CEC DRAFT SUBMISSION: CFA Design Guidelines and Model Requirements for Renewable Energy Facilities -V5 Draft

(June 2026)

1. About the Clean Energy Council

The Clean Energy Council (CEC) is the peak body for the clean energy industry in Australia, representing nearly 1,000 businesses operating across renewable energy generation, energy storage, and the broader clean energy supply chain. Our members include developers, owners, and operators of wind energy facilities, solar energy facilities, battery energy storage systems, nivestors and associated infrastructure across Victoria and nationally.

The CEC supports the objectives of fire safety regulation and recognises CFA's important role in protecting the community, emergency responders, and critical infrastructure. We engage constructively with CFA's Specialist Risk and Fire Safety Unit (SRFSU) on an ongoing basis and have participated in the development of previous iterations of these guidelines.

This submission is made in response to the draft CFA Design Guidelines and Model Requirements for Renewable Energy Facilities Version 5 (v5, June 2026). It reflects feedback received from targeted consultation with CEC members.

2. Executive Summary

The CEC welcomes CFA's continued development of fire safety guidance for renewable energy facilities, and acknowledges the genuine complexity of managing fire risk for large-scale infrastructure in the Victorian landscape.

However, we have significant concerns about a number of provisions in the v5 draft that, taken together, represent a shift away from the evidence-based, proportionate risk management approach that should underpin regulatory guidance of this kind. In particular:

- Several new requirements — including the effective exclusion of battery energy storage systems from the Bushfire Management Overlay and doubled internal road loading standards — are introduced without a transparent evidence base demonstrating the risk they are intended to address or the level of risk reduction they achieve.
- The practical effect of these changes is to significantly constrain the geographic areas available for renewable energy development in Victoria, at a time when the state's energy transition objectives require accelerated deployment across regional landscapes.
- Given CFA's status as the relevant fire authority and recommending referral authority for renewable energy facility applications within the Bushfire Management Overlay under Clause 44.06-6 of the Victoria Planning Provisions, these guidelines carry significant practical weight over project outcomes across broad geographic areas. While CFA is a recommending rather than determining referral authority for renewable energy applications in the BMO, a CFA objection carries very substantial weight in any responsible authority's decision-making process, and in practice makes it extremely difficult for a permit to be granted. Provisions of this consequence must be grounded in robust, published evidence.
- The guidelines appear to apply standards to renewable energy infrastructure that are not consistently applied to other land uses and industries operating within the same environments — including agricultural operations, grain handling, diesel storage, transmission infrastructure, and residential development — raising questions about proportionality and consistency.

The CEC is not arguing against fire safety requirements for renewable energy facilities. We are arguing that those requirements must be proportionate to the actual, quantified risk presented, supported by transparent evidence, and consistent with how risk is managed across comparable industries and land uses. We are also arguing that the planning framework — which exists to assess risk and impacts on a case-by-case basis — must be allowed to function as intended, rather than being pre-empted by blanket exclusions.

The CEC makes five principal submissions, set out below, and requests that CFA engage in a formal, structured consultation process before v5 is finalised.

3. Principal Submissions

3.1 The BMO provisions are not supported by a transparent evidence base and their practical effect as a barrier to permit approval is disproportionate

The v5 draft states that CFA 'does not support' the siting of battery energy storage systems in high-risk environments including the Bushfire Management Overlay (BESS02), and that in the BMO 'risk may not be able to be mitigated to the satisfaction of CFA' (Section 12.3.1). For wind energy facilities, developers must consult CFA's SRFSU before seeking landowner consent where turbines are proposed within the BMO or within 500m of the BMO (WEF02).

These provisions have direct and serious planning consequences. Under Clause 44.06-6 of the Victoria Planning Provisions, CFA is the relevant fire authority and recommending referral authority for renewable energy facility applications within the BMO. Under accepted planning principles and established decision-making practice, a decision maker is unlikely to grant a permit in the face of a CFA objection on fire safety grounds. CFA's objection does not technically mandate refusal, but in practice it carries very substantial weight that is likely to be determinative of the outcome in the vast majority of cases. The practical effect of these guidelines is therefore not meaningfully different from a veto.

