



EES Consultation Plan

Wimmera Project

Prepared for Iluka Resources Limited
November 2020



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EES Consultation Plan

Wimmera Project

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1 Introduction

This Environment Effects Statement (EES) consultation plan (EES CP) outlines Iluka Resources Limited's (Iluka's) method and approach toward community consultation during the environmental assessment process for the proposed Wimmera Project (the Project)¹.

It outlines how Iluka will:

- identify stakeholders potentially interested in the proposed Project;
- inform stakeholders about the proposed Project;
- seek input from stakeholders about the proposed Project; and
- document and respond to stakeholder input.

1.1 Purpose

The purpose of this EES CP is to outline Iluka's community consultation program that will be implemented for the Project to:

- provide meaningful and transparent Project information;
- facilitate stakeholder participation; and
- ensure statutory compliance.

This EES CP has been developed in accordance with the:

- DELWP *Environment Effects Act 1978 EES Consultation Plan Advisory Note* (DELWP 2018);
- Department of Jobs, Precincts and Regions' (DJPR's) *Earth Resources Regulation Community Engagement Guidelines for Mining and Mineral Exploration in Victoria*; and
- Department of Planning and Environment 2017, *Community and Stakeholder Engagement - Draft Environmental Impact Assessment Guidance Series, Guideline 6*.

1.2 Consultation principles

Iluka recognises that effective management of consultation can improve its understanding of community's needs and social licence to operate.

The following principles form the foundation of Iluka's approach to community consultation:

- take a proactive and systematic approach to community consultation;
- recognise the rights, cultural beliefs, values and interests of the community;

¹ Note that the prior to late February 2019, the Wimmera Project was referred to as the Fine Minerals Project. Consequently, reports prepared prior to February 2019 refer to the Project as the Fine Minerals Project.

- respond to community concerns in a timely, open and effective manner;
- encourage a diverse and broad representation of community participation (eg provide assistance for visual and/or hearing-impaired people, culturally and linguistically diverse people, and provide Project information in a range of formats including infographics);
- ensure that consultation activities are accessible by providing a variety of times and methods for participation;
- explore community values and interests with a view to finding common ground;
- use clear, concise and balanced language;
- make scientific and technical information accessible;
- ensure that the purpose of each consultation activity is made clear to avoid creating expectations around a level of interaction that is not intended, or is unable, to be satisfied; and
- in relation to proposed site activities and site layout plans, always consult with Project area landowners first before undertaking consultation with the wider community.

1.2.1 Lessons learnt in consultation

In 2016, Iluka engaged an independent consultant to review the effectiveness of the company's community consultation efforts in the Murray Basin Region, in particular the management of the Hamilton by-products disposal. The review included the following key observations:

- although Iluka took a methodical approach to risk management in general, it underestimated the critical importance of recognising and managing the social elements of the project;
- Iluka over-relied on scientific reasoning to promote and justify the project. Although the scientific data was sound, the information was at times too technical for many members of the community to understand, which in turn generated feelings of unease about the project; and
- Iluka took an 'informing' approach to community consultation rather than a genuine engagement approach. Consequently, many members of the community did not feel genuinely consulted or heard.

The review offered the following key recommendations to Iluka:

- take a more proactive and systematic approach to community consultation;
- recognise that social elements are of critical importance; and
- ensure that the consultation strategy comprises genuine engagement.

Iluka has adopted these recommendations and they will be applied during stakeholder consultation for the Wimmera Project.

2 Wimmera Project

2.1 Assessment in accordance with environmental legislation

The Wimmera Project will be assessed under the Victorian *Environment Effects Act 1978* and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The environmental assessment process for the Wimmera Project is described in further detail in Section 3.

To ascertain whether the Wimmera Project should be assessed in accordance with the Victorian *Environment Effects Act 1978* (EE Act) or the EPBC Act, the details of the Wimmera Project were referred in accordance with these respective Acts for determination. The Environment Effects Statement (EES) and EPBC referral documents represent the most detailed currently publicly available descriptions of the Project.

The EES and EPBC referral documents are available from the following webpages:

- EES referral: <https://www.planning.vic.gov.au/environment-assessment/referrals-and-decisions>
- EPBC referral: <http://epbcnotices.environment.gov.au/referralslist/>

2.2 Project description

The Wimmera Project is a proposal for an open pit mine, processing plant, tailings storage facility and ancillary components to extract mineral sands from the WIM100 deposit and to refine the ore onsite to produce zircon, titanium dioxide and rare earth products. The Wimmera Project will only proceed if it is approved by State and Commonwealth governments, and the Iluka Board approves the required capital investment.

Mining is proposed to be conducted 24 hours per day, 365 days per year for a period of up to 25 years. Mined areas will be progressively restored and rehabilitated as the mine advances, with the aim of restoring land to be equivalent to its pre-mining capability, or to another end land-use as agreed with landowners and regulators.

The Project site is located about 40 kilometres (km) south-west of Horsham and 35 km northeast of Balmoral in Western Victoria, immediately north of the Toolondo Reservoir and the associated small settlement of Toolondo, as shown in Figure 2.1.

The Project site will include:

- removal of topsoil, subsoil and some overburden using conventional earthmoving equipment;
- removal of some overburden and the ore by a dredge;
- an ore slurry system;
- processing plants comprising:
 - a mineral separation plant;
 - a zircon/rare earth refinery;
- mine by-product and refinery waste management infrastructure; and
- supporting infrastructure.

The Project site will comprise the following key areas:

- The **indicative mineralised extent** is the area comprising the economically extractable mineralised resource.
- The **indicative mining extent** is the extent of the economically extractable mineralised resource proposed to be mined. The final footprint was selected to exclude areas of environmental value and main transport routes.
- The **plant area development envelope** is the development envelope, within which the mineral separation plant, zircon refinery, rare earth refinery and supporting infrastructure are expected to be located.
- The **Project site** corresponds to the **mine layout development envelope**. This area comprises the indicative mining extent, the plant area development envelope, and additional area associated with surface mining infrastructure and stockpiles, and adjacent areas that will be undisturbed by the Project, including the Natimuk-Hamilton Road reserve, adjacent Jallumba Marsh, and areas of exotic vegetation separating the surface mining infrastructure and stockpiles.

The key Project areas² are shown in Figure 2.2.

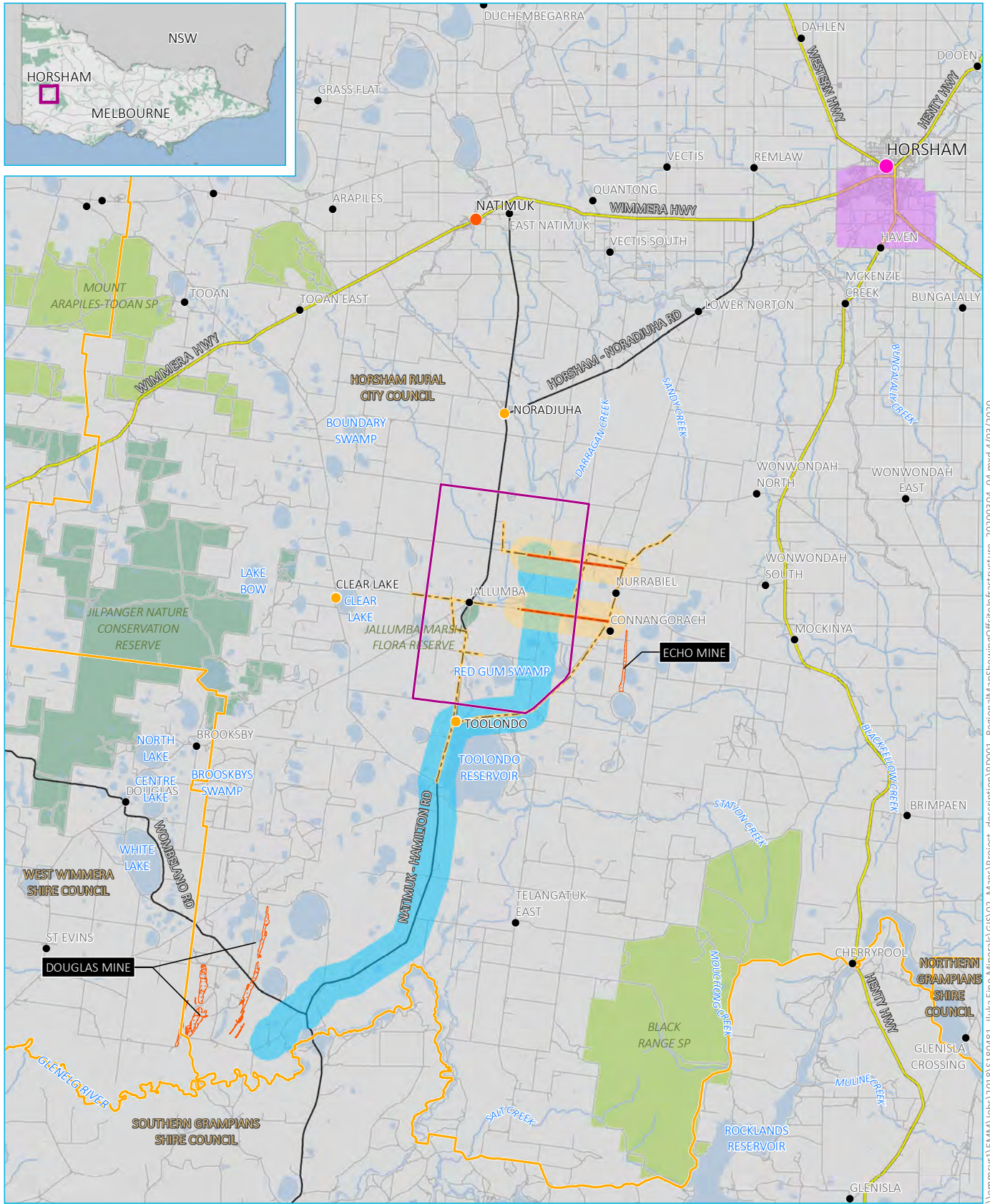
A number of offsite components are also likely to be included in the Project footprint:

- a temporary construction camp during the construction phase;
- a new underground water pipeline;
- a new overhead powerline;
- new access roads; and
- public road upgrades, if required.

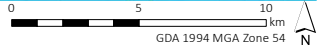
Assessment of offsite component requirements, and their footprint, are underway.

Additional Project information is available via www.iluka.com/engage/wimmera.

² Note the footprint is slightly different to that presented as Figure 2 in the EES referral document that was submitted in July 2019. This is because additional information has become available since July 2019 and the footprints have been revised accordingly.



Source: EMM (2020); Iluka Resources (2019); GA (2011)



KEY

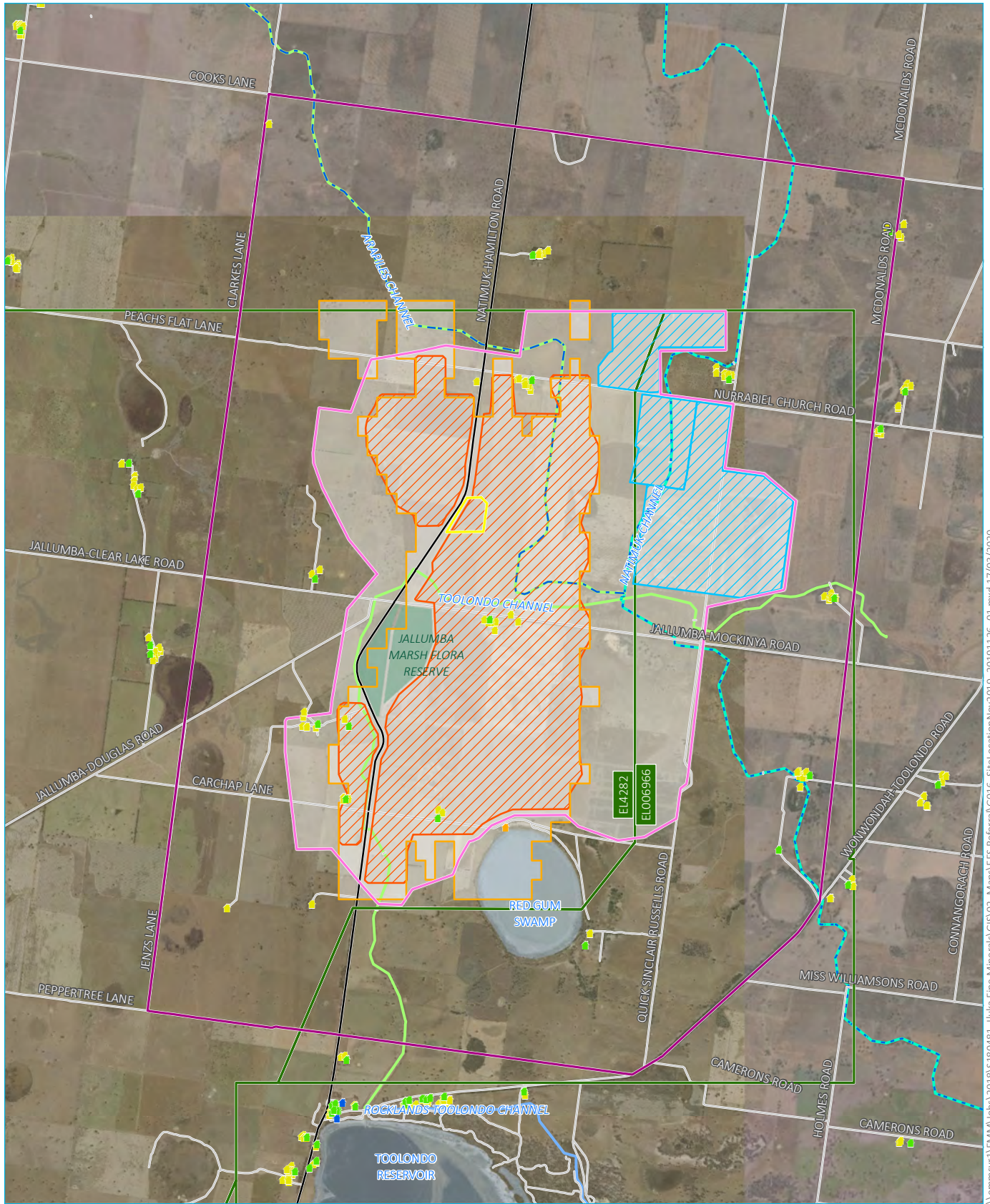
- Environmental study area
- Douglas and Echo mined extent
- Proposed electricity powerline extension
- Existing electricity powerline
- Electricity powerline study area
- Temporary construction camp study area
- Water pipeline study area
- City
- Town
- Township
- Locality
- Highway
- Main road
- Local road
- Named watercourse or channel
- Local government area
- State park
- National conservation reserve
- Waterbody

Regional location showing offsite infrastructure (indicative locations)

Iluka Resources Limited
Wimmera Project
Stakeholder consultation plan
Figure 2.1



\\emmsvr1\EMM\Jobs\2018\5180481 - Iluka Fine Minerals\GIS\02_Maps\Project_description\PD001_RegionalMapShowingOffsiteInfrastructure_20200304_04.mxd 4/03/2020



Source: EMM (2019); Iluka Resources (2019); GA (2011)

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KEY

- | | | |
|----------------------------------|-----------------------------------|---------------|
| Environmental study area | Major road | Community |
| Mine layout development envelope | Minor road | Holiday shack |
| Plant area development envelope | Toolondo channel | Residence |
| Indicative mine extent | Rocklands Toolondo channel | Shed |
| Indicative mineralised extent | Arapiles channel (decommissioned) | |
| Test pit site | Natimuk channel (decommissioned) | |
| Tenement boundary | Waterbody | |
| | National conservation reserve | |

Project site layout

Iluka Resources Limited
Wimmera Project Stakeholder Consultation Plan
Figure 2.2



2.3 Project schedule

The Wimmera Project will only proceed if it is approved by State and Commonwealth governments, and the Iluka Board approves the required capital investment. The Project is expected to take approximately two years to construct. From that point in time, the expected duration of mining activities is 25 years, including initial pre-strip, ore mining, processing and refining, return of all stockpiled overburden and revegetation. Site rehabilitation and monitoring activities will occur progressively during operation and will continue for approximately 15 years following the completion of mining. Indicative Project timeframes are provided in Figure 2.3.

Iluka is currently undertaking a wide range of investigations and assessments regarding the geological, mining, processing, marketing, environmental and socio-political aspects of the Project as part of the pre-feasibility study (PFS) for the Project. This preliminary design and assessment work will select the most appropriate mining and processing methods and estimate the cost of the Project with a precision of $\pm 30\%$. The PFS is scheduled to be completed by Q3 2022.

Subject to a decision by the Iluka Board to proceed with Project planning, the PFS will be followed by detailed feasibility study (DFS) that will confirm and advance the Project design and cost estimate with an precision of $\pm 15\%$. The DFS is scheduled to be completed by Q4 2023 and will be followed by a decision by the Iluka Board whether to proceed with development of the Project. The process to obtain the required government environmental and planning approvals for the Project will proceed in parallel with the PFS and DFS phases of the Project.



Figure 2.3 Indicative Project timeframe

The indicative timeframe for the EES is provided as Figure 2.4.

