

A FRAMEWORK FOR MANAGING ENGAGEMENT FOR GENERATOR PROPERTY MANAGEMENT'S LIDSDALE SITE



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GPM
&
PURSUIT COMMUNICATIONS

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1.0 Introduction

Generator Property Management Pty Ltd is a NSW Government owned business established to take ownership of closed power station sites and undertake their remediation and where appropriate suitable repurposing. GPM operates on the basis of serving the interests reflected by its ownership and therefore seeks to operate at all times in the public interest.

Engaging with the Lithgow, Wallerawang, and Lidsdale communities on the management of land contamination at GPM's Lidsdale site is a key priority. The site has now been declared under the Contaminated Land Management (CLM) Act by the EPA and there are resulting additional challenges managing community engagement arising from the need to communicate complex technical information, uncertainty around perceived health impacts, potential impacts on property prices and the local economy or restrictions on development.

If the communication of these challenges is not carefully considered and addressed, community engagement efforts (or lack of appropriate engagement) can contribute to considerable uncertainty, anxiety, conflict or outrage at individual and potentially broader community and political levels.

This framework is intended to support meaningful, practical engagement with the local community, councils, key stakeholders, and other influential bodies regarding the management of the Lidsdale land and its contamination issues.

This document is also designed to support the Voluntary Management Plan (VMP) and is a requirement of the NSW Environment Protection Authority (EPA). For this reason, this document details the communications and consultation activities GPM plans to undertake in the region around its Lidsdale site.

GPM acknowledges the assistance of Pursuit Communications who assisted with the development of this Communications Management Plan.

1.1 Purpose of the document

This document provides an overarching approach to community and stakeholder engagement for GPM's Lidsdale site which:

- Focuses on best community outcomes and how to work with the community to proactively avoid or manage outrage in relation to contamination.
- Is adaptable to the different project implementation levels that Councils and other stakeholders may be operating.
- Aligns with the best practice frameworks of the industry body "International Association for Public Participation" (IAP2)

This document will assist GPM in understanding:

- How its stakeholders may act or respond to community engagement strategies, and what interests they have in contaminated land issues
- Issues and risks from a community consultation point of view associated with the management of contaminated land at Lidsdale.
- How to manage these community engagement issues and address community interest
- The appropriate methodology for engagement and communication that fits the needs of the community.
- How to evaluate the outcomes of the engagement strategy.

1.2 Objectives

This document objective is to set out the framework to achieve an effective communication plan. It defines the project's communication structure and methods of information collection, screening, formatting, and distribution and seeks to create understanding among project teams. By doing this the necessary actions and processes to facilitate the critical links among people, ideas, and information will be in place for the project's success.

2.0 Description of site

GPM's Lidsdale site is predominantly located in the Kerosene Vale which is located to the North of the town of Wallerawang, and east of the village of Lidsdale in the Blue Mountains region of NSW. The site is accessed off the Castlereagh Highway via a private road that joins the highway through the edge of the Wallerawang Power Station site.

The general area was originally a mining area for coal from early in the 20th Century. This was originally through open cut mining techniques and then through portals driven into the foot of the northern escarpment. These mine entrances remain open and are within the mining lease of Centennial Coal's Angus Place operation.

It is uncertain how the original mining voids were filled, and they largely remain unremediated. Evidence suggests that at least part of these legacy mining voids was used by the community as a rubbish disposal facility. A water course running from this area to the west, has the geographic name of "Dump Creek" is one example of the past use of this part of the site.

The site was then used for ash storage from the early 1950's when the Wallerawang Power Station originally started operation. At this time, a dam was constructed within a standalone mining void to the east of Lidsdale. This dam was subsequently increased in capacity by several stages of raising the wall height throughout its life. Known as the Kerosene Vale Ash Dam (KVAD) it was retired when the power station was expanded in the 1970s, and a high-capacity new dam was constructed higher up the valley and named Sawyers Swamp Creek Ash Dam (SSCAD).

GPM has identified that at various times from the 1950's to the 1980's, the remaining original mining voids were progressively filled with ash as well as general power station waste and building rubble from the demolition of the original power station.

The SSCAD was built across the valley to the east of the original dam as a high wall dam with the aim of filling the valley behind the wall with ash. The dam is at a higher elevation than the KVAD which in turn is higher in elevation than Lidsdale. The original intent was that the SSCAD would enable full generation at Wallerawang to beyond 2020 using the same ash placement techniques used successfully at the coastal and Hunter Valley power stations.

