

## LAKE VERMONT RESOURCES **ENVIRONMENTAL IMPACT STATEMENT**



ONMENTAL SOLUTIONS

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## **Consultation Process**

## 2.1 Environmental objectives and performance outcomes

This chapter has been prepared to assist the DES in carrying out assessment of the Project consultation process in respect of the following objectives stated in the Project TOR:

- Describe the consultation that has taken place and how responses from stakeholders, including government agencies and members of the community, have been incorporated into the design and outcomes of the proposed Project.
- Describe issues of potential concern to all stakeholders at various stages of the proposed Project, from Project planning to commencement, Project operations and decommissioning.
- Describe any proposed future consultation activities and outline how the results of that consultation will be used in the ongoing management of the proposed Project.

## 2.1.1 Consultation objectives

Bowen Basin Coal prepared a 'Community and Stakeholder Engagement Plan' to inform the Social Impact Assessment (SIA) and SIMP based on the Coordinator-General's 'Social Impact Assessment Guideline' (2018) (SIA Guideline). As stipulated in the SIA Guideline, community and stakeholder engagement undertaken for the SIA has been participatory, transparent and inclusive. Participatory engagement is defined as being respectful, meaningful, available to all and tailored to the needs of potentially impacted individuals and groups.

Consultation activities have been conducted in accordance with the 'International Association for Public Participation (IAP2) Code of Ethics for Public Participation Practitioners' (IAP2 2019) as well as 'Australia's National Statement on Ethical Conduct in Human Research' (NHMRC 2007). Objectives of Project consultation have included the following principles:

- Provide local stakeholders with the opportunity to define the local values and characteristics of potentially affected communities.
- Ensure stakeholders have understood the Project details, timing and workforce arrangements so that discussions about impacts and benefits are meaningful.
- Provide stakeholders with the opportunity to identify and assess potential social impacts and applicable management measures.
- Ensure the SIA has considered the interests and perspectives of stakeholders who may be affected by Project-related impacts.
- Integrate the broader EIS and Project engagement activities to provide a range of opportunities for community members and key stakeholders to provide feedback.
- Ensure transparent and inclusive community and stakeholder engagement to facilitate the ongoing management and monitoring of potential social impacts during construction of the Lake Vermont Meadowbrook Project and the ongoing operations and rehabilitation of the Lake Vermont Meadowbrook Complex.
- Provide a complaint mechanism to allow affected communities and stakeholders to register complaints, queries or comments and address them in a timely manner by the Meadowbrook Project.
- Ensure Project planning and delivery are informed by stakeholder views.
- Ensure post-mining land use is consistent with community expectations (Appendix P, Social Impact Assessment).

Bowen Basin Coal is committed to involving the community during the planning, construction, operation and decommissioning of the Project. There is also a commitment to understand all stakeholder concerns in respect of environmental and social impacts anticipated from the Project.

## 2.1.2 Consultation strategy

The purpose of consultation undertaken during preparation of the EIS is to ensure that all relevant stakeholders are aware of the Project, its aspects and potential impacts, and that they are provided the opportunity to comment on issues of relevance to them.

An SIA and SIMP have been developed for the Project by SMEC Australia Pty Limited (Appendix P, Social Impact Assessment). The SIMP document contains the 'Community and Stakeholder Engagement Plan adopted' for the Project, which is provided in Appendix T, Social Impact Management Plan, Section 6. The Community and Stakeholder Engagement Plan provides for:

- stakeholder identification;
- development of an engagement action plan;
- development of a complaints management process;
- undertaking of rehabilitation and closure engagement; and
- development of a community consultation register.

## 2.2 Description of existing values

This section details the existing legislation and policies pertaining to the consultation process and the stakeholders engaged.

## 2.2.1 Stakeholder identification

Under the EP Act, affected and interested persons (as defined by sections 38 and 41, respectively) must be identified for the Project. The identification of affected persons for the Project is provided in Table 2.1, while interested persons are provided in Table 2.2. A map showing landholders relevant to the identification of affected and interested persons is shown in Figure 2.1.

The Project is within the Barada Barna People (QC2012/007) Native Title application area but not within the Barada Barna People's Native Title Determination. The Barada Barna People are the native title holders for the general Project region. Native title has been extinguished over all land within the MLA area and does not form part of the Barada Barna People's Native Title Determination.

The existing Lake Vermont Mine has developed and implemented a CHMP with the Barada Barna People to manage the risk of harm to Aboriginal cultural heritage. This existing CHMP extends to include the Project area. The Barada Barna Aboriginal Corporation has been identified as a stakeholder in the Project.

Name of affected person or organisation	Relationship to Project		
Landholders			
Bowen Basin Coal Pty Ltd	Landholder, Lot 102 on SP310393, being part of the former "Meadowbrook" property.		
	Adjacent landholder, Lot 1 on SP190749 and Lot 2 on SP190747 (Goonyella System Railway and Lake Vermont Balloon Loop).		
	Adjacent landholder, Lot 2 on SP190749 and Lot 2 on SP190748 (Lake Vermont access road)		
Marubeni Coal, Jellinbah Group, Coranar (Australia), CHR Vermont	Underlying landholder, Lot 1 on SP190747, "Mockingbird Downs" property		
RW & LT Berry	Underlying landholder, Lot 5 on SP190749, "Kyewong" property		

#### Table 2.1:Affected persons

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Name of affected person or organisation	Relationship to Project
Namrog Investments Pty Ltd	Adjacent landholder, Lot 9 on CNS98, "Vermont Park" property
BHP Coal Pty Ltd	Adjacent landholder, Lot 101 on SP310393, "Saraji Mine/Saraji East Project" property
	Adjacent landholder, Lot 3 on SP260662, "Lake Vermont" property
GJ and R Bethel	Adjacent landholder, Lot 8 on KL95, formerly the "Septimus" property and now part of "Willunga"
BE and CE Semple	Adjacent landholder, Lot 2 on RP813170, "River Downs" property
BL and JC Pownall	Adjacent landholder, Lot 7 on CNS53, "Leichhardt" property
Tenement Holders	
Bowen Basin Coal Pty Ltd	Overlying tenement holder, ML 70331, ML 70477, ML 70528, MDL 429, MDL 303, MDL 3001
BHP Coal Pty Ltd (BHP Mitsubishi Alliance [BMA])	Adjacent tenement holder, ML 70383, MDL 454, EPC 1444 and EPC 837 (portion overlying)
Pembroke Olive Downs Pty Ltd	Adjacent tenement holder, ML 700033, ML 700034, MDL 3012, MDL 3013, MDL 3014
Aquila Exploration Pty Ltd	Adjacent tenement holder, MDL 519
Anglo Coal (German Creek) Pty Ltd	Adjacent tenement holder, EPC 747
Peabody BB Interests Pty Ltd	Adjacent and overlying tenement holder, EPC 850, adjacent tenement holder of EPC 721
CH4 Pty Ltd (Arrow CSG Pty Ltd)	Overlying tenement holder, ATP 1103/PCA262, ATP 1103/PCA263
	Adjacent tenement holder, ATP 1103/PCA 144
Bow CSG Pty Ltd (Bow Energy Pty Ltd)	Overlying tenement holder, ATP 1031/PCA132
Eureka Petroleum Pty Ltd	Adjacent tenement holder, ATP 814/PCA 199
Indigenous Group	
Barada Barna Aboriginal Corporation	Traditional owners and cultural heritage party for the existing CHMP for Lake Vermont Mine
Local Government	
Isaac Regional Council	Local government area. Approval authority for Lake Vermont Accommodation Village refurbishment and expansion