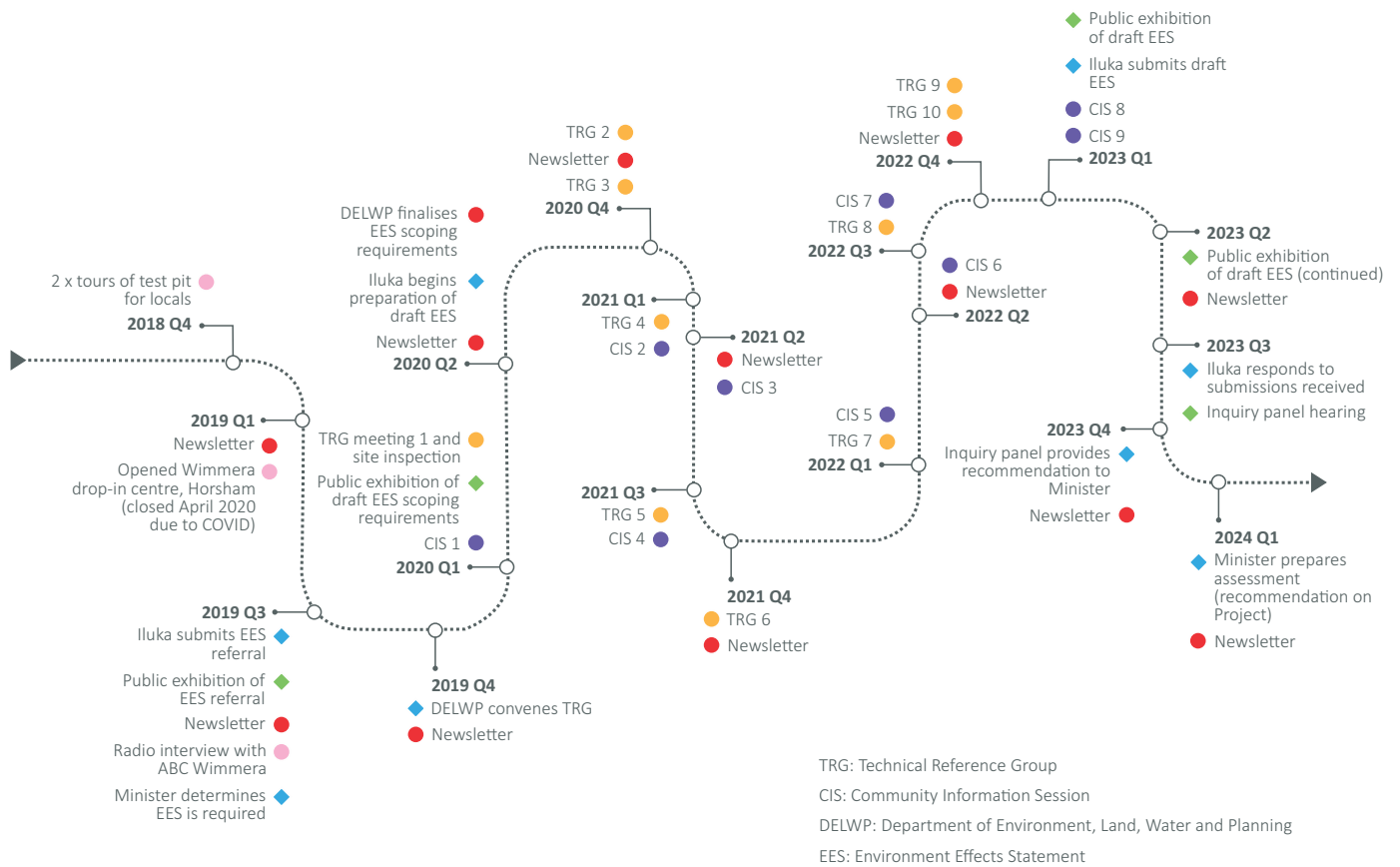


Figure 2.4 Indicative EES timeframe

3 Environmental assessment process

The Wimmera Project will be assessed under the Victorian *Environment Effects Act 1978* (EE Act) and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

3.1 Summary of the EES assessment pathway

In Victoria, assessment of the potential environmental impacts or effects of a proposed development may be required under the EE Act.

An EES referral is used by the Victorian Minister for Planning to determine whether an EES is required. If the Minister for Planning decides that an EES is required, the project proponent is responsible for preparing the EES and undertaking the necessary investigations.

An EES referral for the Project has been submitted and the Victorian Minister for Planning has determined that the Wimmera Project requires preparation of an EES under the *Environment Effects Act 1978* for the following reasons:

- The Project has the potential for a range of significant environmental effects, in particular on:
 - native vegetation, wetlands and associated biodiversity values, including large old trees and listed threatened species and communities;
 - surface water and groundwater (ie flows, quality, availability) and their associated beneficial uses;
 - Aboriginal cultural heritage values; and
 - existing land uses, amenity (ie air quality, noise) and landscape values of the Project area and those associated with the region.
- An integrated assessment of potentially significant effects is necessary to ensure there is sufficient investigation of their extent, significance and related uncertainties. This includes examining the scope for further avoidance, minimisation and mitigation of effects, as well as evaluating acceptability of residual environmental effects.
- An EES will enable a single, rigorous and transparent process for consideration of potentially significant adverse effects of the Project, prior to any relevant statutory decision-making, including under the *Mineral Resources (Sustainable Development) Act 1990*, *Planning and Environment Act 1987*, *Aboriginal Heritage Act 2006* and *Water Act 1989*.

During the EES process there are formal opportunities for stakeholders to make submissions about the Project's potential environmental effects to the Victorian Department of Environment, Land, Water and Planning (DELWP) and the Minister for Planning, as applicable. The formal public review process of an EES includes:

- a public notice releasing the EES draft scoping requirements for 15 business days for public comment (completed in March 2020);
- receipt and consideration of written submissions on the draft scoping requirements by DELWP before the scoping requirements are finalised and issued to the proponent (issued in April 2020);
- a public notice in local and metropolitan newspapers advising of the exhibition of the EES for 30 business days and inviting public comment via written submission to Planning Panels Victoria;

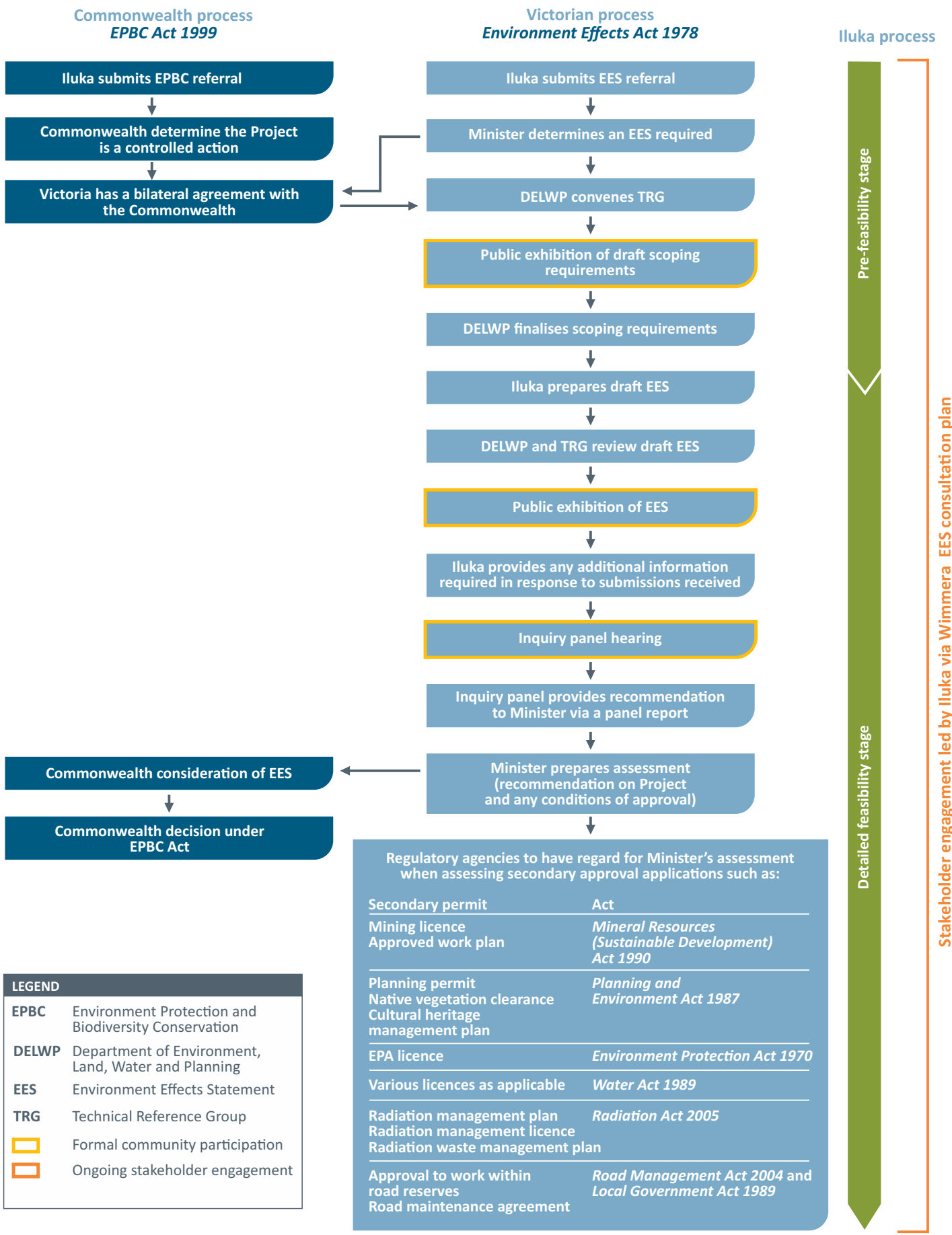
- consideration of written submissions by the Minister for Planning; and
- generally, an inquiry by a panel appointed by the Minister to review the EES, review public submissions, conduct a public hearing and provide a report to the Minister.

This EES CP is a requirement of the EES assessment process.

The process under the EE Act is not an approval process itself, but an assessment of the environmental effects of a project. Ultimately, the Minister's Assessment considers the project's impacts and benefits to determine its acceptability. The Minister's Assessment is provided to decision-makers to enable them to make decisions about a project in the knowledge of the Minister's advice.

Extensive information on the EES process is provided on the DELWP website (www.planning.vic.gov.au/environment-assessment/what-is-the-ees-process-in-victoria).

A summary of the assessment pathway is provided as Figure 3.1.



3.2 Summary of the EPBC assessment pathway

The objective of the Commonwealth EPBC Act is to protect the environment, particularly Matters of National Environmental Significance (MNES). The EPBC Act requires that a person must not take an action that has, will have, or is likely to have a significant impact on any of the MNES or other protected matters without approval from the Commonwealth Minister for the Environment (the Commonwealth Minister).

Before taking an action that could have a significant impact on a matter protected by the EPBC Act, a person must refer the proposed action to the Commonwealth Minister. The Commonwealth Minister then assesses the referral to determine whether the proposed action is declared:

- not to be a controlled action and therefore Commonwealth approval is not required if the action is taken in accordance with the referral; or
- a controlled action and will therefore need formal assessment and approval under the EPBC Act.

Iluka submitted a referral to the Commonwealth Minister, seeking a determination on the application under the EPBC Act (referral number 2019/8493). The Minister's delegate determined that the proposed action is a controlled action and will require assessment and approval under the EPBC Act. The decision cites that the proposed action is likely to have a significant impact on the following matters protected by the EPBC Act:

- listed threatened species and communities (sections 18 and 18A);
- listed migratory species (sections 20 and 20A); and
- nuclear actions (sections 21 and 21A).

The decision also notes that the Project will be assessed under the bilateral Victorian and Commonwealth assessment process; the Victorian EES.

3.3 Summary of the *Mineral Resources (Sustainable Development) Act 1990* requirements

Under the *Mineral Resources (Sustainable Development) Act 1990* (MRSD Act) mining works can only commence once the following have occurred:

- the Minister for Resources has granted a mining licence (MIN);
- Earth Resources Regulation (ERR) has approved the work plan. Note, the work plan must:
 - identify potential risks to the environment, public safety, land, property and infrastructure;
 - identify how the risks will be mitigated/managed;
 - outline Iluka's approach to stakeholder consultation; and
 - include a rehabilitation plan that states the proposed land uses for the post-closure phase, taking into consideration the community's feedback received during consultation (including the landowners' feedback if the land is privately-owned);
- Iluka has entered into a rehabilitation bond;
- Iluka has obtained all the necessary consents required by all applicable Acts;

- Iluka has complied with any conditions relating to environmental offsets, imposed by the Minister;
- Iluka has the required insurance; and
- Iluka has:
 - obtained the written consent of the owners and occupiers of the land affected; or
 - made and registered compensation agreements with those owners and occupiers; or
 - purchased the land affected.

The work plan is a key regulatory instrument for giving effect to recommendations from the Minister for Planning's Assessment. The recommendations can be addressed in the body of the work plan or as conditions for the approval of the work plan.

3.4 Exploration activities

The WIM100 test pit was developed under exploration licence 4282 (EL4282) in accordance with the approved exploration work plan (EWP). Section 39A of the MRSD Act specifies that a licensee has a duty to consult with the community throughout the period of the licence by:

- sharing with the community information about any activities authorised by the licence that may affect the community; and
- giving members of the community a reasonable opportunity to express their views about those activities.

Section 40(3)(d) of the MRSD Act also specifies that an EWP must contain a community engagement plan. A community engagement plan was submitted and approved as a subsidiary document to the test pit EWP.

The Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019 also require mining and exploration licence holders to prepare a community engagement plan.

4 Stakeholder identification

Iluka has engaged with the Murray Basin community since at least 2003 in relation to the nearby Douglas and Echo mines, the Hamilton Minerals Separation Plant and the exploration of the WIM100, WIM50 and Goschen South deposits.

Consequently, Iluka has a comprehensive database of potential Project stakeholders. To further consolidate this database, a stakeholder identification workshop was held on 13 February 2019.

The groups of stakeholders identified as being potentially interested in the Project are outlined in Table 4.1.

This table will be updated as the Project progresses.

Table 4.1 Stakeholders

Category	Stakeholders
Landowners and land managers that will be directly affected	Landowners and land managers in the Project site, and those directly impacted by the offsite infrastructure such as the proposed pipeline, borefield, powerline, contractor construction camp, and any required road modifications
Local residents that may be directly affected	Landowners and land managers living within the area where amenity or health criteria could potentially be exceeded or who live on the local roads that will be part of the transport route Neighbours to the construction camp
Local community members that are not directly affected	Landowners, residents, business owners, employees and visitors in local and regional townships: eg Horsham, Hamilton, Harrow, Toolondo and Balmoral Motorists Iluka contractors and vendors Local sporting clubs (eg Toolondo Golf Club) Local community clubs (including City of Horsham Lions Club, Balmoral Lions Club, Nhill Lions Club, Rotary Club of Horsham, Rotary Club of Horsham East, Rotary Club of Hamilton, Rotary Club of Hamilton North, Rotary Club of Balmoral and Harrow and Pinner Lions)
Users of local/regional transport routes	Landowners, residents, business owners, employees and visitors in local and regional townships, including Horsham, Hamilton, Harrow, Balmoral, Natimuk, Toolondo, Clear Lake and Noradjuha Tourists Motorists (including truck drivers)

Table 4.1 Stakeholders

Category	Stakeholders
Non-government organisations (NGOs), special interest groups and advocacy groups	Environment Victoria Horsham Agricultural Society Horsham Urban Landcare Kanagulk Landcare Group Natimuk Districts Progress Association Natimuk Lake Foreshore Committee Rail Freight Alliance Regional Recreation Water Users Group Roadsafe Wimmera Western Highway Action Committee Western Rail Wimmera Mallee Sustainability Alliance Wimmera River Improvement Committee Wimmera Southern Mallee Local Learning and Employment Network Wimmera Southern Mallee Regional Transport Group
Horsham Rural City Council	Executive and staff Elected members (Councillor Mark Radford (Mayor), Councillor David Grimble, Councillor Pam Clarke, Councillor Alethea Gulvin, Councillor Josh Koenig, Councillor Les Power and Councillor John Robinson)
Neighbouring Councils	Glenelg Shire Council Hindmarsh Shire Council Northern Grampians Shire Council Southern Grampians Shire Council West Wimmera Shire Council Yarriambiack Shire Council
Regional Council bodies	Regional Cities Victoria Victorian Local Governance Association
Aboriginal people and groups	Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC) Aboriginal people
Businesses and local chambers of commerce	Australian Rail Track Corporation Local businesses Regional Development Victoria (RDV) (Horsham) RDV (Warrnambool) Victorian Farmers Federation Wimmera Development Association

Table 4.1 Stakeholders

Category	Stakeholders
Elected representatives of State and Commonwealth Members of Parliament	<p>The Hon. Matthew Canavan, Commonwealth Minister for Resources and Northern Australia</p> <p>The Hon. Sussan Ley MP, Commonwealth Minister of the Environment</p> <p>Dr Anne Webster MP, Commonwealth Member for Mallee</p> <p>The Hon. Dan Tehan, Commonwealth Member for Wannon</p> <p>Emma Kealy, Victorian Member for Lowan</p> <p>The Hon. Lily D’Ambrosio MP, Victorian for Energy, Environment and Climate Change, Minister for Solar Homes</p> <p>The Hon. Jaclyn Symes MP, Victorian Minister for Resources, Minister for Regional Development, Minister for Agriculture</p> <p>The Hon. Tim Pallas MP, Victorian Treasurer and Minister for Economic Development</p> <p>The Hon. Richard Wynne, Victorian Minister for Planning, Minister for Housing, Minister for Multicultural Affairs</p>
Regulatory agencies	<p>Aboriginal Victoria</p> <p>Commonwealth Department of Agriculture, Water and the Environment (DAWE)</p> <p>Department of Jobs, Precincts and Regions (DJPR) (specifically the Earth Resources Regulation (ERR) section)</p> <p>Department of Environment, Land, Water and Planning (DELWP)</p> <p>Department of Health and Human Services (Radiation Safety Services) (DHHS)</p> <p>Department of Transport</p> <p>Douglas mine environmental review committee</p> <p>Environment Protection Authority (EPA) Victoria</p> <p>Glenelg Hopkins Catchment Management Authority (depending on water supply infrastructure)</p> <p>Grampians Wimmera Mallee Water</p> <p>Heritage Victoria</p> <p>Parks Victoria</p> <p>Port of Portland</p> <p>Regional Roads Victoria (formerly VicRoads)</p> <p>Victorian Ports Corporation Melbourne</p> <p>VicTrack</p> <p>Wimmera Catchment Management Authority</p>
Emergency services	<p>Ambulance Victoria</p> <p>State Emergency Service</p> <p>Country Fire Authority</p> <p>Victoria Police</p> <p>Wimmera Base Hospital</p>
Media	<p>Wimmera Mail Times</p> <p>ABC Western Victoria radio (Horsham)</p> <p>ACE radio</p> <p>MIXX FM</p> <p>Horsham and District Community FM Radio</p> <p>Dimboola Courier</p> <p>Northwest Grampians newsletter</p>

Iluka would welcome contact from other potential stakeholders.