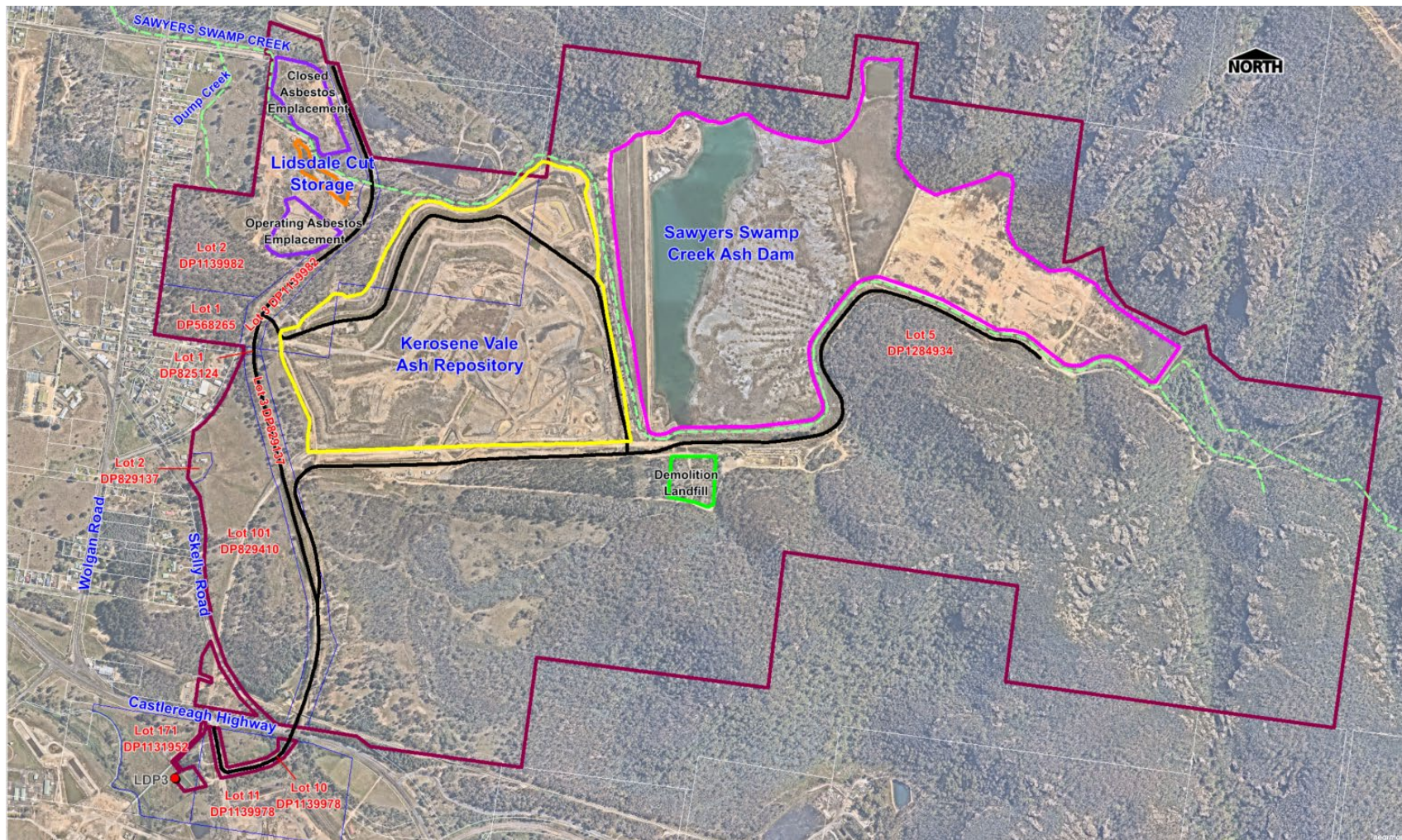
The planned placement relied on progressively raising the height of ash by terracing additional layers of ash up the valley walls over time. This proved unsuccessful and ash could only be placed up to the dam water level. This drastically reduced the dam's capacity and led to a new ash storage area being required early in the 21st century.

The next ash storage area was developed in 2006 and sits on top of the KVAD, originally built in the 1950s. The KVAD had been filled in during the 1980s and 90s. This newest site is called the Kerosene Vale Ash Repository (KVAR).

The KVAR was developed by spreading dampened ash over the old dam and compacting it in layers, progressively raising the height as more ash was delivered. Unlike the previously used ash dams, where the ash was pumped into the dams as a lean slurry, the KVAR is constructed using haultrucks and dozers to mould the ash into a stockpile. The stockpile was designed to be progressively capped on its outer edges to prevent erosion and then capped over the top when its final height was reached.

The power station was closed in 2014, and since this time only minor amounts of ash have been taken to the SSCAD or KVAR. Neither repository had any action physically taken, to bring them to a closed state prior to GPM taking ownership. Rather they have been kept in a dormant operational mode by the previous operators, Energy Australia.

A diagram of the overall site layout is provided on the next page.



GPM formally notified the EPA under Section 60 of the CLM Act that contamination from the site was believed to have crossed the site boundary and there were issues that had the potential to do so. GPM also initiated a Preliminary Site Investigation in accordance with the EPA's guidelines for the management of contaminated sites and this was provided to the EPA in September 2021.

The EPA has now advised GPM it has issued a Declaration of the site as significantly contaminated under the CLM Act and that the site will be formally added to the State's contaminated land register and that GPM will be required to enter into an agreement with the EPA to further investigate the site and then undertake appropriate remediation.

A Site Auditor has been engaged and she has identified the initial work undertaken will need to be further expanded, to fully identify the new areas of concern west of the Coal Haul Road, and then a detailed physical investigation of the site will be necessary to accurately determine the vertical and lateral extent and composition of all contamination sources on the land holdings, any pathways off the site and the wider extent beyond the site boundary.

In addition to the requirements to investigate, the EPA has also given notice it requires far more extensive routine environmental monitoring and reporting, to that required historically. This is partly in response to the NSW Upper House Inquiry into power station ash dams, as well as the notification under the CLM Act.

2.1 Potential contamination pathways off site

GPM's Lidsdale site contamination is not yet fully understood and the first stage of works under the CLM Act Declaration as noted above is to investigate the full extent of what contamination exists on the site and the full extent of any migration off the site.

The evidence currently available identifies contamination of groundwater for metals and salts in deep and shallow aquifers. Deep aquifers move towards the North East well under the ground level of the Newnes Plateau. Shallow aquifers and perched water flows generally follow the landforms and could result in contamination of groundwater into the neighbouring properties along Maddox Lane Lidsdale and through Lidsdale up to the Coxs River.

The groundwater contamination arises from the landfills containing power station ash and other materials. The ash is placed in some areas in the coal seams, directly into the aquifer. In other locations the dams interfere with the shallow water flows and could be carrying minerals and metals across the property boundaries.

The original historic landfills also extend directly across the property boundary into the neighbouring property that faces Maddox Lane. The extent of determining where contamination was originally placed should include this area on the neighbouring property.

There have been historic incidents of dust emissions from the ash stockpiles, these were historically managed by keeping exposed ash wet. GPM has worked to cap the exposed ash and there is now little prospect of dust emissions.

Sawyers Swamp Creek runs through the property and around the walls of both dams, through the former landfill areas. Seepage from the dams is redirected and reticulated to ensure this shallow contaminated water within the site does not enter the water course.

The SSCAD is a high risk scheduled dam under dam safety legislation which requires the dam water level to be kept below a certain level. GPM controls the water level to the required level by pre-treatment and discharge through a licensed discharge point covered under the site's Environment Licence. This discharge of water is directly into the Coxs River upstream of Lake Wallace.

2.2 Potential contamination scenarios

The potential exists at the site for the following contamination scenarios to arise. These scenarios have been used to provide guidance to determine the relevant stakeholders for communication regarding Lidsdale site contamination.

1. Contaminated Water into Coxs River – contamination could flow into the creek running through the site and then into the Coxs River and GPM discharges SSCAD dam water into the Coxs River under its EPL (Environmental Protection Licence).
2. Contaminated groundwater – shallow contaminated groundwater could be influencing water bores down the hydraulic gradient from the site. Deep groundwater is running in coal seams and already impacted and runs deep under the Newnes Plateau.
3. Dust Emissions – Ash Dust has consistency of powder and is easily airborne if disturbed and windblown.
4. Polluted Groundwater Discharge rising to the surface in neighbouring properties.
5. Noise from GPM operations targeting the remediation of contamination sources.
6. Unanticipated contamination by previously unidentified substances.
7. Unanticipated contamination arising from emerging substances of concern.
8. Inappropriate management of Asbestos Disposal Cells leading to airborne asbestos dust.