The CEC does not oppose CFA taking a firm position on fire safety. However, where a regulatory position has the practical effect of excluding a category of infrastructure from a broad geographic area, that position must be grounded in published, transparent evidence demonstrating:

- The specific fire risks presented by renewable energy facilities in BMO environments that cannot be mitigated to an acceptable level;
- Why those risks are categorically different from risks presented by other infrastructure and land uses that operate within BMO-mapped areas without equivalent restriction; and
- What, if any, risk controls or project-specific circumstances would lead CFA to a different conclusion.

The CEC submits that a more proportionate and appropriate approach would be to allow BESS projects to be sited within BMO areas where any potential fire risk can be demonstrated to be mitigable to the satisfaction of CFA, through a site-specific risk assessment and agreed mitigation measures. Treating the BMO as a hard no-go zone for BESS — without providing a performance-based pathway for proponents to demonstrate acceptable risk — forecloses legitimate project configurations without adequate justification. The BMO exclusion for BESS and the pre-landowner consultation trigger for wind are presented without reference to incident data, modelled risk outcomes,

or comparative risk analysis. The CEC requests that CFA publish the evidence base underpinning these provisions before v5 is finalised, and that the guidelines be amended to articulate the specific risk factors that would lead CFA to object — rather than treating BMO location as a near-absolute constraint.

> *The purpose of Victoria's planning and environmental assessment framework is to rigorously assess the risks and impacts of individual projects and determine whether those impacts can be appropriately avoided, mitigated or managed. Introducing blanket restrictions or presumptions against certain forms of infrastructure, regardless of project-specific circumstances, risks undermining the very purpose of that assessment framework.*

Definition of 'landowner consent' and CFA resourcing implications (WEF02)

V5 does not define what constitutes 'landowner consent' for the purposes of this requirement. This is a significant drafting gap. The process of securing landowner agreements for renewable energy projects involves multiple stages, each representing a different level of commitment:

The development process typically involves a staged sequence of agreements: initial expressions of interest or access licences to assess feasibility; option agreements that allow for planning applications to be lodged; and agreements for lease or development agreements that bind landowners to allowing construction. These stages involve fundamentally different levels of commitment, project definition and commercial exposure. Requiring CFA consultation before any of these stages is a materially different obligation to requiring it before a binding development agreement is executed or a project has even bee defined. Proponents will find themselves in the difficult position of needing approval from CFA to approach landholders but needing to engage landholders to suitably define projects enough to meaningfully consult with the CFA. It's unclear to the CEC how this requirement would work in practice.

The CEC requests that v5 define 'landowner consent' with precision, specifying the stage of agreement at which the consultation trigger applies, and that CFA clarify whether the trigger is intended to apply to initial expressions of interest and feasibility licences, or only to binding option agreements and agreements for lease.

There is also a resourcing dimension that v5 does not address. Applying CFA SRFSU consultation as an early-stage gate across all prospective wind sites near the BMO will generate a significant volume of referrals across broad areas of investigation — many of which will not progress to planning applications due to other constraints such as ecology, cultural heritage, aviation, or grid connection. CFA's SRFSU is a specialist unit with finite capacity. Requiring it to engage across the full breadth of early-stage project investigations risks creating bottlenecks that delay projects that do proceed, without a corresponding improvement in fire safety outcomes. It may also result in the premature public disclosure of project investigations — before feasibility is confirmed and before proponents are in a position to manage community engagement appropriately — if CFA consultation requires identifying specific sites or areas of interest to a third-party agency at an early stage.

