MT GELLIBRAND WIND FARM
BUSHFIRE MITIGATION PLAN



CONTROL

PREPARED BY	REVIEWED BY	APPROVED BY
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04-12-2025	04-12-2025	08-12-2025
[SIGNATURE]	*[SIGNATURE]*	*[SIGNATURE]*

*The signed original is kept by **ACCIONA**.*

RECORD OF CHANGES

REV.	DATE	DESCRIPTION
01	21/05/2018	Initial release
02	14/10/2020	General update. Inclusion of planning permit requirements and CFA acknowledgment of Plan.
03	08/12/2025	Template and general revision. CFA reviewed and signed.

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1. ACKNOWLEDGEMENTS

MGWF has planning approval with permit number PL-SP/05/0257 (henceforth, Planning Permit) issued under the Colac Otway planning scheme.

It is a requirement of the Planning Permit under Section *s12(D)* that MGWF must prepare and review a wildfire and emergency prevention and response plan (henceforth, Bushfire Mitigation Plan or BMP). Under subsection s12(D)(i) of the Planning Permit the BMP must be reviewed and updated at least every five (5) years in consultation with the CFA.

This MGWF BMP was reviewed in consultation with

the CFA: On the; 27 / 10 / 2025

And with;



Peter Lockwood LLB

CFA District 6 South
West Region
Acting Assistant Chief Fire Officer

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2. PURPOSE

Acciona Energia (**AE**) has developed this Plan to support the Site's Environmental Management Plan, the Emergency Response Plan and as a requirement of the Mt Gellibrand Wind Farm Planning Permit PL-SP/05/0257 issued under the Colac Otway planning scheme. Specifically, this Permit requires that *the Plan must be reviewed and updated at least every five (5) years in consultation with the Country Fire Authority.*

3. SCOPE

The scope of this document is limited to Site's assets and associated operational and maintenance practices undertaken at Site.

4. OBJECTIVE

AE is committed to reducing the risk of ignition from assets or practices under its control. This continues to be achieved by the application of various techniques including:

- an asset inspection program
- proactive operation and maintenance activities to reduce the risk of fire
- monitoring of plant and surrounding environment
- the prompt reporting of fires
- the safe and quick response for fire extinguishment

5. DEFINITIONS

TERM	DEFINITION
BMP	Bushfire Mitigation Plan (this Plan)
CFA	Country Fire Authority
DEECA	Department of Energy, Environment and Climate Action
EMP	Environmental Management Plan
ERP	Emergency Response Plan
FRV	Fire Rescue Victoria
HSEQ	Health Safety Environment Quality
MGWF	Mt Gellibrand Wind Farm
Plan	This document the MGWF Bushfire Mititation Plan
Site	MGWF
WTG	Wind Turbine Generator

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6. RESPONSIBILITIES

POSITION	RESPONSIBILITIES
GENERAL MANAGER, SOUTHERN OPERATIONS	Responsible for compliance with this Plan
SITE MANAGER	Responsible for the delivery of actions identified within this Plan
HEALTH AND SAFETY REPRESENTATIVE	As defined by relevant O&HS legislation
COMMUNITY & STAKEHOLDER ENGAGEMENT	The distribution of this Plan to relevant external stakeholders

7. DISTRIBUTION LIST

ROLE	DISTRIBUTION METHOD (EMAIL, WEBSITE, INTERNAL ETC…)
GENERAL MANAGER, OPERATIONS	INTERNAL
SITE MANAGER	INTERNAL
HEALTH AND SAFETY REPRESENTATIVE	INTERNAL
COMMUNITY & STAKEHOLDER ENGAGEMENT	INTERNAL
EXTERNAL WEBSITE UPDATE	WWW.COMMUNITY.ACCIONA.COM.AU/MT-GELLIBRAND
CFA DISTRICT 06 COMMANDER (Southwest Region)	ADMIN.D06@CFA.VIC.GOV.AU

8. SETTING

8.1. SITE DESCRIPTION

Acciona Energia is the operator of the Mt Gellibrand Wind Farm located on land approximately 10km North of the Victorian township of Birregurra and 22 kilometers northeast of Colac.

