



Bushfire Risk Management Plan (BRMP)

COLLECTOR WIND FARM

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1.0	13/05/2021	Updated from plan prepared for CWF construction activities	Neil Weston Project Manager	Paul McDonald Operations Manager
2.0	18/07/2023	Update following C10 audit	Paul McDonald Operations Manager	Paison Sutjarit General Manager

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DEFINITIONS

The following terms are used in this document.

OEMP	Operation Environmental Management Plan
CFA	Country Fire Authority
EA	Environmental Assessment
MCoA	NSW Minister for Planning Condition of Approval
SDS	Safety Data Sheet
RFS	Rural Fire Service
The Project	Collector Wind Farm Project
WTG	Wind Turbine Generator



1 PURPOSE

The purpose of this plan is to describe how bushfire risk is managed throughout the operations and management of the Collector wind farm. Works are to be implemented in accordance with the management measures and strategies contained in this plan.

2 DOCUMENT SCOPE

This plan applies to all aspects of bushfire risk management for the project. It complies with the guidelines and/ or procedure developed by the Project for emergency preparedness and response. The target audiences for this plan are the wind farm operations & maintenance (O&M) team, subcontractors, site visitors, and any other relevant stakeholders.

The plan has been developed from the existing Bushfire Risk Management Plan prepared for the construction phase of the project; and identifies the bushfire risks which may arise due to O&M activities on site and describes protocols for responding to a fire during the operations phase.

It describes applicable and relevant:

- Minister's Conditions of Approval (MCoA) issued by the NSW Minister of Planning and Environment
- Mitigation and management commitments contained in the following assessment and planning documentation:
 - Collector Wind Farm Environmental Assessment, prepared for RATCH Australia Corporation Limited (APP Corporation, June 2012) (the EA).
 - Revised Statement of Commitments (APP Corporation, March 2013)
 - Collector Wind Farm Preferred Project and Submissions Report (APP Corporation, March 2013)
 - Collector Wind Farm Modification Report (NGH Environmental, September 2015)
 - Collector Wind Farm Submissions Report (NGH Environmental, December 2015).
 - Revised Statement of Commitments (22 July 2016)
 - Modification Application (10_0156 MOD 2) – Collector Wind Farm – NSW Rural Fire Service Letter 29 October 2018)
 - Collector Wind Farm Second Modification Report (NGH Environmental, October 2018)
 - Collector Wind Farm Submissions Report (NGH Environmental, March 2019)
 - Collector Windfarm Third Modification Application Report (NGH Environmental, July 2019)

3 REFERENCED DOCUMENTS

APP Corporation, 2012. *Collector Wind Farm Environmental Assessment*

Country Fire Association (CFA) 2015, *Emergency Management Guidelines for Wind Energy Facilities*

NSW Rural Fire Service (RFS) 2006, *Planning for Bush Fire Protection*

Southern Tablelands Zone Bush Fire Management Committee, 2009, *Southern Tablelands Bush Fire Risk Management Plan*

Upper Lachlan Shire Council (ULSC) 2009a. Regional State of the Environment Report 2004-2009: Upper Lachlan. September 2009.

Vestas Australia Wind Technology P/L, 2021, *Workplace Health & Safety Environmental Management Plan (WHSEMP)*

4 STANDARDS AND LEGISLATION

Bushfire risk management is governed and provisioned by associated legislation, regulation and guidelines as well as the committed mitigation measures and relevant State conditions of approval.

The OEMP contains details of the legislation, regulation, guidelines and standards that are relevant to the construction of the wind farm project.

4.1 Guidelines and Standards

Table 4-1 lists the non-statutory guidelines and standards that provide for bushfire risk management.

