



Chapter 6

Community and stakeholder engagement

Acknowledgement of Country

Neoen Australia acknowledges the traditional custodians of the land in which we live, and pays its respects to their elders, past and present. The Gunditjmara are the original custodians of the Country on which the Project is located and we acknowledge them as the original custodians. We are committed to Aboriginal engagement and reconciliation and aim to bring Aboriginal and Torres Strait Islander people, local communities and the councils along for the journey to strengthen relationships and enhance local community outcomes.

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6 Community and stakeholder engagement

6.1 Introduction

Neoen Australia Pty Ltd (the Proponent) is a specialist, independent power producer with a long-term vision to produce renewable, competitively priced energy sustainably and on a large scale. The Proponent's total capacity in operation and under construction globally is currently 8.4 GW and it is aiming for more than 10 GW by 2025. The Proponent is one of Australia's leading renewable energy producers with over 4 GW of wind, solar and battery storage projects in operation or under construction.

The Proponent is the owner of the proposed Kentbruck Green Power Hub. The Proponent understands that the success of Project is dependent to a large extent on the development of genuine, open and ongoing relationships with key stakeholders and the local community. The Proponent recognises the importance of ensuring a “no surprises” dynamic with the local community and is committed to developing and nurturing long-term relationships between the Project team and various Project stakeholders.

This Chapter outlines the Proponent's community engagement approach and objectives for ensuring key stakeholders and communities are involved and consulted throughout each stage of the Project's lifecycle. This will include the Environment Effects Statement (EES) process, which includes gathering the important data and technical reports, then the Project's public exhibition period as well as the pre-construction and construction phases. Indicative engagement plans for operations and decommissioning are also included.

Engagement approaches used to date to keep stakeholders informed include one-on-one meetings, project briefings and updates (in-person, virtual, written or electronic), community events and information sessions, and other forms of engagement specific to the stakeholder group. The Proponent has held successful community information days, has met with the Glenelg Shire Council on numerous occasions, and has an open shopfront in the centre of Portland for local people to drop by and ask questions.

Proposed engagement approaches are diverse and have been tailored to the expectations of stakeholders in accordance with the International Agency for Public Participation (IAP2) Spectrum (IAP2, 2023), INFORM, CONSULT, INVOLVE, COLLABORATE and EMPOWER. Wherever possible, The Proponent seeks to deliver engagement in alignment with the INVOLVE, COLLABORATE and EMPOWER end of the spectrum, to ensure stakeholder feedback, interests and concerns are adequately reflected in the final design and operational approach of the Project.

6.2 EES scoping requirements

The *Ministerial Guidelines for assessment of environmental effects under the Environment Effects Act 1978* (Ministerial Guidelines) state that a specific objective of the EES assessment process is “to provide public access to information about potential environmental effects as well as fair opportunities for participation in assessment processes by stakeholders and the public”.

In accordance with this objective, the EES Scoping Requirements identify the consultation requirements to be undertaken as part of the EES process. Section 2.2 of the Scoping Requirements state that the Proponent is responsible for informing and engaging the public and stakeholders to identify and respond to their issues in conjunction with the EES studies. Through implementation of an EES consultation plan, the Proponent has been informing and will continue to inform the public and stakeholders about the EES process and associated investigations and will provide opportunities for input and engagement during the EES investigations.

The EES consultation plan is required to:

- identify stakeholders
- characterise the stakeholder groups in terms of their interests, concerns and consultation needs and potential to provide local knowledge
- describe the consultation methods to be used and outline a schedule of consultation activities during the EES investigations and development of the EES
- outline how inputs from stakeholders will be recorded, considered and/or addressed in the EES.

In response to these Scoping Requirements, a Community Consultation Plan (CCP) for the Project was prepared by the Proponent and published on the Department of Land, Water and Planning's (DELWP) (now DTP) website¹ in February 2020.

¹ <https://www.planning.vic.gov.au/environment-assessment/browse-projects/projects/kentbruck-green-power-hub#overview>

Section 3.2 of the Scoping Requirements states the EES should also include an outline of a program for community consultation, stakeholder engagement and communications proposed for implementation during the construction and operation of the Project, including opportunities for local stakeholders to engage with the proponent to seek responses to issues that might arise during project implementation.

This chapter and the community consultation strategy address the Project’s specific consultation matters in response to the EES Scoping Requirements.

6.3 Consultation approach

The Proponent has a vertically integrated business model, meaning that it ‘develops to own’ its projects. This model is relatively unusual in the industry, affording the Proponent an advantage over some of its competitors in respect to community engagement – the Proponent’s starting point is the clear understanding that it will be long term neighbours and participants in the local community for the lifetime of a project.

As a result, the Proponent considers it to be vitally important that trusting relationships are developed between the team on the ground who know a project the best, and the stakeholders that are part of and connected to their region and local community. Due to the rural nature of the Project’s community, the Proponent’s overall approach to consultation for the Project is open, relaxed, flexible and responsive.

The Proponent has adopted a needs-based approach for community and stakeholder engagement, reflecting the different needs and interests of the various stakeholder groups relevant to the Project. The engagement approach has been designed in line with the Project’s key phases including development, construction, operation and decommissioning, which will facilitate sustained engagement throughout the lifetime of the Project.

The Proponent’s overarching approach to community and stakeholder engagement is underpinned by the set of values and principles described in **Section 6.3**, and implemented as follows:

1. Identify stakeholder groups and individual stakeholders (see **Section 6.4**)
2. Identify engagement objectives for each stakeholder group (**Section 6.4**)
3. Identify appropriate engagement mechanisms for each stakeholder group, based on their needs and interests (**Section 6.4**)
4. Undertake engagement activities (see **Section 6.5**)
5. Consider feedback received and respond to stakeholders where needed (**Section 6.6**).

6.3.1 Consultation and engagement principles

The Proponent has a set of values that underpin and guide its work (see **Figure 6.1**). **Table 6.1** describes how these values translate into the Proponent’s external approach to building relationships with communities.

<p>Integrity</p> <p>We operate with integrity, whatever we do, whenever and wherever we do it.</p> <p>We work with partners who abide by the same rules.</p>	<p>Commitment</p> <p>We uphold all our commitments, internal and external.</p> <p>We believe in hard work and take pleasure in seeing a good job well done.</p>	<p>Audacity</p> <p>We believe we can become a world leader in renewable energy.</p> <p>We have the audacity to operate globally, imagining, designing and implementing competitive, effective energy solutions.</p>	<p>Esprit de corps</p> <p>We are loyal to each other and form a close-knit team.</p> <p>We are proud of our company, our goals and our accomplishments.</p>
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Figure 6.1: Values of the Proponent’s consultation approach

Table 6.1: Principles and practice of the Proponent’s consultation approach

Value & principle	In practice
Integrity <i>Mutual Respect</i>	We provide a space for genuine dialogue where people can participate in respectful discussions.
Integrity <i>Transparency</i>	We demystify the development process for local stakeholders and clearly communicate which points, when and to what extent they are able to influence decisions. We are transparent about how and why decisions are made.
Integrity <i>Inclusiveness</i>	We reach out to involve key stakeholders and the local community so they can play a part in decisions that affect them. We provide a range of opportunities and avenues for ongoing and meaningful dialogue, allowing for detailed and timely discussions.
Commitment <i>Responsiveness</i>	We communicate well and are responsive to emerging issues, concerns and ideas. We provide timely information and ensure people have time to digest information, understand the project and make informed decisions.
Commitment <i>Mutual Benefit</i>	We seek shared outcomes of mutual benefit for the local host community over the long term.
Audacity <i>Innovation</i>	We deliver engagement beyond regulatory conditions and compliance. We are open to and pursue bold and creative ideas and solutions tailored to and driven by the local context of the project.
Esprit de corps <i>Relationship building</i>	We build and nurture long term local relationships and make meaningful links with local leaders and organisations. We provide many avenues for interaction across the project lifecycle.
Esprit de corps <i>Celebration</i>	We value and celebrate community; our own and those of the communities we work with. We enjoy celebrating our successes together.

6.3.2 Engagement phases and communication channels

The Proponent employs a range of communication channels depending on the phase of the project (development, construction or operation). As shown in **Figure 6.2**, the Proponent’s consultation approach comprises eight engagement phases across a project’s lifetime. The Project is currently in the Planning and Approvals phase.