5 Community assessment

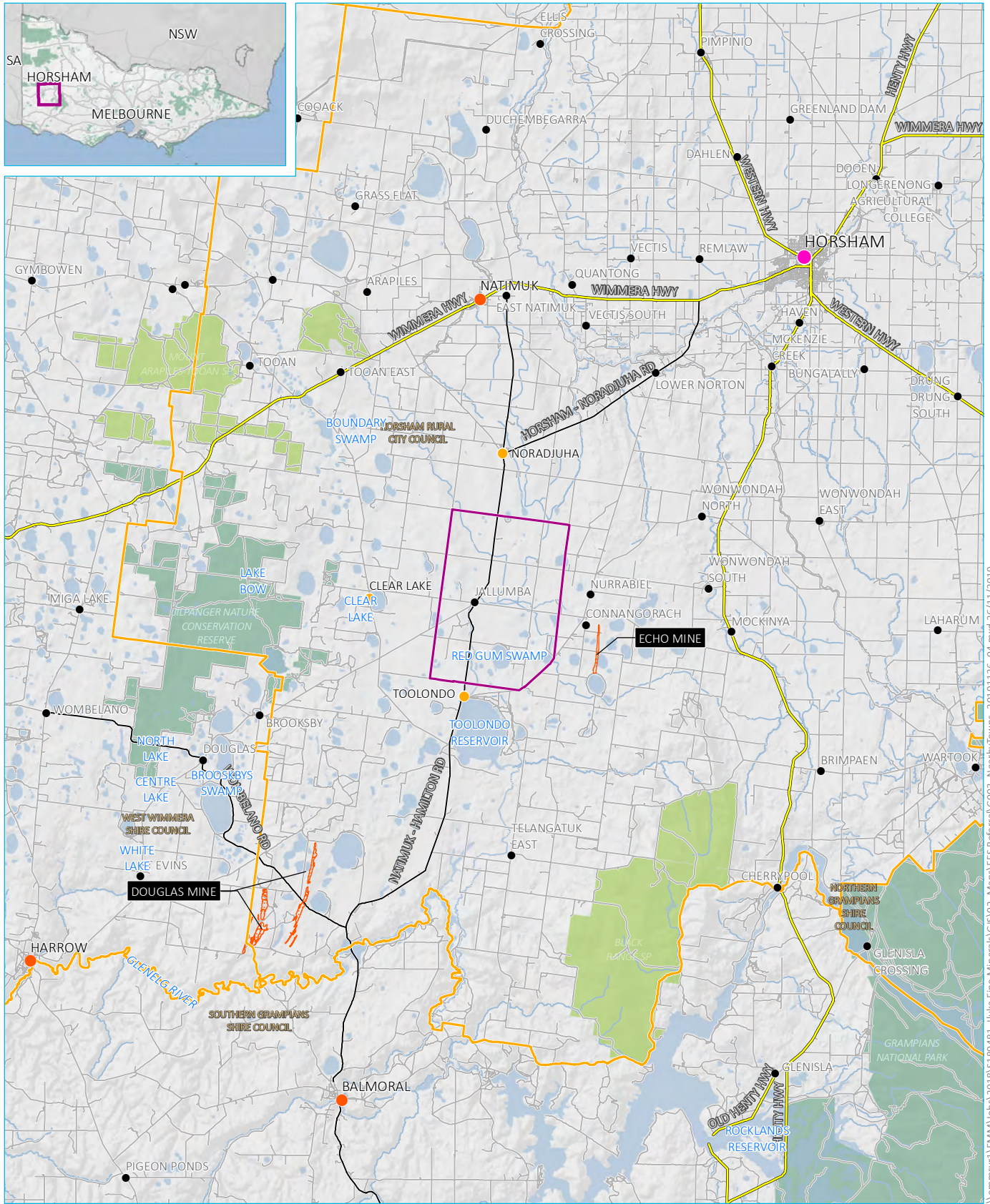
5.1 Community overview

The Project site is located at the locality of Jallumba, approximately 40 km south-west of Horsham, 35 km north-east of Balmoral in the Southern Wimmera Region in Western Victoria. It is approximately 325 km west of the Melbourne central business district.

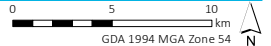
The Project site is located within the Horsham Rural City Local Government area and the Wimmera River catchment.

Prior to European settlement the region was occupied by Wotjobaluk, Jaadwa, Jadawadjali, Wergaia and Jupagulk Traditional Owner groups. These groups are represented by the Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC), the registered Aboriginal party (RAP) under the Victorian *Aboriginal Heritage Act 2006*.

The nearest minor townships to the site are Balmoral (approximately 30 km south), Harrow (approximately 34 km south-west) and Natimuk (approximately 15 km north). The nearest settlements are Toolondo (approximately 1 km south), Clear Lake (approximately 5 km west), and Noradjuha (approximately 4 km north), while the localities Nurrabiel and Connangorach are located approximately 2 km to the east (Figure 5.1).



Source: EMM (2019); Iluka Resources (2019); GA (2011)



- KEY**
- Environmental study area
 - Named watercourse or channel
 - City
 - Douglas and Echo mined extent
 - Waterbody
 - Town
 - Highway
 - Local government area
 - Township
 - Main road
 - State park
 - Locality
 - National park/National conservation reserve

Nearby towns and localities

Iluka Resources Limited
Wimmera Project Community Consultation Plan
Figure 5.1



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The nearest major towns are Horsham (approximately 30 km north-east) and Hamilton (approximately 90 km south). The Horsham Rural City shire has a population of approximately 19,800, with three-quarters of the population being residential within the township of Horsham. Rural land is used largely for agriculture, particularly wheat, canola and grain growing and sheep grazing (ABS 2016).

The surrounding land is predominantly zoned as 'Farming' under the Horsham Planning Scheme. Dry land agriculture (cropping and grazing) is the predominant land use. The population in the vicinity of the site can be generally described as a low-density agricultural community.

5.2 Social assessment

A summary of the key demographic indicators for the Horsham Rural City Council population is outlined in Table 5.1 (ABS 2016).

Table 5.1 Key demographic indicators

Element	Horsham Rural City Council	National
Total population	19,889	24,598,900
Median age	41.1 years	Not available
Median annual total income (excluding Government pensions and allowance)	\$41,072	\$47,692
Unemployment rate	4.9%	6.9%
Total person employed	9,111	Not available
Aboriginal and/or Torres Strait Islander people	1.5%	2.8%
Top five industries of employment in Horsham Rural City Council	Hospitals (except psychiatric hospitals) 7.7% Other social assistance services 3.0% Other grain growing 2.9% Primary education 2.6% Local Government administration 2.5%	Hospitals (except psychiatric hospitals) 3.9% Other social assistance services 1.5% Other grain growing 0.2% Primary education 2.2% Local Government administration 1.3%
Average monthly household mortgage payment	\$1,325	\$1,958
Average monthly household rental payment	\$928	\$1,524
Median house sale price	\$240,000	Not available
Average household size	2.3 persons	2.6 persons
Residents have completed Year 12 or equivalent	37%	51.9%
Total population born overseas	1,186	6,149,388
Population density	4.7 persons per km ²	Not available

5.3 Stakeholder perception surveys

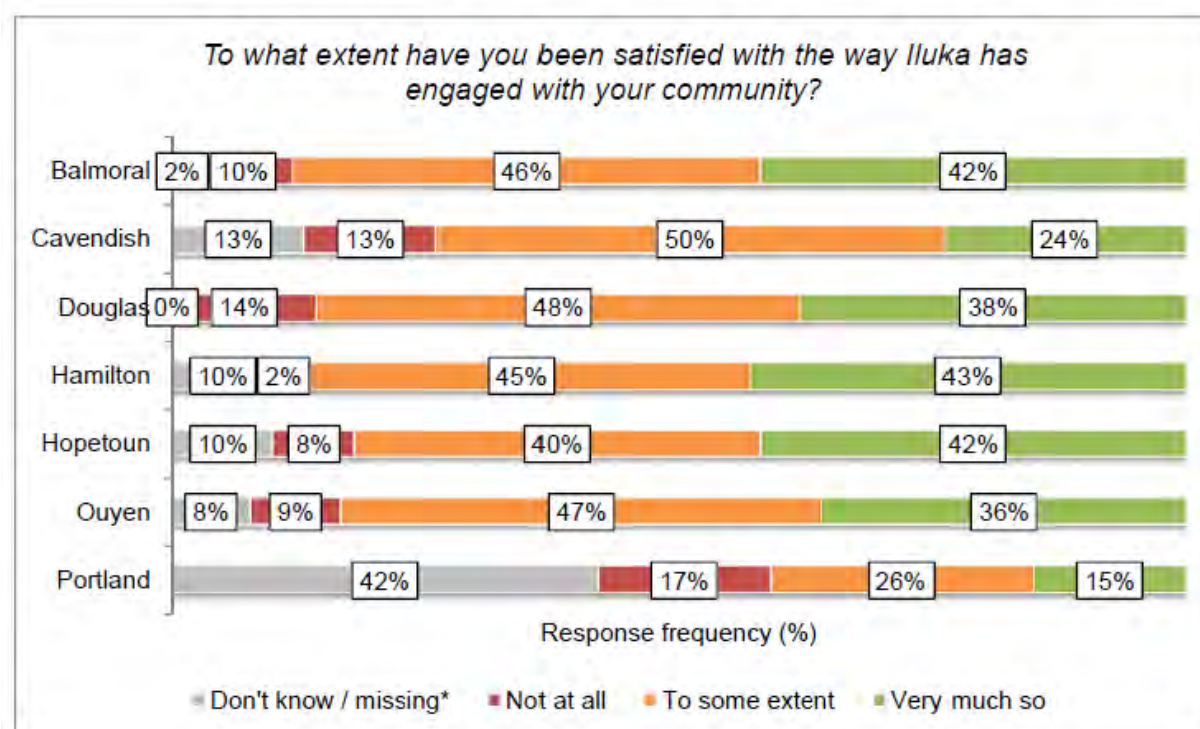
In 2012, Iluka engaged Sheridan Coakes Consulting to undertake a social assessment of Iluka’s Australian operations, comprising Perth Basin (Western Australia), Eucla Basin (South Australia) and Murray Basin (Victoria). The number of and types of stakeholders consulted in the Murray Basin are outlined in Table 5.2.

Table 5.2 Number of stakeholders consulted in Murray Basin

Stakeholder group	Number
Local government and other government bodies	9
Service providers	2
Aboriginal representative groups	5
Special interest/community groups	8
Wider community household survey (across neighbouring localities)	445
Total	469

A summary of the key results for Murray Basin is as follows:

- of the 445 wider community households surveyed, the majority reported being satisfied with the way Iluka has engaged in their community (Figure 5.2);
- stakeholders would like more information about Iluka’s current and future projects; and
- 77% of stakeholders felt that the advantages of mining in the area outweigh the disadvantages.



Source: Coakes Consulting, 2012

Figure 5.2 Murray Basin household response to the way Iluka has engaged with their community (household survey)

In 2018, Iluka engaged KPMG to survey stakeholder perceptions associated with its Australian operations in Perth (Western Australia), Eucla (South Australia), and Murray Basin (Victoria/New South Wales). The survey explored stakeholders' perceptions of the positive and negative impacts that arise from Iluka's activities in Australia; Iluka's management of those impacts; its approach to engaging with communities; and its community partnerships. In total, 163 stakeholders were surveyed.

The results showed a number of positive findings for Iluka's Australian activities as a whole. Stakeholders typically had a positive attitude towards Iluka and its management of environmental factors and its contribution to local communities. The following issues were also identified Australia-wide:

- stakeholders have a strong desire for more information about Iluka's activities, and for Iluka representatives to be more visible in stakeholders' communities;
- stakeholders felt that Iluka could better manage its project-related social impacts;
- while Iluka's presence is recognised as providing economic benefits, these benefits are often perceived as being unfairly distributed and inconsistently delivered over time; and
- there was a common perception that Iluka lacks a strategic long-term approach to community contributions, and that there is insufficient transparency regarding what Iluka does and does not support.

In total, 71 stakeholders were surveyed in the Murray Basin region as part of the 2018 survey. The following results were identified in the Murray Basin region:

- stakeholders had a high level of trust in Iluka, rating the company on average similar in trustworthiness compared to the national average, and the mid-range of all the regions (Figure 5.3);
- while stakeholder's overall opinion of Iluka was the least positive of all the regions, it was still positive and only slightly lower than the national average (Figure 5.4);
- stakeholders would like more information about Iluka's decision-making and future plans for the Murray Basin, in part to help their own planning, particularly future plans that may affect employment, training and development opportunities;
- stakeholders are keen to see Iluka recommence operations in the region, particularly due to the potential creation of jobs and other employment opportunities; and
- stakeholders reflected that in the past, they had developed a good relationship with a key Iluka contact, however, many of those key contacts have since moved away due to downsizing.

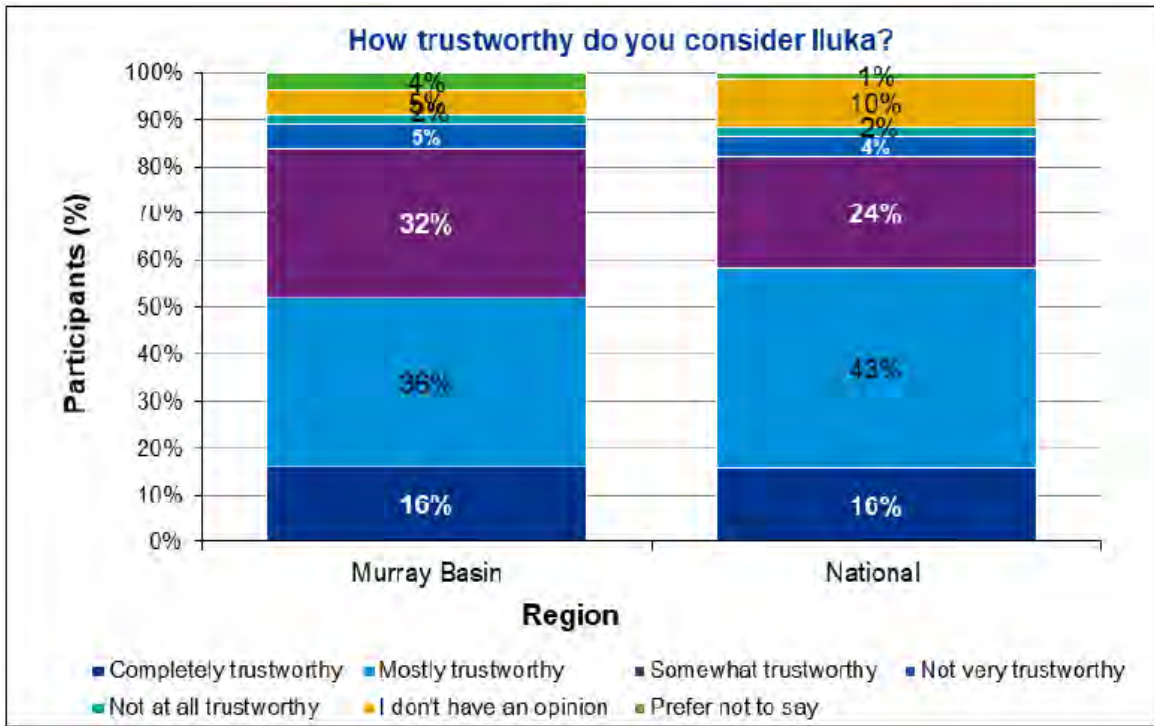


Figure 5.3 Murray Basin stakeholder perception survey results regarding trust

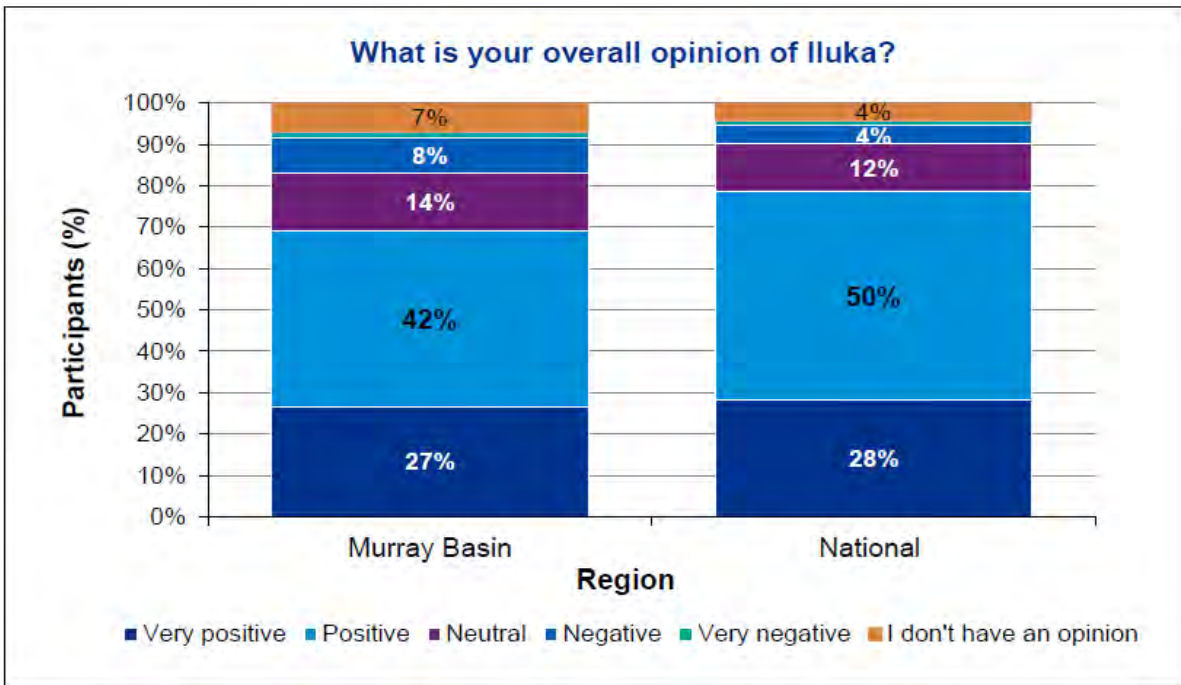


Figure 5.4 Murray Basin stakeholder perception survey results regarding Iluka's reputation

5.4 Summary of likely key issues

A summary of the likely key issues for the Project is outlined in Table 5.3. These issues will be investigated during the assessment process and will be revised as the Project progresses.

