



6 STAKEHOLDER CONSULTATION AND ENGAGEMENT

6.1 Introduction

The method for community consultation and engagement was developed in accordance with the International Association of Impact Assessment's *Social Impact Assessment: Guidance for Assessment and Managing the Social Impacts of Projects* (2015) and the proponent's internal communication plan for major projects. The main steps in the consultation and stakeholder engagement process were to agree a strategy, identify key stakeholders, implement the strategy and record stakeholder feedback. These steps are explained in more detail below.

6.2 Consultation strategy

During development of the ESD and PER, the proponent prepared its own communication plan which provided a strategy for consultation around major milestones, for example, public review of the draft ESD. During that period, the proponent undertook consultation with the community and relevant government agencies.

The purpose of consultation undertaken to date has been to:

- Identify key community and government stakeholders (refer to Section 6.3).
- Inform the community of the Proposal.
- Involve relevant government agencies in concept design development.
- Advise potentially directly affected stakeholders of the Proposal and its potential environmental benefits and risks.
- Record comments and issues about the proposal and concept design from those who may be affected.
- Seek ideas from interested parties to be considered in finalising the design.
- Advise stakeholders on how they may obtain further information or communicate concerns, complaints or suggestions.

A key issues management system was adopted to capture, collate and analyse feedback for its forward engagement program.

6.3 Key stakeholders

The Proposal has a large geographic and social footprint which presents challenges when identifying key stakeholders. The proponent defined its key stakeholders by assessing its proposed operations and what potential impacts (beneficial or negative) the Proposal may have during pre-development, construction, operation, mine closure and decommissioning. A list of key stakeholders and interested parties was developed in early 2012 and continually revised up until the submission of the PER (refer to Table 6-1).



Table 6-1 Stakeholder list through the development of the Proposal

Stakeholder category	Sector / group
Aboriginal groups	<ul style="list-style-type: none"> • Native title claimant groups.
Government	<ul style="list-style-type: none"> • Commonwealth government representatives. • WA Government representatives. • Local government representatives.
Non-government organisations and service providers	<ul style="list-style-type: none"> • Community groups. • Environmental groups. • Research institutions. • Private sector service providers (including Indigenous businesses).
Industry and business	<ul style="list-style-type: none"> • Regional and economic development boards. • Local and regional industries and businesses.
General public	<ul style="list-style-type: none"> • Local. • Regional. • State. • National.

6.4 Cultural heritage community engagement

In 2014 and 2015, the proponent engaged with local Aboriginal families. The aim of consultation was to present the Proposal and understand what potential risks or impacts may exist for Aboriginal heritage.

Consultations and further assessment (refer to Section 10.7.3) deemed the Proposal as being unlikely to have an impact on Aboriginal cultural heritage. The assessment was based on the following due diligence considerations:

- The Proposal is unlikely to harm known Aboriginal objects or places.
- The Aboriginal Heritage Inquiry System search did not indicate moderate to high concentrations of Aboriginal objects or places in the study area.
- The study area does not contain landscape features that indicate the presence of Aboriginal objects.
- The cultural heritage potential of the study area appears to be low.
- There is an absence of sandstone rock outcrops likely to contain Aboriginal art.
- No Native Title claimants are currently registered for the proposed development envelope.

6.5 Community and government engagement

Having achieved a sufficient level of confidence in relation to the technical and commercial business case of the Proposal, the proponent's approach to stakeholder consultation was to develop and implement a stakeholder engagement plan based on the following approach:

- Engage at a 'grass roots' level with the local community most directly affected by the Proposal, and the Government agencies whose approvals were required to start field work.



- Engagement was then broadened to incorporate other key Local, State and Federal government groups and any other interested stakeholders that had been identified either during the initial stakeholder scan or subsequently in discussions with other stakeholders.
- During communications with stakeholders, the proponent explained the Proposal in terms of definition, timelines, potential impacts and benefits and then listened to feedback on concerns, issues or opportunities raised. The proponent responded by modifying the Proposal to address any significant issues that were raised.

The proponent's policy of early engagement, open and transparent discussions, meant that the proponent could adapt both the consultation plan and the Proposal design on the basis of feedback received during the consultation process.