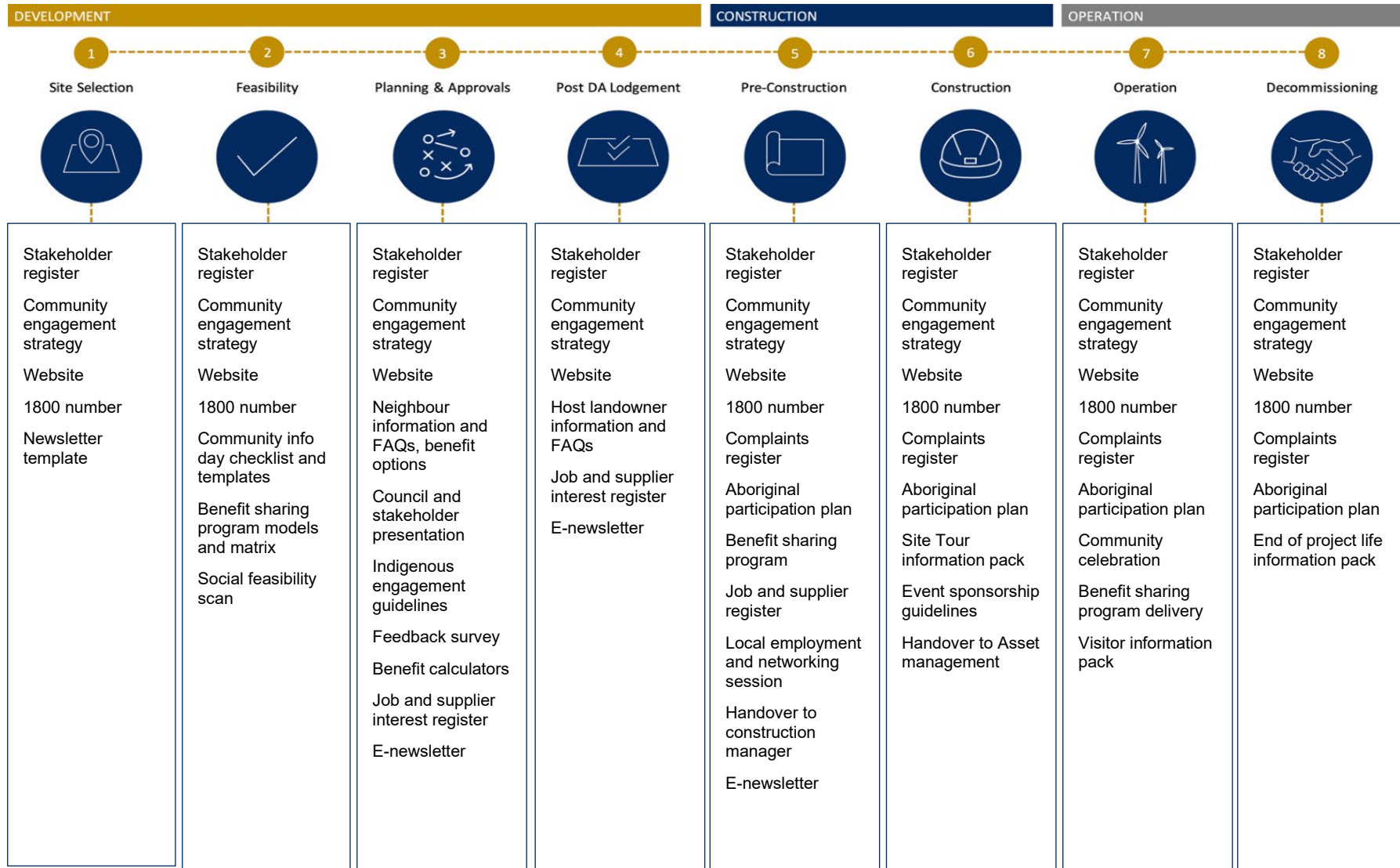


Figure 6.2: Engagement phases and communication channels of the Proponent's consultation approach

6.4 Stakeholders

Stakeholder identification began early in the Project’s development and is a tiered, ongoing process dependent on the character of the region (e.g. the setting – regional or big city; dominant industries, if any; key government policies; and interests of the local community).

A total of 21 key stakeholder groups that would have an interest in the development of the Project have been identified, which have been grouped under six stakeholder categories:

1. Government stakeholders and authorities (see **Section 6.4.1**)
2. First Nations peoples with an interest/stake in local Aboriginal and cultural heritage values (**Section 6.4.2**)
3. Business and industry (**Section 6.4.3**)
4. Nearby neighbours or landholders (**Section 6.4.4**)
5. Interest groups or community groups (**Section 6.4.5**)
6. Recreational or seasonal visitors to the local area (**Section 6.4.6**).

This includes Council and government authorities such as the Country Fire Authority (CFA), members of Parliament, Traditional Owners, schools and tertiary educators, local businesses that could service the Project, local community organisations and special interest groups, host and neighbouring landholders, and visitors to the region.

Table 6.2 provides the engagement objectives for each stakeholder group and the communication channels that the Proponent has identified to enable it to meet these objectives, such as one-on-one meetings, Project briefings and updates (in-person, virtual, written or electronic), community events and information sessions, and other forms of engagement specific to the stakeholder group. The key stakeholders in each stakeholder group that the Proponent has engaged with, either directly or through the TRG process, are listed in **Table 6.2**.

6.4.1 Government and authorities

Table 6.2: Government stakeholder groups and engagement objectives identified for the Project

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Engagement activities
Council	<p>The Proponent has worked with the Glenelg Shire Council to shape the Community Engagement Strategy and community benefit fund.</p> <ul style="list-style-type: none"> • CEO • Mayor • Councillors • Planning team 	<p>To ensure a positive and collaborative relationship with the LGA that can support the long-term goals of the community. Evidence of compliance with planning conditions.</p>	<ul style="list-style-type: none"> • One-on-one engagement • Project briefings and updates • Community information sessions • Regular meetings
Members of Parliament	<ul style="list-style-type: none"> • Roma Britnell (State Member for South West Coast) • Dan Tehan (Federal Member for Wannan) 	<p>To ensure the local member is kept updated about the Project and its progress. To seek input and advice in relation to community priorities.</p>	<ul style="list-style-type: none"> • Project briefing in person by the Proponent’s Victoria State Leader • Invitation to community events.
Road, rail and transport groups	<ul style="list-style-type: none"> • VicRoads • VicTrack • Nelson Airplane Company • Port of Portland 	<p>To ensure Project activities abide by safety and regulatory requirements.</p>	<ul style="list-style-type: none"> • Provide design plans and updates on the Project to prepare for PSA requirements. • TRG process

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Engagement activities
CFA	<ul style="list-style-type: none"> Local volunteers, Brigade Division and HQ Unit Nelson Captain: Andrew Moore GTFP Captain: Gary Weir Mount Richmond Captain: Noel Johnstone Gorae West Captain: Henry Compton 	To ensure Project activities abide by safety and regulatory requirements.	<ul style="list-style-type: none"> Provide design plans and updates on the Project to prepare for any local fire and emergency safety requirements TRG process
DTP	Victorian Department of Transport and Planning – the Impact Assessment Unit (IAU) is responsible for facilitating the EES process and the Planning Renewables unit is responsible for facilitating the PSA process.	To seek regulatory advice on preparation of the EES and application for PSA.	<ul style="list-style-type: none"> One-on-one engagement Project briefings and updates Community information sessions Regular meetings TRG process
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water – responsible for facilitating the EPBC Act approvals process.	To seek advice on preparation of the EES technical studies relating to matters protected under the EPBC Act, including flora and fauna and Ramsar wetlands.	<ul style="list-style-type: none"> One-on-one engagement Project briefings and updates TRG process
TRG agencies	<ul style="list-style-type: none"> DTP IAU DTP Planning Renewables The Barwon South West region of the Department of Energy, Environment and Climate Action (DEECA) Glenelg Shire Council Parks Victoria Environment Protection Authority Victoria (EPA Victoria) Earth Resources Regulation Glenelg Hopkins Catchment Management Authority Southern Rural Water First Peoples – State Relations Heritage Victoria VicRoads / Department of Transport and Planning 	To seek advice on the EES technical studies relevant to each agency's topic of expertise.	<ul style="list-style-type: none"> TRG process One-on-one engagement Project briefings and updates