Table 4-1 Guidelines and standards

Guidelines and standards
Planning for Bushfire Protection (RFS, 2006)
Emergency Management Guidelines for Wind Energy Facilities (CFA, 2015)
Standards for Asset Protection Zones (RFS)
AS 3959 buildings in bushfire-prone areas
AS 1670 – Fire detection, warning, control and intercom systems – Control and indicating equipment

4.2 Minister’s Conditions of Approval

The MCoA relevant to this sub-plan are listed Table 4-2. A cross reference is also included to indicate where the condition is addressed in this sub-plan or other project management documents.

Table 4-2 Relevant Conditions of Approval

MCoA	Condition requirements	Section
A0	In addition to meeting the specific environmental performance criteria established under this approval, the Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, or decommissioning of the project.	Section 7
B16	The Proponent shall ensure that all Project components on site are designed, constructed and operated to minimise ignition risks, provide for asset protection consistent with relevant RFS design guidelines (Planning for Bushfire Protection 2006 and Standards for Asset Protection) and provide for necessary emergency management including appropriate fire-fighting equipment and water supplies on site to respond to a bush fire.	Sections 7, 8, 9 Annex A
B17	Throughout the operational life of the Project, the Proponent shall regularly consult with the local RFS about details of the Project, including the construction timetable, the final location of all infrastructure on the site and contact information. The Proponent shall comply with any reasonable request of the local RFS to reduce the risk of bushfire, minimise impacts on bushfire fighting operations and to enable fast access in emergencies.	Sections 7, 8, 9 Annex A
B18	The Proponent must, in consultation with the local RFS, prepare a Bushfire Risk Management Plan based on the guidelines Planning for Bushfire Protection (RFS, 2006 or its latest edition). The plan must include: <ul style="list-style-type: none"> a) Details of the bushfire hazards and risks associated with the project b) Mitigation measures including contingency plans c) Procedures and programs for liaison and regular drills with the local RFS d) Procedures for regular fire prevention inspections by the local RFS and implementation of any recommendations. 	Sections 7, 8, 9 Annex A.