The farm consists of 44 wind turbines, generating 132 MW of clean energy and has been operational since 2018. It produces the energy equivalent to the demand from around 90,000 homes. The farm is constructed on cleared, undulating land, which is of mixed farming country. The location was selected due to the high exposure to consistent winds and proximity to the transmission network utilized to connect to the national grid.

The sites aerial photo details and other pertinent information is found in Appendix B.

Whilst constructed on cleared and undulating land, the site has been defined by local government as a Bushfire Prone Area within CFA District area:

- CFA District 06 – Southwest District

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8.2. ASSET DESCRIPTION

The key assets located at the Site are outlined in the table below.

NUMBER OF UNITS	ASSET	DESCRIPTION
1	Substation	The Substation collects the underground cables from the transformer kiosks to a single point so that it can be stepped up to a higher voltage (66 kV) and then connected to the switching station. The main substation has (2) power transformers each rated at 75MVA and step up the voltage from 33kV to 66kV and connect to the Powercor Network. The main substation also has one switch building, which has separate, adjoining rooms for the 33kV indoor switchgear, the AC/DC power supplies and control equipment and an additional room to be used and accessed only by the network utility owner, Powercor. The substation includes fully bunded foundations, pumping and oil/water separator facilities. The high voltage switchgear within the transformer yard is fully enclosed and insulated with SF6 gas and lightning protection.
44	Wind Turbine Generator (**WTG**) AW3150	WTG's have a nominal generating capacity of 3 MW and comprise of a rotor (diameter 125m) and nacelle mounted on tall, tapered steel towers 87.5m above the ground. The electrical generator itself is located within the nacelle at the top of the tower and the stator operates at 12 kV. Other control and utility circuits also operate within the nacelle but at lower voltages. Thermal monitoring equipment, mechanical gearbox and hydraulic circuits with their associated hydraulic fluids and lubricating greases and oils are also located within the nacelle. The WTG's high voltage switchgear is located at the door ground level and is fused and insulated with SF6 gas.
44	Kiosk transformers 12/33kV	Transformers are oil filled and located adjacent to each WTG. The kiosk transformers connect the WTG to the 33kV underground reticulation collection system. All 44 turbines are connected to step up 12/33kV kiosk transformers located adjacent to each turbine. The kiosk consists of the transformer and 33kV protection switchgear. The transformer and switchgear are installed into a metallic enclosure known as the kiosk.
3	Met Masts	Meterolgical masts are strategicly located around site and have a height of 87.5m

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NUMBER OF UNITS	ASSET	DESCRIPTION
1	Operations and Maintenance facility	Facility contains offices, warehouse, and a base for all operational and maintenance activities on Site
Various	Underground cable	The Site's internal electrical reticulated system is underground, operating a 12kV connection from turbine internal switchgear to kiosk transformer and then at 33kV from the kiosk to one main 33/66kV substation. The underground power cables are buried at depth in trenches. Protective plates and warning tapes are laid at various depths to protect the cable and warn any ground disturbance activities of the presence of the cable. The cables themselves are heavily insulated, armoured, shielded and registerd with Before You Dig Australia.
0	Overhead powerlines	There are no overhead power lines under the Site's control.

9. BUSHFIRE PREVENTION AND MITIGATION

This Plan outlines specific strategies and programmes to prevent and mitigate fires at the Site. This section lists the adopted preventative strategies and programmes to mitigate the risk of bushfire. The works required for each strategy are outlined below and are guided by Acciona's Risk Management procedures.

