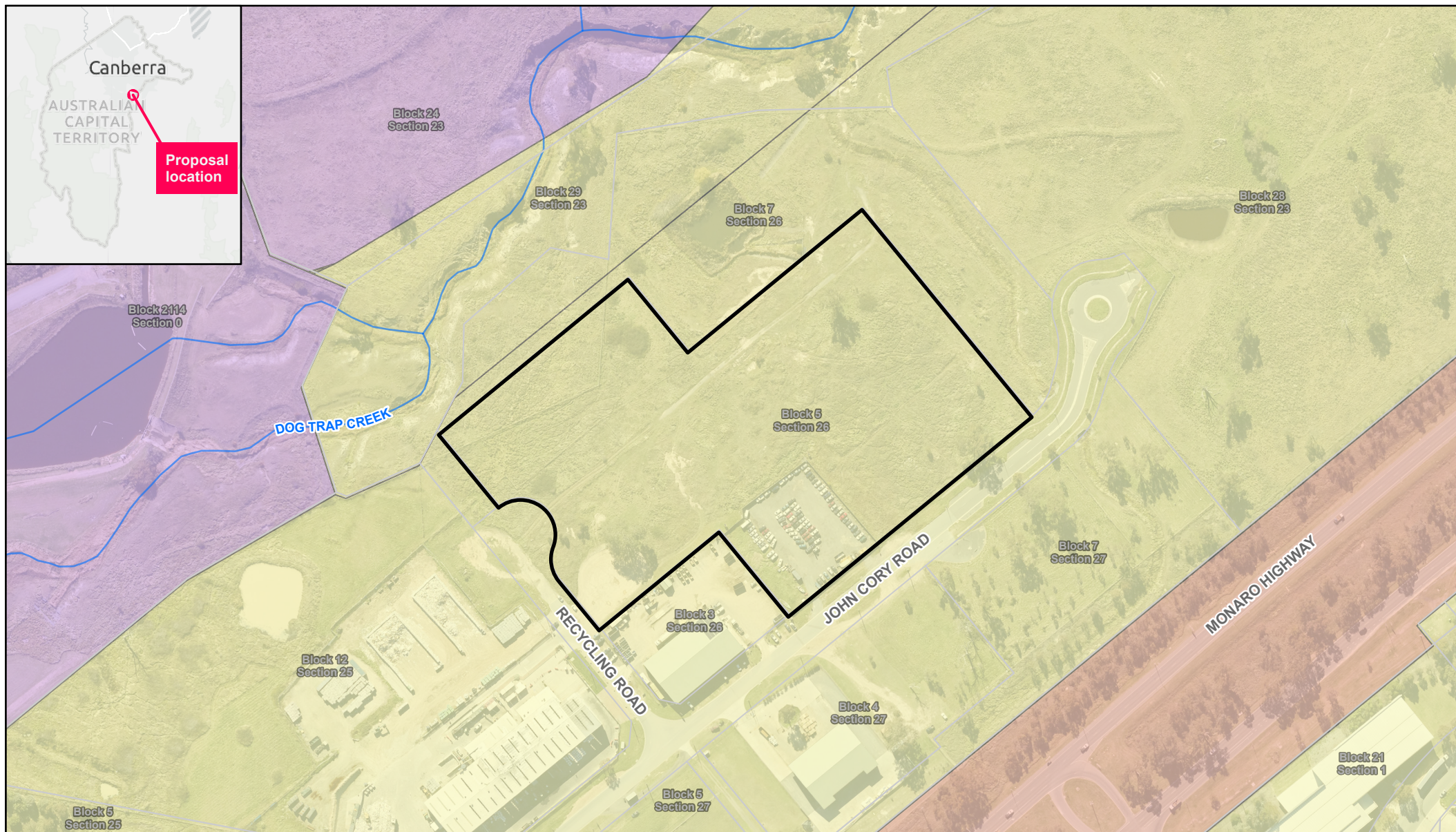
The proposal site (Block 5, Section 26, Hume) is located to the north of the Monaro Highway bordering Recycling Road and John Cory Road. The proposal site is located approximately 12.5 km south of Canberra City with the surrounding area predominately occupied by industrial (IZ1: General Industry) and rural (NUZ1: Broadacre) land use, as shown in Figure 2.