Various phases of stakeholder consultation for the Proposal has been completed. To date, neutral to broad support has been received with the majority of stakeholders requesting to be kept informed as the Proposal progresses through the approval process. Stakeholders to date have included:

- Local Indigenous groups and Traditional Owners.
- Local communities of Coolgardie and Kalgoorlie.
- Local, State and Australian Government departments.
- Local businesses in Coolgardie and Kalgoorlie.

In parallel to stakeholder consultation, the proponent has a policy of creating as many local business opportunities as possible and training and hiring locally. The proponent has already contracted many WA local and Aboriginal-owned businesses. The proponent has also supported a local rangers training program in association with the Goldfields Sea and Land Council, WA Government and local stakeholders.

6.5.1 Government pre-planning focus meeting

In October 2015, the proponent initiated a pre-planning focus meeting that was attended by key decision making authorities within the WA Government. The Commonwealth DoEE was also represented. The aims of the meeting were to (a) introduce and present the Sandy Ridge Proposal to a number of key government departments simultaneously and (b) seek feedback on the environmental and engineering work undertaken by the proponent at that point in time. Refer to Table 6-2 for more information.



6.5.2 Public consultation for the draft ESD

The proponent held two ‘community drop-in’ days at Coolgardie and Kalgoorlie February 10 to 12, 2016 (refer to Plate 6-1 and Plate 6-2). The aims of the drop-in days were to

- a) Present the work carried out by the proponent to date.
- b) Present the scopes of work that would be covered in the PER.
- c) Seek and record feedback on the concept of the Proposal.

Approximately 40 people attended the drop-in days between Coolgardie and Kalgoorlie.



Plate 6-1 Community consultation in Coolgardie

Consultation tools and methods were designed and targeted to maximise opportunities for feedback from stakeholders. The communication tools included eight A1 posters which contained a range of environmental and engineering information about the Proposal (refer to Plate 6-1). Feedback forms and a questionnaire was also provided. These tools were supported by an email address to allow stakeholders to inquire about the Proposal. The identification of key issues raised during the drop-in days is summarised below. A summary of the feedback received from key stakeholders over the last four years is presented in Table 6-2.

Types of waste

The majority of attendees were interested to know what types of waste would be accepted at the site. The proponent confirmed that it would only take chemical wastes and LLW, such as equipment used in the medical and research sectors, and naturally occurring radioactive material. A list of wastes that would and would not be accepted are shown in Figure 6-1.



Plate 6-2 Community consultation in Kalgoorlie

Transport of wastes

Many residents were interested in likely transport routes for clay and waste materials. Specific issues related to:

- Increased traffic.
- Cumulative impacts at Freemantle Port.



- Spill events along transport routes.

Jobs and training

Participants showed significant interest in potential employment and business opportunities associated with the Proposal. Feedback was generally related to expressions of interest in the service and trade sector with a few expressing interest in providing specialist services, including the Indigenous (tourist) sector.

Feedback on future jobs indicated that the Proposal's working conditions must be family friendly i.e. days/hours for availability to local families for ongoing jobs that are secure to keep local residents and population. The Proposal Must be a win/win situation on all levels e.g. job and the environment.

Flora and fauna

Residents and members of government inquired as to the amount of vegetation that would have to be removed as part of the Proposal. They also inquired as to whether there would be any potential impacts on threatened, rare, listed or endangered species. The proponent responded by saying that baseline surveys undertaken to date indicate the site is not constrained by sensitive plants and animals and further studies would be undertaken before the final PER is lodged for approval. In addition, ongoing ecological monitoring would take place during construction and operation of the Proposal.

Water resources

Many who attended were aware the proposed site is located in an arid environment and lacks a true water source. People were interested in where water would be drawn from and how it would be transported to site. The proponent provided information about proposed water resource infrastructure measures and indicated that further information would be provided within the PER.