ACCIONA Energy has identified scenarios that could give rise to fire ignition:

- Contact by person(s) and/or equipment of energised equipment
- Contact by vegetation of energised equipment
- Mechanical or electrical failure of plant or equipment
- Open air operational activities (e.g. vehicle exhausts, and hot works etc).
- Smoking
- Lightening
- Criminal acts

The preventative strategies to reduce the risk of a fire starting onsite include:

- Regular inspection and maintenance of the site's assets, equipment, tools, and vehicles
- Fuel reduction management in proximity to identified assets
- Procedures and processes for site access and restricted / controlled activities for personnel onsite
- Physical barriers (fences) to restrict personnel
- Increased management during elevated fire risk conditions
- Utilisation of trained personnel to implement controls

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The mitigative strategies to reduce the risk of a small fire becoming a larger fire include:

- Maintain and implement a site emergency response plans
- Inform and assist first responders including fire control agencies in the management and investigation of fires on site
- Maintain limited and basic fire fighting and response equipment on site
- Utilisation of trained personnel to implement controls

ACCIONA also welcomes the local Country Fire Authority to participate in regular site familiarisation and exercises on the Site to improve their members knowledge.

9.1. ASSET STRATEGIES

The table below outlines some of the specific strategies to be implemented against each onsite asset.

ASSET	ACCESS	MAINTENANCE	INSPECTION
Substation	General site access controls and yard access is fenced, access is restricted, and gates locked. Fences are signed as per Australian Standards	Works are conducted in accordance with relevant procedures and policies. Plant and equipment maintained in good working order. Substation yard is covered with rock and regular weed management undertaken (either chemical and or mechanical). Bunds in place and free from fuel. Aerial conductors is installed, maintained and functional. Lightning protection is installed maintained and functional. Fuel reduction area of 1m from the yards fence line is maintained.	**Quarterly – housekeeping inspection. Scope:** - fence, gates, locks and signage inplace - asset is tidy and free from litter, fuel, vegetation and/or bird nests - bunding is free from fuel - other visible defects noted and actioned/escalated as required
Wind Turbine Generator (WTG) AW3150	General site access controls and WTG access is restricted, and doors locked. WTG's are signed as per Australian Standards	Works are conducted in accordance with relevant procedures and policies. Plant and equipment maintained in good working order. 2m around the WTG base is covered with rock and regular weed management undertaken (either	**6 Monthly – Preventative Service Inspection.** Scope: - doors locked and signage inplace - fuel reduction area of 2m from the base of WTG - asset is tidy and free from litter, fuel, and/or bird nests - other visible defects noted and actioned/escalated as

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ASSET	ACCESS	MAINTENANCE	INSPECTION
		chemical and/or mechanical). Lightning protection is installed maintained and functional.	required
Kiosk transformers 12/33kV	General site access controls and Koisk access is restricted, and doors locked. Koisk's are signed as per Australian Standards	Works are conducted in accordance with relevant procedures and policies. Plant and equipment maintained in good working order. 2m around the WTG base is covered with rock and regular weed management undertaken (either chemical and/or mechanical). Lightning protection is installed maintained and functional.	**Annual – Preventative Service Inspection.** Scope: - doors locked and signage inplace - fuel reduction area of 2m from the base of WTG - asset is tidy and free from litter, fuel, and/or bird nests - other visible defects noted and actioned/escalated as required
Met Masts (live only)	General site access controls and electrical cabinet door locked.	Works are conducted in accordance with relevant procedures and policies.	**Six monhtly – housekeeping inspection.** Scope: - doors locked and signage inplace - fuel reduction area of 2m from the base of the masts electrical cabinet - asset is tidy and free from litter, fuel, and/or bird nests - other visible defects noted and actioned/escalated as required
Operations and Maintenance facility	General site access controls, compound is locked after normal business hours.	Works are conducted in accordance with relevant procedures and policies. Regular building maintenance is conducted periodically and in accordance with relevant standards.	**Six monhtly – housekeeping inspection.** Housekeeping and compliance is managed through routine inspections and audits.
Underground cable	Excavations control by Permit to Work System	Active maintenance is not applicable as it's aburied asset.	N/A

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ASSET	ACCESS	MAINTENANCE	INSPECTION
	Asset registered with Before Your Dig Australia.		
Overhead powerlines	N/A	N/A	N/A

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9.2. OTHER PREVENTATIVE STRATEGIES

Smoking. Discarded cigerrets pose an ignition risk. Smoking on site is restricted. Areas where smoking is permitted are defined in the Site induction.