## Table 2.2:Interested persons

Name of interested person or organisation	Relationship to Project
State Government	
Department of Environment and Science (DES)	Administering Authority for the Project EIS and EA
Department of Resources	Administering Authority for the Project ML application and water-related aspects/approvals

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Name of interested person or organisation	Relationship to Project
Office of the Coordinator-General – Coordinated Project Delivery Division	Administering Authority for the Strong & Sustainable Resource Communities Act and Social Impact Management Plan development.
Department of Aboriginal and Torres Strait Islander Partnerships	Interest group for the Project
Department of Housing and Public Works	Interest group for the Project
Department of Employment, Small Business and Training	Interest group for the Project
Department of Transport and Main Roads	Interest group for the Project
Department of Communities, Disability Services and Seniors	Interest group for the Project
Queensland Treasury	Interest group for the Project
Department of Agriculture and Fisheries	Interest group for the Project
Commonwealth Government	
Department of Agriculture, Water and the Environment (DAWE)	Administering Authority for the EPBC Act.
Tenement Holders	
Pembroke Olive Downs Pty Ltd	Proximal not adjacent tenement holder of MDL 3013
BHP Coal Pty Ltd	Proximal not adjacent tenement holder of EPC 1444
CH4 Pty Ltd	Potential adjacent, proximal tenement holder of ATP 1103/PCA 151
Whitehaven Coal	Proponent of Winchester South Project to the north-east of the Meadowbrook Project.
Infrastructure Service Providers	-
Aurizon	Rail transport provider (Goonyella/Blackwater rail)
Gladstone Ports Corporation	Port of Gladstone (coal export)
North Queensland Bulk Ports Corporation	Port of Gladstone (coal export)
Dalrymple Bay Coal Terminal Pty Ltd	Dalrymple Bay Coal Terminal (coal export)
Powerlink Queensland	Electricity Supply Provider (Dysart bulk supply substation)
Ergon Energy	
Sunwater	Eungella Water Pipeline Southern Extension (water supply)
Local and regional employment and training providers	
Thiess Mining Services	Mining contractor for Lake Vermont Mine
Resource Centre of Excellence/Regional Industry Network	
Public and private housing providers	
Emergency and Long-term Accommodation Moranbah (ELAM)	Interest group for the Project
Ausco 'Stayover' Workers Village-Dysart	Accommodation village, Dysart
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Name of interested person or organisation	Relationship to Project	
Civeo Dysart Village Mining Camp	Accommodation village, Dysart, proposed accommodation for Project's construction workforce	
Isaac Affordable Housing Trust	Interest group for the Project	
Lake Vermont Accommodation Village	Accommodation village for Lake Vermont Mine proposed accommodation for the Project's operational workforce (in expanded camp)	
Real Estate Agencies (Dysart)	Interest group for the Project	
Local and regional commerce and community devel	opment groups	
Moranbah Traders Association	Interest group for the Project	
Local businesses	Interest group for the Project	
Social and public service providers		
Dysart High School	Interest group for the Project	
Dysart Primary School	Interest group for the Project	
Lady Gowrie Dysart Childcare Centre	Interest group for the Project	
Dysart Community Support Group	Interest group for the Project	
Emergency services and public health providers		
Queensland Police Service	Dysart Police	
Dysart Hospital	Interest group for the Project	
Dysart Medical Centre	Interest group for the Project	
Moranbah District Support Services	Interest group for the Project	
Queensland Ambulance Service	Dysart Ambulance Station	
Other		
Dysart community	Interest group for the Project	
Gavin John Finger	Previous agistee of "Meadowbrook" property, associated with the Project	
ET and PT Murphy	Landholder, Lot 5 on SP235303, "Tay-Glen" property	
Cradcorp Pty Ltd	Landholder, Lot 2 on SP161102, "Dysart" property	
Queensland Resources Council	Mr Ian McFarlane	
Mr Scott Stewart MP	Minister for Resources (Labor)	
Mr Dale Last MP	State Member for Burdekin (Liberal/National Party)	
Ms Michelle Landry MP	Federal Member for Capricornia (Liberal/National Party)	

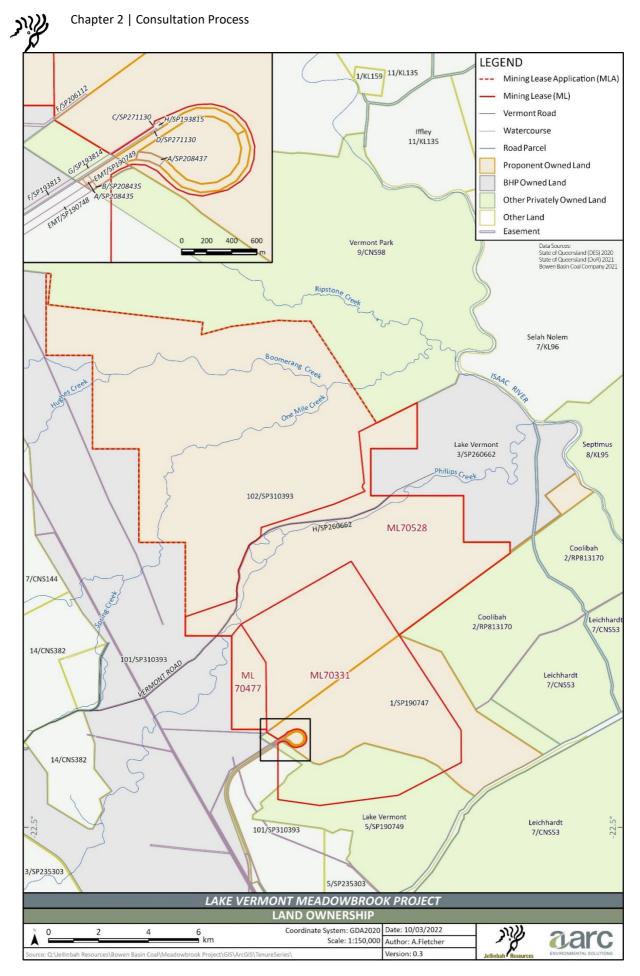


Figure 2.1: Land ownership of the Project site



A stakeholder profile and analysis has been undertaken as part of the Project SIA to determine the level of engagement most appropriate for each stakeholder. Stakeholder analysis has considered the likely extent of impacts on that stakeholder, as well as the ability of that stakeholder to influence the outcome of the Project. A summary of the outcomes of the stakeholder analysis process is provided in Table 2.3, with further detail provided in Appendix P, Social Impact Assessment, Section 3.4.