5 EXISTING PROJECT ENVIRONMENT

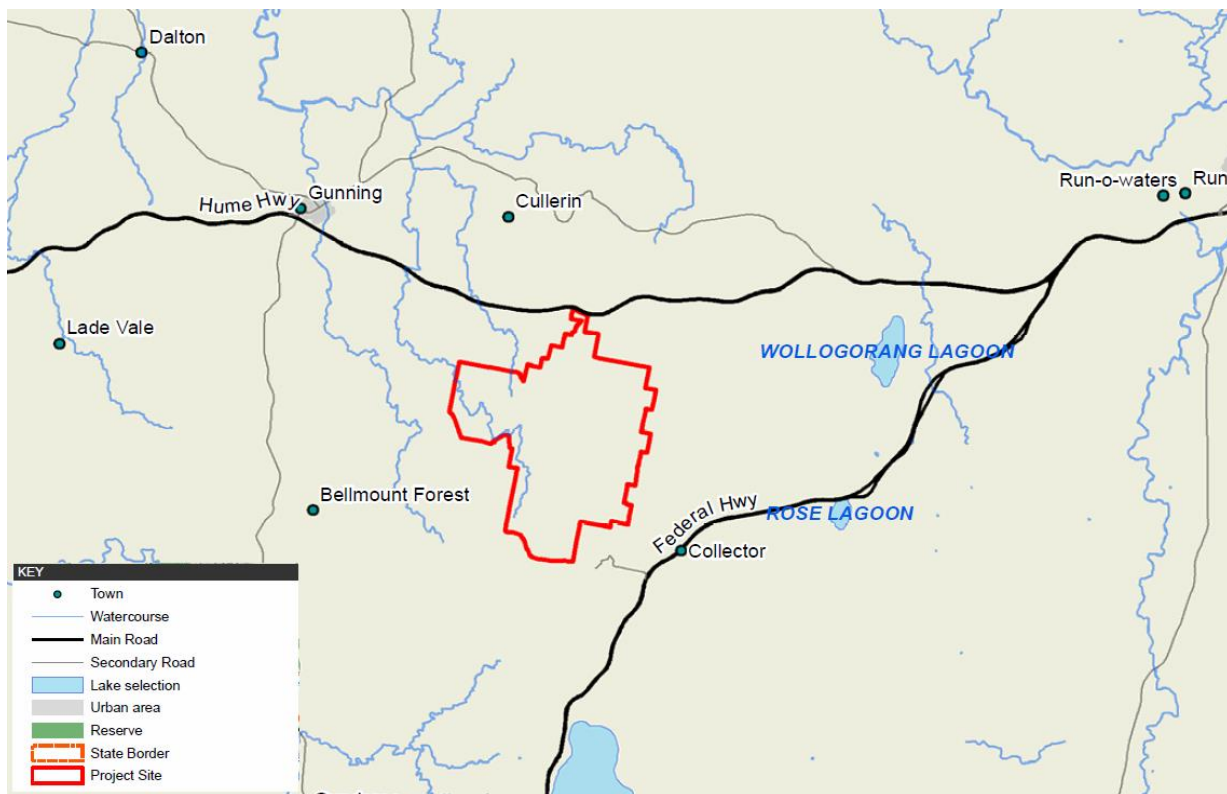
5.1 Bushfire Risk

5.1.1 Fire Season and Weather

The project site is located within the Upper Lachlan Shire (*Figure 1*) and is covered by the Southern Tablelands Bush Fire Risk Management Plan. The 'As Built' Project Layout is provided in *Figure 2* which shows the 54 turbine layout and associated infrastructure.

The bushfire season for the region is generally from October to March-April. The bushfire season is characterised by north/north westerly winds and there may also be short periods of southerly or easterly winds in the late afternoons (Southern Tablelands Zone Bush Fire Management Committee, 2009).

Figure 1-Regional project locality figure



5.1.2 Bushfire Frequency and Ignition

Bushfires within the region are most likely to start as a result of:

- lightning: the greatest source of ignition within the region
- escapes from both illegal and legal burning off: predominantly outside the fire season (between autumn and spring)
- human error: as a result of farming practices or cigarette butts
- arson: largely in urban areas and around rubbish tips.

No fires have been identified as occurring within or near the project site in the past 35 years. Historically bushfires have been largely restricted to areas containing extensive forest / woodland to the east of Goulburn,