6.4.2 Aboriginal and cultural heritage

Table 6.3: Aboriginal and cultural heritage stakeholder groups and engagement objectives identified for the Project

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Engagement activities
Traditional Owners, local Indigenous communities	<p>Registered Traditional Owners and identified indigenous representatives from the local community.</p> <ul style="list-style-type: none"> Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC) Windamara Aboriginal Corporation 	<p>To ensure the Proponent is engaging with local Aboriginal groups beyond planning requirements, such as identifying employment, training and opportunities to work on Country. Refer to Section 6.7.5 for further information about consultation with local Traditional Owners.</p>	<ul style="list-style-type: none"> Sponsorship of a Cultural Values Assessment for the entire Project Area. Invitation to co-design the Aboriginal Participation Plan Invitation to community events

6.4.3 Business and industry

Table 6.4: Business and industry stakeholder groups and engagement objectives identified for the Project

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Engagement activities
Schools, TAFEs and Universities	<ul style="list-style-type: none"> Local primary and secondary schools Southwest TAFE Deakin University (Warrnambool) 	<p>To ensure organisations are updated on education and vocational opportunities associated with the Project. To use the opportunity of a local renewable Project to dovetail relevant and practical educational content into the syllabus.</p>	<ul style="list-style-type: none"> Information and Project updates provided and invitation to future networking and engagement Opportunities for site visits for local schools. Promotion of curriculum content from the Proponent's Learning Hub²
Business groups / industry stakeholders	<p>A detailed list of business groups / industry stakeholders will be identified for the Project pre-construction during the development of the Local Participation and Social Procurement Strategy and Aboriginal Participation Plan. Key business groups / industry stakeholders identified to date include:</p> <ul style="list-style-type: none"> Sims Drilling GR Carr Mibus Brothers Keppel Prince Engineering Porthaul Baxter Hire Equipment Portland Signworks 18 Grams Goodman Photography 	<p>To ensure the Proponent is creating opportunities for local businesses to participate in the development of local renewable energy projects.</p>	<ul style="list-style-type: none"> Pre-construction local business expression of interest Invitation to Local Employment and Supplier Networking session

² The Proponent's Learning Hub: <https://neoenlearning.com/>

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Engagement activities
	<ul style="list-style-type: none"> A1 Realestate Powerhouse Productions 12 Folds Davis Print 		
Accommodation Providers	<p>For detailed list of relevant accommodation providers identified for the Project refer to the draft Workforce Accommodation Management Plan attached at Appendix C of the Social Impact Assessment (Appendix R).</p>	<p>To ensure the Proponent is managing accommodation capacity limitations and creating opportunities for local businesses to participate in the development of local renewable energy projects.</p>	<p>Pre-construction update of the Accommodation Management Plan in consultation with Council.</p>
Employment providers	<p>A detailed list of relevant employment providers will be identified for the Project pre-construction during the development of the Local Participation and Social Procurement Strategy and Aboriginal Participation Plan. Key employment providers identified to date include:</p> <ul style="list-style-type: none"> Invest Victoria Regional Development Victoria. 	<p>To ensure the Proponent is creating opportunities for local businesses to participate in the development of local renewable energy projects.</p>	<ul style="list-style-type: none"> Pre-construction local business expression of interest Invitation to Local Employment and Supplier Networking session
Media	<ul style="list-style-type: none"> Print, electronic and social media Portland Observer The Border ABC South West Mixx FM Radio Coastal FM Win News Western Victoria 	<p>To understand the Project and be able to update their readers / viewers.</p>	<p>Project updates.</p>
Industry specific groups	<ul style="list-style-type: none"> Nearby operating project owners/developers, e.g. Pacific Hydro Nearby proposed project owners/developers: Alinta, Blue Float and WPD Group Key potential off-takers for the Project, including the Portland Aluminium Smelter 	<p>To ensure Project activities are best practice and acknowledge the existing operations and nearby development. Ongoing communication with potential energy off-takers that will benefit the region.</p>	<p>Corporate policies and feedback links from industry via the Proponent's core functions including energy management, operations control and communications to the Project management team.</p>

6.4.4 Near neighbours or landholders

Table 6.5: landholder stakeholder groups and engagement objectives identified for the Project

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Activities
Host Landowners	Residents who are hosting wind infrastructure on their land. Green Triangle Forest Plantation (GTFP) as main landowner.	Ongoing communication and discussions as the Project progresses. Contribution to the project's progress, ability to provide local knowledge, advice and input. Involvement in development of Community Benefit Sharing Scheme.	<ul style="list-style-type: none"> Monthly updates with GTFP and safety and access updates as required. One-on-one meetings Landowner updates & drop-ins Invitations & involvement in community events E-newsletter
Near neighbours	Residents within a 3.5km radius of the project site have the potential to be affected by the visual impact of the wind farm, the noise and heavy vehicle traffic associated with the construction phase. Hancock Victorian Plantation (HVP) as neighbouring plantation owner.	To create and maintain a close connection with neighbours that live within a 5km radius of the Wind farm. To keep neighbours informed about the project from early in the project planning process and provide opportunities to raise issues and provide feedback. To ensure that neighbours are aware of their ability to opt-in to the shared benefits program offered by the project.	<ul style="list-style-type: none"> Residents within 3.5 km of wind farm will be provided a neighbour benefit scheme. One-on-one engagement Invitation to be provided a private photomontage Letterbox drop project updates Community information sessions Invitation to community events E-newsletter
Neighbourhood (3292 & 3305 postcodes)	The local community / people living within the Portland, Gorae West, Heywood and Nelson townships.	To keep neighbours informed about the project from early in the project planning phase. To provide opportunities to raise issues and provide feedback.	<ul style="list-style-type: none"> Letterbox drop project updates Community information sessions Invitation to community events E-newsletter

6.4.5 Special interest or community groups

Table 6.6: Special interest and community groups and engagement objectives identified for the Project

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Activities
Advocacy groups	<ul style="list-style-type: none"> Farmers for Climate Action Foundation for Rural and Regional Renewal Australian Energy Infrastructure Commissioner 	<p>Discussion on community energy and zero emissions targets. Potential for partnerships.</p>	<ul style="list-style-type: none"> Update / presentation on project Invitations to community events
Community organisations	<ul style="list-style-type: none"> Committee for Portland Portland/Nelson sporting clubs Rotary / Lions Club Nelson Tourist Association 	<p>To understand the Project and be able to update their members. To participate in / benefit from Community Benefit Fund.</p>	<ul style="list-style-type: none"> Update/presentation on project Invitations to community events
Social enterprises	<ul style="list-style-type: none"> Friends of the Great South West Walk Men’s Shed Community Gardens Nelson Information Centre 	<p>To understand the Project and be able to update their members. To participate in / benefit from Community Benefit Fund.</p>	<ul style="list-style-type: none"> Update/presentation on project Invitations to community events
Environmental Groups	<ul style="list-style-type: none"> Nature Glenelg Trust Nelson Coast Care Group Basalt to Bay Landcare 	<p>To ensure Project activities abide by regulatory requirements and best practice.</p>	<ul style="list-style-type: none"> Provide design plans and updates on the Project to prepare for PSA requirements. Collaborate on design and Project changes

6.4.6 Recreational or seasonal visitors

Table 6.7: Regional visitor stakeholder groups and engagement objectives identified for the Project

Stakeholder group	Overview and relevant stakeholders	Engagement objectives	Engagement activities
Tourists	<ul style="list-style-type: none"> Users of the Great South West Walk Outdoor tourists including fishers and birdwatchers, and visitors to the national parks and other public reserves Other tourists passing through the Portland or Nelson areas 	<p>To ensure the Proponent is managing accommodation capacity limitations. To maintain access to recreational areas throughout construction wherever possible.</p>	<ul style="list-style-type: none"> Signage, particularly during construction. See draft Workforce Accommodation Management Plan at Appendix C of the Social Impact Assessment (Appendix R).
Visiting workers	<ul style="list-style-type: none"> Seasonal farming workers Other tradespeople and workers not associated with the Project 	<p>To ensure the Proponent is managing accommodation capacity limitations.</p>	<p>See draft Workforce Accommodation Management Plan at Appendix C of the Social Impact Assessment (Appendix R).</p>

6.5 Overview of engagement

Figure 6.3 provides a timeline of the community engagement activities undertaken by the Proponent for the Project, from 2019 to now. Each phase of engagement is described in detail in the following sections.