2.2 Vegetation

The existing mapped vegetation for the proposal site and surrounding land is shown in Figure 3, showing predominantly grassland vegetation, with a small portion of open woodland present adjacent John Cory Road to the southeast.

2.3 Effective slope

Effective slope describes the slope underneath the vegetation considered to form the bushfire hazard, not between the proposal site and the vegetation. The effective slope was assessed using Australian Height Datum contours on ACTmapi (Act Government, 2025). The effective slope to the southeast of the proposal site is classed as upslope/flat while the effective slope in all other directions was downslope >0-5 degrees.



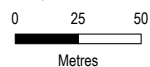
Legend

- Proposal site
- Cadastre
- Watercourses

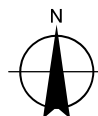
Land use

- Broadacre
- Designated
- General industry

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Map Projection: Transverse Mercator
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Grid: GDA 1994 MGA Zone 55

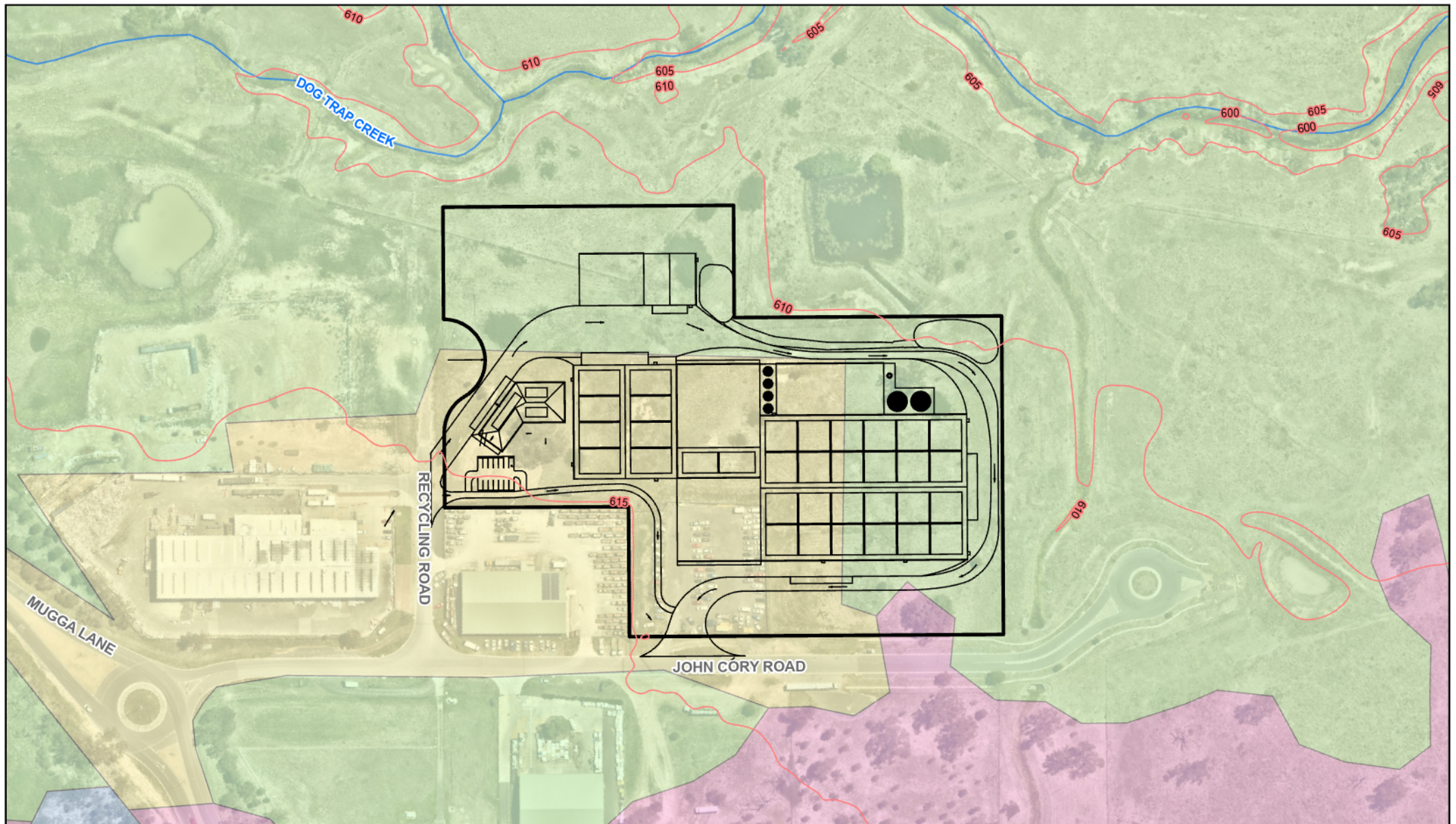


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Surrounding land use

FIGURE 2



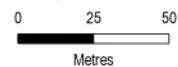
Legend

- Proposal site
- Proposal site layout
- Watercourses
- Contours (5m) 2015

Vegetation

- Grassland
- Planting
- Urban
- Woodland

Paper Size ISO A4



Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 55



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Surrounding vegetation bushfire hazard