Table 5.3 Summary of likely key issues

Issue	Detail
Environmental	
Water access	Issues associated with competition for water supply between mining and agriculture. Potential impact on local water bodies.
Water quality	Potential impacts on receiving water bodies, including the Wimmera River tributaries, Natimuk Creek, Natimuk Lake, and the Glenelg River and Toolondo reservoir (associated with the water supply and pipeline) and groundwater.
Hydrology	Potential impact of changes to surface water drainage (eg flooding, erosion, drying out, sedimentation etc).
Radiation	Potential impact associated with handling and disposal of radioactive material.
Native flora and fauna	Potential impacts on rare and threatened flora and fauna. Potential fragmentation of habitats.
Contamination	Potential contamination of soil or water (eg hydrocarbon spills, salinisation)
Geotechnical	Potential for mining to cause geotechnical instability.
Rehabilitation	Potential for sub-standard rehabilitation. Loss of formerly agricultural land to other end land-uses.
Noise and vibration	Potential noise and vibration nuisance from mine operations and/or mine related traffic.
Dust	Potential for dust nuisance to impact amenity, human health, crops, livestock, native flora and fauna.
Air quality	Potential for exceedances of health-based criteria at neighbouring properties or townships in relation to mining operations and diesel emissions (eg idling trucks).
Increased heavy vehicle traffic	Potential for heavy vehicles to degrade road infrastructure and impact road safety.
Land management	Poor land management resulting in increased weeds, pest animals and erosion.
Soil	Impact on soil quality. Loss of soil due to wind erosion.
Visual amenity	Potential visual landscape impacts.
Socioeconomic	
Social fabric	Impact on community cohesion, lifestyle, sense of place. Impact on the region's image.
Farming	Impact on livelihood, earning capacity and agricultural enterprises.
Land access	Impacts on land access and farming operations.
Land values	Impact on land values and property prices.
European heritage	Impacts to sites of European heritage.
Aboriginal heritage	Impacts to Aboriginal sites.
Community services and infrastructure	Impact on local/regional roads, water supply, power supply and services including hospitals, schools, community and sporting clubs.
Engagement	Access to information, transparency, two-way communication and responsiveness.
Public health and safety	Health and safety risks for local residents and mine workers, including radiation health risks.

Table 5.3 **Summary of likely key issues**

Issue	Detail
Economic growth	Impact on local and regional economy and development.
Community conflict	Tensions between community members with opposing values.
Employment	Impact on local and regional employment.
Regulatory process	Impact of regulatory process on timelines, engagement and assessment outcomes.

5.5 Potential community concerns

A high-level summary of the likely concerns and opportunities predicted for each key stakeholder group is outlined in Table 5.4.

This information was gleaned from various sources, including:

- on-going face-to-face (and telephone) conversations with landowners within the Project area;
- community and stakeholder interviews and online surveys about Project impacts, concerns, expectations and opportunities;
- the results of the 2012 social assessment report;
- the results of the 2018 stakeholder perception survey;
- a stakeholder identification workshop held with Iluka representatives in February 2019;
- desktop research of similar mineral sands project in Victoria; and
- through previous experience with stakeholders on other projects.

This information will be continually updated as the assessment and consultation processes progress.

A range of technical assessments have commenced (or will commence) to assess the key issues.

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
1	Landowners and land managers that will be directly affected (including those that will be directly affected by the offsite components footprints).	<p>Opposition to mining (competition to farming).</p> <p>Opposition to land access – mining.</p> <p>Opposition to land access – supporting infrastructure.</p> <p>Plans to maintain ownership of land for future generations.</p> <p>Opposition to change.</p> <p>Fear and uncertainty about potential Project impacts.</p> <p>Uncertainty about potential impact of Project on neighbouring/regional agricultural productivity.</p> <p>Uncertain Project will proceed/be viable.</p> <p>Mining could have negative impact on region’s social fabric.</p> <p>Insufficient financial compensation.</p> <p>Community conflict.</p> <p>Insufficient time or resources to get involved.</p> <p>Under-resourced/have competing priorities.</p> <p>Lack of technical expertise on mining.</p> <p>Uncertainty about land access process.</p>	<p>Employment opportunity.</p> <p>Opportunity to retire from farming.</p> <p>Diversification of income.</p> <p>Opportunity to access infrastructure (eg pipeline).</p> <p>Investment in social infrastructure.</p> <p>Open attitude toward the Project and the opportunity to engage with Iluka.</p> <p>Familiarity with the land, productivity, land values in the area.</p> <p>Familiarity with Iluka.</p>	<p>Rehabilitation.</p> <p>Visual amenity.</p> <p>Compensation.</p> <p>Land values.</p> <p>Land access.</p> <p>Social fabric.</p> <p>Lifestyle.</p> <p>Impact on farming.</p> <p>Engagement.</p> <p>Community conflict.</p> <p>Water access.</p> <p>Water quality.</p> <p>Increased heavy vehicle traffic.</p> <p>Native flora and fauna.</p> <p>Employment.</p> <p>Dust and noise.</p> <p>Community services and infrastructure.</p> <p>Public health and safety.</p> <p>Radiation.</p>	<p>Mine rehabilitation and closure plan.</p> <p>Landscape and visual impact assessment.</p> <p>Socioeconomic impact assessment.</p> <p>Soil and rehabilitation impact assessment.</p> <p>Agriculture impact assessment.</p> <p>Surface water impact assessment.</p> <p>Groundwater impact assessment.</p> <p>Biodiversity impact assessment.</p> <p>Traffic and transport impact assessment.</p> <p>Noise and vibration impact assessment.</p> <p>Radiation impact assessment.</p> <p>Human health impact assessment.</p> <p>Air quality, energy and greenhouse gas assessment.</p>

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
2	Local residents that may be directly affected (including those that may be directly affected by the offsite components footprints).	<p>Increase in local and regional traffic.</p> <p>Fear and uncertainty about Project impacts.</p> <p>Uncertain Project will proceed/be viable.</p> <p>Opposition to mining (competition to farming).</p> <p>Opposition to change.</p> <p>Mining could have negative impact on region's social fabric.</p> <p>Community conflict.</p> <p>Insufficient time/resources to get involved.</p> <p>Increase demand on local services.</p> <p>Increase in dust and noise.</p> <p>Lack of technical expertise on mining.</p> <p>Water resources.</p>	<p>Employment opportunities.</p> <p>Indirect economic benefit in the region eg goods, accommodation and other services.</p> <p>Diversification of income.</p> <p>Investment in social infrastructure.</p> <p>Open attitude toward the Project and the opportunity to engage with Iluka.</p> <p>Familiarity with the land, productivity, land values in the area.</p>	<p>Rehabilitation.</p> <p>Visual amenity.</p> <p>Land values.</p> <p>Land access.</p> <p>Social fabric.</p> <p>Lifestyle.</p> <p>Impact on farming.</p> <p>Engagement.</p> <p>Community conflict.</p> <p>Water access.</p> <p>Water quality.</p> <p>Increased heavy vehicle traffic.</p> <p>Native flora and fauna.</p> <p>Employment.</p> <p>Dust and noise.</p> <p>Community services and infrastructure.</p> <p>Health and safety.</p> <p>Radiation.</p>	<p>Mine rehabilitation and closure plan.</p> <p>Landscape and visual impact assessment.</p> <p>Socioeconomic impact assessment.</p> <p>Soil and rehabilitation assessment.</p> <p>Agriculture impact assessment.</p> <p>Surface water impact assessment.</p> <p>Groundwater impact assessment.</p> <p>Biodiversity impact assessment.</p> <p>Traffic and transport impact assessment.</p> <p>Noise and vibration impact assessment.</p> <p>Radiation impact assessment.</p> <p>Human health impact assessment.</p> <p>Air quality, energy and greenhouse gas assessment.</p>

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
3	Local community members that are not directly impacted (it is noted that local community members who are not directly impacted may perceive to be impacted).	<ul style="list-style-type: none"> Lack of technical expertise on mining. Wage pressure. Uncertainty or fear about Project impacts. Opposition to mining. Under-resourced/competing priorities. 	<ul style="list-style-type: none"> Employment opportunities. Indirect economic benefit in the region eg goods, accommodation and other services. Investment in social infrastructure. Open attitude toward the Project and the opportunity to engage with Iluka. Familiarity with the land, productivity, land values in the area. Familiar with local community. 	<ul style="list-style-type: none"> Economic growth. Employment. 	<ul style="list-style-type: none"> Socioeconomic impact assessment. Agriculture impact assessment. Traffic and transport impact assessment.

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
4	Non-government organisations (NGOs) and advocacy groups	<p>Uncertainty or fear about Project impacts.</p> <p>Opposition to mining.</p> <p>Under-resourced/competing priorities.</p>	<p>Technical expertise.</p> <p>Opportunity to raise awareness.</p> <p>Opportunity to improve environmental data.</p> <p>Open attitude toward the Project and the opportunity to engage with Iluka.</p> <p>Familiarity with the land, productivity, land values in the area.</p> <p>Familiar with local community.</p> <p>Familiar with Iluka.</p>	<p>Engagement.</p> <p>Land use (operation and post closure).</p> <p>Rehabilitation.</p> <p>Transport options and routes.</p> <p>Increased heavy vehicle traffic.</p> <p>Road maintenance.</p> <p>Water resources.</p> <p>Community services and infrastructure.</p> <p>Employment.</p> <p>Native flora and fauna.</p> <p>Engagement.</p> <p>Strategic direction.</p> <p>Social fabric.</p> <p>Visual impact.</p> <p>Public health and safety.</p>	<p>Mine rehabilitation and closure plan.</p> <p>Landscape and visual impact assessment.</p> <p>Socioeconomic impact assessment.</p> <p>Soil and rehabilitation assessment.</p> <p>Agriculture impact assessment.</p> <p>Surface water impact assessment.</p> <p>Groundwater impact assessment.</p> <p>Biodiversity impact assessment.</p> <p>Traffic and transport impact assessment.</p> <p>Noise and vibration impact assessment.</p> <p>Radiation impact assessment.</p> <p>Human health impact assessment.</p> <p>Air quality, energy and greenhouse gas assessment.</p>

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
5	Local Council (executive and staff)	<p>Pressure from community and lobby groups.</p> <p>Uncertainty about Project impacts.</p> <p>Opposition to change.</p> <p>Mining could have negative impact on region's social fabric.</p> <p>Insufficient technical resources.</p> <p>Regulatory burden.</p>	<p>Open attitude toward the Project and the opportunity to engage with Iluka.</p> <p>Invest in regional infrastructure.</p> <p>Familiar with the land, productivity, land values in the area.</p> <p>Familiar with local community.</p>	<p>Land use (operation and post closure).</p> <p>Rehabilitation.</p> <p>Transport options and routes.</p> <p>Increased heavy vehicle traffic.</p> <p>Road maintenance.</p> <p>Water resources.</p> <p>Community services and infrastructure.</p> <p>Employment.</p> <p>Native flora and fauna.</p> <p>Engagement.</p> <p>Strategic direction.</p> <p>Social fabric.</p> <p>Visual impact.</p> <p>Public health and safety.</p>	<p>Mine rehabilitation and closure plan.</p> <p>Landscape and visual impact assessment.</p> <p>Socioeconomic impact assessment.</p> <p>Soil and rehabilitation assessment.</p> <p>Agriculture impact assessment.</p> <p>Surface water impact assessment.</p> <p>Groundwater impact assessment.</p> <p>Biodiversity impact assessment.</p> <p>Traffic and transport impact assessment.</p> <p>Noise and vibration impact assessment.</p> <p>Radiation impact assessment.</p> <p>Human health impact assessment.</p> <p>Air quality, energy and greenhouse gas assessment.</p> <p>Aboriginal cultural heritage impact assessment (cultural heritage management plan).</p> <p>Historic heritage impact assessment.</p>

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
6	Aboriginal people and groups	Impacts to Country. Under-resourced, competing priorities.	Expertise in cultural heritage. Protection of cultural heritage. Employment opportunities. Open attitude toward the Project and the opportunity to engage with Iluka.	Cultural heritage. Rehabilitation. Employment opportunities. Water resources. Environmental impacts. Engagement.	Mine rehabilitation and closure plan. Socioeconomic impact assessment. Surface water impact assessment. Groundwater impact assessment. Biodiversity impact assessment. Aboriginal cultural heritage impact assessment (cultural heritage management plan). Historical heritage impact assessment.
7	Businesses and local chambers of commerce	Possible opposition to mining (may be regarded as in competition to other industries). Under-resourced/competing priorities. Limited knowledge of mining. Project may not proceed after invested in business expansion. Wage pressure. Reliant on Iluka to advise Project impacts and timelines.	Opportunity to progress regional/state strategic direction. Economic growth for the region. Economic diversity for the region. Familiarity with local area and community. Established business reputation. Time to prepare.	Business impacts. Employment. Economic growth. Water resources. Environmental impact. Strategic plans for region.	Mine rehabilitation and closure plan. Landscape and visual impact assessment. Socioeconomic impact assessment. Soil and rehabilitation assessment. Agriculture impact assessment. Surface water impact assessment. Groundwater impact assessment. Traffic and transport impact assessment.

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
8	Elected representatives of State and Commonwealth Members of Parliament; Horsham Rural City Council	<p>Pressure from community and lobby groups.</p> <p>Potential for lack of bilateral support for the Project.</p> <p>Adverse media coverage.</p> <p>Mining could have negative impact on region's social fabric.</p> <p>Impact on roads and other infrastructure.</p>	<p>Opportunity to progress regional/state strategic direction.</p> <p>Economic growth for the region.</p> <p>Economic diversity for the region.</p> <p>Improvements to community infrastructure.</p>	<p>Social fabric.</p> <p>Strategic plans for region.</p> <p>Economic growth.</p> <p>Increased heavy vehicle traffic.</p> <p>Transport options and routes.</p> <p>Water resources.</p> <p>Public health and safety.</p>	<p>Mine rehabilitation and closure plan.</p> <p>Landscape and visual impact assessment.</p> <p>Socioeconomic impact assessment.</p> <p>Soil and rehabilitation assessment.</p> <p>Agriculture impact assessment.</p> <p>Surface water impact assessment.</p> <p>Groundwater impact assessment.</p> <p>Biodiversity impact assessment.</p> <p>Traffic and transport impact assessment.</p> <p>Noise and vibration impact assessment.</p> <p>Radiation impact assessment.</p> <p>Human health impact assessment.</p> <p>Air quality, energy and greenhouse gas assessment.</p> <p>Aboriginal cultural heritage impact assessment (cultural heritage management plan).</p> <p>Historic heritage impact assessment.</p>

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
10	Regulatory agencies	<p>Inadequate resources and competing priorities.</p> <p>Pressure from community and lobby groups.</p> <p>Adverse media coverage.</p> <p>Mining could have negative impact on region’s social fabric.</p> <p>Impact on roads, infrastructure and resources.</p> <p>Uncertainty about Project impacts.</p> <p>Adverse impacts on environmental values.</p>	<p>Technical expertise of mining and the regulatory system.</p> <p>Adequate information to inform statutory decisions.</p> <p>Willingness to work with Iluka.</p> <p>Willingness to facilitate regulatory process.</p> <p>Opportunity to progress regional/state strategic direction.</p> <p>Employment and economic growth for the region.</p> <p>Economic diversity for the region.</p> <p>Long-term Project (25+ years).</p> <p>Improvements to community infrastructure.</p> <p>Opportunity for community engagement.</p> <p>Opportunities for biodiversity offsets.</p> <p>Expectation that Iluka will achieve high levels of environmental and rehabilitation performance.</p> <p>Investments/upgrades to regional infrastructure (roads, power supply etc).</p> <p>Water resources.</p>	<p>Regulatory process.</p> <p>Engagement.</p> <p>Community opinion.</p> <p>Strategic plans for region.</p> <p>Economic growth.</p> <p>Increased heavy vehicle traffic.</p> <p>Transport options and routes.</p> <p>Visual amenity.</p> <p>Water access.</p> <p>Native flora and fauna.</p> <p>Rehabilitation.</p> <p>Social fabric.</p> <p>Community services and infrastructure.</p> <p>Public health and safety.</p>	<p>Mine rehabilitation and closure plan.</p> <p>Landscape and visual impact assessment.</p> <p>Socioeconomic impact assessment.</p> <p>Soil and rehabilitation assessment.</p> <p>Agriculture impact assessment.</p> <p>Surface water impact assessment.</p> <p>Groundwater impact assessment.</p> <p>Biodiversity impact assessment.</p> <p>Traffic and transport impact assessment.</p> <p>Noise and vibration impact assessment.</p> <p>Radiation impact assessment.</p> <p>Human health impact assessment.</p> <p>Air quality, energy and greenhouse gas assessment.</p> <p>Aboriginal cultural heritage impact assessment (cultural heritage management plan).</p> <p>Historical heritage impact assessment.</p>

Table 5.4 Potential stakeholder concerns and opportunities

Ref	Stakeholder category	Potentially challenging issues/attitudes	Potentially supporting issues/attitudes	Issues	Relevant study
11	Media	Possible reliance on inaccurate information.	Opportunity to provide accurate, balanced news to the community.	Regulatory process. Engagement. Community opinion. Strategic plans for region.	Socioeconomic impact assessment. Radiation impact assessment. Human health impact assessment.
12	Emergency services	Interest in the intensity and frequency of land management activities undertaken by Iluka (eg control of fuel load and fire risk); and Desire to maintain emergency access into the site for fire response and control, including access to water resources for firefighting (eg site stormwater ponds for aerial appliances). Inadequate emergency preparedness causing increased demand on emergency services.	Support for emergency planning and preparedness.	Emergency preparedness. Community infrastructure and services. Water resources. Public health and safety.	Socioeconomic impact assessment. Traffic and transport impact assessment.

6 Consultation actions

6.1 Consultation to date

Iluka has engaged with the local Murray Basin community since 2003 in relation to the nearby Douglas and Echo mines and the Hamilton Minerals Separation Plant and consequently has established a database of stakeholders.