Level of engagement	Stakeholder	IAP2 objective	SIA objective
Collaborate	<ul> <li>Office of Coordinator- General</li> <li>IRC</li> <li>Barada Barna Aboriginal Corporation</li> </ul>	To partner with the public in each aspect of the decision, including the development of alternatives and the identification of the preferred solution.	Collaborate and partner with communities and stakeholders to ensure their input informs the preparation of SIA.
Involve	<ul> <li>Queensland Ambulance Service</li> <li>Queensland Police Service</li> <li>Queensland Fire and Emergency Services</li> <li>Dysart Medical Centre</li> <li>Dysart State School</li> <li>Dysart State High School</li> <li>Lady Gowrie Daycare Centre</li> <li>C&amp;K Kindergarten Dysart</li> <li>Hinterland Community Care</li> <li>Dysart Community Support Group</li> <li>Moranbah Traders Association</li> <li>Local retail businesses</li> <li>Isaac Affordable Housing Trust</li> <li>Operator of Lake Vermont Accommodation Village</li> <li>Real Estate agency</li> </ul>	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	Involve stakeholders in the identification of social trends and issues and of social impacts and management measures.
Consult		To obtain public feedback on analysis, alternatives and/or decisions.	Consult with stakeholders to obtain baseline social data and input to validate identified impacts and management measures.
Inform	<ul> <li>Department of Resources (formerly DNRME)</li> <li>Mackay Regional Council</li> <li>Regional Businesses</li> <li>Unions</li> <li>Employment and training providers</li> <li>Tourists</li> </ul>	To provide the public with balanced and objective information to assist them in understanding problems, alternatives, opportunities and/or solutions.	Inform stakeholders of Project information, including aspects of Project design and the SIA process.

Table 2.3:Stakeholder analysis summary

## 2.2.2 Stakeholder engagement and community consultation

The primary means of community and stakeholder engagement has been *via* semi-structured interviews and meetings with targeted key stakeholders. This was determined to be the most effective way to meaningfully engage and gain genuine input from stakeholders into social impact definition and management (Appendix P, Social Impact Assessment, Section 2.6).

The Project SIA interviews were structured to:

- enable stakeholders to define local values and the characteristics of potentially affected communities;
- provide stakeholders with an understanding of the Project, including timing and workforce arrangements;
- collect stakeholder input specifically regarding potential social impacts and benefits; and
- collect stakeholder input specifically regarding applicable mitigation and enhancement strategies.

SIA engagement activities have been conducted in accordance with good ethical practice, including the 'IAP2 Code of Ethics and Australia's National Statement on Ethical Conduct in Human Research' (2007). Informed consent from participants was gained to ensure they understood that participation was voluntary and confidential.

A register of key consultations undertaken with affected and interested persons is provided in Table 2.4. A more detailed summary of stakeholder engagements is also provided in Appendix P, Social Impact Assessment, Section 4.4.

Affected and interested parties	Category	Consultation record
Affected	Landholders	<ul> <li>Written correspondence to provide notice of Draft ToR— mailed 6 Jan 2020.</li> <li>Letter/flyer update on EIS—mailed 18 Nov 2021.</li> <li>Bore census request—mailed 18 Nov 2021 (potentially impacted landholders only).</li> </ul>
	Tenement holders	• Written correspondence to provide notice of Draft ToR— mailed 6 Jan 2020.
		• Face-to-face meetings with BMA on 16 July 2020 and Mar 2022.
		• Face-to-face meetings with Arrow Energy (CH4) on 5 Nov 2019, 15 Dec 2021 and 23 Mar 2022.
		• Letter/Flyer update on EIS—mailed on 18 Nov 2021.
		• Bore census request mailed on 18 Nov 2021 (potentially impacted tenement holders only).
		• Data sharing agreements have also been entered into with relevant tenement holders (BMA, Whitehaven, Peabody and Pembroke).
	Indigenous Group	• Written correspondence to provide notice of Draft ToR— mailed to Barada Barna on 6 Jan 2020.
		• Face-to-face meeting with Barada Barna representatives held in Moranbah on 22 Nov 2021.

Table 2.4: Consultation regis
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Affected and interested parties	Category	Consultation record
	Local Government	Written correspondence to provide notice of Draft TOR— mailed 6 Jan 2020.
		<ul> <li>Face-to-face meeting undertaken on 12 October 2020 in Moranbah (Project overview and introductions).</li> </ul>
		Face-to-face Project update meeting in Moranbah on 22 Nov 2021.
		Face-to-face Project update meeting in Moranbah on 11 Apr 2022.
Interested	State Government	<ul> <li>First meeting with DNRME on 20 May 2019.</li> <li>Face-to-face pre-lodgement meetings undertaken with DES</li> </ul>
		on 14 Jun 2019 and 05 Aug 2019.
		DES Project update provided on 18 Nov 2020 (face-to-face).
		• DES Project update provided on 26 Feb 2020 (face-to-face).
		<ul> <li>DES Project update provided on 08 Sep 2021 (video conference).</li> </ul>
		DES Project update provided on 22 Mar 2022 (video conference).
		• ToR extension request submitted to DES on 07 Apr 2022.
		<ul> <li>Ongoing engagement with DES throughout the Project (phone and email).</li> </ul>
		• DoR Project update undertaken in May 2019 and 04 May 2022.
	Commonwealth	Pre-lodgement meeting (for Project EPBC Referral) 26 Augus 2019.
	Government	DAWE Project update provided on 08 Apr 2020 (video conference).
		• DAWE Project update provided on 21 Sep 2021 (video conference).
		DAWE Project update provided on 29 Mar 2022 (video conference).
		Ongoing engagement with DAWE throughout Project (phone and email).
		Written correspondence to provide notice of Draft TOR— mailed 6 Jan 2020.
	Tenement holders	• Face-to-face meeting with Whitehaven Coal on 10 Sep 2019 and 25 Aug 2021.
		• Face-to-face meeting with Pembroke Resources on 21 Aug 2019.
		• Face-to-face meetings with Aquila Resources on Sept 2019.
		<ul> <li>Data sharing agreements have also been entered into with relevant tenement holders (BMA, Whitehaven, Peabody and Pembroke).</li> </ul>
		Virtual meetings.
		• Letter/flyer update on EIS—mailed 18 Nov 2021.
	Infrastructure service providers	Written correspondence to provide notice of Draft TOR— mailed 6 Jan 2020.
	Local and regional	• Face-to-face meetings as part of SIA consultation (2020).
	Local and regional employment and training providers	Virtual meetings part of SIA (2020).
	Public and private housing providers	• Face-to-face meetings as part of SIA consultation (2020).