FIGURE 3

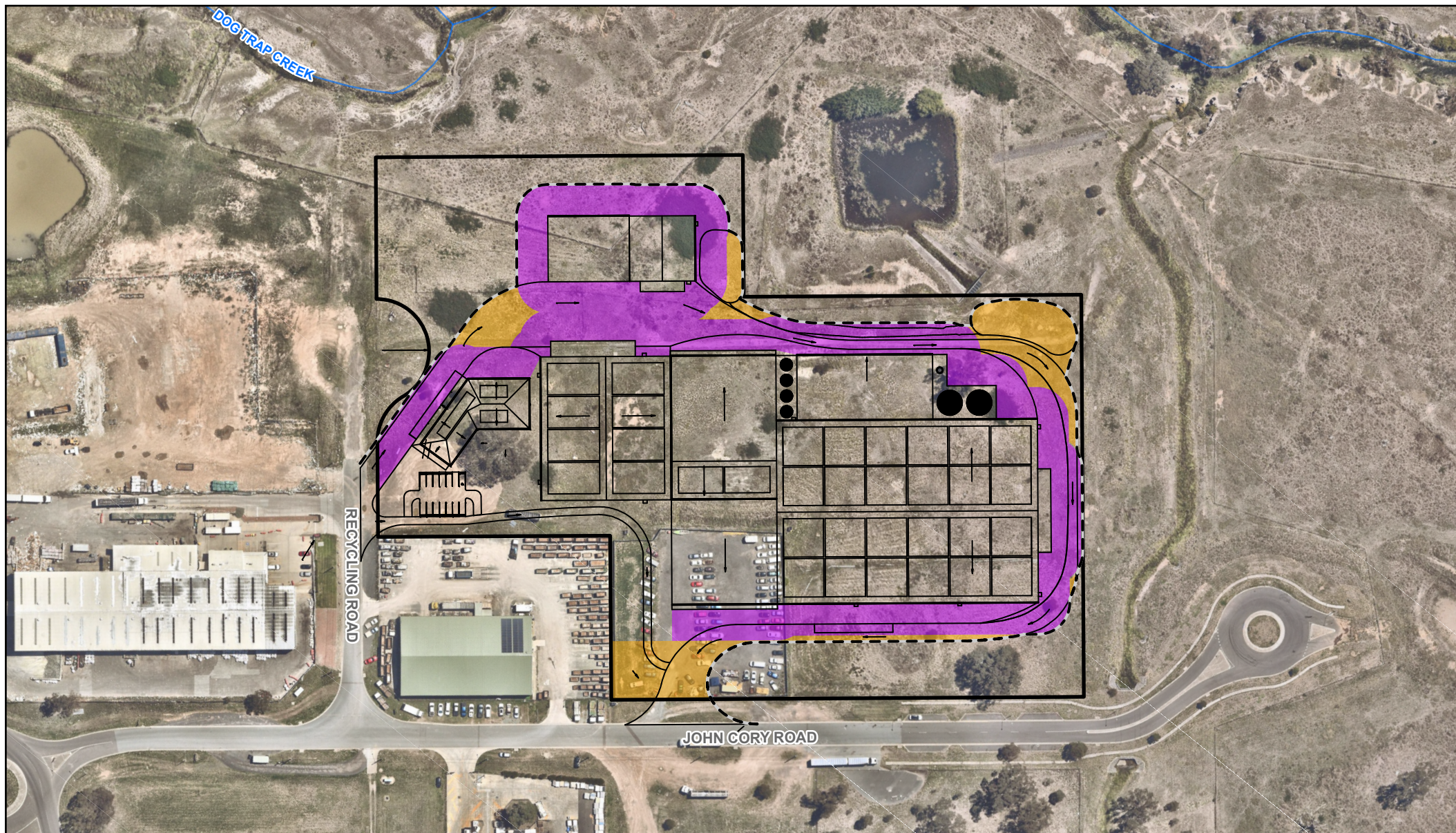
3. Bushfire protection measures

3.1 Asset protection zones

The proposal site is currently mapped as a Bushfire Prone Area by the ACT ESA, (Act Government, 2025), and the following assessment is undertaken in accordance with the BMS Section 8 and Method 1 of AS 3959-2018. APZ requirements for the proposal are provided in Table 1 with an indication of the separation distances shown in Figure 4.

Table 1 *Asset Protection Zone requirements (m)*

Aspect	Vegetation type (BMS)	Location	Effective slope	Required APZ (m)	Comment
Northeast	Grassland	NE of the maturation and refinement building.	Downslope >0-5°	12	Within site boundary
Northwest	Grassland	NW of the primary composting building and truck parking and product storage.	Downslope >0-5°	12	Within site boundary
Southeast	Grassy woodland	Between the maturation and refinement building and John Cory Road.	Upslope/flat	12	Within site boundary
West	Grassland	W of the admin building towards Block 6 Section 26 Hume District.	Downslope >0-5°	12	Within site boundary



Legend

- Proposal site
- Proposal site layout
- Hazard interface
- Watercourses
- Available APZ
- Required APZ

Paper Size ISO A4
0 25 50
Metres

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 55



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Asset protection zone

FIGURE 4

3.2 Access and egress

Primary access to the proposal would be provided via both Recycling Road and John Cory Road (see Figure 1). The access road proposed for the FOGO facility is designed for use by semi-trailer vehicles and would meet the applicable access requirements detailed in Table 14 of the BMS through design. This includes:

- Property access roads to be two-wheel drive, all-weather roads.
- Capacity of the road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles.
- Hydrants are to be provided in accordance with the relevant clauses of AS 2419.1 and ESA requirements.
- There is to be suitable access for a fire appliance to within 4 m of the static water supply where no reticulated supply is available.