3.0 Stakeholder management

Stakeholder management is a critical component to the successful delivery of any project, programme, or activity. Stakeholders are individuals, groups or organisations that are affected by or perceived to be affected by a programme, project, or work.

Once stakeholders are identified, their influence will be determined, along with the development of a communications management plan which will outline how to effectively engage with the stakeholder.

During this process, the stakeholders' expectations can be managed appropriately. Good Stakeholder Management can create positive relationships with stakeholders if it uses information gathered during the following processes.

- Communication:
To ensure the intended message is understood and the desired response achieved.
- Consultation:
To get useful information and ideas, ask questions.
- Compassion:
Operate with an awareness of human feelings. Show your care. Be empathetic.
Listen.
- Planning:
Time investment and careful planning have a significant payoff.
- Relationships:
Try to engender trust with the stakeholders.
- Compromise:
Compromise in any relationship shows a deep understanding of feelings and negates feelings of rigidity.
- Understanding:
Understand what is classed as success and value to the stakeholder regarding the project.
- Responsibility:
Project governance is the key to the project's success.

3.0a Complaint management process

As the table below shows, a process chart has been created for dealing with any complaints relating to the project.



3.1 Identified stakeholder engagement groups for consideration

One of the primary factors that determines a stakeholder is the specific relationship that the stakeholder has with a business.

The illustration below shows several stakeholder groups that GPM and the Communications team have identified as key to the success of the GPM KVAR project.

Messaging and communications activities will be appropriately tailored to these groups through specific activities. (These activities are identified in 3.4).



3.2 Stakeholder engagement audiences

A company's employees, managers and board of directors make up a business's internal stakeholders. Employees of the company are invested in the company's performance to ensure they continue to be paid and retain their jobs.

Internal Stakeholders:

- GPM employees, managers
- NSW Government

Other critical stakeholders:

- EPA
- Greenspot
- Regional Development Australia - Central West

Media:

Radio -

- Radio 2LT
- RBM 89.1FM
- ABC Local Radio Central West

Newspapers -

- Lithgow Mercury
- Central West Village Voice
- Blue Mountains Gazette

Television -

- Prime 7 Central West
- 9 News Central West

Government Representatives:

- The Hon Paul Toole MP - Member for Bathurst, Deputy Premier & Leader of the Nationals, Minister for Police & Minister for Regional NSW
- The Hon Andrew Gee MP, Independent Member for Calare
- Department of Treasury

Local Councils:

- Lithgow Council
- Blue Mountains Council

Community Groups:

- Blue Mountains Conservation Society
- Lithgow Environment Group
- Wallerawang/Lidsdale Progress Society

Local Engagement:

- Local Businesses
- Residents in the general area
- Residents bordering the GPM KVAR site.
- Local residents

3.3 Communicating with stakeholders

Engagement activities will differ depending on the community groups being targeted. Here we've provided an overview of the audiences and information that can be provided to these audiences throughout the project.

Internal Stakeholders

Internal Stakeholders are identified as GPM employees, managers, and the NSW Treasury Post Transaction Group. These groups will be kept up-to-date with project activities, outcomes, and objectives by way of an Internal Reports, which will include:

- Activities/work underway/proposed.
- Environment updates
- Costs
- Important notices
- Community Consultation Group activities
- Scientific results
- A periodic communications report will also be distributed.

Environmental Protection Authority (EPA)

The EPA is a major stakeholder in this project as it was this authority that declared the Kerosene Vale Ash Repository as 'significantly contaminated land'.

GPM is immediately answerable to the EPA; therefore, communication between the two entities is vital in the form of fortnightly email briefings and regular site visits. Items to be communicated include:

- Activities underway
- Milestones
- Important notices
- Community Consultation Group activities
- Land activities - as deemed relevant (local landowners)
- Environment reporting under the EPL
- VMP milestone reports to EPA CLM Group

IMPACT- High

The EPA will approve and direct the additional work to undertake to bring the contamination issues under control for the long term which is a natural outcome from the EPA declaring the Kerosene Vale Ash Repository as 'significantly contaminated land'.

Estimated impacts on GPM include:

- Attending consultation sessions (meetings either virtually or face-to-face)
- Regulatory actions requiring unforeseen actions by GPM.
- Impact in information flow from EPA's own PR and communications activities

Greenspot

As owners of the other ex-Energy Australia site to the south of the Castlereagh Highway, Greenspot has been identified as a special stakeholder for these critical reasons:

1. GPM site borders the Greenspot site
2. Both entities are ex-Energy Australia sites that are being rehabilitated and
3. Respect the impact that each site can have on the other's operations

Greenspot will therefore be kept up-to-date with GPM activities to the north of the Castlereagh Highway in routine face-to-face meetings.

Details to be communicated include:

- Activities underway
- Important notices
- Community Consultation Group activities
- Land activities - as deemed relevant
- Environment updates - as per reporting process

IMPACT: High

Potential for environmental impacts, pending results of tests and ongoing investigations. Should there be any required road closures, this could have the potential to affect Greenspot.

GPM will liaise with Greenspot to ensure no issues arise.

Regional Development Australia (RDA) – Central West

The RDA is a not-for-profit organisation aiming to maximise economic development opportunities across the NSW Central West region. It is for this reason that this organisation was identified as an important Stakeholder.

Their aim is to foster strong, confident, and vibrant regions, which would make them immediately interested in the GPM KVAR project.

The RDA will be kept up-to-date with developments of the project in a monthly email briefing, plus site visits when applicable out of courtesy to their organisation.

IMPACT- Low

Their role within the community is critical and consequently, it is important that updates are provided to the RDA, as they are seen as an authoritative body in the region.

Media

Strong media relations will play a significant role in communicating information about the project to the public and local businesses.

The media channels to be utilised will be TV, radio, print and online outlets. (NOTE: GPM Does NOT have its own social media channels, as its website allows interaction between the community via its “Contact Page”).

- TV

Where suitable, local TV news outlets will be invited to “Media Call” or “Door-Stop” style interviews on-site (or at a relevant location - weather pending). The opportunity remains for advertising regarding critical updates to ensure the local community is aware of any issues or community engagement activities.