Wind and solar asymmetry in the pre-landowner consultation trigger (WEF02)

Finally, v5 applies the pre-landowner consultation trigger to wind energy facilities but not to solar energy facilities, without providing any technical basis for this distinction. Both technologies are deployed in rural landscapes that may intersect with the BMO. If the distinction is based on specific fire risk characteristics of wind turbines — such as the elevated ignition source, the potential for

burning debris to be distributed across a wide area, or the difficulty of aerial firefighting in the presence of turbines — those reasons should be stated explicitly. If there is no technical basis for differential treatment, the asymmetry is arbitrary and creates an uneven regulatory burden that disadvantages wind energy development relative to solar. The CEC requests that CFA either provide a technical justification for the wind-specific trigger or extend the same approach consistently across all technology types.

BMO mapping accuracy and the absence of a review pathway (S12.2, S12.3.1)

The CEC further notes that the BMO is not the most precise instrument for assessing actual fire risk at a specific project location. BMO mapping is undertaken at a landscape scale and its application to individual sites can produce outcomes that do not reflect the specific vegetation, topography, and fire behaviour characteristics of a particular location. An on-ground, site-specific risk assessment is a more reliable basis for determining whether hard constraints are warranted for a given project than BMO designation alone. The CEC submits that v5 should acknowledge this and provide for project-specific risk assessments to inform CFA's referral position, rather than treating BMO designation as determinative. Given the broad geographic extent of the BMO and the limitations associated with low-resolution and potentially outdated mapping datasets, formal mapping amendment and ground-truthing processes are often required before project-specific permissibility can be reliably assessed. The CEC submits that v5 should clearly identify the criteria and methodology used for BMO mapping, so that proponents can undertake informed permissibility assessments at an early stage and support more effective engagement with both the CFA and affected landowners regarding site-specific fire risk.

A related and practically urgent problem is the accuracy of BMO mapping itself. The BMO is not a static instrument — it can be applied to land based on vegetation conditions that have since changed materially. Where BMO mapping was triggered by vegetation that has been cleared, has died, or no longer presents the risk that originally justified the overlay, there is currently no clear mechanism for proponents to demonstrate that the mapped risk is not a current or real risk, and no pathway in v5 for CFA to engage with that question. Section 12.2 states that the CFA Requirements of this guideline 'may not be sufficient for high-risk environments' but provides no guidance on what a proponent should do in those circumstances, or how a proponent can demonstrate that a BMO-mapped area does not in fact present a high risk. The CEC requests that CFA articulate a clear process by which proponents can present site-specific evidence that BMO mapping does not reflect current on-ground conditions, and confirm that such evidence will be considered in CFA's referral response.

3.2 The guidelines do not apply consistent standards across comparable land uses and industries

The BMO covers significant portions of regional Victoria and encompasses a wide range of existing and ongoing land uses, including agricultural operations, grain handling and storage facilities, diesel and chemical storage, transmission and distribution infrastructure, residential development, and industrial operations. Many of these land uses involve known ignition sources, flammable materials, or activities that present fire risk in bushfire-prone environments. Yet none are subject to the equivalent of the restrictions proposed for renewable energy facilities in v5.

This inconsistency undermines the credibility of the framework as a risk-based instrument. If the principle underpinning the BMO provisions is that infrastructure presenting fire risk should not be located in high-risk environments, that principle must be applied consistently across land uses. If the principle is more specific — that renewable energy infrastructure presents a particular risk profile that warrants differential treatment — then that specificity must be articulated and evidenced.

The CEC requests that CFA:

- Publish a comparative risk analysis demonstrating how the fire risk profile of renewable energy facilities in BMO environments differs from that of other infrastructure and land uses operating in the same environments;
- Explain why the risk controls available for renewable energy facilities — which can include fire suppression systems, separation distances, monitoring, emergency planning, and vegetation management — are insufficient to achieve an equivalent level of safety to that expected of comparable industries; and
- Where differential treatment is justified, articulate the specific risk factors that drive it rather than applying facility-type-based exclusions.