SAFETY CASE AND WASTE ACCEPTANCE CRITERIA

INDUSTRY WASTE SOURCE	BEST PRACTICE SAFETY CASE
✓ Resources (mining and oil and gas)	✓ Certified Management System
✓ Manufacturing (heavy industry, chemicals) generation	✓ Strict regulated packaging and transport systems
✓ Utilities (power, water, waste including households)	✓ Strict waste characterisation and acceptance criteria
✓ Agriculture, forestry and fisheries	✓ Multiple man made barriers (“engineered barrier”)
✓ State Emergency Service (man made or natural disasters)	✓ Thick 70 myr old dry clay bed (“geological barrier”)

TYPICAL CONTAINER TYPES



WASTE TYPES	Accepted on site (surface storage) ³	Accepted below surface in cells ³
• Hazardous chemical wastes subject to meeting the characteristics criteria below:	✓	✓
• Liquid and sludges	✓	✗ ¹
• Explosive wastes	✓	✗ ¹
• Flammable liquids or solids	✓	✗ ¹
• Self combusting wastes	✓	✗ ¹
• Highly corrosive or oxidizing	✓	✗
• Gases	✗	✗
• Clinical waste such as infectious hospital waste and body parts	✗	✗
• Municipal Solid waste such as putrescible household and commercial waste	✗	✗
• Uncertified waste which can not be identified	✗	✗
• Naturally Occurring Radioactive Material (up to LLW ²) such as oil & gas industry scale	✓	✓
• Low level Waste (LLW) smoke detectors, exit signs, industrial gauges & medical isotopes	✓	✓
• Intermediate level waste (ILW) High level waste (HLW) - reprocessed & spent nuclear fuel	✗	✗
• Nuclear waste - from power generation and defense use	✗	✗

¹ Normally excluded unless modified before disposal or during disposal so the operational and post closure safety of the waste cell and facility is not compromised
² Classification of Radioactive Waste – ARPANSA RPS20
³ ✓ = accepted, ✗ = not accepted. ✗¹= normally excluded but possibly suitable



Figure 6-1 Example of communication tool around waste acceptance



Table 6-2 Summary of consultation and engagement activities since 2012

Year	Stakeholder	Milestone event	Feedback
2012	Department of Mines and Petroleum and Goldfields Land and Sea Council	Application for Exploration License lodged 25 May 2012	Application for an exploration lease was referred to the Goldfields Land and Sea Council (the recognised Native Title Representative Body for the Goldfields region) on 8 August 2012. No objections were lodged and there are no records of any claims affecting the area covered by Exploration Licence E16/440.
2012	Department of Mines and Petroleum	Exploration License granted	Exploration License (E16/440) granted 23 January 2013. The Company has the right to explore for minerals for five years, subject to the Company meeting its annual expenditure commitments. Three of the 20 sub-blocks overlaid the IWDF file notation areas (FNA* –set aside for future expansion). The proponent informed the Department of Finance, Building Management and Works that the proponent would complete no exploration over the three blocks overlapping the FNA. On 11 November 2013, the WA Government, DMP approved the stage one drilling program on E16/440.
2014	Traditional owners	Cultural heritage baseline investigations	Site walkovers with Traditional Owners concluded the proposed exploration development envelope is not constrained by items of known Aboriginal heritage. Heritage survey completed by experienced anthropologist.
February 2015	Traditional Owners and Anthropologist	Cultural heritage baseline investigations	On February 2015, the DMP approved the stage two drilling program on E16/440. A second site visit with Traditional Owners was undertaken to confirm the proposed development envelope is not constrained by items of known Aboriginal heritage. The results of the second walkover did not alter from the first site walkover. Heritage survey completed by experienced anthropologist. Stage two drilling program lasted three weeks and ended 21 March 2015.
March 2015	Traditional owners	Cultural heritage baseline investigations	A second site visit with Traditional Owners was undertaken to confirm the proposed development envelope is not constrained by items of known Aboriginal heritage. The results of the second walkover did not alter from the first site walkover.
October 2015	Decision Making Authorities	Pre-planning focus meeting ¹⁸	The proponent received neutral to positive support for the Proposal. Stakeholders within government were interested in job creation and the potential for long-term job security as a result of the Proposal. Other issues raised included: <ul style="list-style-type: none"> The design of the facility, particularly the acceptance and separation of chemical wastes from LLW.