- While there is no perimeter access provided for the northern exposure of the product storage and truck parking workshop to the north of the site, the proposed APZ would be trafficable for emergency response appliances in the event of a fire from that aspect.

3.3 Water supply

The proposal would be serviced by reticulated water supply. ICON Water supplied reticulated water supply would be connected to the proposal meeting acceptable solutions of the BMS and complying with *Utilities Act 2000*. Installation of fire hydrants spacing, sizing and pressure would comply with AS2419.1:2019. Hydrants would be accessible (i.e. outside parking bays or within the access road) and suitably spaced. Additionally, all above ground water service pipes external to the building will be metal, including taps.

The proposal would also be fitted with an internal automatic fire sprinkler system.

Static water supply is also available in the form of two stormwater ponds proposed within the proposal site as well as a number of ponds and dams in the surrounding landscape.

3.4 Utilities

Gas is not proposed to be used on the proposal site.

Electrical servicing for the proposal site would be provided via overhead power lines. Overhead powerlines would be kept clear of existing vegetation with no part of a tree closer than the distance set out on Evoenergy's website¹ as per the BMS. To meet the standards set out in BMS pole spacing should be short (30 metres) unless crossing gullies, gorges or riparian areas. Consultation with the service provider is recommended for any new overhead powerlines.

3.5 Construction standards

Whilst bushfire is not captured in the National Construction Standards (NCC) for Class 5-8 buildings, the BMS applies the general fire safety construction provisions of the NCC as acceptable solutions however, requirements for bushfire protection are required to be assessed on a case-by-case basis.

The proposed FOGO facility falls into the Class 5-8 building definition.

Based on the proposed layout using a Fire Danger Index of 100 for the ACT, the indicative Bushfire Attack Levels (BAL) for the proposal is indicated in Table 2 and shown in Figure 5.