Consultation in relation to the Wimmera Project commenced in 2018. Consultation has comprised, but was not limited to:

- circulation of the Wimmera Project Update No. 1 (February 2019), No. 2 (June 2019), No. 3 (December 2019), and No. 4 (May 2020) to Project area landowners, local council representatives, State and Commonwealth Members of Parliament, local post offices, milk bars and community noticeboards in Balmoral and Natimuk, local media (radio, newspaper), local interest groups and letterbox drops in the Toolondo and Noradjuha area;
- circulation of the Murray Basin Newsletter, including an article introducing the Project in the May 2018 and the November 2018 editions to Project area landowners, local Council representatives, State and Commonwealth Members of Parliament, local post offices, milk bars and community noticeboards in Balmoral and Natimuk, local media (radio, newspaper), local interest groups and letterbox drops in the Toolondo and Noradjuha area;
- establishment of Wimmera Project-specific pages on the Iluka website, including:
 - <https://iluka.com/operations-resource-development/resource-development/wimmera>
 - <https://www.iluka.com/engage/wimmera>
- targeted consultation (emails, meetings and phone calls) with affected landowners from November 2018 through to current regarding land access to conduct environmental assessments (ecology, noise, groundwater, surface water and Aboriginal cultural heritage) and for drilling;
- targeted face-to-face consultation in early June 2019 with affected landowners regarding the Project site layout, prior to submission of the EES and EPBC referrals;
- test pit tour day for local landowners and earthmoving contractor family members (25 November 2018). Opportunistic site visits of the test pit by other interested locals, including local police (11 December 2019);
- targeted face-to-face/telephone consultation in late May and early June 2020 with affected landowners regarding the indicative alignment for the proposed Douglas to Project site water pipeline;
- targeted phone consultation in mid-August 2020 with affected landowners and key stakeholders regarding Project progress;
- radio interviews with ABC Wimmera (4 July 2019 and 23 August 2019);
- establishment of the staffed drop-in information centre at the Horsham Real Estate office. This centre opened in February 2019 and was open Tuesdays and Fridays 9.30am–2.30pm or by appointment. The office was closed in April 2020 as part of Iluka’s COVID-19 response;

- establishment of the staffed drop-in information centre at Natimuk as part of the initial awareness campaign. This centre was open from July 2019 to January 2020 and was open Thursdays 9.00am–2.30pm or by appointment;
- community information line for members of the community to discuss the Project with Iluka (1800 305 993);
- implementation of the *WIM100 Test Pit Community Engagement Plan* (Iluka Resources Limited 2018) (Appendix A). The plan outlines the key stakeholders identified, their potential concerns, the proposed communications strategy and the proposed schedule;
- discussion with Government agencies prior to formation of the Project Technical Reference Group, including:
 - Department of Economic Development, Jobs, Transport and Resources - Earth Resources Regulation (DEDJTR) (now Department of Jobs, Precincts and Regions (DJPR)) (February 2018) regarding the preparation of an exploration work plan in relation to the test pit;
 - VicTrack and DEDJTR (now DJPR) (May 2018) regarding permission to construct a temporary access road for the test pit across decommissioned Balmoral rail corridor in relation to the test pit;
 - Horsham City Rural Council planning department and VicRoads (August 2018) regarding permission to construct a temporary access road in relation to the test pit;
 - Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC) (August 2018) regarding management of potential cultural heritage issues associated with the Project;
 - GWM Water (October 2018) regarding an application for a water carting permit in relation to the test pit;
 - EPA Victoria regarding the required scope and duration of air quality monitoring (November 2018);
 - Department of Health and Human Services (November 2018) in relation to the test pit;
 - Wimmera Catchment Management Authority (November 2018) in relation to potential surface water impacts associated with the test pit;
 - EPA Victoria (July 2018) regarding permits for the disposal of water associated with the test pit;
 - RDV to introduce the Project (February 2019);
 - Horsham Rural City Council to introduce the Project (June 2019);
 - Interagency workshop (April 2019) to introduce the project to local and state government departments and agencies, attended by RDV, Department of Jobs, Precincts and Regions (DJPR), Department of Premier and Cabinet, EPA, DELWP, DHHS, Transport for Victoria and Invest Victoria (IV); and
 - Wimmera Project working group, comprising RDV, DEDJTR (now DJPR), EPA, DELWP (head office only, not DELWP Grampians region), DHHS and IV (May, July, September, October and December 2019). The purpose of these meetings was to provide Project updates.
- following formation of the Technical Reference Group (TRG) in December 2019 the first TRG meeting was held in Horsham on 22 January 2020, followed by a site visit for TRG members on 23 January 2020;

- the first community drop-in session was held at the Noradjuha Memorial Hall on 11 March 2020 from 3 pm–8 pm. Approximately 30 members of the community attended;
- social assessment in 2012 of Iluka’s Australian operations, including those in the Murray Basin (Victoria) (Section 5.2); and
- stakeholder perception survey in 2018 of Iluka’s Australian operations, including those in the Murray Basin (Victoria) (Section 5.3).

6.2 Consultation actions

The consultation actions and objectives for the Wimmera Project are outlined in Table 6.1 (sorted by action). Many of the consultation actions are ongoing, such as access to the Project website and provision of the community feedback hotline, however, for ease of reference, key consultation events are also presented chronologically in Figure 2.4, sections 6.3 and 6.4. The timing of the consultation actions will be further defined as the Project progresses, and Iluka will provide regular updates to the consultation schedule via www.iluka.com/engage/wimmera.

Consultation activities have and will continue to be adjusted to comply with COVID-19 restrictions, as applicable.

The consultation program has been specifically designed to provide a range of options for stakeholders to access Project information and a range of options for stakeholders to provide feedback. The primary source of Project information will be the Project webpage, however a range of hardcopy material will also be available at consultation events and at the drop-in centres (including frequently asked question (FAQ) sheets and Project newsletters). Project material can also be provided to the local and regional community via letterbox drop/mailout upon request.

To facilitate transparency, the consultation schedule has been designed to ensure stakeholders are able to obtain updates on Project information in a timely manner and thereby provide feedback to Iluka earlier rather than later.

Where the objective of the consultation activity is to provide information, the information provided will largely be about the assessment process and the Project itself. Where the objective of the consultation activity is to gauge stakeholder concerns, the information received will be dependent on stakeholders.

6.2.1 Stakeholder preference for method of receiving information

During the 2012 social assessment of Iluka’s Murray Basin (Victoria) operations (Sheridan Coakes Consulting 2012), key stakeholders (defined as stakeholders with a direct linkage to, or interest in, Iluka’s operations) were asked how they would like to receive information from Iluka. Whilst the numbers of respondents were small, respondents indicated that their most-preferred ways of receiving information from Iluka were via email and personal meetings (7 respondents or 30% each) followed by project briefings, the Iluka website and telephone (all 4 respondents or 17%). Key stakeholders did not indicate a preference for the local newspaper, local radio or community groups.

Key stakeholders were also asked what they would like to know and receive about Iluka’s ongoing operations. The most frequent request was to be provided with the future intentions of Iluka’s proposed and planned mining activities in the region. Respondents were also interested to be kept up to date with current mining activities, partnership opportunities, and information on key incidents.

Iluka has taken these preferences into consideration in the proposed consultation program for the Wimmera Project. Given the survey was undertaken in 2012, Iluka has commenced seeking feedback from stakeholders during the consultation program to determine whether these preferences still apply, and to revise the methods accordingly if required. For example, Iluka has received feedback that most landowners prefer a text message for day-to-day communication about land access etc but prefer a face-to-face meeting or telephone call for Project updates (subject to COVID-19 restrictions). Iluka is also seeking information from the broader community regarding

communication preferences via the Project website (www.iluka.com/engage/wimmera), as part of the next Project update (distributed via email and hard copy mail), the Project newsletter and during any Project-related verbal communications.

As not all households in the region have internet access and not all members of the community will be able to attend the community information sessions, Iluka will put up signage at local shops and community notice boards inviting people to phone Iluka if they would like to receive Project updates via mailout.

As at September 2020 Iluka has 103 recipients on its Project mailout list including:

- all landowners that will be directly affected by the Project; and
- various members of the community residing/working in the Horsham municipality.

It is expected that the number of recipients will increase as the Project progresses.

Table 6.1 Consultation actions

Action	Description and objective	Target audience	Timing
Iluka Murray Basin newsletter	A newsletter that provides updates on Iluka’s operations and proposed projects in the Murray Basin.	Landowners, residents and businesses in the Murray Basin	Approximately quarterly
Wimmera Project webpage www.iluka.com/engage/wimmera	Wimmera webpage that will provide the following information as it becomes available: <ul style="list-style-type: none"> • EES referral; • EPBC referral; • Project newsletters; • FAQ sheet; • Project update, including project schedule; • consultation activities update; • upcoming consultation activities; • environmental baseline studies; • EES environmental assessment process and schedule; • EES study program scope, schedule and preliminary results; • process and opportunities for providing feedback (including details of how feedback will be considered/addressed); and • fact sheets about EES study program scopes, schedule and preliminary results. 	Landowners Regulators Broader community	To be developed, then ongoing
Wimmera Project newsletter	A Project-specific newsletter designed to provide information about the Project (eg newsletters, fact sheets about EES study program scopes, schedule and preliminary results, information about consultation activities, etc).	Email stakeholder distribution list Attendees at consultation events Local and broader community (copies can be provided at local shops, at Wimmera community information sessions, posted out etc, as applicable)	At key milestones, as applicable
Iluka community feedback line	A staffed feedback telephone line to encourage discussion about any Iluka activity including the Project and to promote involvement in upcoming community consultation activities. Phone 1800 305 993.	Local and broader community	Ongoing

Table 6.1 Consultation actions

Action	Description and objective	Target audience	Timing
Drop-in information centre	<p>Staffed information centre in Horsham, designed to provide information about any Iluka activity including the Project and to obtain community feedback and promote involvement in upcoming community consultation activities.</p> <p>Horsham Real Estate, 15 Firebrace Street, Horsham, 9.30am to 2.30pm on Tuesdays and Fridays or by appointment 1800 305 993.</p> <p>Staffed information centre in Natimuk for the period July 2019 to January 2020 to assist with sharing information with local community. The centre was open one day a week to provide information about the Project and to obtain community feedback and promote involvement in upcoming community consultation activities.</p>	Local and broader community	<p>The drop-in centre was closed in April 2020 in response to the COVID-19 pandemic</p> <p>As there were no visitors to the Natimuk drop-in information centre over this period, the decision was made to close the centre in January 2020 and to instead direct all enquiries to either the Project website or the Horsham information centre.</p>
Media releases	Media releases to provide updates on the Project and to promote involvement in upcoming community consultation activities.	Broader community	At key milestones, as applicable
Media advertising	Purchase of advertising space in local newspapers to provide Project updates and to promote involvement in upcoming community consultation activities. Note this is separate to the statutory public consultation requirements.	Local and broader community	At key milestones, as applicable
Staffed displays	Staffed displays at local community events, designed to provide information about the Project and promote involvement in upcoming community consultation activities.	Local and broader community	Approximately one per quarter once the EES assessment process commences (subject to COVID-19 restrictions)
Community information sessions	<p>Information sessions designed to provide information about the Project, identify stakeholder concerns and work to address stakeholder concerns. Opportunity to meet Project experts.</p> <p>See Section 6.3.</p>	Local and broader community	See Table 6.2.
Radio	Radio interviews with Iluka to provide non-technical summaries of Project and to promote involvement in upcoming community consultation activities.	Local and broader community	At key milestones, as applicable

Table 6.1 Consultation actions

Action	Description and objective	Target audience	Timing
Project survey	Online and/or printed survey designed to obtain information about stakeholder feedback, concerns and suggestions relating to the Project and to the consultation process.	All stakeholders, particularly attendees at consultation events	Ongoing
One-on-one meetings	Meetings with all landowners and land managers that will be directly affected to negotiate land access and infrastructure layout/alignment and to provide information about the Project and to promote involvement in upcoming community consultation activities.	Affected landowners	As required (largely during the exploration and assessment phase). In response to COVID-19 many of these meetings will be held via telephone
Frequently asked questions (FAQs)	<p>This document will be regularly updated as information becomes available to provide responses to frequently asked questions about the Project. Typical topics to be covered will include:</p> <ul style="list-style-type: none"> • how will the Project impact local and regional employment opportunities? • how will the Project impact local community services eg schools, health services, emergency services, bus/taxi services and local businesses etc? • how will the Project impact local and regional community infrastructure eg public roads, hospitals, sport/recreation facilities, hotels, tourism attractions etc? • how will the Project impact local agricultural enterprises? • how will the Project impact the local and regional environment (particularly water supply)? • how will the Project impact the social fabric of the region? • what legacy will the Project leave for the region? What is Iluka’s plan for closure and rehabilitation? • what impact will the Project have on public health and safety? • how is this Project different/similar to other Iluka projects? • what is the Project schedule (including the study program and assessment schedule)? • how will Iluka consider/address my concerns? 	All stakeholders	To be developed, then ongoing

Table 6.1 **Consultation actions**

Action	Description and objective	Target audience	Timing
Email	Stakeholders can sign up to be included on the Wimmera consultation database to receive email updates about the Project and upcoming consultation events.	All stakeholders	Ongoing
Project site tours	Tours of the Project site to enable a better understanding of the Project constraints and to invite discussion.	Local and broader community Regulators	At least once during the assessment phase
Meetings with regulators	Meetings with regulators to introduce the Project and discuss the assessment process.	Regulators	As required
TRG meetings	Regular meetings to provide technical and statutory advice to Iluka and DELWP regarding the preparation of the EES technical studies and the EES. See Section 6.4 and Appendix C.	TRG members (including Iluka)	See Appendix C.
Meetings with BGLC	Discuss: <ul style="list-style-type: none"> • opportunities for Aboriginal training and employment; • opportunities for procurement of Aboriginal services (revegetation, pest and weed management, fencing, etc); • intangible cultural heritage (eg impacts on stories and song-lines); • minimising impacts on culturally iconic species of plants and animals; • minimising impacts on waterways and ground water; • promotion of cultural heritage awareness, and • any other matters of interest to BGLC. 	BGLC	At least twice during the assessment phase
Community consultative committee	Iluka recognises that community consultative committees and similar forums can make important contributions to Project engagement by: <ul style="list-style-type: none"> • providing the broader community assurance that environmental impact management commitments and obligations are subject to intensive and detailed scrutiny by representative peers; and • materially informing and improving decisions relating to social issues such as regional employment and development and access to regional infrastructure and services. 	Broader community, potential community consultative committee members	Engagement on committee/forum design: Q4 2020–Q1 2021 Formation of committee/forum: Q1–Q2 2021

Table 6.1 Consultation actions

Action	Description and objective	Target audience	Timing
	<p>Iluka also recognises that for community consultative committees and similar forums to be effective, they must represent and embrace diversity of perspectives through processes that are inclusive, respectful and constructive. Critical steps to ensuring functional engagement include:</p> <ul style="list-style-type: none"> • a process to select or elect committee members that delivers a committee composition aligned to the expectations of the community represented; and • an inclusive and constructive governance framework. <p>Iluka is engaging with Project stakeholders to determine the preferred framework. Several options are being explored, including:</p> <ul style="list-style-type: none"> • a committee administratively supported by Iluka but independently chaired; and • a committee formed and chaired by an independent local authority, such as RDV or Horsham Rural City Council. 		
Signage	Signage on the Project site advising the name of the Project, the key contact person and number for the construction phase and the construction schedule.	Local community and construction personnel	Construction phase
Statutory consultation	<p>Public exhibition of EPBC referral.</p> <p>Public exhibition period of the EES referral.</p> <p>Public notice of the draft scoping requirements for the EES.</p> <p>Public exhibition period of the EES.</p> <p>TRG meetings.</p>	<p>Broader community and interest groups</p> <p>Landowners</p> <p>Regulators</p>	<p>Public exhibition of EPBC referral: 2019</p> <p>Public exhibition period of the EES referral: 2019</p> <p>Public notice of the draft scoping requirements for the EES: March 2020</p> <p>Public exhibition period of the EES: approximately Q1/Q2 2023</p> <p>Inquiry panel hearing: approximately Q3 2023</p> <p>TRG meetings: see TRG meeting row above.</p>

6.3 Community information sessions

Iluka's engagement plan includes nine community information sessions for the Wimmera Project.

While COVID-19 restrictions apply the sessions will be held online. We plan to resume sessions in community locations once the restrictions are lifted, and will incorporate ideas from the community into the design of the sessions.

The online sessions will allow participants to attend for the entire three-hours or to drop in and out based on their topics of interest. To enable participants to plan their time in advance, a detailed agenda will be circulated at least three weeks prior to each session.

The sessions will provide a chance for community members to meet with the technical experts working on the Project.

A recording of each session will be uploaded to the website for members of the community to view at their convenience.

The preliminary agenda and schedule is provided as Table 6.2. Please check the website for more detailed agendas and for log in details.

Each session will focus on 2-3 key topics and each session will begin with an update on:

- the Project in general;
- consultation activities;
- Project design;
- Project schedule; and
- key community concerns raised to date.

Table 6.2 Proposed community information session schedule and agendas

Community information session number	Approximate date	Agenda
1	March 2020	Project introduction <ul style="list-style-type: none">• who is Iluka?• how is this Project different/similar to other Iluka projects?• EES study program scope, schedule and preliminary results• EES approval process and schedule• process and opportunities for providing feedback (including details of how feedback will be considered/addressed)
2	1 February 2021	<ul style="list-style-type: none">• biodiversity• landscape and visual• water

Table 6.2 Proposed community information session schedule and agendas

Community information session number	Approximate date	Agenda
3	late April 2021	<ul style="list-style-type: none"> historical heritage noise and vibration historic heritage
4	late July 2021	<ul style="list-style-type: none"> radiation air quality, energy and greenhouse gas Aboriginal cultural heritage
5	Q1 2022	<ul style="list-style-type: none"> agriculture biodiversity offset strategy
6	Q2 2022	<ul style="list-style-type: none"> surface water groundwater roads, traffic and transport
7	Q3 2022	<ul style="list-style-type: none"> geotechnical soil and rehabilitation socioeconomic
8	Q1 2023	<ul style="list-style-type: none"> EES draft work plan
9	Q1 2023	<ul style="list-style-type: none"> draft EPA works approval application draft rehabilitation and closure plan draft planning scheme amendment

6.4 TRG meetings

Iluka proposes 10 TRG meetings during the preparation of the EES and associated documents, as outlined in Appendix C.

Iluka will provide the necessary documents to the TRG at least 10 business days before the TRG meetings. Similarly, Iluka has allowed 15 working days after each TRG meeting to receive comment back from TRG members. Note that the final order in which the studies will be presented to the TRG will be advised as the EES studies are developed.

The format of the TRG meetings will be subject to COVID-19 restrictions.

6.5 Invitation to provide feedback

Iluka will invite community discussion and feedback on the Project at every opportunity and in particular through the following channels:

- provision of feedback forms at all community events;
- provision of an invitation on Project website to be on the consultation database to receive Project updates;
- provision of a Project hotline;

- provision of a Wimmera webpage outlining the Project, promoting consultation, and inviting feedback via the project email address Wimmeraproject@iluka.com;
- drop-in information centre at Horsham (closed in response to COVID-19);
- committees, such as a TRG (regulators only); and
- a community consultative committee (if one is established by an independent entity).

6.6 Registration of feedback

All Project-related feedback received by Iluka (including complaints, suggestions, concerns and questions) will be recorded in Iluka's Consultation Manager software program.

6.7 Responding to/evaluation of feedback

To facilitate transparency, key issues raised during the consultation process will be summarised in the EES, including details of actions taken by Iluka to address these issues. The issues will be considered and addressed as applicable as part of the Project design, in the preparation of the study program, the technical assessments, the main EES document and in the supporting documents.

Iluka will continue to take into account the aspirations of landholders when developing project plans and designs, including layouts, infrastructure relocation, management of agricultural infrastructure and post rehabilitation land uses, as far as practical. Consultation will focus on the decisions that will be made in consultation with stakeholders.