Affected and interested parties	Category	Consultation record
	Local and regional commerce and community development groups	• Face-to-face meetings as part of SIA consultation (2020).
	Social and public service providers	• Face-to-face meetings as part of SIA consultation (2020).
	Emergency services and public health providers	• Face-to-face meetings part of SIA consultation (2020).
	Other (Table 2.2)	• Written correspondence to provide notice of Draft TOR— mailed 6 Jan 2020.
		<ul> <li>Face-to-face meetings with local community support groups.</li> <li>Letter/flyer update on EIS—mailed 18 Nov 2021.</li> </ul>

In addition to completed consultation, the SIMP (Appendix T, Section 6) details a community and stakeholder engagement action plan for the construction, operation and rehabilitation phases of the Project. The SIMP identifies actions to be undertaken, responsibilities, relevant stakeholder groups and consultation timeframes (Appendix T, Social Impact Management Plan).

Ongoing monitoring and review of the SIMP are also provided for in recognition that the SIA reflects the social conditions within the study area at the time of assessment. Monitoring and review, therefore, provides a mechanism to implement adaptive management should proposed management measures prove to be ineffective.

## 2.3 Potential impacts

An overview of stakeholders engaged and the key matters that have been raised and discussed is provided in Table 2.5.

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#### Table 2.5: Summary of stakeholder engagement and key matters raised

Category	Entity	Means of engagement	Key matters discussed/issued raised
Local Government	Isaac Regional Council—elected representatives and key Council staff	Face-to-face meetings; Standing Committee meeting and subsequent discussion	<ul> <li>The IRC appreciated the opportunity to learn about the Project and looks forward to an ongoing relationship with Jellinbah.</li> <li>Council recognised that Jellinbah is an existing operator, and the Project is essentially an underground extension of the existing Lake Vermont operation.</li> <li>Council appreciated that without the underground extension, operations at Lake Vermont would scale back significantly and result in the workforce being reduced by 50%, which would have a negative social impact on Dysart.</li> <li>Council provides a broad range of services and facilities in Dysart. It was recognised that a diminishing rate base makes service delivery increasingly difficult.</li> <li>Council recognises the ongoing dialogue regarding the planning approvals for the expansion of the Lake Vermont Workers Accommodation Village. It was recognised that camps could generate economic activity and benefit for local businesses.</li> <li>Council is committed to advocating wherever possible for opportunities to be provided to local businesses.</li> <li>A preference of Council is to support existing infrastructure and services rather than coming up with new initiatives. It is preferable for projects to invest in supporting the sustainability of existing facilities, services and networks.</li> <li>Council acknowledged the Project would create impacts on local housing and accommodation, if not in isolation, through the cumulative impact on multiple Projects planned within the region. Strategies should, therefore, be proposed to support the management of these challenges.</li> <li>Mental health is a major issue in the workforce. Council's position is that local living greatly reduces mental health is a wajor issue in the workforce. Council's position is that local living greatly reduces further dialogue regarding potential extra usage and maintenance contributions regarding the Golden Mile Road.</li> </ul>
State Agency	Office of the Coordinator- General—Coordinated Project Delivery Division (CPDD)	Face-to-face meetings	<ul> <li>OCG recognised and welcomed the involvement of Jellinbah in the SSRC Act review.</li> <li>It was recognised that a key focus of the SSRC Act is to enable local communities to benefit from major resource projects. Jellinbah highlighted that this was an outcome that was wholly supported, as reflected by the contributions already made to community outcomes in Dysart.</li> <li>OCG appreciated being provided with a briefing on the Meadowbrook Project and the SIA to be completed as part of the EIS.</li> </ul>

Category	Entity	Means of engagement	Key matters discussed/issued raised
			<ul> <li>OCG recognised the existing Lake Vermont operation. It was further recognised that Lake Vermont and the Meadowbrook Project are very closely linked in terms of maintaining existing levels of employment and contributions to the Dysart community.</li> <li>It was acknowledged that Dysart was the central community of relevance to the Project.</li> <li>SMEC confirmed that the local study area adopted for the SIA was the town of Dysart and Isaac LGA.</li> <li>OCG recommended continued engagement with Isaac Regional Council to complete the SIA and SIMP.</li> <li>OCG highlighted the importance of creating ongoing employment opportunities for residents of Dysart and the broader region. Also recognised the challenge of attracting people to move to Dysart and encouraged innovative incentives being provided to encourage this outcome.</li> <li>OCG recognised the housing situation in Dysart due to BMA holding a substantial proportion of housing stock.</li> </ul>
State Agency	Department of Aboriginal and Torres Strait Islander Partnerships	Virtual meeting	<ul> <li>DATSIP explained that its role is to enhance and protect Aboriginal and Torres Strait Island culture and improve social and economic outcomes for Indigenous people.</li> <li>It was highlighted that there is a need to break intergenerational disadvantages experienced by Aboriginal people and that the provision of employment and training programs make a very positive contribution to achieving this outcome.</li> <li>DATSIP offers support in terms of creating and sustaining Indigenous employment. It is recommended that targets for Indigenous employment are set by major projects as it has proven to be one way in which to further promote commitment to Indigenous employment and training outcomes.</li> <li>DATSIP strongly encourages mining proponents to have structured programs in place to maximise Indigenous employment.</li> <li>It was recognised that employment and training targets need to be realistic and that it can be very difficult to achieve such targets, as a mining environment may not be amenable to Indigenous people. It is only with proper support networks that this situation can be improved.</li> <li>DATSIP maintains a register of Indigenous businesses. If Jellinbah or the primary contractor would like to undertake an EOI process with Indigenous businesses, DATSIP can assist with distribution through business networks.</li> <li>DATSIP highlighted that the continuity of programs and awareness regarding opportunities in the mining sector are key factors influencing success.</li> </ul>