3.3 Specific new requirements lack an evidence base and are disproportionate to the identified risk

Beyond the BMO provisions, several specific new requirements in v5 are introduced without a transparent rationale or evidence base. The CEC raises the following concerns:

Internal road loading standard doubled to 30 tonnes (EVA02)

V5 doubles the required structural capacity of internal roads from 15 tonnes to 30 tonnes across all facility types. This will have material cost implications for large wind and solar projects with extensive internal road networks. The additional road load-bearing and dimensional requirements also conflict with biodiversity protection objectives that seek to minimise vegetation disturbance and land impacts. Wider and more extensive internal road infrastructure reduces opportunities for progressive rehabilitation of disturbed areas, increases ongoing landowner lease impacts, and limits the agricultural coexistence outcomes that communities and landowners expect from wind energy projects. CFA should identify the specific emergency vehicle type or operational scenario driving this requirement, and demonstrate that the benefit in terms of fire safety outcomes justifies the significant additional infrastructure cost and environmental impact across the sector.

Acoustic barrier modelling obligations (BESS18)

Where EPA noise requirements necessitate acoustic barriers around BESS installations, v5 requires that barriers be fully open on at least two adjoining sides, and where this cannot be achieved, that detailed radiant heat and gas dispersion modelling be undertaken. This creates a complex and potentially costly interaction between EPA noise requirements and CFA fire safety requirements. Many projects near rural residences will face EPA-mandated noise barriers. The CEC requests that CFA engage with EPA to develop coordinated guidance that allows both objectives to be met without requiring duplicative or conflicting infrastructure solutions.

Per-unit fire water requirement for decentralised BESS (BESS14)

V5 requires a 45,000L static water tank within 120m of each decentralised BESS unit, regardless of the aggregate risk profile of the installation. For a large wind farm with battery units at each turbine, this requirement could translate to dozens of individual water tanks distributed across the site. CFA explicitly states that it does not consider fire risk to be reduced by decentralisation, but provides no evidence for this position in the context of modern lithium iron phosphate (LFP) battery chemistry, which has a materially different thermal runaway profile from earlier chemistries. The CEC requests a technology-specific risk assessment to support this requirement.

Decentralised BESS — mutually exclusive requirements (BESS05, BESS14)

These two requirements are mutually exclusive for turbine-integrated or DC-coupled BESS configurations. A water tank cannot be located within 120m of a BESS unit that is itself required to sit outside a collapse zone of more than 300m from the turbine. V5 provides no guidance on how proponents are to resolve this conflict. At project scale, the only available response is to abandon the integrated configuration entirely — effectively prohibiting a technology arrangement that is technically sound and commercially important for hybrid renewable energy systems.

V5 introduces two requirements for turbine-integrated and DC-coupled BESS configurations that are physically incapable of being simultaneously satisfied:

- A 45,000L static water tank must be located within 120m of each decentralised BESS unit (BESS14).
- BESS units should be located outside the wind turbine collapse zone (BESS05) — which is typically in excess of 300m from the turbine base.

The CEC requests that v5 be amended to enable facility-level fire water strategies for decentralised BESS, supported by risk modelling, rather than requiring per-unit tank placement that cannot be physically achieved in turbine-integrated configurations. The CEC also notes that the collapse zone approach adopted in BESS05 was introduced following the turbine failure at Berrybank Wind Farm associated with a lightning strike, and submits that there may be merit in recognising opportunities to adopt reduced buffer distances where supported by appropriate mitigation measures — such as operational controls that isolate turbine and BESS units during lightning events. The prescribed collapse zone typically extends well beyond established lease boundaries and approved disturbance footprints, further constraining the integration of complementary infrastructure and limiting the ability of existing wind farm developments to respond to evolving market and grid stability requirements. The CEC further notes that a pilot decoupled BESS installation operating at a wind farm south-east of Ballarat was developed in consultation with CFA, approved under a planning permit, and has demonstrated a safe operating history — yet would not satisfy the draft guideline requirements under BESS05. It is unclear the extent to which operational learnings from this installation have informed the draft guidelines, and the CEC requests that CFA engage with the operators of this and similar facilities before v5 is finalised.