- Radio

A series of radio advertisements will be produced through Lithgow’s Radio 2LT (or suitable production agency). These advertisements will announce the call for applications to be part of the Community Consultation Group (CCG). They will also be there to inform the public of any significant events or outcomes stemming from the project.

Radio interviews will also be arranged when necessary to explain important aspects of the project at key stages.

ABC Radio Central West will be invited to attend a site visit and hold a private briefing and interview with GPM Managing Director, Stephen Saladine.

- Print - Newspapers & Online

Advertising will be taken out in the Lithgow Mercury and the Central West Village Voice to announce the call for applications to be part of the CCG and general communications activity, as it is deemed necessary.

Editorial will also be arranged as a public information piece about the project and site visits will be arranged with strategic media personnel when necessary.

General press releases will be distributed to all outlets periodically to announce important notices, milestones, good news stories and CCG activities.

IMPACT– Medium/High

The role of the media between GPM and the community is vital, consequently, keeping the media informed with the latest news and progress of testing and community consultation groups is key to keeping both the media and local community abreast of the work being undertaken. Whilst most of the future media relations should be positive, there is a strong chance that some journalists will want to put forward an antagonistic slant on the project which will require critical management.

Government Engagement

Both the Federal and State representatives will be kept up-to-date with all project matters so they can in turn answer any questions or complaints their constituents have about the project.

- Face-to-face meetings, site visits and regular communication in times of crisis will facilitate this. Additionally, a monthly email update will be distributed to both representatives, outlining the following:
- Activities /work underway / proposed
- Environment updates
- Costs
- Important notices
- Community Consultation Group activities
- Scientific results

IMPACT- Medium/High

Pending the outcome of the continued testing and works, it is anticipated that the Government will support the works of GPM and ensure a positive outcome.

Local Councils

Both the Lithgow City Council and the Blue Mountains City Councils will also be kept up-to-date with all project matters so they can, in turn, answer any questions or complaints their rate-payers have about the project.

GPM will continue to meet with Lithgow City Council to outline when they are with the project and what it means for the area. Site visits can also be arranged, when necessary, plus a monthly email update will be distributed to both representatives outlining:

- Activities underway
- Important notices
- Community Consultation Group activities
- Land activities
- Environment updates

IMPACT- Medium/High

Some locals may believe reaching out to council for information regarding the project may provide further information or offer an opportunity to “vent”.

Additionally, some Councillors are more sensitive to the environmental impacts of the project than others and may have to be handled with more sensitivity.

It is critical that Council always remains informed of the project status and has the appropriate contact details for GPM to pass on to concerned residents.

Community Groups

The local Community Groups identified that would be interested in this GPM project are:

- Lithgow Environment Group
- Wallerawang/Lidsdale Progress Association
- Blue Mountains Conservation Society

It is important to keep groups like this informed of all activities as they are concerned with the local environment, and their members are locals to the area.

These community groups will be invited to have a representative on the CCG so that all project activities are transparent and will be reported back to their respective groups and likewise any concerns they have can be reported and replied to at the meetings.

Additionally, a monthly email briefing will be sent to each group to keep them up to date with the following:

- Activities underway
- Important notices
- Community Consultation Group activities
- Land activities - as deemed relevant (local landowners)
- Environment updates - as per reporting process

IMPACT - High

Members of these groups may be local (immediate) neighbours, while others may be passionate about the local environment and the future of the land for generations to come.

It's for these reasons that local community groups are kept informed of latest developments directly from GPM to avoid "hearsay" and misinformation.

Keeping these groups up to date with information will help stop idle gossip and negative conversation.

Local Engagement

The residents and businesses in the Wallerawang/Lidsdale area are very important stakeholders in the project. All are directly impacted by the project and will therefore be communicated with in a very caring and understanding manner. This Local Engagement is broken down into three areas:

- Residents bordering the GPM KVAR site
- Residents in the general area
- Local Businesses

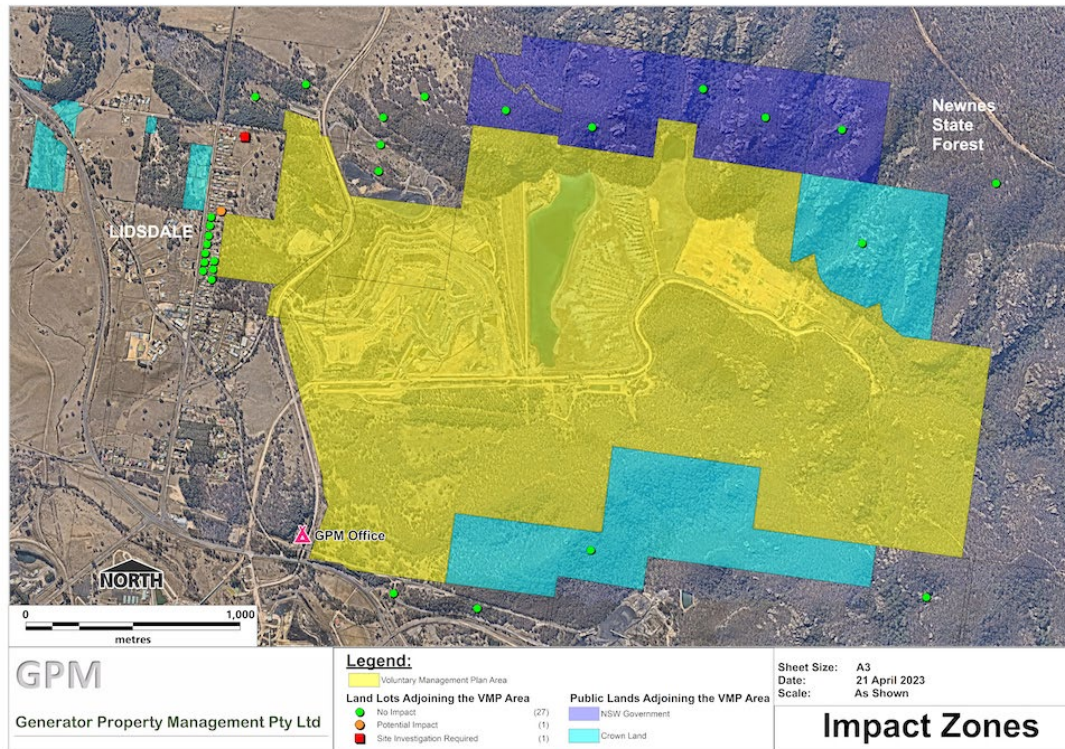
Residents bordering the site (*see map below*) will receive ongoing communication about the below activities by letter drops and door knocking.