Category	Entity	Means of engagement	Key matters discussed/issued raised
State Agency Department of Housing and Public Works	Virtual meeting	• The Department of Housing currently has approximately 20 houses in Dysart. Most of these are currently occupied.	
	Public Works		• As part of a region-wide effort to reduce the quantity of housing stock held by the Department, there are properties in Dysart that they are seeking to sell. There have been three properties in Dysart recently sold by the Department.
			• Some of the housing stock is Dysart is aged and in need of renovation and repair.
			• There is limited demand for Departmental housing from within the Dysart community itself. Demand for social housing predominantly comes from other areas in the region (such as Moranbah) and outside the region.
			• Departmental housing is generally reserved for people in crisis situations or with very limited economic resources.
			• The Department recommends that mining companies should try to invest in housing, as this serves to reduce the volatility of local housing markets.
State Agency Department of Employment, Small Business and Training		Virtual meeting	• The Department seeks to work in partnership with proponents to provide training and apprenticeship programs. They seek to work with Project proponents to connect buyers and major contractors with local businesses seeking to expand their supply chains and position them to win project work.
			• The Department administers the 'Major Project Supply Chain Development Program' that supports job creation and development of regional supply chains. This is achieved through assisting proponents to engage directly with local businesses involved in all stages of the supply chain.
		• There are various government-funded programs that can be tapped into. Under 'Skilling Queenslanders for Work', there are four programs that can be linked with. It is recommended that when the Project is at an appropriate stage of development, Jellinbah will make contact and work through what can be supported.	
		• There are skill shortages in key industries relevant to the Project, particularly in construction, due to recent government-led construction programs to stimulate the economy post-COVID.	
			• Mining skills seem to be in relatively short supply, though this can be difficult to gauge due to it being unclear when projects will be decommissioned.
			• Would like to see the proponents of major projects access available Departmental programs to a greater extent. There is a range of programs on offer; however, uptake by industry is sometimes limited.



Category	Entity	Means of engagement	Key matters discussed/issued raised
			<ul> <li>It was noted that the nature of employment in the mining industry (particularly seven days on/seven days off shift scheduling) has had an effect on whether people choose to live in local communities. The Department would be interested in linking with/supporting Jellinbah in any training initiatives (particularly 18–25-year-old cohort). This does not need to be a locked-in performance initiative—just working through what can potentially be done to maximise employment opportunities for young people.</li> </ul>
Local and regional employment and training providers	Thiess Mining Services	Face-to-face meeting	<ul> <li>Thiess is the principal mining contractor for the existing Lake Vermont Mine.</li> <li>Thiess has demonstrated a high-level of commitment to providing apprenticeship opportunities for young people, with over 63 apprentices being supported since 2013.</li> <li>A challenge has been that the mining industry has not promoted itself as well as it could have to young people. This has resulted in low numbers of school leavers and university graduates specialising in mining engineering. To address this deficiency, Thiess has had to train persons with civil engineering qualifications for mining roles.</li> <li>There has been an effort to open up more roles that are not a seven days on/seven days off 12 hours a day roster. This allows more women with children to participate in the workforce.</li> <li>Jellinbah and Thiess have supported a wide range of community initiatives in Dysart. They have established a very close relationship with schools by supporting the annual awards nights in both the high school and primary school. They have also been involved in a variety of programs, including science, technology, engineering and mathematics (STEM) week where on-staff mining professionals go to schools and run sessions with children around specific mine engineering and operation topics.</li> <li>Thiess supports bok week in the schools—this includes the publication of two books, including one which presents local Aboriginal poems, with Thiess funding all printing and publication costs.</li> <li>Thiess is highly supportive of Indigenous culture and the creation of opportunities for Indigenous people. They provide funding to the 'Sisters in Mining Program', which seeks to open opportunites for Indigenous women to gain employment in the mining sector. They also provide sponsorship to the celebration of National Aborigines and Islanders Day Observance Committee (NAIDOC) week in Dysart.</li> <li>Workforce wellbeing is a focus. Jellinbah and Thiess provide a comprehensive 'Employee Assistance</li></ul>

Category	Entity	Means of engagement	Key matters discussed/issued raised
Local and regional employment and training providers	Resource Centre of Excellence/ Regional Industry Network	Virtual meeting	<ul> <li>The Resource Centre of Excellence provides facilities and support across all facets of resource development. A key objective of the Centre is to bring people together to work together to solve industry problems.</li> <li>The centre is based in Mackay and provides support and guidance to mining and other resources businesses across the Mackay Isaac Whitsunday region.</li> <li>The centre includes an underground mine simulated training and testing facility and showcases emerging technology and capabilities. They also provide training and conference facilities.</li> <li>The centre recently held a successful open day for local businesses to view the Centre's facilities and meet and collaborate with other resource sector professionals.</li> </ul>
Public and private housing providers	Emergency and Long-term Accommodation Moranbah (ELAM)	Face-to-face meeting	<ul> <li>ELAM provides emergency accommodation for persons in times of crisis.</li> <li>ELAM offer a 12-week support program that includes food, accommodation and transport.</li> <li>Of the people that ELAM assists, most progress through the Department of Housing system to attain long-term accommodation.</li> <li>There are high levels of demand for crisis accommodation with all available accommodation fully booked.</li> <li>Highly recommend providing the workforce with a genuine opportunity to live in local communities. Living locally not only benefits the town but also the employee in terms of being part of the family and the community and the company, as there is less turnover of staff.</li> <li>Dysart has a great community who have proven to be highly resilient. The town has gone through some difficult times recently but remains a very good place to live, with strong local community connections.</li> <li>Dysart has been affected by the decision of the Department of Housing to provide social housing to people from other areas (Charters Towers, Mackay etc.). People have moved to Dysart without fully appreciating the relative isolation and lack of services. They are generally not able to find employment and fail to integrate into the community.</li> <li>Domestic violence is a primary reason for people seeking crisis accommodation, and this has further worsened as a result of COVID.</li> </ul>
Public and private housing providers	Ausco 'Stayover' Workers Village- Dysart	Face-to-face meeting	<ul> <li>There is a total of 410 rooms at the village.</li> <li>The 15 m<sup>2</sup> rooms all include a double bed and ensuite along with a desk, bar fridge and flat screen TV with Foxtel.</li> <li>There are 10 'Eco-cabins', which are an executive option. They are considerably larger (30 m<sup>2</sup>) and well appointed.</li> </ul>