Fire water infrastructure — scale, proportionality, and strategic siting (FPS01, BESS14)

More broadly, the cumulative effect of fire water requirements across a large facility — tanks at each site entrance, at each 100ha of solar area, and at each decentralised BESS unit — results in a level of infrastructure obligation that is disproportionate to the actual improvement in emergency response outcomes. In many wind farm layouts, turbines are accessed directly from public roads or distributed access points, and applying full water storage requirements at every access point produces redundant infrastructure without a clearly improved response pathway.

- Allow CFA-approved whole-of-site fire water network designs as an alternative to prescriptive per-unit tank placement, where proponents can demonstrate equivalent coverage through risk modelling.

The CEC submits that v5 should shift from prescriptive per-unit and per-access-point tank placement to a strategic, facility-level approach to fire water infrastructure siting. A whole-of-site network design — with water infrastructure located at substations, key internal intersections, and points that genuinely correspond to emergency access and response pathways — would better align with how CFA actually responds to incidents at large facilities, and would avoid the duplication of infrastructure that current requirements produce without a commensurate improvement in emergency response capability. Such

an approach should be available where proponents can demonstrate, through CFA-approved network design and risk modelling, that equivalent or superior coverage is achieved.

Nacelle fire suppression and occupational safety conflict (WEF04)

The requirement for automatic fire suppression systems within wind turbine nacelles (WEF04) introduces a conflict with occupational health and safety obligations that v5 does not address. Certain suppression systems — particularly those that displace oxygen — create a confined space hazard for technicians required to work within nacelles during maintenance and normal operations. This risk profile differs materially from BESS containers, which are designed for external access and intervention. The CEC requests that CFA differentiate requirements between occupied and unoccupied infrastructure, and allow alternative approaches for nacelles — such as fire detection, alarms, early warning systems, and portable suppression equipment — that achieve equivalent fire safety outcomes without creating a secondary occupational safety hazard. Any requirements must be assessed for alignment with Australian WHS legislation and confined space safety standards.

Wind turbine ground clearing (WEF07)

The ground-clearing requirement specified under WEF07 is not practical in areas where paddocks are located immediately adjacent to turbine hardstands. Applying this requirement as specified would increase the land area required to be secured under lease from landowners, with associated commercial and tenure implications, and would impose significant ongoing maintenance costs to keep ground cover to 100mm across large areas of active farmland.

A related concern is that the prescribed clearing requirement may not be achievable where turbines are not located centrally within their hardstands — a common design outcome due to site-specific engineering, environmental, and land constraints. In these cases, compliance may require an expanded vegetation management area beyond the hardstand footprint, increasing land disturbance and creating tension with the avoidance and minimisation principles in the Biodiversity Assessment Handbook and with agricultural coexistence outcomes. The CEC requests that CFA adopt a flexible, risk-based approach to vegetation management around turbine hardstands that accounts for site-specific design constraints.

Low-combustible transformer oil — wind turbines and substations (WEF06, SUB07)

The requirement for low-combustible transformer oil applies to both wind turbine generators (WEF06) and substations (SUB07). In both cases, this requirement is not commercially viable as a standard specification. Dry-type transformers are common in turbines up to approximately 6MW, but oil-cooled transformers are standard in newer, larger turbine models and in utility-scale substation applications, and cannot be readily substituted. The guidelines do not specify the conditions that trigger the SUB07 requirement, making it unclear whether it applies universally or only in defined risk scenarios.

The CEC requests that CFA clarify the intended scope of WEF06 and SUB07, identify what transformer types and specifications are considered compliant, and confirm whether performance-equivalent alternatives — including enhanced containment, bunding, and fire suppression systems — can be accepted where low-combustible oil is not technically or commercially feasible.

Substation fire water infrastructure (SUB04)

SUB04 appears to require substations to be equipped with hydrants, tanks, and booster pumps. Substations are not currently designed or constructed with this infrastructure, and introducing these requirements would represent a significant increase in capital expenditure and ongoing operational and maintenance costs without a published evidence base or risk justification. The CEC requests that CFA identify the specific emergency response scenarios driving this requirement and confirm whether

performance-based alternatives — such as proximity to existing water supplies or mobile tanker access — can be considered where the prescribed infrastructure is disproportionate to the risk profile of the installation.