Service vehicles. Vehicles with hot exhausts and brakes pose an ignition risk. Drivers are to ensure their vehicles comply with relevant CFA legislation during the Fire Danger Period. That is to:

- always keep their vehicle in good mechanical order
- use formed roads to limit contact with curing/cured grass or crops.

Plant and heavy vehicles. These are vehicles such as road maintenance machinery or grass slashing equipment that pose an ignition risk. Drivers are to ensure their vehicles comply with relevant CFA legislation during the Fire Danger Period. That is to:

- ensure the vehicle is in proper working order and free from faults or defects that could cause an outbreak of fire
- be fitted with a spark arrester that complies with AS 1019
- carry prescribed fire suppression equipment. Which includes:
  - A fully charged knapsack with not less than 9 litres of water; **AND**
  - A fully charged water (stored pressure) fire extinguisher that is fully changed and maintained

Hot Works. Hot works such as cutting, grinding and welding pose an ignition risk. Hot works are conducted in accordance with the Hot Works Procedure. Hot works are not permitted during catastrophic fire danger and / or Total Fire Ban days as declared by the CFA; unless permitted, in writing by CFA, FRV or DEECA through Fire Permits Victoria (https://firepermits.vic.gov.au/).

Criminal Act. Criminal acts may include but are not limited to arson, malicious damage to plant or vehicle incidents. The site is fenced by farm fencing with the substation and facility surrounded by security fencing. Limited alarms are utilised onsite and are connected to the remote operating center.

9.3. FIRE FIGHTING EQUIPMENT

Basic firefighting equipment is retained onsite to extinguish small fires. The equipment to be provided, maintained onsite include:

- Service vehicles
  - Vehicle mounted fire extinguisher
  - First aid kit
- Plant and heavy equipment
  - A fully charged knapsack with not less than 9 litres of water; AND
  - A fully charged water (stored pressure) fire extinguisher that is fully changed and maintained
- Substations hold
  - At least one 5 kg ABE powder-type, stored pressure fire extinguisher
- Operations and Maintenance Facility
  - Water Pump Trailer
  - Extinguishers (various)
  - Water tanks (2 x 22500 litre) – general site use (No CFA Connection point installed)

9.4. TRAINING

Firefighting is only to be attempted by personnel after they have reported the fire and then only if it is safe to do so. Personnel shall have completed the following basic training, which is regularly refreshed.

Basic 'Fire Awareness' training which comprises of the following:

- Identification of risks & hazards
- Fire combustion and fire spread
- Fire prevention and extinguishment techniques
- Scenario-based practice exercise

10. MANAGEMENT DURING ELEVATED FIRE RISK CONDITIONS

Acciona Energia takes a tiered approach to the management of fire risk which is generally informed by government bodies such as the Bureau of Meteorology, the Country Fire Authority and the Colac Otway Shire.

Prior to the Fire Danger Period being declared by the CFA Acciona undertakes the following summer readiness review activities with the intent of reducing risk as the summer period approaches verification that:

- vehicles and buildings are appropriately stocked with serviced extinguishers, first aid kits and communication devices
- grass and fuel levels are managed around onsite buildings
- relevant Emergency Response Plan exercises have been scheduled
- onsite personnel qualification and training is reviewed
- liaison with local brigades (consider site familiarization, site use for exercise etc…)

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When a **catastrophic fire danger rating** and/or **Total Fire Ban**, is declared by the CFA, Acciona Energia will with the intent of reducing fire risk:

- the site manager to consider risk and thus work locations
- vehicle operators to be confined to formed roadways
- hot works are not permitted (unless a written exception has been sought and received from CFA, FRV or DEECA)

When site personnel become aware of a **fire event in proximity to the site**, Acciona Engeria will review the prevailing conditions and advice from the CFA to consider the following:

- activating the Emergency Response Plan and Procedure
- relocating staff to the maintenance facility
- full site evacuation; and,
- the utilization of Acciona's remote operating center to operate the site.