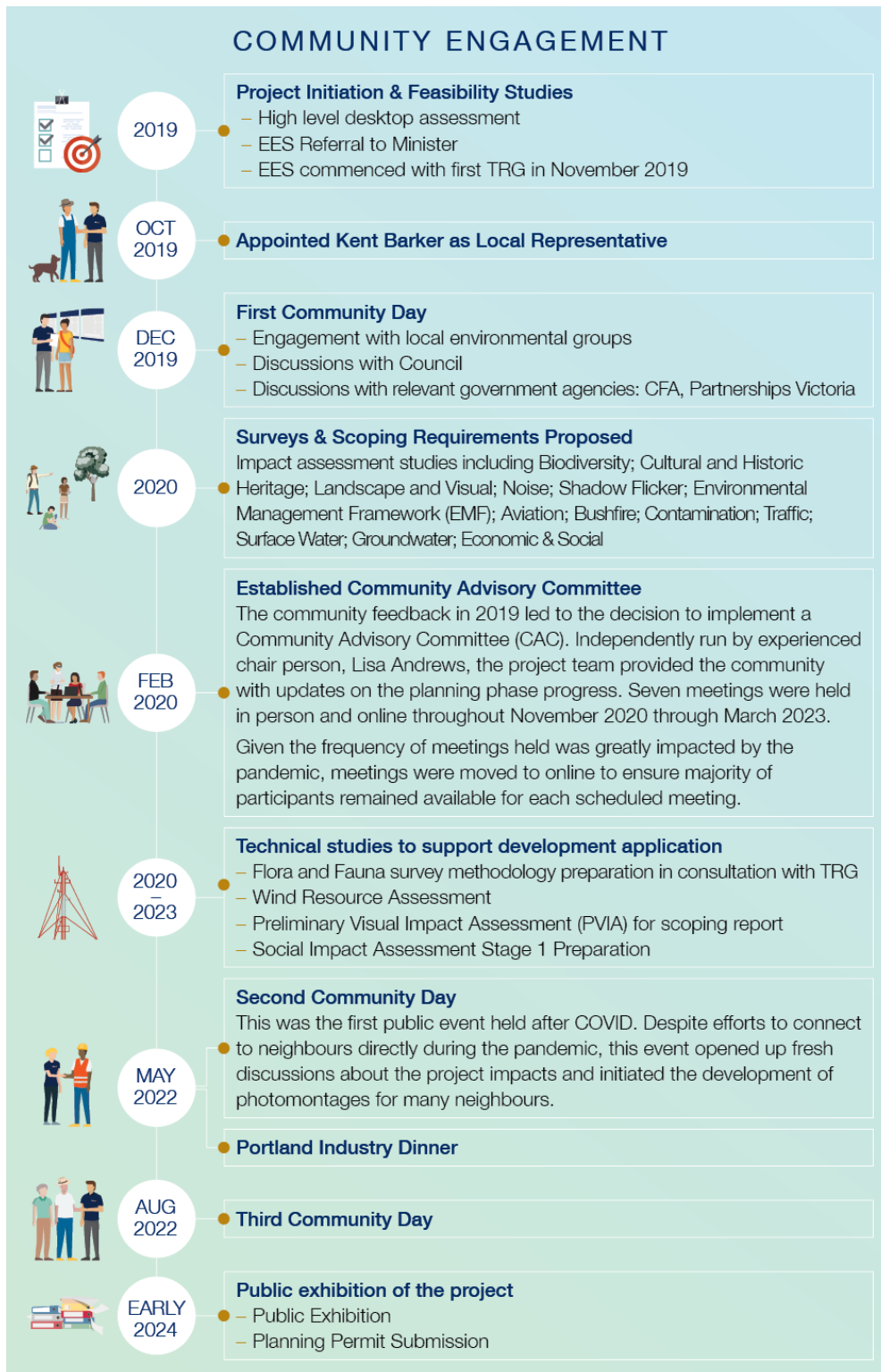


Figure 6.3: Summary of the Proponent's community engagement activities and timeline for the Project

6.5.1 Phase 1: Site selection (June 2018 – September 2019)

This phase was initiated following successful early meetings with the landholders involved in the Project, namely GTFP and the surrounding landholders. These meetings resulted in the signing of land use option agreements, at which point broader consultation commenced.

Early 2019 saw engagement with the Glenelg Shire Council and some Project neighbours. The Proponent also reached out to Federal MP Dan Tehan (online meeting) and State MP Roma Britnell (in person). Engagement with Project landholders was ongoing.

The Project website went live in late March 2019, and community drop in sessions were held in both Portland and Nelson in April.

In April 2019, the Proponent also met with Energy Minister Lily D'Ambrosio and her staff, as well as holding a further meeting with the Mayor and CEO of the Glenelg Shire Council. There was also a meeting with Regional Development Victoria.

In May, the Proponent presented to the community group 'Powering Glenelg'.

July saw community meetings in Nelson, Mt Richmond and Portland with good attendance, and members were able to meet key Project consultants involved in planning, ecology, and grid connection.

The Project was referred to the Victorian Minister for Planning in July 2019 under the EE Act, and to the Commonwealth Minister for Environment in August 2019 under the EPBC Act.

6.5.2 Phase 2: Feasibility (scoping requirements period) (October 2019 – January 2020)

This period of Project development commenced with the appointment of a local Community Liaison Officer who is a resident of Portland.

Additional community drop in sessions were held in Nelson, Mount Richmond and Portland in December 2019.

Community feedback in 2019 led to the Proponent's decision to implement a Community Advisory Committee (CAC). The CAC was established in early 2020 following interviews and newspaper advertising to ensure a good cross section of representatives from the local area. It is independently run by an experienced chair person, Lisa Andrews, with the objective of providing the community with updates as the Project progresses throughout the planning phase and providing a feedback loop to incorporate the community's feedback into Project decisions where appropriate.

6.5.3 Phase 3: Planning and approvals (early 2020 to present)

The CAC continued to meet regularly since its establishment, pivoting to online meetings during COVID-19 shutdowns.

The Project engagement approach widened to include increasing numbers of community and interest groups as the Project progressed through the planning phase.

Community Information Days were again hosted by the Proponent in person from 2022 onwards after the COVID-19 shutdowns had lifted, to present Project details and be available to answer questions from the community. This included the following events:

- 25 May 2022 in Portland, Mount Richmond and Heywood
- 15 August 2022 in Portland and Nelson.

A shopfront was also opened in Portland in August 2022 to provide a place for local community members to drop in and speak to a project representative when needed.

6.5.4 Phase 4: Post EES lodgement (public exhibition and panel hearings) (mid to late 2024 onwards)

The Proponent will ensure that the community surrounding the Project is proactively informed of the Project's public exhibition period, and of their right to access the publicly exhibited information and to ask any questions they have of the Proponent.

This will involve the preparation and placement of the following notices:

- A notice issued two weeks prior of the EES exhibition period, inviting the public to request the EES documentation in hardcopy or USB format
- A notice to be published when the exhibition period commences, inviting comment on the EES documentation.

The notices will be published at the following locations:

- The Age and the Herald Sun (a daily paper in accordance with the Ministerial Guidelines (DTP, 2023))
- The Australian (a national newspaper in accordance with EPBC Act requirements)
- The Portland Observer, the Hamilton Spectator, and the Border Watch (local newspapers in accordance with Ministerial Guidelines).

Similar information will also be sent directly to relevant community groups and Project stakeholders, as identified in **Section 6.4**.

In accordance with the requirements stemming from the Ministerial Guidelines (DTP, 2023) and EPBC Act, the Proponent will provide the Department of Transport and Planning’s (DTP’s) Impact Assessment Unit, as well as Planning Panels Victoria, with draft content of the advertisements for review.