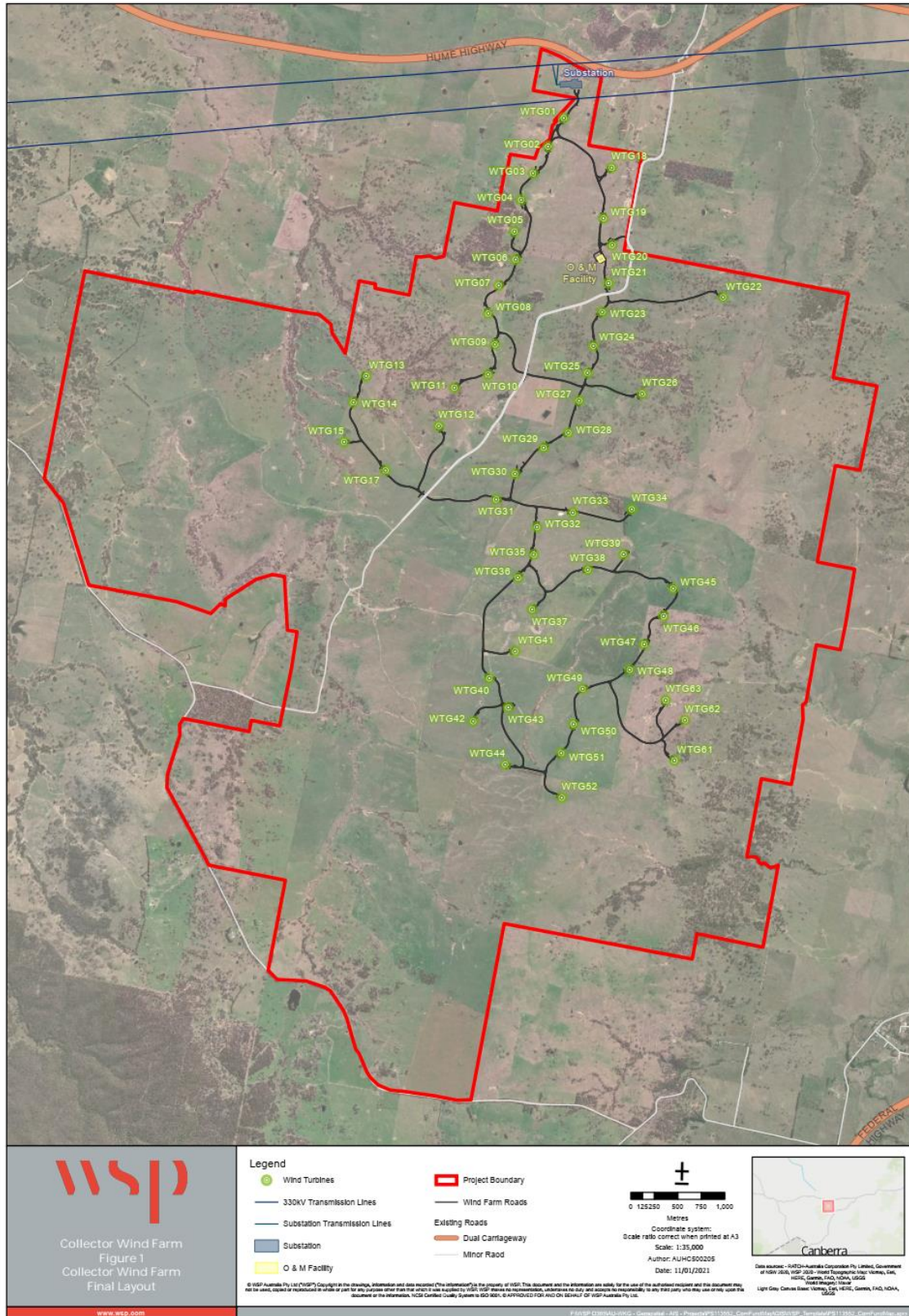


Bushfire Risk Management Plan Collector Wind Farm

in the vicinity of Burrinjuck, Wee Jasper, Fullerton and Mount Werong (Southern Tablelands Zone Bush Fire Management Committee, 2009).

In recent years, other fires have occurred at Old South Road Cullerin 2023, Wind Turbine Cullerin 2023, Tower Hill Gunning 2015 and Taralga 2019/20 and 2023.

Figure 2 Constructed Project Layout



5.1.3 Bushfire Hazards

Due to past vegetation clearing and ongoing grazing the fuel loads are reasonably low and the existing level of bushfire protection for life and property on the project site is relatively high (APP Corporation, 2012).

With the wind farm operations on the site, potential sources of ignition and / or increase risk of fire include:

- ignition from lightning strikes
- electrical short circuit, malfunction, or explosion in the substation, wind turbines, or associated electrical cabling
- sparks as a result of tool use (e.g. welding, grinding) during maintenance activities
- operation of wind turbines at ambient temperatures outside of the safe operating range or overheating of the components
- inappropriate storage of combustible or flammable substances on site.
- ignition caused by Catalytic converters on petrol driven vehicles
- cigarette smoking
- Spark/flare up through operation of ground breaking equipment against rock and inclement weather.

Other hazards that could increase bushfire risks include inadequate knowledge of site personnel such as lack of awareness of bushfire in vicinity, fire danger ratings or emergency and bushfire contingency plans.

5.2 Planning for Bushfire Protection

All development on Bush Fire Prone Land must satisfy the aim and objectives of Planning for Bushfire Protection (RFS 2006).