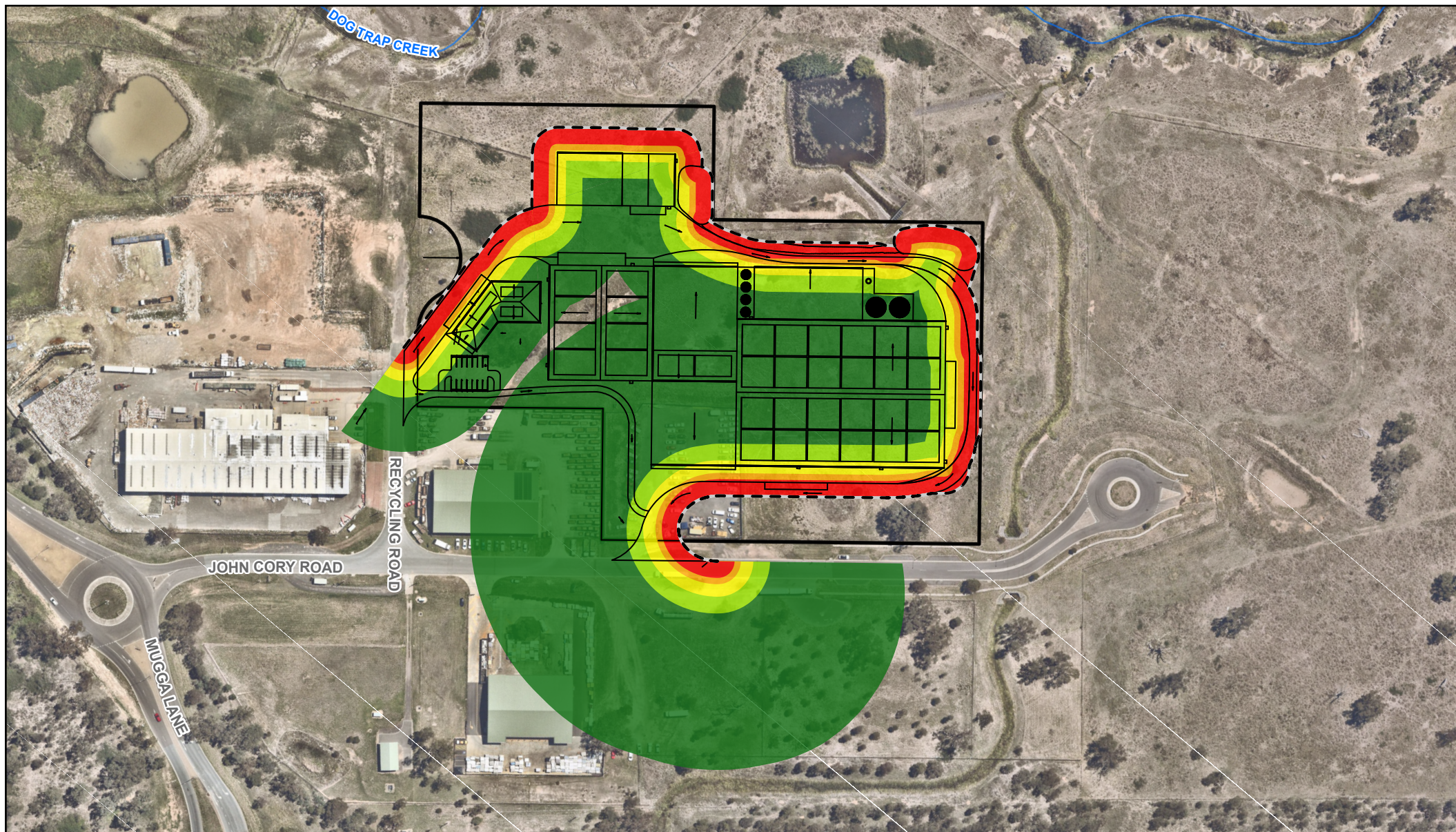
There is an opportunity to manage the proposal site to the boundary with landscaping in accordance with Appendix 4 of the BMS as outlined in Section 3.7 to reduce the BAL exposure of the buildings thereby reducing the construction requirements of the product storage and truck parking workshop, primary composting building and the biofilter and ancillary infrastructure building to BAL-19 or less.

¹ <https://www.evoenergy.com.au/residents/trees-and-powerlines>

Table 2 *Indicative Bushfire Attack Levels for the proposal*

Aspect	Vegetation	Slope	BAL (AS 3959)
Northeast	Grassland	Downslope 0-5°	29
Northwest	Grassland	Downslope 0-5°	29
Southeast	Grassy Woodland	Upslope/flat	29
West	Grassland	Downslope 0-5°	29

All fences and gates are to be constructed of non-combustible materials in compliance with Section 7.5 of the BMS.