During exhibition, the Proponent’s shopfront in Portland will be open for extended hours, with hardcopy and USB copies of the EES available for community members.

6.5.5 Phase 5 to 7: Pre-construction, construction and operations (future)

Table 6.8: Overview of construction phase engagement activities to be undertaken for the Project

Activity	Description / format / tools / resources	Target stakeholders	Purpose	Timeframe	Responsibility
Start of construction media	Issue proactive media release to mark start of construction, highlighting local benefits and local employment targets, approach and outcomes.	Media (online and newspapers)	Inform	Q1 2025	Community Liaison Officer Neoen Project Manager
Start of construction event	Host event for landholders to mark start of construction. Introduce Neoen Project Manager and Head construction contractor and invite feedback on planned approach to monitor for new issues/concerns.	Near neighbours	Involve	Q1 2025	Neoen Project Manager
Key stakeholder meetings	Further meetings with key stakeholders to introduce the Neoen Project Manager and Head construction contractor where necessary, to invite feedback on the planned approach to monitor for new issues/concerns.	<ul style="list-style-type: none"> • Council • MPs • Regulatory authorities • Local community groups 	Involve	Q1 2025	Community Liaison Officer Neoen Project Manager Head construction contractor
Site signage	Provide informative site signage in addition to minimum compliance signage. This will include contact details for the community.	All	Inform	Q1 2025	Neoen Project Manager Head construction contractor
Community Benefit Fund	Establish a Community Benefit Fund Advisory Committee via local advertising and newsletter coverage and host the first meeting. Provide and agree on Terms of Reference.	<ul style="list-style-type: none"> • Council • Neighbours • Local community • Broader community 	Empower	Q3 2027	Neoen Project Manager

Activity	Description / format / tools / resources	Target stakeholders	Purpose	Timeframe	Responsibility
Building capacity for local employment	Continue discussions and face to face introductions with key employment and economic representatives to establish the best means of supporting local hire objectives with the head construction contractor.	<ul style="list-style-type: none"> Local suppliers Local workers 	Inform	Ongoing	Neoen Project Manager
Social procurement	Continue engagement with key stakeholders to engage organisations that work directly with the Project, offering opportunities to local and Indigenous people as priority.	<ul style="list-style-type: none"> Traditional Owners/ Aboriginal businesses Local Not For Profits Employment agencies Schools 	Collaborate	Ongoing	Community Liaison Officer
Community e-newsletter	Continue production of the community e-newsletter and provide updates on construction as required. Deliver to neighbours within 3.5 km of the Project Area and email to key stakeholders and community members listed in the Proponent's stakeholder register.	<ul style="list-style-type: none"> Near neighbours Key stakeholders 	Inform	Ongoing	Community Liaison Officer
Transport route engagement	Consider additional stakeholders potentially impacted by the transport route and site deliveries and commence targeted engagement in advance of transport occurring.	<ul style="list-style-type: none"> Transport route residents Australia Post local service 	Involve	Pre-construction	Neoen Project Manager
Near neighbours	Continue close engagement with near neighbours to inform of Project progress, timings and monitor for issues as they arise. Implement use of construction disruption fund as required to mitigate impacts.	Near neighbours	Collaborate	Ongoing	Community Engagement Advisor
Emergency Services	Continue to engage with the CFA and other emergency services to ensure the Project supports local emergency response.	Emergency services	Inform	Ongoing	Neoen Project Manager
Ongoing media and community outreach	Continue to provide factual, informative media stories to the local paper for the purposes of updating the community/stakeholders on Project achievements and deliverables against social benefit and local procurement plans.	<ul style="list-style-type: none"> Media Local community Shire of Glenelg 	Inform	Ongoing	Neoen Communications Team

Activity	Description / format / tools / resources	Target stakeholders	Purpose	Timeframe	Responsibility
Complaint investigation and response plan and complaints register	Maintain an enquiries and complaints register and respond in line with the procedure outlined in the CEMP. Monitor the 1800 Project number and website enquiries. Regularly report feedback from this process to the Proponent's construction team to adjust the engagement approach / plans if required.	Project Team	Inform	Ongoing	Neoen Project Manager
Resident drop-in session	Host onsite or nearby resident drop-in session for community members to meet with the Proponent's construction team and participate in an informal update / discussion about ongoing onsite works.	<ul style="list-style-type: none"> • Neighbours • Local community 	Involve	Pre-construction	Community Liaison Officer
Key stakeholder tours	Provide an in-person experience of wind farm construction by providing key stakeholder site tours, hosted by the Proponent and the head construction contractor.	<ul style="list-style-type: none"> • Council • MPs • Chamber of Commerce • Community groups 	Involve	During construction	Neoen Project Manager
Community engagement monitoring and review	Periodically monitor / assess quality, timeliness and reach of engagement initiatives. Confirm that the engagement plan is meeting its proposed objectives.	Project Team	Inform	Ongoing	Community Liaison Officer

Table 6.9: Overview of operation phase engagement activities to be undertaken for the Project

Activity	Description / format tools / resources	Target stakeholders	Purpose	Timeframe	Responsibility
Start of operations media/event	Consider running a start of commercial operations event and media announcement. Invite key stakeholders and neighbours as an opportunity to share the outcomes delivered by the Project to date.	<ul style="list-style-type: none"> • Media • Neighbours • Council • MPs • Special interest groups • Project Team 	Inform	Commercial Operation Date (COD)	Community Liaison Officer Neoen Project Manager
Project Fact Sheet	Redevelop a Project Fact Sheet to suit operations and use for distribution in hard copy during school visits, tours and the website.	All	Inform	COD	Neoen Asset Management Team (TBC)
E-newsletter	Final edition of the e-newsletter to detail approach to asset management and to support transition into operations.	Neighbours Local community	Inform	COD	Neoen Asset Management Team (TBC)

Activity	Description / format tools / resources	Target stakeholders	Purpose	Timeframe	Responsibility
Neighbour relations	Maintain relations with immediate neighbours via direct communications, involvement in wider community activities and provision of an annual onsite event. Utilise neighbour communications for early identification of issues and risks (i.e. noise).	Near neighbours	Involve	Ongoing	Neoen Asset Management Team (TBC)
Complaint Investigation and Response Plan	Ongoing implementation of a formal enquiries and complaints procedure to ensure ongoing best-practice management of community contacts. Maintain 1800 Project number.	All	Involve	Ongoing	Neoen Asset Management Team (TBC)
Incident Response Procedure	Specific communications and engagement input to incident management to ensure community and stakeholder perspective is included (e.g. media management, neighbour notifications).	All	Inform	Ongoing	Neoen Asset Management Team (TBC)
Community outreach	Provision of site tours and/or speaking engagements to relevant groups including MPs, councils, business authorities and schools.	Local community Shire of Glenelg	Involve	Ongoing	Neoen Asset Management Team (TBC)
Community Benefit Fund	<p>Implement annual community grants commitment each year, for the life of the asset.</p> <p>Implementation includes planning, activation (advertising and stakeholder communications), media, and liaison with social benefit partners in collaboration with the Grants Committee.</p> <p>The Grants Committee will be formed during operations to administer the Community Benefit Fund.</p>	<ul style="list-style-type: none"> • Neighbours • Council • Local community • Shire of Glenelg 	Empower	Ongoing	Neoen Asset Management team (TBC)
Council and Emergency Services meeting	Maintain periodical meetings with the Council Mayor and General Manager (Council, quarterly). Maintain annual site meetings with CFA prior to bushfire season.	<ul style="list-style-type: none"> • Emergency Services • Council 	Collaborate	Ongoing	Neoen Asset Management team (TBC)

Activity	Description / format tools / resources	Target stakeholders	Purpose	Timeframe	Responsibility
Website	Maintain the existing Project website and update with relevant operations, Project news and community news as relevant and appropriate. Maintain as the primary source of detailed Project information.	All	Inform	Ongoing	Neoen Asset Management team (TBC)
Industry advocacy	Proactively identify opportunities to promote the Project's operations to the broader energy industry (e.g. through conferences and memberships). Respond to industry requests for asset operations data for the purposes of research and advocacy.	Energy industry	Involve / collaborate	Ongoing	Neoen Asset Management Team (TBC)

6.6 Feedback responses

6.6.1 Collection of feedback

Feedback was collected at the Community Information Days via feedback forms. The community was also invited to suggest ideas for benefit-sharing and how the Project could bring economic, environmental or tourism benefits to the area and/or the residents' lifestyles. During three Community Days in 2022, the Proponent provided a link to a survey. To date the Proponent has received 163 unique responses to the online survey. Approximately 70% of respondents live in the local area, of which around 13% are local accommodation or tourism providers.