ESV consultation for substations and interaction with transmission line requirements (Sections 10.4, 10.10)

Sections 10.4 and 10.10 appear to introduce a requirement to consult with Energy Safe Victoria (ESV) in relation to substation design. This is not a current regulatory requirement. The nature, scope, and timing of the required ESV consultation is not defined, and the basis for ESV's involvement and how its views will interact with the CFA referral process are unclear. Introducing an undefined consultation obligation with a separate statutory body will add complexity, uncertainty, and potential delays to substation design and delivery. The CEC requests that CFA clarify the intended purpose and scope of this requirement, the stage at which consultation is required, and how ESV input will interact with CFA's own requirements and referral process.

A related issue arises for transmission lines, where proponents are already subject to ESV requirements including an Electrical Safety Management Scheme (ESMS) and Electric Line Clearance Management Plan (ELCMP). The guidelines do not clarify how these existing obligations interact with any additional CFA requirements for transmission line infrastructure. The CEC requests that CFA clarify how the CFA transmission line provisions interact with the existing ESV regulatory framework, and confirm whether compliance with ESV requirements will be considered in CFA's assessment, or whether additional CFA-specific obligations apply.

BESS unit separation distance

The requirement for a minimum 3m separation between adjacent BESS units on the door side is overly conservative and not aligned with a technology-specific, risk-based approach. OEM large-scale burn tests are specifically designed to establish the separation distances required to prevent fire propagation between units; a blanket 3m requirement applied regardless of OEM test data does not reflect this evidence base. The CEC requests that CFA confirm whether separation distances derived from OEM large-scale burn test configurations will be accepted as an alternative to the prescribed 3m requirement, where proponents can demonstrate that the tested configuration achieves equivalent fire containment outcomes.

Access point consultation and conflict with road safety requirements

The requirement for CFA consultation on the number and location of site access points may, in some circumstances, conflict with project traffic management and road safety requirements set by other authorities. The guidelines do not provide guidance on how competing considerations should be resolved where CFA's preferred configuration differs from what is required by the relevant road authority. The CEC requests that CFA provide clear guidance on how such conflicts are to be identified and resolved during project design, and confirm the relative weight given to each consideration in the CFA referral process.

Discretionary static water storage requirements (FPS01)

The guidelines provide CFA with discretion to require additional static firefighting water storage (minimum 45,000 litres) where more than three turbines are accessed from a single public road access point, or where turbines are located more than 500 metres from a public road. The conditions under which this discretion will or will not be exercised are not defined, creating uncertainty for proponents at an early stage. The CEC submits that these discretionary requirements should be replaced with clear, risk-based criteria. In calibrating those criteria, CFA should have regard to the

relatively low incidence of wind turbine fire events and appropriately balance the substantial net community benefits of renewable energy infrastructure — including its contribution to energy security and system resilience — against the marginal risk reduction achieved by additional static water requirements in low-probability scenarios.

Arc flash risk assessments — undefined scope and application

The requirement for arc flash risk assessments requires further definition, particularly where such assessments are expected to inform consultation processes or planning applications. The guidelines do not specify the required assessment methodology, trigger thresholds, or how outcomes are intended to be applied in the CFA referral or planning process. Without this guidance, there is a material risk that arc flash assessments could generate recommendations for undergrounding electrical infrastructure at significant cost, without a clearly demonstrated risk-based justification. The CEC requests that CFA define the circumstances and thresholds triggering an arc flash assessment, the methodology considered appropriate, and how outcomes will be weighted in the referral process, including what constitutes an acceptable risk outcome.