The overall aim of the Planning for Bushfire Protection guidelines is to provide for the protection of human life (including firefighters) and to minimise impacts on property from the threat of bush fire.

The Planning for Bushfire Protection guidelines are mostly applicable to residential development, which is the focus of the guidelines. However, the following objectives for bushfire management and mitigation are relevant to the construction phase of this project:

- to ensure all construction personnel are adequately protected from exposure to a bushfire
- to maintain asset protection zones around buildings on site during their construction and, for all permanent structures, after completion of construction
- to undertake all construction activities in a manner that minimises any potential for material ignition
- to ensure safe site access and egress for all staff and emergency personnel if required
- to ensure appropriate firefighting equipment is held on site and all staff are aware of the workplace health and safety protocols in the event of a fire
- to locate and map any supplies of water present on site that could assist to meet the needs of fire fighters (and others assisting in bush fire-fighting) and to ensure the location of these water sources is known
- to regularly consult with the local NSW RFS on appropriate bush fire management strategies.

5.3 Bushfire Contingency Plan

An emergency situation affecting people on the site could arise as a result of:

- a Total Fire Ban
- a bushfire to be near to or approaching the site
- a bushfire originating within the wind farm site or is travelling through the site.

A bushfire contingency plan for these situations is outlined in Annex A. Further details of emergency preparedness and response are addressed in the Collector Wind Farm Workplace Health and Safety Environmental Management Plan (WHSEMP).

5.4 Consultation with RFS

Consultation has been undertaken with the NSW Rural Fire Service (RFS) throughout the development of the project, from first planning through to construction and operations. The broad advice from RFS on its requirements during construction and operation included:

- the measures detailed in the Planning for Bushfire Guidelines should be followed
- RFS do not have requirements specific to wind farms
- RFS suggested a managed area around each WTG rather than requiring an Asset Protection Zone (APZ).

Further feedback from RFS during various discussions defined specific conditions:

1. A Fire Management Plan should be prepared for the development in consultation with the local NSW RFS District Office (this plan), to include:
 - 24-hour emergency contact details including alternative telephone contact;
 - Site infrastructure plan;
 - Site access and internal road plan;
 - Construction of asset protection zones / managed areas and their continued maintenance;
 - Appropriate location of hazards (physical, chemical and electrical) that could impact on firefighting operations and procedures to manage identified hazards during firefighting operations.
2. Essential equipment should be designed and housed in such a way as to minimise the impact of bush fire on the capabilities of infrastructure to provide communication during bush fire emergencies. In this regard, the substation and other new building should be constructed to comply with Australian Standard AS 3959-2009 Construction of buildings in bushfire-prone areas.
3. A 10 metre Asset Protection Zone (APZ) equivalent shall be provided around proposed turbines, substation and control building to the standard of an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of Planning for Bush Fire Protection 2006 and the NSW RFS document Standard for asset protection zones.
4. A minimum of 20,000 litres of water shall be provided for firefighting purposes in accordance with Section 4.1.3 of Planning for Bush Fire Protection 2006.

Consultation with RFS will continue through the life of the operating asset, to maintain dialogue between the parties and ensure any changes to wind farm operations are addressed through agreed updates to this plan. Where possible engagement with the RFS for the planning and implementation of fire drills will occur. Updates to this management plan will be shared with the local RFS branch.

6 MITIGATION AND CONTROL

The following outlines the management measures and mitigation strategies that have been / will be undertaken through the construction and operations phases of the project to mitigate the potential impacts associated with bushfire risk management.