¹⁸ Key decision making authorities who were represented at the meeting included the OEPA, DER, DMP, Department of Lands, DoEE



Year	Stakeholder	Milestone event	Feedback
			<ul style="list-style-type: none"> The type of waste to be accepted and not accepted. The transport of waste materials to and from Perth and Kalgoorlie. The level of interaction the proponent has undertaken with Traditional Owners.
November 2015	Government (State representatives)	Completion of pre-feasibility report	The issues raised by State government representatives were similar to those raised during the October pre-planning focus meeting.
February 2016	Coolgardie community	Draft ESD public review	Refer to Section 6.5.2.
February 2016	Kalgoorlie community	Draft ESD approved for public review	Refer to Section 6.5.2.
May 2016	Decision Making Authorities	Draft ESD comments following public review	<p>Radiological Council required the proponent to define site selection characteristics by referencing recent studies to ensure compliance and suitability of site selection criteria under current legislative and best practice requirements. This has been addressed in Section 2.3.</p> <p>Radiological Council required the proponent to provide a summary of the history of waste acceptance of WA from across Australia with particular regard to WA Policy and the <i>Nuclear Waste Storage and Transportation (Prohibition) Act 1999</i> and its relationship to this proposal. This has been addressed in Chapter 4.</p> <p>Radiological Council requested the proponent to clarify the appropriate examples of wastes with concentrations below 3700 Bq/g[^] and half-lives less than 30 years. This has been discussed in Section 10.6.4.</p> <p>Conservation Council requested the PER define ‘nuclear waste’ and ‘radioactive waste’ and describe the waste that would and would not be accepted. This has been addressed in Section 1.2.3.</p> <p>General comments – concerns from other Government and political sectors were raised relating to the potential for future acceptance of intermediate and high level waste. The proponent has not nominated the Proposal as a potential National Radioactive Waste Management Facility. The proponent is not planning to make such a nomination. The proponent would not accept a nomination should it be made by any other party.</p>



Year	Stakeholder	Milestone event	Feedback
			<p>Conservation Council raised the issue of transport of intractable, hazardous and low level radioactive wastes. The proponent has included an Operating Strategy for the Proposal (Appendix A.16). The Operating Strategy includes a high level description of components including management of transport contractors and waste contractors, and the proponent’s standards for transport that need to be met, prior to waste deliveries being accepted at the Facility.</p> <p>The Wilderness Society of WA required the proponent to address potential impacts on the Great Western Woodlands and Helena and Aurora Range Conservation Park and potential regional cumulative impacts. This has been addressed in Section 10.3.2.</p> <p>The OEPA confirmed that an international peer review of the engineering design is required for the PER. The proponent has commissioned an independent peer review relating to the engineering design and storage components of the Facility (refer to Appendix A.21).</p> <p>The Department of Health required the proponent to address matters relating to drinking water and water quality monitoring. The proponent has addressed this in a site specific drinking water management plan (refer to Appendix A.20).</p> <p>The Department of Aboriginal Affairs required the proponent to submit a Heritage study. This has been addressed in Appendix A.13.</p> <p>The Wilderness Society requested the proponent to consult with Traditional Owners. This is covered in Section 10.7.</p> <p>General comment around mine closure and rehabilitation and costs associated with these activities were raised. The proponent has provided a MCP (Appendix A.19) and Decommissioning Plan (Appendix A.18). Costs associated with both closure and decommissioning are discussed in both appendices.</p>

*File Notation Area

^ Becquerels per gram



6.6 Future consultation

6.6.1 Overview

Continuous consultation is a commitment of the proponent and liaison would continue with non-government organisations, local politicians and other interested parties. The proponent maintains a stakeholder register and would continue to liaise with Traditional Owners, the community and key government departments throughout the life of the Proposal.

The proponent also places key community and regulatory related information on its website www.tellusholdings.com and shares news updates with interested stakeholders.

6.6.2 PER for public review

When the PER is released for public review, extensive consultation with the key stakeholders identified in Table 6-1 would be undertaken, particularly the communities of Southern Cross, Coolgardie and Kalgoorlie. Opportunities for online feedback would be available to the public via the EPA's website and the proponent's website.