Mandatory management plans — timing relative to planning approval

Several mandatory management plans identified in the guidelines — including the Fire Management Plan (per facility) and Emergency Plan — cannot reasonably be finalised prior to planning approval. These documents require a level of design detail and contractor-specific information that is only available after approval, detailed design, and procurement. Requiring finalisation as a pre-approval condition is impractical and inconsistent with standard planning process sequencing across the sector. The CEC requests that the guidelines explicitly recognise that these plans can be prepared in consultation with CFA following planning approval, secured through permit conditions, and finalised once detailed design and contractor arrangements are confirmed.

Underground electric line requirements (ELC01)

ELC01 requires that electric lines associated with renewable energy developments be installed underground wherever possible, except where required to be above-ground for grid connection. The CEC submits that this requirement is not supported by a transparent evidence base and will impose significant unnecessary cost on renewable energy projects. Underground cabling costs materially more than overhead lines across equivalent distances, and for large wind and solar projects with extensive internal electrical networks spanning tens of kilometres, the cumulative cost implication is substantial. The requirement to underground "wherever possible" also introduces a broad and undefined obligation — without specifying the circumstances in which above-ground installation will be accepted, proponents face uncertainty about what standard of justification is required to deviate from the default. The CEC requests that CFA identify the specific fire risk scenario that ELC01 is intended to address, demonstrate that the risk reduction achieved by undergrounding justifies the significant additional cost, and define with precision the circumstances in which above-ground installation will be accepted as satisfying the requirement.

3.4 The guidelines risk undermining the purpose of Victoria's planning and environmental assessment framework

Victoria's planning and environmental assessment framework — including the permit process under the Planning and Environment Act and the Environment Effects Statement process is designed to assess the risks and impacts of individual projects on their merits, and to determine whether those impacts can be appropriately avoided, mitigated, or managed. It is a rigorous, evidence-based process that considers community expectations, environmental outcomes, and the broader public interest.

The effect of introducing broad geographic exclusions or strong presumptions against certain forms of infrastructure in regulatory guidance — particularly guidance issued by a recommending referral authority with the practical influence of CFA — is to pre-empt that case-by-case assessment. Where CFA has published a position that a category of infrastructure is not supported in a defined geographic area, applicants, responsible authorities, and decision-makers will treat that position as effectively settled before the planning process has been allowed to function.

This is particularly concerning for Victoria's energy transition. The BMO covers large portions of the regional landscapes in which renewable energy development necessarily occurs. Effective exclusion of BESS from these areas, and the creation of strong presumptions against wind turbines near BMO boundaries, will constrain project design, reduce investment certainty, increase costs, and ultimately slow deployment at a time when acceleration is required.

The CEC submits that CFA's guidelines should be calibrated to inform and support the planning process — not to pre-empt it. Requirements should be expressed in terms of the risk controls and standards that facilities must meet, not in terms of categorical exclusions from geographic areas. Where CFA considers that certain environments present risks that cannot be mitigated to an acceptable level, that position should be established through the planning and assessment process on a project-specific basis, with reference to the specific hazards and circumstances of each proposal.

3.5 A structured consultation process is required before v5 is finalised

The v5 draft represents a significant departure from the approach taken in previous versions of these guidelines in a number of areas. Changes of this consequence — particularly those that affect project viability, investment certainty, and Victoria's capacity to meet its energy transition objectives — should not be finalised without a genuine, structured consultation process with industry.

The CEC requests that CFA:

- Commit to a formal consultation period of no less than 60 days from the date of public release of the v5 draft, during which industry, planning practitioners, and specialist fire safety consultants can provide written submissions;
- Publish the evidence base — including incident data, risk modelling, and comparative analysis — underpinning the new or changed requirements identified in this submission;
- Convene a technical working group with industry representatives and specialist bushfire consultants to review the specific provisions identified in this submission before finalisation; and
- Engage with the Department of Transport and Planning and the Department of Energy, Environment and Climate Action to ensure that the guidelines are consistent with the objectives of Victoria's planning and energy policy frameworks.