- Activities underway
- Important notices
- Community Consultation Group activities
- Land activities- as deemed relevant (local landowners)
- Environment updates- as per reporting process

General Residents and Local Businesses around the Wallerawang/Lidsdale area will be able to refer to Corflute Signage in the neighbourhood outlining the aims of the project and directing them to the GPM website or QR information code.

GPM has identified three zones for local residents bordering the GPM property. These zones are:

1. Adjoining residents with on -site investigations required.
2. Adjoining with potential impacts
3. Adjoining with NO potential impacts



A Community Consultation Group (CCG) will also be formed by way of application. Community members who feel they want to contribute towards the discussion and evaluation of activities in relation to the project will be invited to apply to be part of the group. The group would convene on a Quarterly basis, and minutes would be distributed via email and would also be available on the GPM website.

In addition to the CCG, general Community Information Sessions for local community members and businesses on an as-needed basis, to offer an opportunity to engage with locals and inform them of the latest activities, outside of the CCG group.

IMPACT:

High - Residents bordering the site.

Consequently, through the above-mentioned channels, GPM will endeavour to keep the community around Kerosene Vale informed of all activities and results from testing.

Medium - General residents of the area

The support of the community for these activities and future endeavours is critical to the success of GPM.

Further activities /groups to target:

In addition to the above stakeholder communication activities, GPM will also consider the potential benefits of:

- Engaging an Expert Panel that can offer specific insights on the project to the media and local community. This panel can also form part of the CCG meetings and have input in all communication material.
- GPM could also update the Community Information section of their website as required
- GPM may create a dedicated email address to enable the community and businesses to communicate effectively with involved parties.

3.4 Overview of activities - including purpose, frequency, and distribution channels

Vehicle	Target	Description / Purpose	Frequency	Owner	Distribution Vehicle	Internal/ External	Comments
Communications report	Internal stakeholders, EPA & Government Officials	Updating GPM team of communications activities	As required	Pursuit /GPM	Via Email	Internal	A fluid document as the project continues
Media Releases	Media, Local residents, Community groups, Council, RDA Central West, Greenspot	Update from GPM Community Consultative Group	As required	Pursuit	Email/ telephone media channel for interview/s if required	External	Issuing schedule to be confirmed
Community Notices /Public Notices	Local residents, Community groups	Update from GPM regarding activities and community consultative group	Appearing as required in two different papers in the local area	Pursuit	Email/ publication in papers	External	Issuing to be confirmed

Vehicle	Target	Description / Purpose	Frequency	Owner	Distribution Vehicle	Internal/ External	Comments
Corflute signage	Local residents, Community groups,	Succinct signage to promote callout for community consultation group	Signage number TBC	Pursuit	Printed and erected	External	Quote for signage to be secured as will a quote for placing signs in suitable locations
Letterbox drop to neighbouring properties - Letter and/ or Flyers	Local residents, Community groups, Greenspot	Providing those within an “immediate radius” of the GPM site with an update of activities and next steps	As required	Pursuit	Letters to be printed and distributed to appropriate areas	External	Draft in Google Docs - update to be created as required
Radio advertising	Local residents, Community groups	To provide the community with updates from GPM via radio as required	TBC	Pursuit /GPM	Radio	External	TBC - radio advertising rates to be secured.

Vehicle	Target	Description / Purpose	Frequency	Owner	Distribution Vehicle	Internal/ External	Comments
Community Information Sessions	Local residents, Media, Greenspot, Community Groups, Council, RDA Central West	Opportunity to engage with locals to inform them of latest activities - outside of the Community Consultation Group activities	TBC	GPM/ Pursuit	Face to face meeting /sessions Notices will be published regarding upcoming information sessions and topics to be covered - where appropriate letter box drops will be made informing of upcoming of information sessions and information available online	External	Subject matter experts to be on hand to answer questions as well as CCG members, councillors, and GPM staff

Community Consultation Group (various phases - details shared in Section 3.5)	Local residents with a desire to contribute towards the discussion and evaluation of activities relating to the VMP.	Opportunity to engage with locals to inform them of latest activities - outside of the Community Information Sessions	TBC	GPM/ Pursuit	Face to face meeting and minutes to be distributed via email and available on the GPM website	Internal	A select group of members from the community to contribute to the activities.
Vehicle	Target	Description / Purpose	Frequency	Owner	Distribution Vehicle	Internal/ External	Comments
Expert Panel	Local residents, Greenspot, Media, RDA Central West, Community groups, Council, EPA	Expert panel on hand to offer specific insights	TBC - could form part of CCG meetings	GPM /PC	Face to face meeting / expert panel newsletter / website update	External	To be reviewed subject to feedback
Website updates	Local residents, Greenspot, Community groups, EPA, Media	As required updates provided to EPA via GPM website	As required	GPM	Website - The existence of the website will be promoted through other aforementioned vehicles.	External	The website also highlights alternate contact details should members of the community wish to use those.

Dedicated Email address created	Local residents, Community groups	A dedicated email address “westinfo@gpmco.com. au” can be created for use for public to contact GPM	N/A	GPM	Communication with public - promotion through PR activities	External	
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3.5 Key messaging

Communications Report:

These reports will be for internal use and to update the EPA and other groups as appropriately identified.

The reports will highlight activities underway, those completed and those communications activities that are yet to be completed.

Communications reports will be issued via email and made available online as is relevant.

Media Releases:

GPM will reach out to relevant media outlets (across TV, Radio, Print and Online) with relevant updates regarding the project. Information will be made available through the media releases and, if appropriate, media interviews / further comments can be provided either as pre-recorded sound bites or in-studio / in-situ interviews.

A fluid schedule of releases has been drafted for GPM's internal purposes, and should the EPA request, a copy can be made available. Please note: Pending changes in the project and updates will mean that, as previously stated, this schedule will at all times remain fluid to allow for critical releases to be issued as deemed necessary.

Copies of media releases will be shared on the GPM website after they have been disseminated to appropriate media outlets.

Should a contamination / crisis scenario arise, GPM will collaborate with the EPA regarding the best course of immediate action to communicate clear and concise information to the local community and key stakeholders, in the immediate instance, with further steps taken as per a crisis communications plan.