6.6.2 Themes from community feedback and responses

This section summarises feedback provided by members of the community throughout the Project's engagement and consultation process, and describes how the Project design and plans have responded to this feedback.

The following infographic provides a summary of the key themes raised during the community engagement activities held to date.

Theme 1:
Visual Impact

Visual impact of the wind turbines in an agricultural and coastal landscape

While many neighbours express the view that the development of renewable energy is important, the main objection amongst near neighbours was the potential visual impact of the Project on their property. Neighbours closest to the Nelson (western) end of the Project have concerns around proximity and height of towers to their homes, farms and outbuildings. Community and nature groups were concerned around the visual impact from the Great South West Walk (GSWW) and key landmarks including Lake Mombeong, Cape Bridgewater, Nelson and public campsites.

Response to Theme 1

- The Proponent has conducted face to face meetings with neighbours and developed photomontages from several dwellings to gain a full understanding of concerns and to develop agreements to best mitigate visual impacts.
- Community information sessions have been run in Portland, Mount Richmond, Nelson and Heywood providing the opportunity for the community to raise visual impact concerns and the Proponent to respond to them, and/or communicate how visual impacts will be mitigated/managed.

- The Project design has involved the optimisation of the location and number of turbines to limit the visual impact from properties (as discussed in **Section 4.3.1.4 of Chapter 4 Project development**). There have been significant changes to the layout to provide a greater buffer to areas within the Glenelg Estuary and Discovery Bay Ramsar site (the Ramsar site) and many of the turbines initially proposed on private farmland have been removed as part of the EES process. The Project design changes are detailed in **Chapter 4 Project development**.
- The Proponent has actively engaged with the Friends of the GSWW, made changes to the Project layout and moved turbines away from key areas, including Hedditch Hill and Lake Mombeong and Swan Lake campsites. Wire frames from coastal areas have been presented to Friends of the GSWW and photomontages provided for key areas of concern (e.g. along the GSWW) to help with visualising the likely visibility of turbines from these areas. Turbine setback from the majority of the walk was also increased due to ecological reasons, leading to further reductions in visual impacts on coastal areas.

Theme 2:
Transmission connection options

Proposed overhead transmission line route option to Portland (Option 2 as described in Section 4.7 of the EES)

Near neighbours, community members and the Glenelg Shire Council have expressed a concern that the transmission line route Option 2, connecting the wind farm to the to the 500 kV line near Cashmore, via a new substation, would be at a significant impact to the community especially in comparison to Option 1 (underground through Cobboboonee National Park and Forest Park and overhead to the Heywood Terminal Station). Concerns that would have turned them against supporting overall Project included

- Personal / community safety, particularly regarding increased bushfire risk
- Potential to limit the land use options of involved and neighbouring properties including existing uses such as organic crops and dairy farming
- Increased impact to traffic and transport in the medium populated area (e.g. Mount Richmond, Gorae West, Heywood) during construction (over and above the transport requirements for the wind farm component)
- Land devaluation.

The extent of concern reached the media and community groups were formed to oppose Option 2. A full report on this matter was prepared which led to the decision to focus on the alternative route to the existing Heywood Terminal Substation (Option 1). The community expressed a strong preference for Option 1 as being preferable due to the greater benefits for the national park (less bushfire risk due to the underground cabling) and to the community.

The Transmission Line Options Assessment (**Appendix A**) provides more detail.

Response to Theme 2

- Meetings with key landholders and neighbours to understand the perceived and real impact of the transmission line Option 2 on their land and way of life.
- Feedback form invited responses directly on the perceived and real impact of the transmission line Option 2 on their land and way of life.
- Responding to questions from members of the Facebook Group and community meeting held 31 January 2021
- Decision by the Proponent to discontinue pursuing Transmission Line option 2 and sharing this information via media, newsletters, community meetings and the Project website.
- Engaged Umwelt, the Proponent’s lead planner for the Project, to undertake an objective analysis of the transmission line options considered for the Project and summarise the Proponent’s justification for decision making around the transmission line routes. This analysis has been undertaken in the Transmission Line Options Assessment (**Appendix A**).

Theme 3:
Ecotourism Concerns

Environmental concerns about impacts on local flora and fauna that might affect ecotourism

Near neighbours, community members and environmental groups, particularly those located around Nelson, have expressed concerns regarding wind farm and transmission line impacts on native flora and fauna. The region has an ecotourism industry and some local businesses and many volunteer organisations have been set up in this area to benefit from the scenic natural environments.

Response to Theme 2

- The Project design and EES biodiversity study program has been in depth for many species including Southern Bent-Wing Bat, Brolga and other threatened bird species. Turbine buffers have been adopted to mitigate these impacts where possible and appropriate. Results of these studies have been shared in information sessions with the community with the ecologists have been available to answer questions and receive feedback.
- Design modifications have been adopted to avoid wetland areas, in particular, with turbine-free buffers placed around wetlands in the Ramsar site.
- Construction methodologies have been modified to reduce impacts in environmentally sensitive areas where avoidance has not been possible, e.g. for construction of the underground transmission line through Cobboboonee National Park and Forest (see **Section 4.7.4** for more information).
- Turbine design modifications have been adopted to avoid bird and bat strikes, including raising the minimum lower blade tip height from 45 to 60 m above ground.
- Ecotourism organisations have been consulted with and discussions regarding mutual benefits are ongoing.

Theme 4:
Construction impacts

Effect of traffic, dust, safety concerns, noise, and fire risk on the local community (social impacts)

Neighbours and community members have expressed a range of concerns about the impact of Project construction period on the community, including:

- Traffic, dust and noise impacts on nearby properties.
- Potential bushfire risk associated with construction during summer.
- Accommodation impacts of a large workforce on an already stretched regional housing and accommodation market.
- Social impacts of a large external workforce in a small community. With two other wind farms previously constructed in the region, there are concerns about behavioural incidents.

Response to Theme 4

- The Proponent will consult and communicate with neighbours about likely impacts of the Project on the land and identify areas of concern with neighbours.
- The Proponent will share the construction schedule and possible impacts with landholders potentially impacted by the construction process to assist with farming or business operations.
- The Proponent will consult with neighbours regarding plans to seal/bituminise roads pre-construction to minimise disruption to road use.
- The Proponent will have its own insurance policy in place to provide coverage in the unlikely event that wind farm equipment is damaged by fire, and a Bush Fire Management Plan will include procedures to deal with a fire on site, requiring water to be kept on site for that specific purpose.
- The Proponent will prepare an Accommodation Management Plan to consider how the local region can best accommodate the incoming construction workforce (see Appendix C of the **Social Impact Assessment (Appendix R)**).
- The Proponent will establish a Local Participation and Social Procurement Strategy to increase local employment and reduce population influx.

Theme 5:
Impacts on Indigenous sites and tangible and intangible values

Impacts on Indigenous sites and tangible and intangible values of the Gunditjmara Native Title rights holders.

The Proponent has engaged with the Traditional Owners of the Country on which the Project is being developed, the Gunditjmara people. Initial meetings identified that the Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC) were rights holders of the land, not stakeholders.

Gunditjmara community concerns included:

- Impacts on any subsurface artefacts that may be located within the pine plantation (and which are therefore difficult to find during field investigations but could be impacted during Project construction).
- The Project Area has been in private ownership for a number of generations so there are few recorded sites or historical records.