4. Summary of Specific Requests

#	Request	Relevant provision(s)
1	Publish the evidence base underpinning the BMO exclusion for BESS and the pre-landowner consultation trigger for wind, including incident data and risk modelling.	BESS02, WEF02, S12.3.1

2	Articulate what, if any, risk controls or project-specific circumstances would lead CFA to a different position on BESS in the BMO.	BESS02, S12.3.1
3	Publish a comparative risk analysis demonstrating how renewable energy facilities in the BMO present a different risk profile to other land uses operating in the same environments.	S12.2, S12.3
4	Clarify the criteria and methodology used for BMO mapping and articulate a clear process by which proponents can present site-specific evidence that BMO mapping does not reflect current on-ground conditions.	
5	Identify the specific emergency vehicle type and operational scenario driving the 30-tonne internal road loading standard and demonstrate the proportionate benefit.	EVA02
6	Engage with EPA to develop coordinated guidance on acoustic barriers for BESS that avoids conflicting infrastructure obligations.	BESS18
7	Provide a technology-specific risk assessment for decentralised LFP BESS to support the per-unit fire water requirement.	BESS14
8	Commit to a formal consultation period of no less than 60 days from public release and convene a technical working group with industry before finalisation.	All
9	Engage DTP and DECA to ensure v5 is consistent with the objectives of Victoria's planning and energy policy frameworks.	All
10	Amend v5 to resolve the mutually exclusive requirements of BESS05 and BESS14 for turbine-integrated and DC-coupled BESS configurations, and enable facility-level fire water strategies supported by risk modelling. Engage with operators of existing decoupled BESS installations before finalisation.	BESS05, BESS14
11	Confirm whether BESS unit separation distances derived from OEM large-scale burn test configurations can be accepted as an alternative to the prescribed 3m door-side requirement.	BESS (separation)

12	Clarify the scope of WEF07 ground-clearing requirements and allow performance-based or site-specific approaches where paddock layout or off-centre turbine placement makes prescribed clearing impractical or results in unnecessary land disturbance.	WEF07
13	Clarify the scope and trigger conditions for low-combustible transformer oil requirements under WEF06 and SUB07, and confirm whether performance-equivalent alternatives are accepted where substitution is not technically or commercially feasible.	WEF06, SUB07
14	Identify the evidence base for SUB04 fire water requirements for substations and confirm whether performance-based alternatives are available.	SUB04
15	Define the purpose, scope, and process for ESV consultation under Sections 10.4 and 10.10, and clarify how CFA transmission line requirements interact with existing ESV obligations including the ESMS and ELCMP.	S10.4, S10.10
16	Define the trigger thresholds, methodology, and intended application of arc flash risk assessment requirements.	Arc flash assessments
17	Provide guidance on resolving conflicts between CFA access point requirements and road authority traffic and safety requirements.	EVA (access points)
18	Replace discretionary static water storage triggers with clear, risk-based criteria that appropriately balance net community benefits against marginal risk reduction.	FPS01
19	Explicitly recognise that management plans including the Fire Management Plan and Emergency Plan can be finalised after planning approval and secured through permit conditions.	FMP, EP

5. Conclusion

The CEC and its members are committed to the highest standards of fire safety in the design, construction, and operation of renewable energy facilities. We recognise CFA's important role and engage constructively with its requirements as a matter of course.

However, fire safety regulation must be proportionate to the actual, quantified risk presented, supported by transparent evidence, and consistent with how comparable risks are managed across other industries and land uses. Several provisions in the v5 draft do not currently meet this standard. Their practical effect, given CFA's role as the relevant fire authority and recommending referral authority and the very substantial weight its objections carry in permit decision-making, would be to create a near-insurmountable barrier to renewable energy development across broad geographic areas of regional Victoria without adequate justification.

The CEC calls on CFA to publish the evidence underpinning the provisions identified in this submission, to engage in a genuine and structured consultation process before v5 is finalised, and to ensure that the guidelines remain calibrated to support — rather than pre-empt — the rigorous, case-by-case assessment that Victoria's planning framework is designed to deliver.

We would welcome the opportunity to discuss this submission with CFA's Specialist Risk and Fire Safety Unit and are available to participate in any technical working group process.

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