Communications for the potential contamination scenarios identified have been identified as follows:

Scenario	Media release plan:
<p>Contaminated Water into Coxs River – contamination could flow into the creek running through the site and then into the Coxs River and GPM discharges SSCAD dam water into the Coxs River under its EPL (Environmental Protection Licence).</p>	<ol style="list-style-type: none"> 1. EPA alerted. 2. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details for local residents who may be impacted. 3. Media release issued with facts, contact numbers for concerned local residents to use and information regarding the next update. 4. Follow-up releases /updates provided. 5. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter
<p>Contaminated groundwater – shallow contaminated groundwater could be influencing water bores down the hydraulic gradient from the site. Deep groundwater is running in coal seams and already impacted and runs deep under the Newnes Plateau.</p>	<ol style="list-style-type: none"> 1. EPA alerted. 2. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details for local residents who may be impacted. 3. Media release issued with facts, contact numbers for concerned local residents to use and information regarding the next update. 4. Follow-up releases /updates provided. 5. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter

<p>Dust Emissions – Ash Dust has consistency of powder and is easily airborne if disturbed and windblown</p>	<ol style="list-style-type: none"> 1. EPA alerted. 2. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details for local residents who may be impacted. 3. Media release issued with facts, contact numbers for concerned local residents to use and information regarding the next update. 4. Follow-up releases /updates provided. 5. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter
<p>Polluted Groundwater Discharge rising to the surface in neighbouring properties.</p>	<ol style="list-style-type: none"> 1. EPA alerted. 2. Neighbouring property owners personally approached. 3. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details for local residents who may be impacted. 4. Media release issued with facts, contact numbers for concerned local residents to use and information regarding the next update. 5. Follow-up releases /updates provided. 6. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter
<p>Noise from GPM operations targeting the remediation of contamination sources.</p>	<ol style="list-style-type: none"> 1. Neighbouring property owners approached personally. 2. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details for local residents

	<p>who may be impacted.</p> <ol style="list-style-type: none"> Media release issued with facts if required, contact numbers for concerned local residents to use and information regarding the next update. Follow-up releases /updates provided. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter
Unanticipated contamination by previously unidentified substances.	<ol style="list-style-type: none"> EPA alerted. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details if local residents are impacted. Media release issued with facts, contact numbers for concerned local residents to use and information regarding next update if required. Follow-up releases /updates provided. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter
Unanticipated contamination arising from emerging substances of concern.	<ol style="list-style-type: none"> EPA alerted. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details for local residents who may be impacted. Media release issued with facts, contact numbers for concerned local residents to use and information regarding the next update. Follow-up releases /updates provided.

	<p>5. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter</p>
<p>Inappropriate management of Asbestos Disposal Cells leading to airborne asbestos dust.</p>	<ol style="list-style-type: none"> 1. EPA alerted. 2. Statement issued with what works are being done to stop /mediate the situation with immediate effect and advisory details for local residents who may be impacted. 3. Media release issued with facts, contact numbers for concerned local residents to use and information regarding the next update. 4. Follow-up releases /updates provided. 5. If issue has been resolved, final release issued, and summary of steps taken to resolve the matter

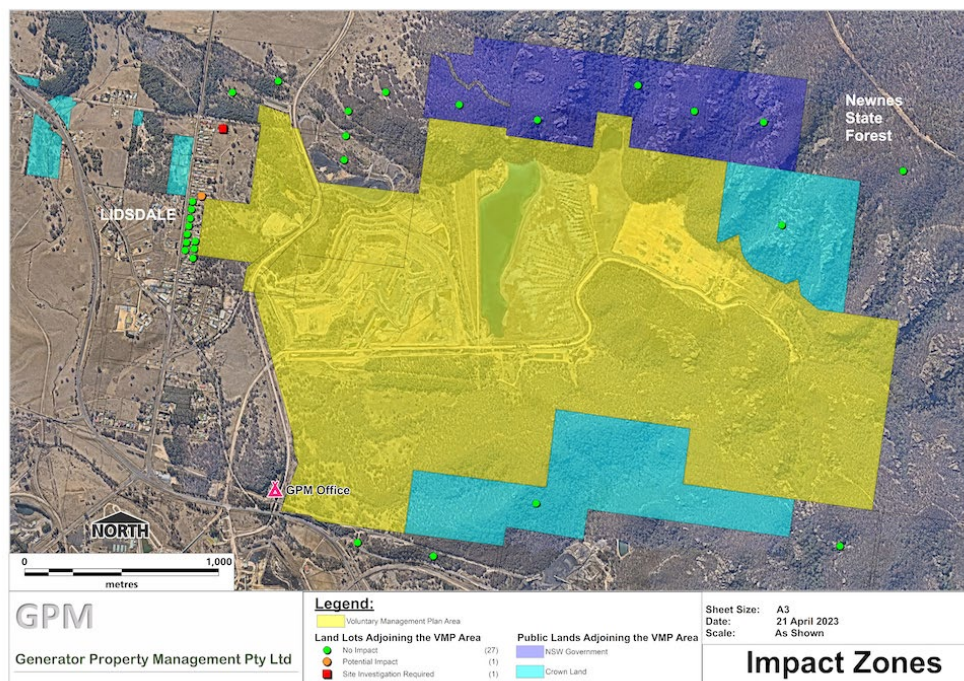
Community Notices /Public Notices:

These notices will be created for publication in local papers and as versions made available as letter box drops. These notices will endeavour to reach the community on a more direct level.

The notices will be distributed to the following areas.

Note: Categories have been identified as follows:

1. Adjoining with on-site investigations required
2. Adjoining with potential impacts
3. Adjoining no impact



Additionally, copies of these notices will be available on the GPM website. Community members will be able to respond with any queries via the dedicated email address (see below for details).

Corflute Signage:

Corflute Signs will be produced and will be posted in the local area as a public information tool, explaining the project and directing the community where to access more information on the project via website details and a QR code.

Signage will be displayed in high traffic areas and removed by GPM once it is deemed no longer necessary for public awareness.

Some high traffic areas identified include (but are not limited to):

- Mumma Joe's Diner
- Friendly Grocer Wallerawang
- Commercial Hotel
- Post Office
- Wallerawang Service Station
- Bedwell's Produce Store
- Black and Gold Cabins
- At the entrance(s) to GPM office at Lidsdale

Letterbox drops:

As previously described, Beyond the community notices, these letterbox drops will be more personalised, in terms of recipients and the information contained within.

As with media releases, if a crisis /contamination scenario arises, local residents will be contacted in the best way possible for immediate notification.