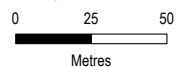
Legend

- Proposal site
- Proposal site layout
- Hazard interface
- Watercourses

BAL

- 12.5
- 19
- 29
- 40
- FZ

Paper Size ISO A4



Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 55



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Bushfire attack level (BAL)

FIGURE 5

3.6 Storage risk mitigation

Fires at composting facilities can occur under certain conditions if internal heat builds up to ignition point. Fires can be caused by human error (e.g. carelessly disregarding a cigarette), improper procedures (e.g. a welding spark from doing a repair next to a stockpile), lightning, arson, spontaneous combustion and bushfires. A number of these causes can be addressed through operational planning and bushfire preparedness planning and should form part of the emergency and evacuation planning for the proposal site.

Key conditions that lead to spontaneous combustion are biological activity, relatively dry materials or dry pockets, large well-insulated piles, limited or low air flow, and time for temperature to build up. The ignition point for compost is 150-200 degrees Celsius². In addition, there may be other contributing factors such as a nonuniform mix of materials, poor moisture distribution, difficulty in knowing temperatures throughout a pile, and sometimes a lapse or oversight in monitoring.

The *Fire safety guideline – Fire safety in waste facilities* (NSW Fire and Rescue 2020) provides guidance to manage fire risk, for fire prevention through effective storage management, monitoring hazards and implementing policies and procedures to be considered in the development of bushfire mitigation and operational plans for waste facilities with hazardous material. However, the guideline does not apply to any waste facility, or areas of, that are being used for composting, including in-vessel, green waste and anaerobic digestion and therefore does not apply in this instance.

3.7 Landscaping

Any proposed landscaping and management of open spaces or residual areas is required to consider bushfire risk in determining location, species, density, extent and ongoing maintenance. All open space within the proposal site would undergo management to meet APZ or low hazard standards under AS3959-2018.

The proposed APZ may require tree removal to support the proposal however the proposal site is predominantly cleared. Fuel management practices to be implemented by the proposal site operator within the APZ (both within the licence area and outside to the west and northeast) shall be as follows in accord with the ACT BMS:

All APZs will require regular slashing of grass fuels to a maximum height of 200 mm before the start of the bushfire season (generally 1st October) and maintained at this maximum height when grassland curing is ≥ 70 per cent.

When establishing and maintaining an APZ the following requirements apply as defined in Appendix 4 of BMS:

- Trees:
 - Canopy cover should be less than 15% (at maturity).
 - Trees (at maturity) should not touch or overhang the building.
 - Lower limbs should be removed up to a height of two metres above ground.
 - Tree canopies should be separated by two to five metres.
 - Preference should be given to smooth barked and evergreen trees.
- Shrubs:
 - Create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided.
 - Shrubs should not be located under trees.
 - Shrubs should not form more than 10% ground cover.
 - Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
- Grass:
 - Grassland maintained at ≤ 200 millimetres height when grassland curing is $\geq 70\%$.
 - Grass should be kept mown.

² www.tcforensic.com.au/docs/article10.html

- Leaves and vegetation debris should be removed.

Other principles that should be considered and incorporated where possible include:

- Avoid creating fuel ladders (shrubs, bark, dropped branches, leaves etc.).
- Select suitable plants (low flammability, avoid dense and elevated fine fuels).
- No plants near vulnerable building components (windows, decks).

3.8 Emergency management planning

An emergency management plan for the proposal would be required to be developed prior to the operation and occupancy of the proposal site. These plans should clearly identify bushfire preparedness actions, bushfire response actions, evacuation plans and procedures (for onsite and offsite evacuation), on-site refuge locations.

There is a risk to users of the proposed facility, particularly on days of elevated fire danger. Therefore, it is proposed that a usage restriction be placed on the proposal site and the public access to the facility such that occupation is limited to essential staff only on days where the Fire Danger Rating is forecast to be Catastrophic and potentially at lower levels depending on risk and advice from relevant authorities.

4. Compliance with BMS

The bushfire protection measures, and standard identified in this report are guided by the acceptable solutions for each performance measure within Section 7.4 of BMS 2023.