Table 6-1 Relevant Conditions of Approval

Management Measures & Mitigation Strategies	Status / Responsibility	Source
Development Phase		
Design		
Inclusion in design of lightning protection measures for turbines and substations including lightning conductors to be built into each of the turbines	Complete Construction Contractor	MCoA B16 SoC 8.05
Provide dedicated monitoring systems (e.g. SCADA) to enable wind turbines to be automatically shut down if ambient temperatures exceed the safe operating range.	Complete Construction Contractor	McoA B16 SoC 8.02
The design of the substation should include a gravel and concrete area free of vegetation to prevent the spread of fire from the substation and to reduce the impact of any bushfire on the structure	Complete Construction Contractor	McoA B16
Buildings meet the specifications and requirements of the AS 3959 of buildings in bushfire-prone areas in order to improve their performance when subjected to burning debris, radiant heat or flame contact generated from a bushfire Where practicable, keep services underground, particularly electricity (reticulation between turbines).	Complete Construction Contractor	McoA B16 SoC 8.04
Where practicable, keep services underground, particularly electricity (reticulation between turbines).	Complete Construction Contractor	McoA B16
Siting		
When siting buildings or other infrastructure, avoid higher risk areas e.g. site on low flat sites and maximise setbacks from hazardous vegetation (greater than 30m if possible)	Complete Construction Contractor	McoA B16
Provision for emergency services		
Prior to commencement of construction, the proponent will submit the 'as constructed co-ordinates', final height (AHD) and the base height (AHD) of each Wind Turbine Generator to the Rural Fire Service	Complete Construction Contractor	MCoA B13
Provide suitable ingress and egress to site and escape routes. Access roads should have the capacity and design to carry fully loaded fire fighting vehicles.	Complete Construction Contractor	McoA B16
Locate and map any supplies of water present on site that could assist to meet the needs of fire fighters (and others assisting in bush fire-fighting) and to ensure the location of these water sources is known	Complete Construction Contractor	McoA B16
Fire evacuation plan		

Develop and implement Fire Evacuation Plans and drills in consultation with RFS	Ongoing Operations Contractor / Site Manager	MCoA B18© SoC 8.01
Operations Phase		
Liaison		
The RFS are to be provided a copy of this plan and will be invited to the site and meet with site personnel and take part in site familiarisation tours.	Ongoing Proponent	MCoA B17 SoC 8.01
The RFS will be provided with the final wind turbine locations, ancillary infrastructure, construction work schedule and locations of additional water supplies for construction, potential landing pads for firefighting aircrafts and helicopters and access gates for firefighting services.	Ongoing Proponent	MCoA B17
Construction Phase		
Inductions Inductions provided for operations personnel & visitors on bushfire risk management and other fire risks that could be present at the project site, the site's bushfire contingency plan and emergency response procedure.	Ongoing Operations Contractor	MCoA B16 SoC 8.01
Firefighting equipment Basic firefighting equipment provided at site office and site vehicles, including fire extinguishers and other equipment suitable for initial response actions with a minimum of one trained person on-site.	Ongoing Operations Contractor	MCoA B16 SoC 8.01
Additional equipment available on site at all times: <ul style="list-style-type: none"> • Fit-for-purpose fire fighting trailer, for use during higher risk maintenance activities as mitigation against ignition risk • Hand held fire extinguishers carried in all operations site vehicles • Communication equipment • Static water supply – farm dams and water tanks at the O&M Compound 	Ongoing Operations Contractor / Proponent	Good practice
Hot works permits Hot Works Permits required for any works which could result in the ignition of a fire. A hot work permit is issued by an authorised person before any hot work (grinding or cutting using angle grinders, cutting or welding works using arc /gas equipment or any activity that generates a flame or spark) is carried out.	Ongoing Operations Contractor	MCoA B16
Hot Works Permits will not to be issued on Total Fire Ban Days, or when the Site Manager deems weather conditions are too dangerous.	Ongoing Operations Contractor	MCoA B16
Fire Danger warnings Site personnel to check Rural Fire Service website (www.rfs.nsw.gov.au) at least twice daily during the fire season (October 1st - March 31st).	Ongoing Operations Contractor	MCoA B18(b) SoC 8.01
Limit employee activity and presence within the site during Extreme Fire Danger Periods to essential works only.		