11. FIRE INVESTIGATION

11.1. FIRE INCIDENTS OR NEAR MISSES

All fire incidents and near misses will be investigated by ACCIONA. The investigation will use the companies established event investigation and reporting frameworks and process to identify the cause of the fire and the actions required to reduce further occurrences on a repeat incident.

Acciona Energia provides assistance to fire control authorities, as required, including in the investigation of fire on site.

12. COMPLIANCE AND MONITORING OF THE PLAN

The primary mechanism for monitoring conformance with this plan will be through compliance inspections and the Internal Audit program.

Upon the identification of non-conformances or where further actions may be necessary,

items will be managed as per ACCIONA Energy's Non-Conformance Procedure.

12.1. IDENTIFYING DEFICIENCIES AND REVISING THE PLAN

This Plan is reviewed if there are material changes or deficiencies

identified by a variety of means such as:

- Regular review of this BMP by the Site Manager
- Reviews or recommendations by Regulators
- Audit findings
- Incidents and Investigations
- Changes in legislation, standards or industry practice, and Operational Changes.

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13. RELATED DOCUMENTATION

CODE	TITLE
	Before You Dig Australia (BYD Australia)
	CFA legislation and online guidance materials
PLN03_PAU01_GAE07006	Emergency Response Plan Operations and Maintenance
PLN01_PAU01_GAE07016_MTGWF	Mt Gellibrand Operational Environmental Management Plan (OEMP)
	Mt Gellibrand Wind Farm Planning Permit PL-SP/05/0257

***NOTE**: Complete the table with the documentation, legislation, regulations, etc. that is relevant to the document.*

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APPENDIX A – CFA RATINGS EXPLAINED

The **Fire Danger Rating** attempts to outline how a fire would behave if one started, including how difficult it would be to put out. The higher the rating, the more dangerous the conditions. The rating is a trigger to act, it is very important that readers do not confuse these ratings. This Appendix provides a brief explanation of rating system used by CFA.

CATASTROPHIC



What does it mean?

If a fire starts and takes hold, lives are likely to be lost.

- These are the most dangerous conditions for a fire.

What should I do?

For your survival, leave bushfire risk areas.

- Your life may depend on the decisions you make, even before there is a fire.
- For your survival, do not be in bushfire risk areas.
- 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.

EXTREME



What does it mean?

Fires will spread quickly and be extremely dangerous.

- These are dangerous fire conditions.
- Expect hot, dry and windy conditions.

What should I do?

Take action now to protect your life and property

- Check your bushfire plan and 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 bushfire risk areas.
- Leaving bushfire risk areas early in the day is your safest option.

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HIGH



What does it mean?

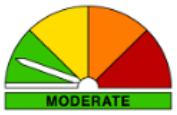
Fires can be dangerous.

What should I do?

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 property may be at risk. The safest option is to avoid bushfire risk areas.

MODERATE



What does it mean?

Most fires can be controlled.

What should I do?

Plan and prepare.

- Stay up to date and be ready to act if there is a fire.

NO RATING

The system also introduces an 'off' level for days where no proactive action is required by the community. This does not mean that fires cannot happen, but that they are not likely to move or act in a way that threatens the safety of the community. This rating is the thin white wedge on the colour wheel sitting under 'Moderate'.