Response to Theme 5

- The Proponent met with key members of GMTOAC in November 2021 and provided a video and presentation of the Project, its footprint and the proposed transmission line route through Cobboboonee National Park / Forest Park.
- GMTOAC members were provided with the opportunity to ask questions about the Project and share their views.
- GMTOAC accepted a Notice of Intent from the Proponent to negotiate a CHMP and potentially an Indigenous Land Use Agreement (ILUA).
- GMTOAC advised the Proponent of the need for a Cultural Values Assessment (CVA) to detail not only the tangible but intangible cultural values of the area. The CVA is being prepared in parallel with the EES process (between September 2022 and July 2023), but the report has not been prepared in time to accompany the EES (refer to **Chapter 11 Cultural heritage** for more information on the scope of work for the CVA).
- The Proponent and GMTOAC members walked the proposed Project site in September 2022 and gained a mutual understanding of the Project and its potential impacts of the land in relation to cultural significance to the Gunditjmara people.

Theme 6:
Local access to economic opportunities

Employment opportunities for local people

There seems to be a general perception that large civil projects come with their own workforce and that despite assurances, the Project will offer few opportunities for local employment. Several renewable energy projects have been developed in the region over the past 20 years, which have been constructed with a mix of imported and local products and personnel. More recently there has been a wind farm under construction where local businesses have not had the opportunity to quote or become involved. There is a keen interest from local suppliers and jobseekers to take advantage of opportunities offered by the Project to develop new skills or develop their business for this market. While many suppliers are enthused about the opportunities that the Project could offer, they are unsure how their business could expand and then contract to meet the changing work environment.

Response to Theme 6

- The Proponent have developed a job and supplier registry to be able to communicate opportunities at each stage of the Project's development process, and will establish an Industry Capability Network (ICN) gateway that would enable suppliers to provide information on the services they can provide to the Project. The ICN gateway would be advertised via e-newsletter.
- Project updates are regularly emailed to stakeholders who have expressed interest in working on the Project.
- CAC meetings have provided members and organisations, including but not limited to the Committee of Portland, local community members, Council representatives and community members, a forum to discuss employment opportunities and understand the requirements for the Project at each stage.
- The Proponent has shared its approach to local participation at the September 2019 CAC meeting, providing a case study of its work on the Numurkah Solar Farm (<https://www.youtube.com/watch?v=Odxl0ZLvavE>).
- The Proponent is developing a Local Participation and Social Procurement Strategy to maximise the local business opportunities on the Project, and to ensure adequate lead-in time for local businesses to be able to build their capacities and prepare the workforce to meet the opportunities.
- The Proponent will continue to meet with local businesses, industry bodies and regional economic development networks to share information and prepare for the Project's construction period.

6.7 Consultation outcomes and benefit sharing

6.7.1 Neighbour Benefit Program

Near neighbours are the stakeholder group most likely to be impacted by the Project. The Proponent will therefore establish a Neighbour Payment Program to provide a significant financial benefit to near neighbours. These funds will be provided to landholders with dwellings located within 3.5 km of one or more wind turbines.

An indicative total budget of ~\$200,000 p.a. will be provided to near neighbours. Acceptance of funding will be unconditional and will not limit neighbours from objecting or registering complaints.

Table 6.10: Near neighbour social benefits

Near Neighbours				
Benefit	Summary	Scope for stakeholder co-design	Indicative budget	Timing
Neighbour Benefit Program	Annual payment to near neighbours depending on their dwelling location and the number of nearby turbines.	Low - goodwill gesture from the Proponent which does not place any requirements on the neighbour, who remains free to oppose and/or submit complaints about the Project.	~\$200,000 per annum over 30 years (TBC)	Negotiated prior to operation commencing, payments made throughout the Project's operating life.

6.7.2 Community Benefit Fund

The Proponent is proposing an annual Community Benefit Fund of \$150,000 for the Project for the purpose of delivering tailored community benefits to the communities of Nelson and Portland and the immediate local region. The fund will be administered by the Community Enterprise Foundation, the philanthropic arm of the Bendigo and Adelaide Bank (which administers the Proponent's community funds across its entire portfolio of assets).

To ensure community oversight and involvement in the design and allocation of the Fund, an advisory committee will be established. Members will include:

- One host landowner representative
- Two or three local community group representatives
- One Glenelg Shire Council representative
- One Neoen Project representative.

Applications will be invited from interested people that align with themes to be identified by the Proponent in consultation with the community, and the applicants in proximity to the Project will be prioritised. The advisory committee will report annually to the Proponent, as detailed in the monitoring and evaluation methods described in **Table 6.11**.

Table 6.11: Community social benefits

Benefit	Summary	Scope for stakeholder co-design	Indicative budget	Timing
Sponsorship	Early-stage sponsorship of community activities (e.g. football club, playground development)	High - one-off funding provided to eligible community groups on receipt of community-led proposals	\$20,000	Implemented during planning and post-approval phases
Community Benefit Fund	Annual fund for eligible local projects	High - Community members will be on the grants committee	\$150,000 per annum over 30 years	Co-design underway for implementation commencing at the start of Project operations

Benefit	Summary	Scope for stakeholder co-design	Indicative budget	Timing
Educational initiatives	Provision of Learning Hub renewable energy education resources for students in years 5–6 and 7–8	Medium – Local schools are able to access and implement the Learning Hub resources	N/A	Ongoing
Construction in the Community	In-kind construction / technical support for delivery of new community assets	High - funding will be directed towards community-planned initiatives	\$50,000	Offered during Construction Phase
Artwork	Project artwork that celebrates local culture & renewable energy	Med – the Proponent welcomes community input on themes and artists	\$50,000 approx.	Towards end of construction / early operations

6.7.3 Ecology Fund

The Project has the opportunity to make a large contribution to ecological preservation in the Portland and Nelson region. The Proponent has set aside \$1,000,000 per year to be spent on projects that are important to the local and Indigenous communities such as land acquisition (for public land / nature reserves), care and maintenance of that land, staff to undertake field work, research projects, and offsets.

In 2020, The Recovery Plan for the Southern Bent-wing Bat (*Miniopterus orianae bassanii*) was prepared by the former Department of Environment, Land, Water and Planning, now Department of Energy, Environment and Climate Action (DEECA), and has been adopted under the EPBC Act as the national recovery plan for the species. The species is found in Victoria and South Australia.

This is the first national recovery plan for the species. The long-term recovery objective is to ensure that the Southern Bent-wing Bat can survive, flourish and retain its potential for evolutionary development in the wild. The recovery plan outlines the recovery actions necessary to ensure the species' long term survival in the wild. It lists several recovery objectives and actions, which would be greatly assisted by the funding from the Project.

Table 6.12: Biodiversity benefits

Benefit	Summary	Scope for stakeholder co-design	Indicative budget	Timing
Ecology fund	Annual fund dedicated to ecological preservation	High - Community groups and nature preservation	\$1,000,000 per annum over 30 years	Co-design underway for implementation commencing at the start of Project operations

6.7.4 Support for local jobseekers and businesses

The Proponent will develop a Local Participation and Social Procurement Strategy to maximise the Project's opportunities for local jobseekers and businesses. The Local Participation and Social Procurement Strategy will result in the Proponent and its head construction contractor utilising their spending power to cultivate and deliver genuine social benefits within the community.

The Project will also focus on delivering environmentally sustainable outcomes that can stem from social procurement and socially responsible business practices.

Additionally, the Proponent has developed promotional videos to provide 'shared wisdom' from suppliers to its other wind farms. These videos have been distributed locally, giving local community and suppliers valuable intelligence on what to expect when tendering, working and living near a Neoen-developed wind farm.

6.7.5 Working with Indigenous stakeholders

Impacts or changes to culture include effects on people's shared beliefs, customs, values, language, and dialect, as well as their local culture, heritage, and ability to access cultural resources.

The GMTOAC is the Native Title rights holder for a portion of land in the Project Area. Their interests not only lie with the Project land where Native Title exists, but also their connection to the entire Project Area that was once cared for by Gunditjmara people.

The GMTOAC has been involved in the development of the Project's CHMP since 2019. The Proponent had initially engaged a cultural heritage advisor to lead the development of the CHMP, but the need for stronger engagement with the GMTOAC led the Proponent to appoint a new Cultural Heritage Advisor in consultation with the GMTOAC. Andrew Long and Associates (ALA) was engaged to prepare an EES Cultural Heritage Impact Assessment Report that details it has developed a predictive model for identifying sensitive landforms more likely to contain Aboriginal objects in collaboration with the GMTOAC; a methodology which the GMTOAC has endorsed (see **Aboriginal Cultural Heritage Technical Report (Appendix J)**).