Observe fire warnings and notices, including evacuation notices.		
In the case of fire ban or bushfire within or near the site, follow the contingency plan (Annex A).		
Restrict low clearance vehicles with catalytic converters from entering the site on days for fire danger ratings of high or greater. Low clearance vehicles with catalytic converters are to remain on sealed access tracks at all times	Ongoing Operations Contractor	MCoA B18(b) CFA 2015
Vehicles Only diesel operated vehicles to be used on un-constructed roads and at all other times where possible.	Ongoing Operations Contractor	MCoA B18(b)
Ensure ongoing maintenance of all vehicles used on site to minimise sparking from exhaust systems		
Vehicles to be parked in designated parking areas clear of ground cover vegetation and avoid parking in long grass		
Hazardous substances All Hazardous Substances and Dangerous Goods must be kept in secure storage facilities according to the regulations and designation of the SDS requirements	Ongoing Operations Contractor	MCoA B18(b)
Maintenance of electrical equipment All electrical tools to be tested and tagged in accordance with regulations. monthly. Required servicing on all electrical equipment to be carried out as per product manuals and standard procedures.	Ongoing Operations Contractor	MCoA B18(b)
Asset Protection Zone An Asset Protection Zone (APZ) to be maintained around the control room and substation buildings, compliant with the Planning for Bushfire Protection guidelines (RFS, 2006).	Ongoing Operations Contractor	MCoA B16 SoC 8.04
Maintain the 'managed area' around each wind turbine.		
Smoking Smoking or the use of electronic cigarettes is permitted only in designated areas where appropriate disposal units are provided.	Ongoing Operations Contractor	MCoA B18 (b) MCoA B16
Communication Maintain adequate communication equipment within site including evacuation alert system such as an air horn.	Ongoing Operations Contractor	MCoA B18(b)
Building requirements Buildings fitted with fire detection systems in accordance with AS 1670 – Fire detection, warning, control and intercom systems – Control and indicating equipment	Ongoing Operations Contractor	MCoA B18(b)

7 MONITORING AND INSPECTION

Table 8-1 outlines the monitoring and reporting to be undertaken during the operation phase of the project relating to bushfire risk management.

Table 7-1 Monitoring and Inspection

Monitoring & Reporting Requirements	Status / Responsibility	Source
Operations Phase		
Monitor all work areas daily for appropriate fire extinguishers, tagged electrical equipment, correctly stored combustible substances, build-up of dry vegetative fuel (such as leaves, felled trees or shrubs or tall dry grass) or other dry combustible materials (paper, cardboard, rags).	Ongoing Operations Contractor	MCoA B18
Fire extinguishers will be checked every 6 months, and replaced if faulty. Any extinguishers discharged or used will be replaced.	Ongoing Operations Contractor	MCoA B18
The designated site representatives will, during the bushfire season, check the operation of all firefighting equipment on a daily basis. Outside the bushfire season firefighting equipment will be inspected and checked on a weekly basis. Records of inspections shall be maintained.	Ongoing Operations Contractor	MCoA B18 SoC 8.01
Ongoing visual inspections for smoke or fire on site or in the vicinity, and appropriate response	Ongoing Operations Contractor	MCoA B18
Following fire, investigate cause of fire and update facilities or procedures to prevent further incidents in consultation with RFS	Ongoing Operations Contractor / Proponent	MCoA B18
The Local RFS will be approached to conduct regular fire prevention inspections where any recommendations will then be implemented	Ongoing Operations Contractor / Proponent	MCoA B18(a) (d) SoC 8.01
Consult with the RFS after the commencement of operation and any other time thereafter as required by the RFS, to ensure that the local RFS is familiar with the development, including location and identification of wind turbines for the purpose of fast access in emergencies. Local Fire Control contact. Upper Lachlan Local Government Area (Southern Tablelands Office) Phone: 02 4832 0268 Address: 40 McIntosh Road, Crookwell 2583	Proponent	MCoA B17 SoC 8.01
Include bushfire risk management in OEMP.	Proponent	MCoA B16

8 REVIEW AND IMPROVEMENT

8.1 Continuous Improvement

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

The continuous improvement process will be designed to:

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

8.2 Update and Amendment

The processes described in the OEMP will be followed for updating and amending this plan. A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure.