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Category	Entity	Means of engagement	Key matters discussed/issued raised
			<ul> <li>The complex also includes an entertainment centre, BBQ areas, gym, running track, café' and corner store.</li> <li>With the exception of 10 rooms, all rooms at the village are fully contracted to BMA.</li> <li>The village is used as a spill over facility for the adjacent BMA camp. While BMA has contracted almost all of the rooms, they are not always used. The village is often only 50% occupied.</li> </ul>
Public and private housing providers	Real estate agencies	Face-to-face meetings	<ul> <li>Housing in Dysart remains dominated by the influence of BMA who retain ownership of a substantial proportion of housing stock.</li> <li>Housing values dramatically reduced following the closure of Norwich Park mine along with the general mining activity downturn which occurred throughout the region in 2013/14.</li> <li>There has been very little new housing stock coming online. Many of the houses in Dysart are not high quality, as they were built for the purpose of servicing the life of mines rather than a long-term ownership.</li> <li>There has been a recent uplift in the housing market in Dysart.</li> <li>There is a deficiency of supply of higher-quality, large (four bedroom) homes for which there is a relatively high-level of demand.</li> <li>Rental accommodation is also relatively constrained for higher-quality houses.</li> <li>There are some positive signs that the housing market will further stabilise. Projects such as Meadowbrook and Saraji are very important to both direct demand and stimulation of speculative interest and investment in Dysart.</li> </ul>
Local and regional commerce and community development groups	Moranbah Traders Association	Face-to-face meeting	<ul> <li>Moranbah Traders Association seeks to create links between mining proponents and local businesses for mutual benefit.</li> <li>Moranbah Traders Association is a voluntary, community-owned entity that has been operating for 25 years. There are about 120 members, with a core group of 25 who regularly meet.</li> <li>It is recognised that Jellinbah is an existing operator in Dysart and has a reputation for being respectful and committed to the town. It is generally the case that if proponents do the right thing for the community, then they will support continued and expanded operations.</li> <li>The culture and attitude set by proponents is important in terms of overall community and business acceptance and support for projects.</li> <li>Throughout the region, there has been strong levels of activity and growth over the last few years—even the onset of COVID has done nothing to affect the level of regional activity.</li> </ul>

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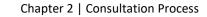
Category	Entity	Means of engagement	Key matters discussed/issued raised
			<ul> <li>In places like Moranbah, the level of activity is already having a notable effect on housing prices and the availability of housing. Dysart is not yet experiencing such pronounced effects; however, history has shown that things can change quickly, as it would only need a major project like Saraji East to rapidly stimulate commercial and housing demand.</li> <li>It is the construction phase that creates 'boom time' conditions. Once projects move into operational phases, there is generally far less pressure on housing and local services.</li> <li>Highly recommend encouraging workers to reside locally, as a strong town works best for all parties. Businesses thrive in a buoyant, local economy, which also benefits proponents in terms of viable local procurement alternatives.</li> <li>A focus of the Moranbah Traders Association is to achieve cheaper flights in and out of the region. Provision of safer road conditions is also a priority.</li> <li>There are regional opportunities associated with technology, such as increasing automation along with building capability in fleet maintenance.</li> <li>Council is attempting to establish an Isaac Chamber of Commerce, which would replace the primary role of the Moranbah Traders Association.</li> <li>The Dysart Business Group is a loose association of businesses and is not an incorporated body.</li> </ul>
Local and regional commerce and community development groups	Local businesses	Face-to-face meetings	<ul> <li>The poor state of the commercial centre of Dysart is a major factor making things tough for local businesses. The owner resides on the Gold Coast and has refused to make any of the necessary investments to maintain the amenity of the centre.</li> <li>Businesses in the centre are committed to the town and do everything possible to create a good experience for customers; however, the condition of the shopping centre makes things difficult.</li> <li>The shopping centre used to be a real community hub. It was a place where everyone enjoyed coming, as there were water features and playgrounds. Residents commonly were married at the centre.</li> <li>Unfortunately, the wrong investor bought the premises, and it has fallen into disrepair to such an extent that it has become a feature which represents the demise of Dysart as a thriving community.</li> <li>In spite of the poor state of the shopping centre, businesses have recently enjoyed relatively buoyant levels of trade. There have been some positive signs that the local economy is recovering.</li> <li>One factor which effects all businesses is the persistent power outages. It is not known whether this is due to poor connections to the shopping centre or a broader problem.</li> <li>Overall, the business community has needed to become resilient to the boom-and-bust cycles, which continue to characterise the town.</li> </ul>

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Category	Entity	Means of engagement	Key matters discussed/issued raised
Local and regional commerce and community development groups	Barada Barna Aboriginal Corporation		<ul> <li>There have been ongoing negotiations between Jellinbah and the Barada Barna regarding the resolution of the Native Title over the parcel of land adjacent to the Lake Vermont Workers Accommodation Village.</li> <li>The Barada Barna are looking to build long-term relationships with proponents, such as Jellinbah. They are looking to build an understanding of their culture (e.g. connection to land) with mining companies.</li> <li>The Barada Barna are looking to maximise employment opportunities, particularly opening up training and skills development opportunities for Barada Barna People. This is not just about technical training but also all the other levels of support that deliver sustained employment outcomes.</li> <li>The Barada Barna would like to see proponents prioritise sustainable employment pathways for traditional owners and not just employ Aboriginal people from anywhere to meet targets/quotas.</li> <li>Mentoring is the key to generating successful employment outcomes for young people. This is what the Barada Barna is focusing on.</li> <li>Recording history and language is very important to the Barada Barna, as much of their history has been lost. Suicide prevention is also a focus, as rates are too high for Indigenous people.</li> <li>Any support the Proponent could make to trainees and employment pathways would be greatly appreciated.</li> <li>Barada Barna acknowledged they are in the process of developing their own rehabilitation capabilities to support mine rehabilitation through their associated consulting entity.</li> <li>An interest was expressed by the Proponent to update the existing 'Cultural Heritage Management Plan' relevant to the Lake Vermont Complex. This proposal was supported by Barada Barna.</li> </ul>
Social and public service providers	Dysart High School	Face-to-face meeting	<ul> <li>The school currently has a total of 275 students. This is below full capacity, which is around 350 students.</li> <li>Overall numbers at the school have been declining over the last 10 years. There is a direct correlation with the number of people associated with the resource industry living in town.</li> <li>There is a notable differentiation in terms of the types of students at the school. There is a substantial cohort who are from relatively well-off families and are well cared for. There is also a stream of students from low socio-economic families predominantly living in social housing. There are some high-need students in this cohort.</li> <li>One of the key challenges for the school is to retain the academically-minded and committed children through to Year 12. Retaining these students by creating an environment for them to thrive in is important.</li> </ul>