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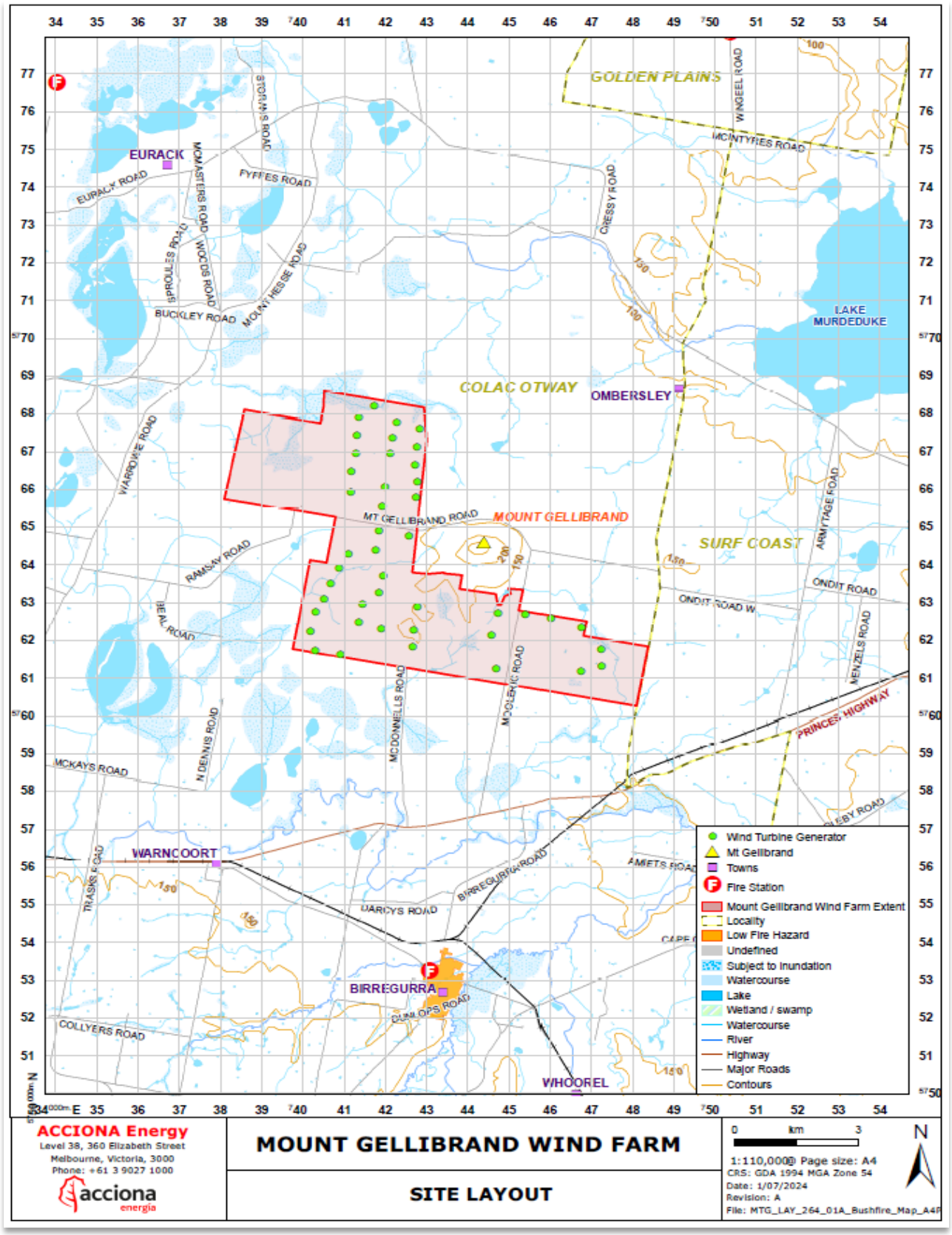
APPENDIX B – WIND FARM LOCALITY AND FACILITY MAPS