The Proponent will also continue to formally engage with and invite the GMTOAC to participate in and contribute to the Project's planning and development process. For example, Elder Auntie Denise Lovett attended the site of a new met mast in May 2022 and gave her verbal acceptance for its installation which occurred in September 2022.

The Proponent and the GMTOAC will negotiate an ILUA with regard to the transmission line in Cobboboonee National Park and Cobboboonee Forest Park. The GMTOAC accepted the Proponent's draft Future Act Notification letter at their board meeting in March 2022. A condition to GMTOAC's acceptance was for the Proponent to fund a CVA that would be undertaken by an independent cultural heritage advisor for the Project Area to draw out significant stories and information relating to relevant Country, including the entire wind farm site.

The CVA is currently being prepared and will involve the preparation of a report that details the cultural landscape and cultural values of the Project Area including the ethnohistory, mapping of cultural value locations and areas of cultural sensitivity, and recommendations for adaptive management and mitigation. This process will help inform the Project's assessment of and response to Aboriginal cultural values in the Project Area. The CVA will provide information to the Gunditjmara Native Title Group as they negotiate the ILUA.

6.7.6 Indigenous participation and long-term benefit-sharing

The Proponent is committed to identifying opportunities for Indigenous participation and employment during construction and operation of the Project, including the co-development and implementation of an Aboriginal Participation Plan.

The Proponent's Reconciliation Action Plan (RAP) was published in March 2023 and is publicly available on the Reconciliation Australia website³. It notes that the Proponent has developed an Indigenous Participation Plan template outlining its commitment, strategy, and approach to ensuring Aboriginal and Torres Strait Islander participation across its projects. The template is guided by and aligns with the Australian Government's *Interim Engaging with First Nations People and Communities on Assessments and Approvals under the Environment Protection and Biodiversity Conservation Act 1999* guidance document (DCCEEW, 2023).

The Aboriginal Participation Plan will provide strategies to enhance benefits to the broader Gunditjmara community and other Indigenous occupants in the region; develop targeted workforce, training and accommodation strategies; and be supported by an Aboriginal engagement process. It will aim to encapsulate all Gunditjmara interests and priorities to most appropriately set mutually agreed arrangements for working together.

6.8 Monitoring and evaluation

The Proponent is committed to continually improving its approach to engaging with the community and how it works to shape mutually beneficial plans and initiatives.

Evaluation is not a stand-alone or isolated process. Evaluation is an integral and ongoing component of every communication and engagement activity. Evaluation is also a vital element for forward planning and can provide a strategic basis for decisions about issues, including the allocation of resources.

Evaluation and monitoring measures will be detailed in the Community Engagement Strategy used to guide the ongoing delivery of community engagement and the overall development of the Project.

³ Reconciliation Australia website: <https://www.reconciliation.org.au/reconciliation-action-plans/>

Chapter 19 Environmental Management Framework (EMF) has been developed to provide a transparent and consistent framework for managing environmental risk and mitigating adverse effects of the Project. An important aspect of the EMF is ongoing community consultation, stakeholder engagement and communications during construction and operation of the Project.

The EMF sets out procedures for the following:

- complaints recording and resolution
- auditing and reporting of performance including compliance with relevant statutory conditions and standards
- review of the effectiveness of the EMF for continuous improvement.

The Complaint Investigation and Response Plan will be developed for all phases of the Project’s lifetime, that:

- Outlines the process for making and recording complaints and their resolution
- Provides a range of avenues (e.g., direct phone number, email) for community members to express their concerns or ask questions
- Specifies response and resolution procedures to ensure timely responses are provided to complaints raised.

The EMF is accompanied by a list of Mitigation Measures detailing the various plans. These specifically include:

- Community Engagement Strategy MM-SE01
- Shared Benefits Strategy MM-SE02
- Local Participation and Social Procurement Strategy MM-SE03
- Aboriginal Participation Plan MM-SE05
- Complaint Investigation and Response Plan and Complaints Register MM-SE06.

The key objectives of monitoring and evaluation, in relation to community engagement, are to:

1. Measure anecdotal levels of community and stakeholder support for the Project and Project team with the view to improving this over time and/or changing the engagement approach if key issues emerge
2. Verify that stakeholders and community members are provided with regular and diverse opportunities to be involved (or empowered) in planning, delivery and assessment of community benefits and outcomes
3. Monitor the number of complaints made in relation to the Project and to monitor the Project team efficacy in responding to these complaints in an efficient, timely manner
4. Evaluate the measurable benefits of any community benefit or formal community engagement initiatives.

Table 6.13 provides details of monitoring and evaluation methods that will be utilised by the Project team throughout the Project’s lifetime.

Table 6.13: Monitoring and evaluation methods

Objective	How measured?	Metric/s	Responsibility / frequency of measurement
Measure anecdotal levels of community and stakeholder support for the Project. Adjust the Project’s engagement approach in response to issues if monitoring shows these to be emerging	Progressively evaluate delivery of the Community Engagement Strategy in accordance with the planned schedule	>80% of community engagement strategy initiatives delivered to plan	Engagement Lead (new position within Neoen for the Project) – annual report provided to the Proponent
	Provide survey forms at events, briefings and via the website	>60% positive feedback forms	Engagement Lead - as required
Verify that stakeholders and community members are provided with regular and diverse opportunities to be involved (or empowered) in planning, delivery and assessment of community benefits and outcomes	Track involvement / frequency of key stakeholders in specified engagement activities	Number of key stakeholders (High Interest, High Impact) considered involved ⁴ in Project engagement initiatives: <ul style="list-style-type: none"> • Pre-construction meetings • Grant committee • Site briefings • General communications 	Engagement Lead - as required
	Monitoring of unique use of website forms	Number of unique uses of website forms	Engagement Lead - as required

⁴ Involved is as per the IAP2 Spectrum definition of level of engagement.

Objective	How measured?	Metric/s	Responsibility / frequency of measurement
Monitor the number of complaints made, specifically the number of complaints that are escalated to third parties, and Project Team efficacy in responding to these in an efficient, timely manner	Track register of enquiries and complaints received	<ul style="list-style-type: none"> <5 unique complaints made to the Project per quarter <2 unique complaints escalated to third parties every six months >90% complaints and enquiries satisfactorily resolved within the timeframes specified in the plan 	Engagement Lead - complaints and enquiries response times/ outcomes to be recorded in weekly Project team minutes
Evaluate the measurable benefits of any community benefits or formal community engagement initiatives	Unique number of quality initiatives delivered either as partnerships or via grant funding	<ul style="list-style-type: none"> Number and dollar value of initiatives delivered to local community that deliver improved outcomes. Number of initiatives that provide longer-term outcomes (e.g. establishment of new infrastructure, provision of long-term skills development, establishment of new social enterprises) 	Engagement Lead - annual social benefit performance report to be provided to the Proponent
	Measurable benefits or outcomes delivered as a direct result of the Project's Community Benefit Fund	Number of targeted outcomes delivered as a result of community funding (e.g. new scholarships offered, training places provided, environmental gains realised)	Community Grant Administration Committee – annually. Analysis to be performed as part of the group's terms of reference

6.8.1 Conclusion

The Proponent is one of Australia's leading renewable energy producers with over 2 GW of wind, solar and battery storage projects in operation or under construction and understand that the success of the Project is dependent to a large extent on the development of genuine, open and ongoing relationships with key stakeholders and the local community.

The Project's proposed engagement approaches are diverse and have been tailored to the expectations of stakeholders, to ensure stakeholder feedback, interests and concerns are adequately reflected in the final design and operational approach of the Project. Engagement approaches used to date to keep stakeholders informed include one-on-one meetings, Project briefings and updates (in-person, virtual, written or electronic), community events and information sessions, and other forms of engagement specific to the stakeholder group.

All feedback provided by members of the community throughout the Project's engagement and consultation process, has been recorded, responded to, and used to inform the design of the Project where possible. Feedback has also informed the development of benefit sharing initiatives valued at approximately \$350,000 per annum, an ecology fund of \$1,000,000 per annum and local and Indigenous participation initiatives.

Evaluation and monitoring measures will be detailed in the Community Engagement Strategy used to guide the ongoing delivery of community engagement and the overall development of the Project.

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