For a contamination scenario the letterbox drop letters will contain the following information:

- Detail of contamination scenario
- Action being taken.
- Scope of works
- Period of works
- Next steps once works are completed.
- Contact details during works phase
- GPM's website details

Copies of the letterbox drop letters can be made available online should local residents misplace, or inadvertently destroy their letter/s.

Radio advertising:

15, 30 or 45 second Radio Commercials will be produced through 2LT Radio (or appropriate production agency as necessary) providing updates on the overall project and announcing the call for Community Consultation Group participation application.

The adverts will be shared with commercial radio stations, as is appropriate and audio copies could be made available for download from the GPM website, if it is deemed necessary.

Should a contamination scenario arise the radio advertising messaging will contain the following information:

- Contamination information
- Action being undertaken.
- Contact information

Community Information Sessions:

Meetings will be promoted in advance through local media promotion and corflute or relevant printed signage within the community.

These information sessions will be separate to the Community Consultation Group meetings. These information sessions will be more general in nature and allow for open, fair, and manageable discussion around relevant issues as they arise.

A chair/representative from GPM will run the meeting and minutes will be taken during the meetings. These minutes will then be available for the community to download from the GPM website.

Should a crisis or contamination situation arise, a dedicated meeting will be coordinated in conjunction with the EPA and (if suitable, GPM's Expert Panel).

The crisis /contamination meeting will allow for clear and consistent communication of key points of the situation at hand, a snapshot of the next steps and details of best contacts for the community to speak to for further information.

Printed handouts will be available (if deemed necessary) with the following information:

- Summary of issue
- Steps being undertaken to stem the issue.
- How long the work will take.
- Next phase of action (and estimated commencement date)
- Key contacts during contamination management works
- GPM's website details

As with any other information session, minutes will be documented and shared on the GPM website.

Community Consultation Group (Establishment phase):

GPM will issue a call-out to interested parties to form the Community Consultation Group, relevant qualifications will be reviewed as to the relevancy of their contribution to the group. Meetings will be held at GPM's Lidsdale office at a time that is convenient for all concerned, to ensure that maximum attendance is ensured.

These meetings will enable community members to contribute towards the project, voice concerns (A complaint process, for any that arise will be followed, as per the previous chart under 3.0a)

These meetings will be chaired by a representative of GPM, with minutes documented and shared on the GPM website.

Community Consultation Group (project phase):

Once the community group has been selected, members will be notified of their appointment to the CCG. Throughout the project phase their contributions will be critical to the success of the overall project, in offering a variety of opinions.

Meetings will be held at GPM's Lidsdale office at a time that is convenient for all concerned, to ensure that maximum attendance is ensured.

These meetings will be chaired by a representative of GPM, with minutes documented and shared on the GPM website.

Should any contamination concerns arise, these will be forwarded to the EPA and GPM's own scientific team for consideration and a complaint / concern process will be followed.

Community Consultation Group (Conclusion phase):

Upon the conclusion of the project, all CCG members will be invited to present their final thoughts for any potential elements that may be of benefit to the area in the future of the site.

A final meeting will be held at a convenient time and location, with acknowledgements to be made to all members of the CCG for their time and contributions.

This final meeting and presentation will be chaired by a representative of GPM, with minutes documented and shared on the GPM website. A potential media release could be considered regarding the conclusion of this element of the project.

Website updates:

The GPM website will remain the main public facing communication channel between GPM and the general public.

There are several tabs relevant to the project including:

- Media Releases -Where contamination media releases will be found.
- Community Updates -Where contamination updates will be found.
- Kerosene Vale CCG
- Contact - -Where contamination contact options will be found.

These pages will be regularly updated throughout the project period.

Dedicated email address:

GPM has created a dedicated email address /drop down option on the “Contact” page. This email address will direct concerns relating to Kerosene Vale to the relevant contact at GPM and ensure prompt reply to their matter.

Should the matter require further input from the EPA or other stakeholders, these will be flagged at the earliest opportunity.

4. Key outcomes

The plan produced for the Stage 1 VMP aims to achieve the following key outcomes:

- Community/stakeholders to be kept informed about the progress of the VMP. As detailed in Section 3 of this document each Community/Stakeholder Audience has its own communication vehicle to keep them across all updates, emergencies, and general progress of the VMP.
- Local community members who may be affected by the specific elements of the VMP (for example, by off-site investigations) need to be given appropriate and timely prior notice, and appropriate consents need to be obtained prior to access to private properties.
- Enquiries or complaints from the community or other stakeholders need to be recorded and responded to in a timely manner.

Glossary:

Abbreviation	Meaning
SSCAD	Sawyers Swamp Creek Ash Dam
KVAD	Kerosene Vale Ash Dam
KVAR	Kerosene Vale Ash Repository
EPL	Environment Protection Licence
Kerosene Vale CCG	Kerosene Vale Community Consultation Group
IAP2	International Association for Public Participation
VMP	Voluntary Management Plan
EPA	NSW Environment Protection Authority
GPM	Generator Property Management Pty LTD

APPENDIX A:

Community Engagement Principles

The following sections provide background and overarching principles that form the basis for the framework.

A1.0 Successful Community Engagement

The International Association of Public Participation (IAP2) is dedicated to the development and commitment to better engagement between organisations and their communities. IAP2 provides several standards and training offerings that are internationally recognised as best practices.

One of the critical underpinnings of IAP2 is the promise whereby an organisation is clear with the community as to the level or depth of engagement that will be undertaken.

Consistent with IAP2, a successful community engagement program relies on the following:

- A staged approach to properly engage with the community at relevant times to ensure required outcomes are met.
- Developing a community engagement strategy to guide all parties to undertake consultation in their local areas and use tactics that meet their capacity and needs.
- Selecting and implementing appropriate engagement tactics that can be implemented simply and effectively.
- Developing a suite of tools for all parties to communicate and engage on the project.

A1.1 Key Challenges for Engagement

The framework acknowledges the critical challenges faced by all parties with respect to community engagement, including:

- Resourcing and educating staff to deliver an adaptable community engagement program.
- Managing the varying impacts on different stakeholders and different locations
- Improving community awareness or understanding and managing community outrage
- Managing expectations from a wide variety of stakeholders with different needs
- Dealing with potential impacts of remediation costs on individual landowners or broader community
- Balancing environmental considerations with community needs and expectations.