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Category	Entity	Means of engagement	Key matters discussed/issued raised
			<ul> <li>There is a real focus on tailoring the curriculum as much as possible to the interests and career pathways that are available.</li> <li>The school is always looking to increase career pathway options, such as school-based traineeships and apprenticeships.</li> <li>As the mining sector is so dominant in the region, it makes sense to focus education and training on opening up career pathways into this sector. The school highly welcomes ongoing partnerships with Jellinbah and other proponents to achieve this outcome.</li> <li>STEM is also a focus, and the school appreciates the contributions that Jellinbah and Thiess have made in terms of professionals coming to the school and showing students the sorts of opportunities there are in the mining sector.</li> <li>Any opportunities to further build an active and sustained partnership between the school and Jellinbah's Lake Vermont/ Meadowbrook Project is highly welcomed. The expansion of the existing workers camp was briefly discussed. The expanded camp is somewhat buffered from school buildings by the oval; however, the construction of appropriate fencing would be appreciated.</li> </ul>
Social and public service providers	Lady Gowrie Dysart Childcare Centre	Face-to-face meeting	<ul> <li>The centre is operating very close to full capacity. The only spaces available are a couple in the junior kindy age range (3–5 years).</li> <li>The waiting list for younger age groups (babies through to 3 years) is long, as there is a high demand.</li> <li>There has been a recent upsurge in demand presumably due to an upswing in mining activity.</li> <li>There are two things which inhibit the ability to offer greater availability: lack of staff and available space.</li> <li>It is very difficult to attract staff to Dysart. This has been exacerbated by the requirement for Certificate III and degree qualified staff. There is a general shortage of these employees and attracting them to Dysart is a real issue. It is understood that by the end of 2021, the centre will need to have all staff either fully qualified or in the process of studying to attain the required qualifications.</li> <li>Housing can be an issue in Dysart because there is a lack of quality stock, which further detracts people from coming to Dysart. Most of the centre's staff have partners who have subsidised housing.</li> <li>The centre does not have the resources to expand the available space. There is an adjacent community space that could be fitted out as an area for the 3–5-year cohort. This would free up additional space in the existing rooms for younger ages.</li> </ul>



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Category	Entity	Means of engagement	Key matters discussed/issued raised
			<ul> <li>Any contributions or support to expand the space available for children or to attract staff would be most appreciated, as the provision of childcare to meet community demand is rapidly becoming a real challenge.</li> <li>A further issue in Dysart is the lack of any after-hours care for school children. There used to be a number of services; however, these have recently closed due to tighter operational requirements that has left a gap.</li> </ul>
Social and public service providers	Dysart Primary School	Face-to-face meeting	<ul> <li>The school currently has 330 students. The maximum capacity of the school is 500 students.</li> <li>There is a notable loss of students between primary school and high school, as reflected in there being around 100 more children enrolled in the primary school than the high school.</li> <li>There is a constant turnover of teachers. Many young and graduate teachers come to Dysart to 'do their time' in a regional area. There will be five new teaching staff coming next year—three of which are university graduates. Generally, they commit to a three-year stint in Dysart.</li> <li>The school does actively recruit new teachers. They make sure new teachers have a good understanding of the environment they are entering, including some of the limitations in terms of services and facilities. This prepares them and avoids any feelings of disappointment. Overall, there is a positive attitude and a commitment to do a good job while in the community.</li> <li>The school is fortunate to have some exceptional long-term teachers who create a great environment for the students and the young teachers coming through.</li> <li>Further support is provided by the Centre for Learning and Wellbeing in Emerald that focuses on attraction and preparation of teachers in rural areas.</li> <li>All teaching staff are provided housing, and the school manages a portfolio of houses, which does create an administrative burden that needs to be managed.</li> <li>There is a general lack of opportunities for students outside of school. This is particularly so for girls. The dance school in the shopping centre is a really important service; however, its ongoing viability may be affected by the shopping centre owner demanding excessive rents.</li> <li>There is a lack of mental health support for young people.</li> <li>Prevention is the best intervention regarding mental health. There are some great programs such as Headspace and Bush Kids; however, they are only outreach services in Dysart.</li> </ul>



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Category	Entity	Means of engagement	Key matters discussed/issued raised
			• Parenting courses are also very important. There are some high-need families in Dysart. This includes some very low socio-economic families and also other families when the parents are largely absent due to both parents working for resource projects.
			• There has been a recent increase in the number of mothers taking up job opportunities and the subsequent drop off in students' academic performances, as they are not getting the same support and encouragement at home.
			• There are also lots of amazing families in town who work really hard to support the school and the students.
			• Dysart is quite a complex community in that it wouldn't exist if not for the mines, but it also seeks to maintain a degree of its own autonomy and self-identity.
Social and public service providers	Dysart Community Support Group	Face-to-face meeting	• Dysart is quite a transient community. This has an effect on accommodation availability and affordability.
products			• When rents are down, there is commonly an influx of people on low incomes moving into town. They underestimate the high cost of living and the lack of support services and end up requiring assistance.
			• An ever-increasing cohort is single mothers looking to escape abusive relationships who are attracted by the relatively low rental prices.
			• A lot of what the Community Support Service does is problem-solving for people who are in need.
			• Housing and accommodation are an ongoing challenge. While there are a large number of unoccupied dwellings, they are privately owned and not available for rent. There is high competition for available stock.
			• Investors who bought houses at high rates are waiting for the next boom to sell and are not prepared to spend any money on maintenance in the interim. Houses are subsequently in poor condition.
			• There are four units of affordable housing in Dysart that are owned by the Isaac Affordable Housing Trust. They are all occupied and demand for these is strong.
			• Low-income and vulnerable people who move to Dysart do not realise how difficult it is to access services. There is no public transport, and it is beyond the means of some people to access services in Moranbah and Mackay
			• There were a cohort of long-term homeless and very low-income people who were provided Department of Housing accommodation in Dysart. They have not integrated into the community and are high-need. Fortunately, some of these are now moving on to locations that are able to better provide the social support services required by these individuals.