Key community issues will be a standing agenda item at each TRG meeting.

Iluka will continually evaluate of the effectiveness of the Wimmera Project's consultation activities. Feedback from the first community drop-in session (held on 11 March 2020) was largely positive; of the 10 attendees that responded to the prompt '*I am satisfied with today's session*' 90% either agreed or strongly agreed. Similarly, of the 11 attendees that responded to the prompt '*I am satisfied with Iluka's level of engagement on the Wimmera Project so far*' 82% either agreed or strongly agreed.

Complaints will be managed in accordance with Iluka's grievance management procedure, as outlined in Appendix B. Lessons learnt during the evaluation process will be used to enable improvements to the EES CP as the Project progresses.

6.8 Record of consultation activities

Details of Wimmera Project-related consultation activities will be recorded in Iluka's Consultation Manager software program and will be summarised on the Wimmera webpage (including details of previous and upcoming activities).

6.9 Evaluation of the EES CP

Iluka will evaluate the effectiveness of the EES CP on a biannual basis using the following information:

- adherence to the consultation calendar;
- feedback received from participants regarding the effectiveness of the consultation process; and
- extent to which the objectives of the EES CP have been met.

It is noted that the implementation and effectiveness of this EES CP will may also be monitored by DELWP through periodic audits and/or if complaints are received by the department.

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Appendix A

Test pit community engagement plan





Iluka Resources Ltd

WIM100 Test Pit

Community Engagement Plan

Exploration Licence No. 4282 (EL4282)

Mineral Resources (Sustainable Development) Act 1990

Revision: 1.0

Date: 29 August 2018

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Document control

Revision	Details of review or changes	Prepared by	Date created
1.0	Draft	M. Little	22/07/2018
1.1	FINAL	M. Little	29/08/2018

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1 Introduction

1.1 Iluka Resources Limited

Iluka Resources Limited (Iluka) is an Australian Securities Exchange listed resources company. It is a major participant in the global mineral sands sector, involved in the sales and marketing of titanium based products (rutile, ilmenite, synthetic rutile) and zircon. The company's business model involves mineral sand exploration, project development, operations and marketing.

Conventional coarse-grained mineral sand deposits have been mined at the Douglas and Echo mine sites near Balmoral in south-west Victoria, and at the Kulwin and WRP mine sites near Ouyen in the north-west of the state. These sites are currently within the rehabilitation phase, although a small portion of the former Douglas Mine continues to receive the tailings waste stream from the Hamilton Mineral Separation Plant for disposal.

1.2 Background

Western Victoria hosts a number of fine-grained mineral sand deposits that as yet have not been developed due to technical difficulties of processing fine grained deposits. Iluka acquired the WIM50 and WIM100 in-ground resources (EL4282) as part of the Basin Minerals takeover. Optimised resource and reserve boundaries have been developed based on existing drilling results, however further work is required to determine whether a mining proposal will be developed for any of the deposits.

Iluka proposes to excavate a test pit in the WIM100 deposit within EL4282 to bulk sample at least 500 dry tonnes, and potentially up to 1,500 dry tonnes, of ore for further metallurgical test work. The test pit site is located within the municipality of Horsham Rural City.

The proposed test pit operations require an Exploration Work Plan (EWP) to be lodged using the DEDJTR Resource Rights Allocation and Management (RRAM) system. The Work Plan must be developed in accordance with the DEDJTR publication *Preparation and Approval of Work Plans & Work Plan Variations using RRAM: Guideline for Mineral Exploration Projects*, Version v0.5, July 2017 (the RRAM Guideline).

Section B3 of the RRAM Guideline outlines the requirement to develop a Community Engagement Plan (CEP) as a mandatory supporting document to the Exploration Work Plan for the WIM Test pit operations, and this document satisfies that requirement.

1.3 Purpose

This document fulfils Iluka's obligation to prepare a CEP, as defined in section 39A of the *Mineral Resources (Sustainable Development) Act 1990*, and Schedule 14 of the *Mineral Resources (Sustainable Development) (Minerals Industries) Regulations 2013*.

The CEP identifies the stakeholders relevant to the WIM100 Test Pit, and describes how, when and what engagement will occur with those communities and stakeholders during approvals, site establishment, operational and rehabilitation stages of the site.

1.4 Scope

This CEP applies to the operations undertaken at the WIM100 Test Pit work area as illustrated in Figure 2 below.

This CEP applies to all phases (site establishment, test pit bulk sampling operations, site rehabilitation) of the WIM100 test pit site as described in Section 5.2 of the WIM100 Test Pit (EL4282) – Exploration Work Plan (WIM100 Test Pit EWP).

This CEP is a subsidiary 'risk management plan' to the 2018 WIM100 Test Pit EWP and provides the framework for the consultation with stakeholders during the WIM100 test pit site establishment, operational and rehabilitation phases.

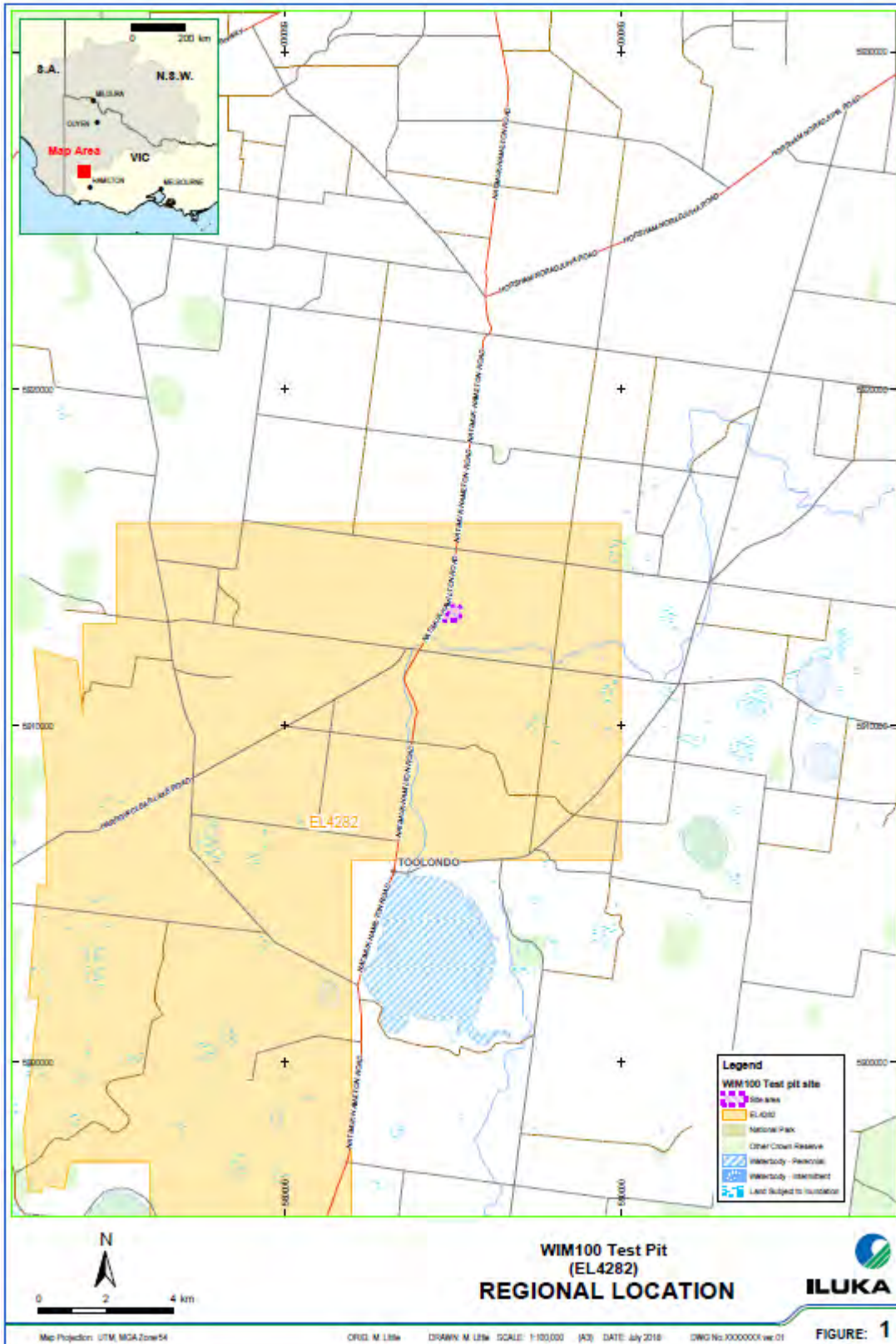


Figure 1: WIM100 test Pit - Location

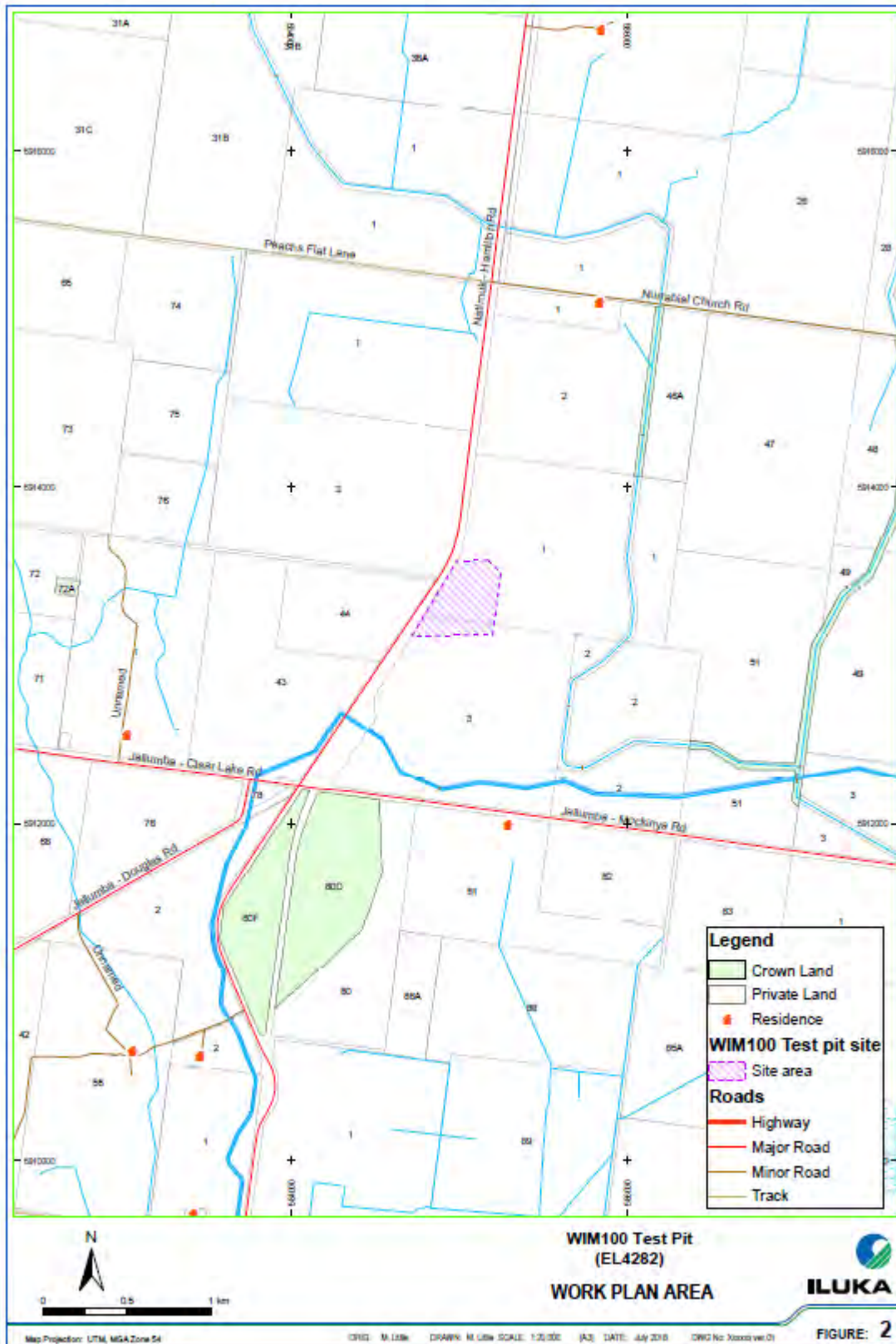


Figure 2: WIM100 Test Pit – work plan area

2 Regulatory context

2.1 Legislation

The *MRSA* and the Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013 state that mining licensees have a duty to consult with the community across the life cycle of an operation, from exploration through to the operational phase and rehabilitation.

The specific requirements of the Act and Regulations applicable to this CEP are outlined in Table 1.

Table 1: Regulatory requirements for Community Engagement Plans

Condition	Obligation	Comment
<i>Mineral Resources (Sustainable Development) Act 1990</i>		
Sec 39A	<p>39A. Licensee's duty to consult with community A licensee has a duty to consult with the community throughout the period of the licence by:</p> <p>(a) sharing with the community information about any activities authorised by the licence that may affect the community; and</p> <p>(b) giving members of the community a reasonable opportunity to express their views about those activities.</p>	<p>Satisfied through the implementation of this CEP.</p> <p>Mechanisms for community engagement and management of community feedback are addressed in Section 4 of this plan.</p> <p>This CEP is a subsidiary plan to WIM100 Test Pit (EL4282) Exploration Work Plan.</p>
<i>Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013</i>		
Schedule 14 Item 4	<p>For exploration licences</p> <p>4. A description of the proposed arrangements for consultation with landholders, Crown land managers and local councils</p>	<p>Satisfied through the implementation of this CEP.</p> <p>Community identification addressed in Appendix A, and summarised in Section 3 of this plan.</p> <p>Mechanisms for community engagement addressed in Section 4 of this plan.</p> <p>Mechanisms for managing community feedback, concerns and complaints engagement also addressed in Section 4 of this plan.</p>

2.1.1 Supporting guidelines

Detailed guidance on the preparation of CEPs is provided in the DEDJTR *Community Engagement Guidelines for Mining and Mineral Exploration in Victoria* (June 2017) ("the Guidelines").

The structure and content of this CEP complies with the requirements of the Guidelines.

3 Community Assessment

3.1 Community overview

The WIM100 test pit site is situated in the southern Wimmera region of Western Victoria and is located in the north-eastern corner of the much larger exploration lease EL4282. The test pit site is within the Horsham Rural City Local Government area, and the Wimmera River catchment.

Prior to European settlement the region was occupied by Wotjobaluk, Jaadwa, Jadawadjali, Wergaia and Jupagulk Traditional Owner groups. These groups are represented by the Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC), the Registered Aboriginal Party (RAP) under the Victorian *Aboriginal Heritage Act 2006*.

The nearest minor townships to the test pit site are Balmoral (approximately 37km south) and Harrow (approximately 41km south-west). The nearest localities are Toolondo (approximately 8km south), Clear Lake (approximately 8km west), Noradjuha (approximately 9km north) and Nurrabiel (approximately 7km east).

The nearest major towns are Horsham (approximately 30km north-east) and Hamilton (approximately 90km south). The Horsham Rural City shire has a population of approximately 19,800 persons, with three-quarters of the population being residential within the township of Horsham. Rural land is used largely for agriculture, particularly wheat, canola and grain growing and sheep grazing (ABS, 2016).

The surrounding land is predominantly zoned as 'Farming under the Horsham Planning Scheme. Dry land agriculture (cropping and grazing) is the predominant land use. The population in the vicinity of the site can be generally described as a low density agricultural community.

3.2 Previous stakeholder engagement activities

Engagement with many of the identified stakeholders has previously occurred during the approvals, operational and current rehabilitation phases of the nearby Douglas and Echo mines. Iluka's exploration drilling program has also included landholder interaction and land access consent for drilling activities in the local region in 2014, 2016 and 2018, including on the land upon which the test pit is located.

Initial stakeholder engagement regarding the intention to establish a test pit has occurred as detailed in Table 2 below.

Table 2: Stakeholder engagement

Stakeholder	Initial engagement
Landholder	February 2018
Earth Resources Regulation, DEDJTR	February 2018
Horsham Rural City Council	May 2018
Community*	May 2018
VicTrack	June 2018
VicRoads	July 2018
GWMWater	July 2018
Department of Health and Human Services	August 2018
Barengi Gadjin Land Council Aboriginal Corporation	August 2018

*May 2018 edition of the Iluka Murray Basin Newsletter

An Environmental Review Committee (ERC) was established for the Douglas mine site in 2003, and has met quarterly since this time. The ERC includes representatives from Local Government Authorities, Statutory Authorities, local landowners, non-government organisations and community groups. Meetings of the ERC are also open to the public. The purpose of the ERC is to review environmental performance relating to the Douglas and Echo mines (DEDJTR, 2018). Iluka has also used ERC meetings as a forum for consulting with the local community on new mine approvals (such as the former Echo satellite mine development), and variations to the Douglas mine Work Plan approval. The intention to establish a test pit for bulk sampling activities was flagged during the May 2018 ERC meeting, and the updates will continue to be provided to the Douglas ERC as appropriate.

Other stakeholder engagement activities that have been conducted in the local region by Iluka in the past include, but are not limited to:

- Tours of the Douglas mine site
- Public information sessions

- Newsletters;
- Media releases;
- Targeted consultation with affected land owners (meetings, phone calls etc);
- Staffed displays at community events (Balmoral Show and Hamilton 'Sheepvention').

These prior engagement activities have served to identify many of the relevant stakeholders to the Iluka WIM100 Test Pit (refer Section 3.4 below)

3.3 Identification of affected communities

Per the Guidelines, stakeholder identification has considered communities based on their categories of place, interest and standing (Table 3).

While the WIM100 Test Pit operations are completely separate from operations at Iluka's nearby Douglas and Echo mine sites, it is recognised that community and stakeholder interest in Iluka's operations can transcend site boundaries. Therefore, while this analysis has been undertaken for the test pit site, historical opinions, views and/or concerns toward Iluka's operations across the broader region are also pertinent to this CEP and Iluka's engagement.

For purposes of this CEP, the classification of community stakeholders in Table 3 is based on the following:

Community of Place

These stakeholders:

- own or manage¹ land that is subject to test pit operations; or
- are local to or neighbour the test pit site (indirect impact); or
- have a cultural connection to the land affected by the test pit.

The interests and questions of these stakeholders are considered as high priority/high importance in terms of consultation and engagement.