A1.2 Community Engagement Objectives

In line with the IAP2 spectrum, community engagement objectives can be one or many of the following:

- Inform the community about a project and why it is required.
- Gather feedback from the community (impacted or interested) on the options available to the community around a contaminated land matter.
- Collect useable information on how those options might be enacted (tangible details relating to “how to”)
- To improve awareness and manage expectations around the roles and responsibilities of potentially various local and state government authorities and other stakeholders who may be involved in the contaminated land project.
- To give the community some control in the management of contaminated land, helping to reduce the potential for outrage when an action takes place.
- Through engagement methods, identify:
 - What the community members values are.
 - Differences between community members values and opinions (which will assist all parties in making better decisions and will inform communication)
 - Community representatives who can positively and constructively contribute to enhancing community engagement outcomes.

A1.3 Factors that Increase Emotion and Outrage

GPM is aware that dealing with an issue such as land contamination is highly sensitive, and consequently, those affected by the case can feel an increase in emotion and outrage.

Several factors contribute to outrage. Identifying those relevant to a contaminated land scenario means that all parties can address these factors strategically (i.e., early planning to reduce the potential for anger developing) or reactively in situations where anger already exists.

Here are some of those factors:

- Lack of Voluntariness
A higher potential for outrage exists when parties feel they are being pushed into a particular course of action rather than those actions being voluntary.
- Lack of Control
When people have some semblance of control over risk, they are less likely to be outraged.
- Unfairness
Parties facing higher risk without higher benefits are likely to be more outraged.
- Poor Process
Parties will feel more outraged if the organisation is considered untrustworthy, dishonest, or arrogant.
- Morality
Parties will feel outraged by issues that are considered morally wrong.
- Dread
Things that are dreaded can exaggerate the perception of risk and outrage.

Some other factors that can increase emotion and outrage in relation to contaminated land can be:

- Nature of the contamination
- Period of exposure (past and future)
- Those attached to amenities and lifestyle.
- Impacts on health
- Proximity to people
- Close to schools and day-care centres
- Historical actions (Council-led or community-led OR non-action where Councils/government have done nothing)
- Media (aggressive, hostile, or ill-informed)
- What adjoining councils are/are not doing
- Effects on property prices

Empathetic communication is required to reduce outrage.

Expert in Managing Public Outrage, international consultant Dr Peter Sandman, suggests the following advice when helping parties cope empathetically with outraged stakeholders.

- Listen - Dr Sandman emphasises the importance of listening and allowing people to vent as a crucial first step. People want to tell you their stories. Before you accomplish anything else, you must listen to them vent.
- Echo What you Heard - Skilful echoing shows people that you have really heard what they have said.
- Ask Questions - Ask questions that open up the conversation rather than shutting it down.
- Find Things to Agree with and Points to Add - Early in the relationship; it's useful to voice some agreement and then take that point another step in a new direction.
- Find Things to Voice Reservations About - Establishing yourself as an authentic person whose views add value means showing you don't always agree. Rather than rebutting, it can be good to use the 'yes, but...' strategy.

A1.4 Community Engagement Principles

The following principles are considered key to engagement processes relating to the first two of the contaminated land scenarios that have been identified, i.e., managing contaminated land information, and contamination on public land:

1. Engage Early – Build community knowledge and understanding of the Contaminated Land Information System / public land project, its history, the need for a system/project, its responsibilities, and any research that has been done.
2. Provide time to Prepare – Give communities time to understand and make sense of information and prepare for possible impacts from being identified in the Contaminated Land Information System or by the public land project.
3. Respect Community Interest – For example, by gathering history and knowledge about contaminated sites and stories from the community.
4. Communicate Risks – Be honest and transparent about the risks identified through the information system development process/project investigations and seek input from the community to identify those risks.
5. Explain the Need – Explain what approaches are being taken in a way that communities can understand, and which accurately portrays the complexity and challenges of decisions that need to be made.
6. Ensure a Fair Process – Follow a process that is transparent and fair to the broad range of community members affected by contaminated land.
7. Respect Emotions – Recognise and respect that our communities have a high emotional attachment to the safe enjoyment of both their immediate and local environments, particularly vulnerable areas.
8. Enable Community Engagement – Provide skills and resources to educate and enable the community, stakeholders, and staff to engage in contaminated land identification and prevention.
9. Understand Different Responses – Some landowners with land included on an Information Register will have little concern or interest in the matter, whereas others may be upset or outraged.

A1.4a Community Engagement Crisis Preparedness

Should a crisis situation eventuate, GPM will liaise immediately with the EPA and work to achieve a sound communication strategy that succinctly conveys concise information to the community.

GPM has an identified spokesperson for Crisis issues, who has received media training. Media contacts are constantly updated, and location /locations are noted for suitable announcements.

Throughout any crisis the four pillars of crisis communication will be followed as best practice.

These pillars are:

- The Truth - Acknowledging the truth of the situation and how things currently stand.
- Acknowledgement - Appreciating external/internal influences, responsibilities, and roles in the next best steps to move forward.
- Empathy Reflecting a sense of empathy through what is said (and the way it is said) and what is presented (body language)
- Respect For the land, the locals, and the next steps, that this process will be dealt with in the best way possible, and measures will be taken to prevent any such crises occurring in the future.

The following principles are considered key to engagement processes relating to the third Contaminated land scenario that has been identified (i.e., unexpected contamination and emerging contaminants):

1. Engage as early as Possible – Give communities time to understand and make sense of the information currently available and prepare for possible impacts. Preferably notify communities immediately and indicate that there is a planned process to gather more information and then develop an appropriate action plan.
2. Communicate Risks – Be honest and transparent about the risks identified relating to the emerging or unexpected contaminants and seek input from the community to identify or clarify those risks.
3. Explain the Need – Explain what approaches are being taken in a way that communities can understand, and which accurately portrays the complexity and challenges of decisions that need to be made.
4. Ensure a Fair Process – Follow a process that is transparent and fair to the broad range of community members affected by emerging or unexpected contamination.
5. Respect Emotions – Recognise and respect that our communities have a high emotional attachment to the safe enjoyment of both their immediate and local environments, particularly vulnerable areas.
6. Understand Different Responses – Some residents will want to stay and 'fight', whereas others will want to evacuate immediately in the face of emerging or immediate contamination.

A1.5 Evaluation

Throughout the management plan process, GPM will consult with the EPA to provide updates and secure feedback.

It is through this feedback that proper evaluation processes will take place.

An evaluation report of the communications activities report will be prepared for the EPA for their consideration at the conclusion of the project.

It is envisaged that this report will highlight the successes of the project and areas where improvement / further steps may be required.



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