Category	Entity	Means of engagement	Key matters discussed/issued raised
Emergency services and public health providers	Dysart Police Station	Face-to-face meeting	<ul> <li>The Dysart Police Station has two permanent officers. Housing is also provided.</li> <li>Overall, rates of crime have dropped off recently—could be related to the onset of COVID.</li> <li>Most call-outs are related to domestic violence and mental health. There has been greater reporting of domestic violence, and it now accounts for up to 40% of all call-outs.</li> <li>There is some drug-related crime in Dysart—primarily cannabis and ice.</li> <li>There are some high-need families who have moved into Dysart, as they were provided Department of Housing social housing. These are the cause of a few problems in the community. There are very few call-outs to the worker accommodation villages—almost all call-outs are to houses. The camps are well run, and mining proponents do a good job to ensuring workers are well behaved.</li> <li>The only issue with the Jellinbah and Thiess camp is the lack of CCTV cameras. The only callouts have been related to the theft of property off the back of Utes. If there was an entry gate and CCTV cameras in the parking areas, this would be a deterrence and enable perpetrators to be identified.</li> <li>Speeding is an ongoing issue on the highway, with workers coming on or going home from shifts. Fortunately, there have not been any recent fatalities.</li> <li>There is an issue with young people roaming around in groups at night. Increased employment opportunities for women (BMA's 50% target for female employment) have resulted in children being unsupervised at home, as both parents are at work.</li> <li>Children sometimes break into empty houses and get up to some mischief. Currently, it is all fairly innocent, and there haven't been many serious issues. However, this could deteriorate the longer this situation persists.</li> <li>Overall, Dysart is a good town to live in. It is a safe town that has a strong sense of community.</li> <li>The Police work closely with social service providers regarding mental health and domestic violence issues.</li> </ul>
Emergency services and public health providers	Dysart Hospital	Face-to-face meeting	<ul> <li>There is a total of 18 to 20 nursing staff at the hospital, along with a number of administrative staff.</li> <li>There is only one doctor at the hospital who also practises at the medical centre. There is definitely a need for another doctor in Dysart—at least a locum to provide support and cover.</li> <li>The hospital provides a women's health service and an allied health team visits one day a week.</li> <li>There are no dedicated mental health services. This is a major gap in health services, particularly as the incidence of mental health-related issues has been growing substantially in recent years.</li> </ul>

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Category	Entity	Means of engagement	Key matters discussed/issued raised
			<ul> <li>Causes of mental health problems seem to be due to drugs (amphetamines) and anxiety and depression because of loneliness and dislocation from family.</li> <li>The move of workforces to a seven days on/seven days off shift has seemed to have had a negative effect on mental health and overall levels of satisfaction with life. There is limited opportunity to interact with community and family in a normal way. This seems to take a toll on people, and the result is depression and drug and alcohol dependence. Most of the mental health issues that arise in workers camps are medi-vacced straight to Mackay.</li> <li>Dysart used to be a thriving community. There should be incentives for mine workers to reside in towns, as this seems to be good for both the towns and the workers, as they are able to have a more meaningful relationship with their families and the community.</li> <li>A major problem in Dysart is the lack of any public transport or taxi service. This has a big impact on people's ability to get to the hospital or the medical centre, particularly for elderly and vulnerable members of the community. If something could be done to provide a bus or subsidised transport service for these people, it would make a real difference.</li> </ul>
Emergency services and public health providers	Dysart Medical Centre	Face-to-face meeting	<ul> <li>The only doctor in Dysart who has been servicing the town for over 20 years.</li> <li>The medical centre is usually very busy, and there is often a waiting list to book an appointment.</li> <li>There have been additional doctors providing services and support; however, it has proven difficult to maintain commitment to the town due to high levels of demand throughout regional areas.</li> <li>The Medical Centre building is owned by the hospital. The doctor runs the practice out of the building and also provides medical services for the hospital.</li> <li>If the doctor is required at the hospital, patients at the medical centre either have to wait or re-schedule their appointment.</li> </ul>
Emergency services and public health providers	Moranbah and District Support Services	Face-to-face meeting	<ul> <li>Finding qualified and experienced staff is very difficult across all elements of society. A preoccupation with local employment quotas isn't completely realistic, as there are limited numbers of people available for employment.</li> <li>Youth engagement is a major issue in Dysart. There is a lack of options to keep children and young people busy and engaged. This is exacerbated by parents who are absent due to working 12-hour a day shifts. There are too many children and young people in Dysart who are roaming around unsupervised but have a substantial amount of cash or a credit card on them, as this is what parents have provided in lieu of being present.</li> <li>The police are generally very good despite being significantly under-resourced. They need to deal with a large non-resident workforce, which for some reason, do not get recognised in terms of resource allocations. This does not make any sense, and Council have continually tried to make this point recognised by the bureaucrats in Brisbane.</li> </ul>



Category	Entity	Means of engagement	Key matters discussed/issued raised
Emergency services and public health providers	Ambulance Service	Virtual meeting	• Fatigue seems to be a major cause of accidents—people are working very long shifts and alternating between day shift and night shifts. It is not surprising that there are resultant accidents. Queensland Ambulance Service appreciates major projects keeping them informed of developments that impact on their ability to service areas.
			• The Ambulance Service does get call-outs to workers camps. While the larger camps have medical first-aid capabilities, the Ambulance Service is called for more serious matters. This includes mental health issues, which can be challenging for paramedic staff.



## 2.4 Mitigation and management measures

Social impact mitigation and benefit enhancement measures have been developed for the Project in response to the SIA. The Project SIMP identifies mitigation and management measures across five key sub-plan areas:

- 1) community and stakeholder engagement;
- 2) workforce management;
- 3) housing and accommodation;
- 4) local business and industry procurement; and
- 5) health and community wellbeing.

Mitigation and management measures have been developed for each of these sub-plan areas, as detailed in Chapter 19, Economic.

## 2.4.1 Ongoing consultation

Bowen Basin Coal is committed to undertaking ongoing stakeholder consultation during the construction, operation and decommissioning phases of the Project. The Project SIMP outlines the 'Engagement Action Plan'. Ongoing consultation with stakeholders will facilitate monitoring and review of impacts, as well as mitigation measures.

## 2.4.2 SIMP monitoring

Consistent with the SIA principle of adaptive management, the Project SIMP provides a monitoring framework for each sub-plan that is designed to measure the effectiveness of management measures (Appendix T, Social Impact Management Plan, Section 2, 3, 4 and 5).

Each management measure detailed in the SIMP is assigned a monitoring and reporting framework to ensure ongoing effectiveness and relevancy of actions and, where required, amendment of ineffective actions. Monitoring results and stakeholder feedback will enable Jellinbah to identify if management measures are not effective. In particular, stakeholder feedback throughout the SIMP implementation will assist in identifying changes to social conditions and community priorities.

The Project SIMP will also be reviewed annually to assess the effectiveness and relevancy of the SIMP, with outcomes to be reported in the annual 'Social Impact Management Report'. Bowen Basin Coal will prepare an annual SIMP Report for each year of construction and for the first five years of operation. The SIMP may be reviewed and revised within a shorter period of time should Bowen Basin Coal consider amendment of the SIMP is necessary.