Community of Standing

These stakeholders:

- have a statutory interest in the site and/or specific activities therein (e.g. under legislation, approvals, licences and permits); or
- have authority over land and other resources that may be affected by site activities (e.g. local government, water authorities, catchment management authorities); or
- are recognised bodies with a special interest in the operation.

The impacts, interests and concerns of these stakeholders are always important given their role as regulators, managing authorities of public/environmental resources and representatives of the public and community.

Community of Interest

These stakeholders are:

- not impacted, or only infrequently impacted, by site activities; or
- may have a low level of interest in the test pit site / Iluka's activities.

Engagement with these stakeholders is typically undertaken in an ad-hoc manner, if/where matters arise.

¹ Includes local government authorities (LGAs) who manage made and unmade road reserves

Table 3: WIM100 Test Pit – stakeholder mapping (as at July 2018)

Category	Identified Stakeholders
Community of Place	<ul style="list-style-type: none"> • Landowners and land managers directly affected by the test pit • Neighbouring landowners/residents
Community of Standing	<ul style="list-style-type: none"> • State Regulatory agencies: <ul style="list-style-type: none"> ○ DEDJTR (Earth Resources Regulation) ○ EPA Victoria ○ Department of Human & Health Services (DHHS) ○ Department of Environment, Land, Water and Planning (DELWP) ○ VicRoads ○ VicTrack • Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC), registered Aboriginal Party (RAP) representing Traditional Owner groups. • Local government and other agencies: <ul style="list-style-type: none"> ○ Horsham Rural City Council (HRCC) ○ Wimmera Catchment Management Authority ○ Grampians Wimmera Mallee Water
Community of Interest	<ul style="list-style-type: none"> • Public users of transport routes; • Iluka contractors and vendors • Local and regional townships: e.g. Horsham, Hamilton, Harrow and Balmoral businesses and residents; • Emergency services providers (particularly local CFA brigades, and Wimmera Base Hospital in Horsham). • Douglas Mine ERC

3.4 Potential community impacts, concerns and interests

Planning and undertaking community engagement requires an understanding of the impacts, concerns and interests applicable to the communities and other stakeholders identified above. .

These may be actual, potential or perceived and are gleaned from various sources such as prior and current Iluka engagement activities, site experience, local knowledge/relationships, media, as outcomes of risk assessment processes (for example, assessing potential site impacts and affected parties within the EWP), stakeholder perception surveys and the activities or operations of other similar organisations.

The following sections consider the various potential impacts, concerns and interests for each community stakeholder identified in Table 3 for the test pit site, and are also applicable for the nearby Douglas and Echo mine sites. Iluka recognises that the views, concerns and interests of the community (whether actual or perceived) vary widely and are dynamic. Accordingly, the points listed are not presented as a conclusive or authoritative commentary on the community, but are intended to guide Iluka's engagement approach at the current date of this CEP.

3.4.1 Landowners and land managers directly affected by the WIM100 Test Pit site

Potential impacts, concerns and interests with respect to landowners and land managers directly affected by the WIM100 Test Pit site include, or may include:

- Timeliness of rehabilitation and return to final landform;
- The quality of final rehabilitation and implications to achieving the agreed post-test pit land use. This includes the key focus of landform stability;
- Fulfilling commitments made under land access agreements;
- Impacts from site activities (dust, noise, light pollution, fire, runoff, groundwater contamination, transport routes and other);
- The visual amenity (aesthetic) of the rehabilitated final landform; and

- Access to rehabilitated land for cropping and grazing in accordance with agreements.

3.4.2 Neighbouring landowners/residents

Potential impacts, concerns and interests with respect to neighbouring landowners and residents to the test pit site may include:

- Impacts from site activities (as above); and
- The visual amenity (aesthetics) of the rehabilitated final landform.

3.4.3 Aboriginal communities (Traditional Owner groups)

The Barengi Gadjin Land Council Aboriginal Corporation (Barengi Gadjin) are the Registered Aboriginal Party (RAP) representing the Wotjobaluk, Jaadwa, Jadawadjali, Wergaia and Jupagulk Traditional Owner groups in the region.

Potential impacts, concerns and interests in relation to Traditional Owner (TO) groups may include:

- The management and protection of any cultural material discovered during the period of site operations, particularly during the site establishment phase; and
- The rehabilitation process and the quality of final rehabilitation (e.g. 'looking after country').

3.4.4 Communities along / users of transport routes

Potential impacts, concerns and interests in relation to communities along and public users of transport routes (e.g. Natimuk-Hamilton Rd) may include:

- General community concern regarding an increase in site-related traffic during the site establishment, operational and rehabilitation phases of the test pit site; and
- General community concern regarding the condition and maintenance of rural roads in the vicinity of the test pit site and region more generally.

3.4.5 Regulatory authorities

Potential impacts, concerns and interests in relation to the regulatory authorities include:

- Compliance with relevant regulation;
- Desire for consultative approach with Iluka, but strictly within the bounds of legislation;
- Expectation that Iluka achieve high-levels of environmental and rehabilitation performance; and
- Appropriate engagement with identified stakeholders.

3.4.6 Local government authorities

Potential impacts, concerns and interests in relation to the local government include:

- Compliance with relevant regulation;
- Ensuring the post-exploration land use is compatible with the local government planning scheme;
- Desire to be kept informed by Iluka as to general business dealings in the region and activities at the test pit site; and
- Appropriate engagement with identified stakeholders.

3.4.7 Iluka contractors and vendors

Potential impacts, concerns and interests in relation to Iluka contractors and vendors include:

- Increased or new business dealings with Iluka due to the site establishment, operational and rehabilitation phases of the test pit (financial opportunity).

3.4.8 Local and regional townships

Potential impacts and interests in relation to local and regional townships include:

- Increased or new employment opportunities due to the site establishment, operational and rehabilitation phases of the test pit;
- Increased or new indirect economic benefit from exploration operations (e.g. food, accommodation and other services) due to the site establishment, operational and rehabilitation phases of the test pit; and
- Level of concern regarding an increase in site-related traffic during site establishment, operational and rehabilitation phases of the test pit.

3.4.9 Emergency services

Potential impacts and interests in relation to emergency services providers include:

- Interest in the intensity and frequency of land management activities undertaken by Iluka (e.g. control of fuel load and fire risk); and
- Desire to maintain emergency access into the test pit site for fire response and control, including access to water resources for fire-fighting (e.g. site stormwater ponds, test pit for aerial appliances).

3.4.10 Local media

Potential impacts and interests in relation to local media include:

- Interest in the reporting on the progress of site establishment, operations and rehabilitation;
- Interest in reporting on community sentiment and/or relationship with Iluka and its regional activities;
- Interest in the potential for future developments by Iluka in the region; and
- Interest in investigation and reporting on local mining-related activities in response to broader trends in the mining industry and other mineral exploration and/or mining projects in Victoria.

3.5 Community attitudes and expectations

Iluka conducted a Social Impact Assessment (SIA) across all of its Australian operations in 2012. The assessment included the nearby Douglas mine site via direct face-to-face engagement with key stakeholders, and through telephone interviews with individuals selected at random within communities surrounding the site. With respect to the Douglas site, this SIA confirmed many of the key areas for improvement required by Iluka in the eyes of local communities that have been acknowledged in this CEP (low perceived benefits from the site, low trust/fairness, concern over Iluka's environmental credibility and low reputation).

Iluka has undertaken a stakeholder perception survey in Q3 2018 across all of its activities in Australia, including the region local to the Douglas site. This survey will provide a means of re-assessing (base-lining) community attitudes and expectations, with the outcomes used to refine the engagement strategies presented in this CEP.

Community attitudes and expectations may also be identified through:

- Meetings or phone calls with land owners;
- interactions at community events (such as 'Sheepvention' in Hamilton);
- stakeholder perception surveys, as may be commissioned by Iluka; or
- comments or complaints lodged by members of the community.

3.5.1 Managing differences

Iluka recognises that community expectations regarding our activities and how we engage will, at times, differ from what Iluka can or is able to provide.

Handling of grievances will be in accordance with the Iluka Group Procedure – Grievance Management (PRC3062) (Refer Appendix 1).

4 Engagement

4.1 Provision of information

Iluka will provide information to the community through the following means:

- Newsletters (periodic);
- Media releases (periodic);
- ASX releases (as required);
- Iluka Sustainability Report (annually);
- Iluka corporate website; and
- Informal meetings (e.g. face-to-face meetings with landowners).

4.2 Consultation schedule

A schedule for stakeholder consultation, based on specific matters of importance, is provided in Table 4. This table is not intended as an exhaustive schedule for consultation, and may be updated as required.

Table 4: Proposed consultation schedule

Milestone or event	Engagement themes	Target stakeholders	Suggested methods
Pre-submission of Exploration Work Plan	Proposed test pit operation Approval requirements	Affected landowner Community of standing stakeholders	Face-to-face meetings Phone calls or emails
Approval of Exploration Work Plan		DEDJTR Affected landowner	Phone calls or emails Face to face meetings
		Community of interest stakeholders	Media release Newsletter
Commencement of site establishment activities		Affected landowner Community of interest stakeholders	Media release Newsletter
Test pit operations	Upon discovery of cultural artefacts	Traditional Owners (via BGLCAC)	Formal correspondence Phone calls or emails Site meeting
Significant change to rehabilitation schedule	Land affected, nature of the change, and the rationale for change	Affected land owner	Face-to-face meeting Phone call
		DEDJTR	Meeting or phone call/email combination
Planning for reinstatement of any cultural heritage artefacts	Request collaboration on appropriate return of artefacts.	Traditional Owners (via BGLCAC)	Formal correspondence Site meeting
		Affected land owners/land managers	Formal correspondence Site meeting
Completion of rehabilitation operations	End of active operations on the site.	Affected land owner	Formal correspondence Face-to-face meeting
	Monitoring to ensure rehabilitation is successful		Site meeting

Milestone or event	Engagement themes	Target stakeholders	Suggested methods
	will be ongoing.	DEDJTR	Formal correspondence Meeting or phone call/email combination
		Local Government	Formal correspondence Meeting or phone call/email combination
		Community of interest stakeholders	Media release Newsletter
Rehabilitation deemed complete and successful	Monitoring data and other evidence demonstrate that rehabilitation objectives and obligations have been met. (E.g. no further activities on site are expected. Confirmation of completion will be sought from regulatory agencies.	Affected land owner	Formal correspondence Meeting
		DEDJTR	Rehabilitation Completion Report
Ongoing	Any potential future developments subsequent to completion of test pit operations	Community of standing stakeholders Community of interest stakeholders	Face-to-face meetings Media release Newsletters Sustainability report

4.3 Community feedback

Iluka will receive feedback from the community through the following means:

- Iluka Community Contact phone number (1800 201 113);
- Feedback given directly to an Iluka employee; and
- Via the Iluka corporate website, communities support email service (email address to enable community members to provide feedback or to register a grievance (communities.support@iluka.com)).

4.4 Community concerns and complaints

Iluka will respond to community concerns and complaints received in the following manner (in accordance with the Iluka Group Procedure – Grievance Management, PRC3062):

- Collect details of the complainant and their issue via the 1800 line (1800 201 113), or other means;
- Acknowledge the grievance within 2 days (if possible), or directly if the grievance is lodged via phone;
- Advise the complainant that they may remain anonymous; declare any information as confidential; or opt-out of the grievance process at any time should they wish to do so. Where the complainant is in a vulnerable position or otherwise at risk of harm, the complainant should also be informed of any appropriate support services available;
- Document the initial grievance incident record using Iluka’s Loss Control Card system (Cintellate Incident Management System). Follow-up consultation shall be recorded in Consultation Manager;
- Where further information is required to verify or understand the nature of the grievance, it shall be investigated. Site-level mechanisms (e.g. commitments of licenses, approvals or other instruments) shall determine how a grievance is to be investigated, any timelines that apply and procedures for

reporting investigation outcomes. Investigations shall be undertaken in a timely manner (i.e. within 1–2 weeks) as specified in the local-level mechanism;

- Where a credible grievance is found or is suspected to exist, a plan to remedy the issue(s) shall be proposed, and where possible agreed on with the complainant. Where complainants or affected parties are numerous, efforts to engage appropriate representatives in the resolution process should be made;
- Once agreed actions have been taken, complainants (and other stakeholders, where appropriate) should be consulted to determine whether satisfactory resolution of the grievance has occurred;
- The grievance should only be closed out once a satisfactory resolution has been acknowledged by all relevant parties.

Iluka will advise ERR of community concerns or complaints:

- following investigation of the concern or grievance; and
- during the resolution process as required, including notification of successful resolution.

5 Administration

5.1 Records management

Records associated with community/stakeholder engagement shall be administered as outlined in Table 5. U-docs refers to the Iluka document management system.

Table 5: Record management matrix

Record Type	Format	Record Location
Grievances	Electronic	Cintellate
Engagement records	Electronic	Consultation Manager

5.2 Roles and responsibilities

Table 6 sets out the roles and responsibilities for the implementation of this plan.

Table 6: Roles and responsibilities

Position	Role
Hamilton Operations Manager	Oversight of stakeholder consultation for the test pit operation. Complaint/grievance resolution, where applicable.
Test Pit Project Manager	Oversight of test pit site rehabilitation. Complaint/grievance resolution, where applicable.
Principal Environment Specialist	Oversight of test pit site environmental performance and compliance. Complaint/grievance resolution, where applicable.
Manager Stakeholder Relations	Engagement guidance/support. Internal review and endorsement of engagement plans

5.3 Plan endorsement

This plan is subject to acceptance and/or endorsement by DEDJTR Earth Resources Regulation as a subsidiary management plan to the WIM100 Test Pit (EL4282) Exploration Work Plan (Iluka 2018).

6 Document review

A revision of this CEP may be triggered by:

- changes to regulatory requirements for engagement;
- changes/updates to the WIM100 Test Pit (EL4282) Exploration Work Plan; or
- changes to community engagement strategy and methods.

These changes shall be subject to regulatory review and approval prior to that update being ratified and implemented.

Minor updates to this CEP (cosmetic edits, or amendments not material to the scope or application of the plan) will not be submitted for formal regulatory review and approval.

At any time that this CEP is updated, it shall be uploaded to / updated within the DEDJTR RRAM system.

This document is all times a controlled document within Iluka's document management system.

7 References

Australian Bureau of Statistics. (2017, Sept 21). Data by Region. Retrieved Apr 10, 2018

DEDJTR (2018) Environment Review Committee, Department of Economic Development, Jobs, Transport and Resources, State Government of Victoria

IAP2 (2014) Public Participation Spectrum, International Association for Public Participation Australasia, available: <https://www.iap2.org.au/About-Us/About-IAP2-Australasia-/Spectrum>, accessed: 23rd April 2018

Iluka (2018) WIM100 Test Pit (EL4282) Exploration Work Plan

DEDJTR (2017) Preparation and Approval of Work Plans using RRAM: Guideline for Mineral Exploration Projects, v0.5 July 2017. Department of Economic Development, Jobs, Transport and Resources, Victoria.

DEDJTR (2018) Community Engagement Guidelines for Mining and Mineral Exploration in Victoria, available: <http://earthresources.vic.gov.au/earth-resources-regulation/licensing-and-approvals/minerals/guidelines-and-codes-of-practice/community-engagement-guidelines-for-mining-and-mineral-exploration>, last updated 7th June 2017.

Mineral Resources (Sustainable Development) Act 1990 (Vic)

Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013 (Vic)

8 Acronyms

BGLC	Barengi Gadjin Land Council
DEDJTR	Department of Economic Development, Jobs, Transport and Resources (VIC)
DELWP	Department of Environment, Land, Water and Planning (VIC)
DHHS	Department of Health and Human Services (VIC)
DoEE	Department of Environment and Energy (Cth)
EES	Environment Effects Statement
EPA	Environment Protection Authority (VIC)
EPBC	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
ERC	Environment Review Committee (Douglas)
ERR	Earth Resources Regulation
GHCMA	Glenelg-Hopkins Catchment Management Authority
GWMW	Grampians Wimmera Mallee Water
HRCC	Horsham Rural City Council
Iluka	Iluka Resources Limited
LACA	Land Access and Compensation Agreement
MRSDA	<i>Mineral Resources (Sustainable Development) Act 1990</i> (VIC)
WPV	Work Plan Variation

9 Appendices

9.1 Appendix 1 – Iluka Group Procedure: Grievance Management



Appendix B

Iluka's grievance management procedure





HSEC Group Procedure Grievance Management

Contents

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1. Objective

The objective of this procedure is to set out the minimum requirements for the management of external stakeholder grievances.

The procedure is designed to achieve the following outcomes:

- external stakeholders are able to access a locally-appropriate process to raise grievances;
- grievances lodged are recorded, investigated and resolved in a timely manner.

Unaddressed grievances can result in community resentment and unrest, harm to Iluka's reputation, disruptions to Iluka operations and in extreme cases conflict or violence. Addressing grievances early and effectively can help build credibility and trust between Iluka and external stakeholders and minimise risks to the business and the communities in which Iluka operates.

Where a grievance relates to or involves any allegation of criminal conduct, Iluka must refer such allegations for investigation by the relevant authorities.

2. Terms

Grievances are public complaints, submitted via the locally established grievance mechanism, alleging specific or general damage, conduct, negative impact or dissatisfaction arising in connection with Iluka's business activities.

A grievance mechanism is an established process to receive, record, investigate and resolve grievances.

3. Scope

This document fits within the Environment, Health, Safety and Community (HSEC) Management System Framework, which describes: the scope of the HSEC Management System; accountabilities for implementing the system; and the revision and document control processes for documents within the system.

In so much as this procedure pertains to managing grievances toward Iluka, it relates solely to grievances intentionally submitted to the company or its designated representatives. Grievances, public comment, or complaints aired via other channels, such as social media, are not intended to be managed via this procedure.

This procedure is focused on communities and other external stakeholders directly or indirectly impacted by Iluka's business operations. This procedure does not apply to commercial disputes or internal grievances.

While Iluka may, at its discretion, deal with grievances directed at the activities of its contractors in doing so it does not accept primary responsibility for such grievances.

4. Requirements

4.1 Designing a local-level Grievance Mechanism

Each site or project shall design and document a locally appropriate mechanism to receive, resolve and respond to grievances from external stakeholders ("Grievance Mechanism").

This local mechanism shall be designed in accordance with the Key Effectiveness Criteria in Appendix 1 and incorporate the requirements of section 4.1.1 below.

Accordingly, the Grievance Mechanism will be based on engagement and dialogue with local stakeholders, accessible, predictable, transparent and subject to periodic review. The mechanism should be proportionate to the scale of Iluka's presence.