Measure	Acceptable solutions	Compliance
Asset Protection Zones	– An APZ is provided in accordance with Table 20 in Appendix 1 of BMS – APZs are managed in accordance with the requirements of Appendix 4 of BMS – IAPZs are wholly within the boundaries of the development site unless the adjacent land is mapped as IAPZ by the ESA. Consultation with ESA required – APZ are located on lands with a slope less than 4 degrees	Complies The APZ is to be provided in accordance with Table 20 of BMS. The APZ is wholly within the boundaries of the development site.
Access	– Property access roads are two-wheel drive, all-weather roads – The capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles – Hydrants are provided in accordance with the relevant clauses of AS 2419.1 and ESA requirements – There is suitable access for a fire appliance to within 4m of the static water supply where no reticulated supply is available	Complies Property access roads are two-wheel drive all weather roads designed for semi-trailer use sufficient for full loaded firefighting vehicles meeting acceptable solutions of the BMS. The APZ to the north of the Product storage and truck parking workshop will be trafficable for firefighting appliances.
Water supplies	– Reticulated water is to be provided to the development, where available; and – A static water supply is provided where no reticulated water is available – Fire hydrant spacing, design and sizing comply with the relevant clauses of AS2419.1 and ESA requirements – Hydrants are not located within any road carriageway – Fire hydrant flows and pressures comply with the relevant clauses of AS2419.1 and ESA requirements – All above-ground water service pipes external to the building are metal, including and up to any taps	Complies ICON Water would supply reticulated water to the proposed FOGO facility meeting acceptable solutions of the BMS

Measure	Acceptable solutions	Compliance
Electricity services	- Where practicable, electrical transmission lines are underground; and - Where overhead, electrical transmission lines are proposed as follows: - Lines are installed with short pole spacing (30m), unless crossing gullies, gorges, or riparian areas; and - No part of a tree is closer to a power line than the distance set out in accordance with the specifications in evoenergy's website³.	Can comply Electrical transmission lines are proposed to be overhead. The requirements of overhead powerlines described in Table 14 of the BMS can be met through design in consultation with the service provider.
Construction standards	- BAL is determined in accordance with Table 21 of BMS - Fencing and gates are constructed in accordance with Section 7.5 of BMS - Class 10a buildings are constructed in accordance with Section 8.3.2 of the BMS	Can comply BAL determined in accordance with Table 21 of the BMS is presented in Table 2 and Figure 5. Fences and gates are to be compliant through design and constructed of non-combustible materials. There are no bushfire requirements for the Class 10a building as it is greater than 6m from the other buildings.
Landscaping	Compliance with the ACTESA 'Asset protection zone standards' (see Appendix 4 of BMS)	Can comply Landscaping of areas within the APZ are to be managed in accordance with Appendix 4 of BMS In addition it is recommended that all grassland vegetation throughout the proposal site is kept to a height $\leq 200\text{mm}$ when grass curing is $\geq 70\%$.

5. Recommendations and conclusion

5.1 Recommendations

The Development Application is required to address bushfire prevention measures identified within this report and summarised below:

Recommendation 1: APZs are to be provided in accordance with Table 1, with the APZ to the north of the product storage and truck parking workshop to be trafficable for firefighting appliances.

Recommendation 2: Overhead electrical transmission lines are to be installed with short pole spacing (30 metres) and away from vegetation in line with BMS. Consultation with the electrical transmission line service provider is undertaken to ensure the overhead electrical transmission.

Recommendation 3: Construction requirements to be implemented in design and construction under NCC to the BAL presented in Table 2. Alternatively, the proposal site can be managed to the landscaping requirements of Appendix 4 of the BMS to the proposal site boundary to reduce the BAL exposure of the buildings thereby reducing the construction requirements of the primary composting and biofilter and ancillary infrastructure buildings.

³ <https://www.evoenergy.com.au/residents/trees-and-powerlines>

Recommendation 4: APZ landscaping is to comply with the ACT BMS Appendix 4 and be guided by the fuel management principles. These will be managed by the proposal site operator.

Recommendation 5: Emergency and evacuation plans should be developed prior to construction, operation, and occupancy of the proposed facility as summarised in Section 3.8. A copy of the Bush Fire Emergency Management and Evacuation Plan should be provided to ACT ESA for its information prior to occupation of the development.

5.2 Conclusion

It is considered that the proposal can comply with all bushfire planning requirements if the above recommendations are incorporated.

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