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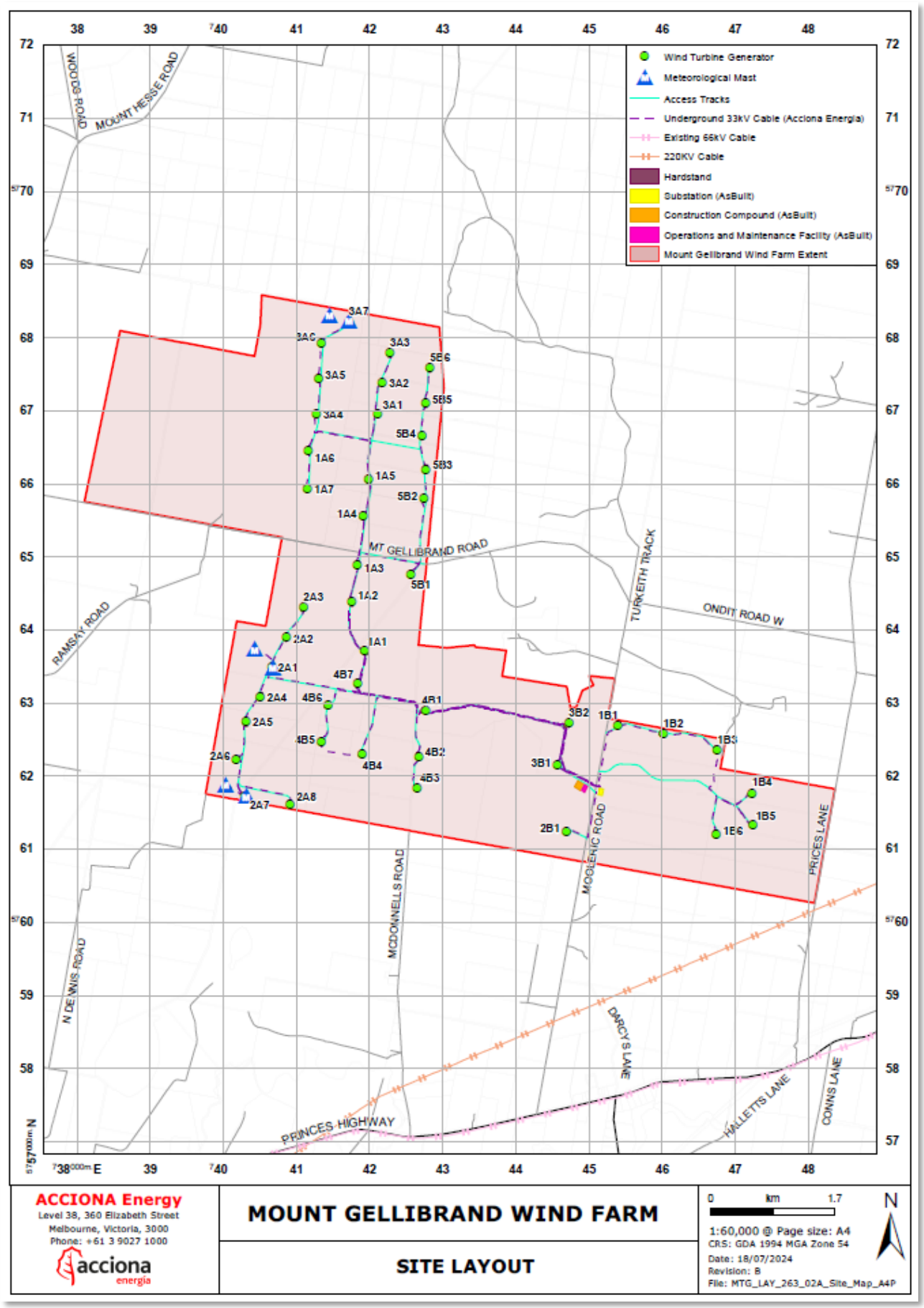

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