



POSITION STATEMENT SUMMARY

Emergency plan requirements at sites having lithium batteries

Position

Effective 5 December 2024, the following is a position of Fire and Rescue NSW (FRNSW):

When a site or premises has a combined total of 25,000 kg or more of lithium batteries being used, handled, stored or installed, FRNSW recommend the site satisfy the requirements of [clause 361](#) of the *Work Health and Safety Regulations 2017 (WHS Reg.)*.

Note: FRNSW consider the fire and life safety risk from bulk quantity of lithium batteries to be commensurate with manifest quantity hazardous chemicals.

Reference to lithium batteries includes lithium-ion, lithium-ion polymer and lithium metal polymer batteries, whether being standalone or integrated into a battery pack or system such as a battery energy storage system (BESS). Lithium batteries incorporated into electric vehicles and/or plant are included in the combined total if they are associated with the site or premises (e.g. owned, managed, stored or charged on the site).

In satisfying clause 361, the person conducting a business or undertaking (PCBU) of any applicable site or premises should lodge a copy of the emergency plan with FRNSW, which includes:

- the emergency plan developed under clause 43 of the *WHS Reg.*
- an Emergency Services Information Package (ESIP) prepared in accordance with FRNSW fire safety guideline [Emergency services information package and tactical fire plans](#), available at www.fire.nsw.gov.au. The ESIP should include the following relevant information:
 - a site plan which identifies the location, battery type or chemistry, and quantities of lithium batteries located on the site
 - details of all associated fire safety measures and containment features of the site, and included within the tactical fire plans as appropriate
 - a copy of the battery manufacturer's recommendations including any isolation or shutdown procedures, and appropriate extinguishment method
 - relevant and current Safety Data Sheets (SDS) for the lithium batteries at the site.

Any written recommendations made by FRNSW on the emergency plan, including within the ESIP, should be incorporated within the final emergency plan for the site.

Note: The relevant consent or regulatory authority may impose this position as a condition upon the PCBU (i.e. to submit a copy of the emergency plan and ESIP to FRNSW).

Reference must be made to the FRNSW website to ensure this position is current at the time of use, and this position has not been superseded or revoked.

Fire and Rescue NSW

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Summary

This position statement identifies a threshold of 25,000 kg of lithium batteries warrant consideration of the fire and life safety risks, which FRNSW regard as being commensurate with other manifest quantity hazardous chemicals.

Note: Currently, lithium batteries are considered a mixed class dangerous goods article under the *WHS Reg.* and *Australian Dangerous Goods Code*, however, they are not specifically identified within Schedule 11 of the *WHS Reg.* as having any manifest quantity.

The position requires the PCBU to satisfy clause 361 of the *WHS Reg.* and provide a copy of the emergency plan to FRNSW and incorporate any written recommendation received regarding the content or effectiveness of the emergency plan within a revision. Recommendations are provided if the emergency plan does not adequately address the fire and life safety risks posed by the lithium batteries to the site and its workers.

Note: Clause 43 of the *WHS Reg.* imposes a legislative duty on the PCBU to prepare, maintain and implement an emergency plan for the workplace and its workers.

Reference is made to the types of lithium batteries that are to be considered within scope of this position, including the form the batteries may take such as whether standalone or integrated (e.g. a BESS). The position also clarifies that lithium batteries incorporated within electric vehicles or plant are within scope of this position and included into the combined total mass of the given threshold.

Due to the fire and life safety risk to responding emergency personnel, FRNSW also requires an ESIP to be prepared and lodged with the emergency plan. Proponents are directed to the FRNSW guideline [Emergency services information package and tactical fire plans](#) in the development of the ESIP. The ESIP should include any relevant information regarding the lithium batteries that will assist firefighters to develop intervention strategies (e.g. location, quantity, safety data sheets, manufacturer recommendations, etc.).

This position statement has been authorised for release by Chief Superintendent Fire Safety, FRNSW.

Contact us

For further information contact the Fire Safety Branch on (02) 9742 7434 or email firesafety@fire.nsw.gov.au.