ANNEX A – BUSHFIRE CONTINGENCY PLAN

This bushfire contingency plan outlines the actions required in the case of:

- Total Fire Ban
- bushfire to be near to or approaching the site
- bushfire originates within the wind farm site or is travelling through the site.

Total fire ban days

- The Site Manager (or a delegated person) is to regularly listen to radio broadcasts, check weather forecasts and RFS website (or 'Hazards Near Me NSW' app) and maintain contact with the RFS.
- If a fire is identified in the region or within the site, follow procedures below.

Bushfire nearby the site

- The Site Manager (or a delegated person) is to regularly listen to radio broadcasts, check weather forecasts and RFS website (or 'Hazards Near Me NSW' app) and maintain contact with the RFS.
- Advice should be sought from the RFS.
- If a bush fire threatens, the Site Manager, in consultation with emergency services, will decide on whether the site should be evacuated and if so where personnel will be safely evacuated to. This will take into consideration prevalent wind direction, fire front and advice from RFS.
- Instructions from emergency services should be followed.

Bushfire within site

- Incident should be immediately reported to:
 - emergency services by calling 000
 - Site manager.
- If safe to do so, every effort should be made to extinguish the fire before it gets out of control.
- The Site Manager, in consultation with emergency services, will decide on whether the site should be evacuated and if so where personnel will be safely evacuated to. This will take into consideration prevalent wind direction, fire front and advice from RFS.
- Conduct physical accountability (head count) (determined by visitors books and weekly plan schedules) of all workers including subcontractors to ensure all personnel are accounted for.
- Coordinate site access for emergency response personnel (RFS and any other emergency services required)
- Inform the RFS of:
 - the nature of the fire and of any known hazards which they may encounter during fire suppression efforts such as; compressed fuel gas tanks, roadworks, toxic or hazardous materials present
 - the personnel accountability survey. If individuals are unaccounted for, give the last known location of the individuals to fire rescue personnel.
- Secure fire area. Close off site if necessary until all firefighting has been completed including investigative actions.
- Report the details of event and damage assessment to the Project Manager.
- Arrange for monitoring of accident site or damaged equipment until a remedial action plan is developed. Employ security guard services where appropriate.
- Coordinate with RFS who will direct the investigation to determine: cause of fire; remedial actions necessary for clean-up; and preventive measures necessary to prevent reoccurrence.

ANNEX B – EMERGENCY CONTACT DETAILS

Role / Authority	Name / Role	Telephone Number
Vestas On-call technician	Varies	0472 901 467
Vestas Regional Service Manager	Nick Warren	0457 047 799
COLWF Site Manager	Paul McDonald	0428 342 068
Fire and Rescue NSW	Fire & Rescue Goulburn 157-161 Bourke Street Goulburn	000 (02) 4822 1608
NSW Rural Fire Service	RFS Southern Tablelands Zone 1410 Laidlaw Street Yass	000 (02) 6226 3100
NSW Police Force	Goulburn Police Station 274 Sloane Street Goulburn	000 (02) 4824 0799
NSW Ambulance	Goulburn Ambulance Station: 18 Clifford Street Goulburn	000 (02) 4822 1822
Public Health Unit	NSW Health (Goulburn Base Hospital)	(02) 4827 3111
NSW EPA Environmental Hotline	-	131 555 (02) 9995 5000
WIRES	-	1300 094 737 02 4822 3888
Workcover NSW	-	132 360
Upper Lachlan Shire Council	-	(02) 4830 1000