4.1.1 The standard grievance process

While the design of individual Grievance Mechanisms may differ in accordance with local conditions, all mechanisms shall incorporate the steps outlined below. Appendix 2 includes an example flowchart for the grievance management process; this should be further developed and tailored to the needs of the site and local community.

- a) **Awareness.** Information about the grievance mechanism, including the avenues for submitting a grievance, shall be made publically available in the appropriate language(s) and in a form appropriate to prevailing literacy levels. This information should be regularly shared during public presentations or discussions, and where possible, physically disseminated and displayed within relevant communities.
- b) **Lodgement.** The avenues available to stakeholders to lodge a grievance will vary. These shall include, at a minimum, a direct point of contact with the company. However a range of options is preferable, including the use of a third-party contact office/person. Lodgement options should be practically accessible (taking into account any potential geographic or technological barriers). All mechanisms shall give stakeholders the option to lodge grievances anonymously or ensure protection of the complainants identity where requested.
- c) **Designated representative.** Each site or project shall designate a representative to act as the responsible Grievance Officer. All grievances lodged shall be referred to this person; he/she shall then ensure all requirements of the local Grievance Mechanism are met, and that all required actions are undertaken and/or delegated to the appropriate person(s), through to close-out.
- d) **Acknowledgement.** The Grievance Mechanism should specify a maximum timeframe within which the complainant is promptly contacted to acknowledge that the grievance has been received and to explain the grievance process and timelines (where possible, within 2 days is recommended).

The complainant should be advised of: the voluntary nature of the process; the option to proceed on an anonymous basis and/or request that certain information be kept confidential, and the option to opt out or withdraw the grievance at any stage. Where the complainant is in

a vulnerable position or otherwise at risk of harm, the complainant should also be informed of any appropriate support services available.

- e) **Recording** All grievances shall be recorded in *Cintellate*¹. The initial record shall be updated to include: results of any investigations and information about how and when the grievance was resolved, including a record of any remediation, planned preventative action(s) and/or monitoring. Where there is ongoing engagement to resolve and follow up on a grievance, a record should be maintained. Once the grievance has been mutually agreed to be resolved, it shall be recorded as closed-out.

Sites that receive a high volume of grievances shall maintain and regularly review status reports on the timeliness and effectiveness of grievance resolutions.

- f) **Referral.** For grievances that involve credible allegations of any criminal conduct, violence or serious human rights violations, the mechanism shall provide for referrals to relevant authorities and/or credible organisation(s) as appropriate.

Such allegations may be identified from the outset, during investigations or at a later stage of the grievance process; regardless of the timing, the obligation to consider referral options still applies. Subject to any legal obligations to report criminal conduct, the complainant's consent should be obtained prior to disclosing any information that personally identifies the complainant to authorities.

- g) **Investigation.** Where further information is required to verify or understand the nature of the grievance, it shall be investigated. The local-level mechanism shall establish direction on how grievances are to be investigated and nominate an appropriate person from each department to respond to investigation requests. Investigations shall be undertaken in a timely manner (i.e. within 1–2 weeks) as specified in the local-level mechanism.

The outcome of the investigation shall be communicated to the complainant.

- h) **Response.** Where a credible grievance is found or is suspected to exist², a plan to remedy the issue(s) shall be proposed, and where possible agreed on with the complainant. Where complainants or affected parties are numerous, efforts to engage appropriate representatives in the resolution process should be made.

In the event that grievances involve security risks to community stakeholders and/or Iluka personnel, the resolution process should be designed in such a way as to minimise such risks. This plan may include actions to prevent the reoccurrence of similar issues which may give rise to future grievances.

- i) **Resolution or Escalation.** Once agreed actions have been taken, complainants (and other stakeholders, where appropriate) should be consulted to determine whether satisfactory resolution of the grievance has occurred.

There may be instances where a resolution cannot be resolved between the Site and the complainant, in which case the grievance may require referral to, or involvement of, third

¹ Where a site or project does not have physical access to *Cintellate*, arrangements should be made with the Sustainability Group for alternative records management.

² There may be some complaints or grievances that are found to be unfounded and spurious, or too marginal and too trivial to warrant a serious investigation and remedy process. In this respect, it is important that public information provided about the grievance mechanism states that spurious and trivial claims will not attract remediation.

parties (i.e. external stakeholder committee) or an alternative mechanism (e.g., mediator or ombudsman). Beyond this, where complaints still cannot be resolved, they may require referral to official agencies or judicial processes. The processes for escalation shall be included in the documented local-level Grievance Mechanism.

In any instance where a satisfactory resolution cannot be met, the grievance shall be tracked in *Cintellate* and appropriate escalation, investigations, communication and recommendations shall continue through the designated representative, and be recorded.

- j) **Close-out.** The grievance should only be closed out once a satisfactory resolution has been acknowledged by all relevant parties.

The Grievance Mechanism shall include specified timeframes in which each step should be completed and these should be clearly communicated to stakeholders. Recommended time frames are included above and should be considered when electing timeframes appropriate for the local context.

4.2 Review and reporting

Sites shall maintain and regularly review status reports on the volume of grievances, the timeliness and effectiveness of grievance resolutions, and any trends in complaint types, locations and complainants.

Monthly summary reports are to be reviewed by Group Sustainability for inclusion in regular monthly HSEC reporting. Summary data on grievances lodged and resolved is to be made available for the annual Sustainability Report, including specific note of any grievances pertaining to *the customary rights of local communities and indigenous people*.³

The effectiveness and appropriateness of local-level Grievance Mechanisms shall be reviewed annually (at a minimum) or at milestones in site activities, and updated if required, prior to the commencement of the next phase of work.

5. Responsibility

The site or project manager shall be responsible for the overall implementation of the Grievance Mechanism and determine delegated responsibility for:

- design of the Grievance Mechanism;
- handling of grievances; and
- compliance with this Procedure.

All site or project personnel should be made aware of the local-level Grievance Mechanism. Any recipient of a complaint should know how to report and/or delegate the required actions.

Employees managing complex and/or a high volume of grievances shall be provided with training in grievance management; this may include specific conflict management, dispute-resolution, stakeholder engagement and/or human rights training, as appropriate to local needs and the risk profile of the site or project.

6. Revision & document control

HSEC Group Procedures are reviewed every 2 years. If required, they are revised and reissued in accordance with Iluka information management standards.

³ To enable reporting in accordance with the GRI G4 Sustainability reporting indicators

Document number:	
Trim reference:	
Approved date:	20 November 2017
Author/s:	Samantha Chadwick, Manager Communities
Approved by:	Lisa McGrath, Sustainability Manager
Document owner:	Lisa McGrath, Sustainability Manager
Related documents:	HSEC Management System Framework HSEC Group Standard 2: Social Performance HSEC Group Procedure: Social Performance Consultation Manager User Guide HSEC Group Standard 12: Incident Reporting and Investigation HSEC Group Guideline: Hazard, Incident and Emergency Classification (GUI 1135). Additional guidance can be found in these documents: ICMM: Handling and Resolving Local Level Concerns & Grievances Harvard Kennedy: Rights-Compatible Grievance Mechanisms Community grievance mechanisms and Australian mining companies Rio Tinto Guide: Community complaints, disputes and grievances

Appendix 1

Key Effectiveness Criteria*

A. Legitimacy – local-level grievance mechanism must be viewed as legitimate by local stakeholders. The mechanism should establish a process to ensure all complainants are understood and treated respectfully and with sensitivity irrespective of their perceived authenticity.

B. Based on Engagement & Dialogue - Wherever possible communities and other stakeholders should be involved in the design of the mechanism to ensure it is acceptable, accessible, respectful of local cultural norms and inclusive of local/customary decision making processes.

This may be particularly important in societies that have a distinct segregation of roles and responsibilities, gender imbalances, hierarchical leadership, and also where indigenous peoples reside.

C. Proportionality - When designing the mechanism it is important to tailor it to the scale of the project or operation, the severity of the adverse social impacts and the likely frequency and/or seriousness of potential complaints.

D. Accessibility - It is important that the mechanism is straightforward and easy for community members to access with no cost, meaning that communities should face no obstacle to using the mechanism.

It should be easily understood, written in non-jargon, local language, and easy for aggrieved people to lodge a complaint.

The mechanism should be appropriately publicized through culturally appropriate channels, external processes (community meetings, radio, newspapers, leaflets, etc.) and routine stakeholder engagement processes.

Consideration should be given to allow different ways of making complaints and adapt these to the local culture, helping to overcome barriers to access people may face, including language, literacy, awareness, distance or fear of retribution or reprisal.

E. Choice - The established mechanism, and related processes, shall only be utilised where a complainant has voluntarily elected to submit a grievance to the company (directly or via a third party). Complainants will not be obliged to continue with the grievance process and can opt out at any stage.

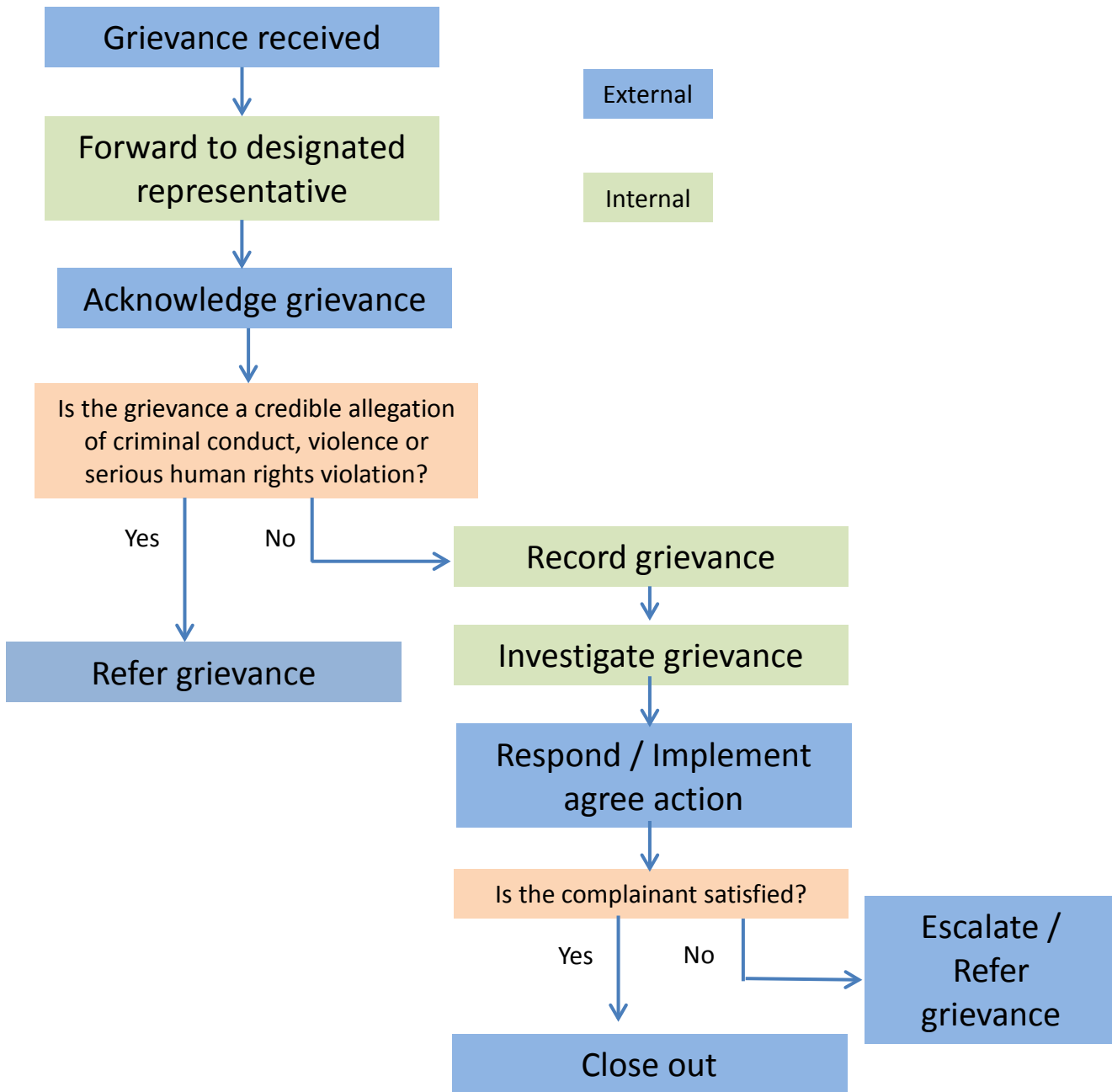
F. Predictability - The adopted mechanism should be predictable providing a clear and known timeframe for each stage and clarity on the types of outcomes that can and cannot be offered.

G. Transparency - The process (especially the receipt of complaints, the basic stages to the grievance process and timeframes) must have sufficient transparency to meet stakeholder concerns and expectations, while allowing for dialogue to remain confidential and, where requested, for complainant confidentiality.

H. Continuous Improvement – Regular monitoring of the grievance mechanism and its outcomes, particularly of trends and patterns, is critical to ensuring systemic problems are identified and practices adapted accordingly.

** These criteria have been adapted from the effectiveness criteria included in the Ruggie Framework (Guiding Principles on Business & Human Rights: Implementing the United Nations 'Protect, Respect, and Remedy' Framework).*

Appendix 2 – Generic grievance management process flowchart



NB. This is a generic process chart only. Sites and projects are expected to develop the specific details of the process in a manner suitable to their own local context. This may include, for example, various avenues for receiving grievances, as preferred by and appropriate to local stakeholders.



Appendix C

Indicative TRG meeting schedule



Wimmera Project – TRG meeting and document review schedule

TRG meeting number	Agenda items	Key relevant TRG agency members (note all agencies have the option to comment)	Deadline for provision of report to TRG	TRG meeting date	TRG comments to DELWP
1	TRG site visit and project introduction	Entire TRG	NA	22-23 January 2020	NA
NA	Revised EES study program	Entire TRG	V2 late September 2020 V3 November 2020	NA	10 days after receipt
2	Impact assessment methods	Entire TRG	NA	8/10/2020	NA
3	Biodiversity baseline	DELWP-IA, DELWP-BIO, PV, DAWE	23/10/2020	10/11/2020	1/12/2020
3	Landscape and visual impact assessment	DELWP-IA, DELWP-RP, DJPR-AV, DJPR-ERR, AV, HV, HRCC	23/10/2020	10/11/2020	1/12/2020
3	EES table of contents	Entire TRG	6/11/2020	10/11/2020	1/12/2020
4	Noise and vibration impact assessment	DELWP-IA, DELWP-BIO, EPA, DOHH, CMA, HRCC	11/02/2021	25/02/2021	18/03/2021
4	Historical cultural heritage impact assessment	DELWP-IA, DELWP-RP, DJPR-ERR, AV, HV, HRCC	11/02/2021	25/02/2021	18/03/2021
4	Biodiversity impact assessment	DELWP-IA, DELWP-BIO, PV, DAWE	11/02/2021	25/02/2021	18/03/2021
5	Aboriginal cultural heritage (mine site)	DELWP-IA, DELWP-RP, DJPR-ERR, AV, HV, HRCC	21/06/2021	5/07/2021	26/07/2021
5	Air quality, energy and greenhouse gas impact assessment	DELWP-IA, DJPR-AV, DJPR-ERR, EPA, DOHH, HRCC	21/06/2021	5/07/2021	26/07/2021
5	Radiation impact assessment	DELWP-IA, DJPR-AV, DJPR-ERR, EPA, DOHH, HRCC, DAWE	21/06/2021	5/07/2021	26/07/2021
5	Baseline soil collation report	DELWP-IA, DELWP-RP, DJPR-AV, DJPR-ERR, EPA, PV, SRW, CMA, HRCC	21/06/2021	5/07/2021	26/07/2021
6	Agriculture impact assessment	DELWP-IA, DELWP-RP, DJPR-AV, DJPR-ERR, DOHH, SRW, CMA, HRCC	28/10/2021	11/11/2021	2/12/2021

TRG meeting number	Agenda items	Key relevant TRG agency members (note all agencies have the option to comment)	Deadline for provision of report to TRG	TRG meeting date	TRG comments to DELWP
6	Offset strategy	DELWP-IA, DELWP-BIO, PV, DAWE	28/10/2021	11/11/2021	2/12/2021
6	Human health impact assessment	DELWP-IA, EPA, AV, DOHH, SRW, CMA, VicRoads, HRCC	28/10/2021	11/11/2021	2/12/2021
7	Traffic and transport	DELWP-IA, DELWP-RP, DJPR-AV, DJPR-ERR, VicRoads, HRCC	16/12/2021	31/01/2022	21/02/2022
7	Geotechnical	DELWP-IA, DJPR-ERR	16/12/2021	31/01/2022	21/02/2022
7	Groundwater baseline and impact assessment	DELWP-IA, DELWP-BIO, DELWP-RP, DJPR-AV, DJPR-ERR, EPA, PV, SRW, CMA, HRCC	16/12/2021	31/01/2022	21/02/2022
7	Surface water impact assessment	DELWP-IA, DELWP-BIO, DELWP-RP, DJPR-AV, DJPR-ERR, EPA, PV, SRW, CMA, HRCC	16/12/2021	31/01/2022	21/02/2022
8	Soil and rehabilitation assessment	DELWP-IA, DELWP-RP, DJPR-AV, DJPR-ERR, EPA, DOHH, SRW, CMA, HRCC, DAWE	7/06/2022	21/06/2022	12/07/2022
8	Socioeconomic impact assessment	DELWP-IA, DELWP-RP, DJPR-AV, DJPR-ERR, DOHH, HRCC	7/06/2022	21/06/2022	12/07/2022
9	Draft rehabilitation and closure plan	Entire TRG	19/10/2022	1/11/2022	22/11/2022
9	Mine work plan	Entire TRG	19/10/2022	1/11/2022	22/11/2022
9	EPA works approval application	Entire TRG	19/10/2022	1/11/2022	22/11/2022
9	Planning scheme amendment	Entire TRG	19/10/2022	1/11/2022	22/11/2022
10	Draft EES report	Entire TRG	30/11/2022	14/12/2022	10/02/2023

Notes

1. Each meeting agenda will include the following:
 - project update;
 - key community concerns raised to date; and
 - other business.
2. Iluka plans to meet with the TRG planning sub-committee from Q4 2020 onwards to discuss the legislative framework that applies to the planning components.
3. EES chapters (eg Introduction, Project description, Environment and impact assessment framework, Project rationale, Legislative context and Environmental and social context etc) will be progressively sent to the TRG for review from December 2020 onwards. Each TRG meeting will include a standing agenda item to discuss the chapters if required.

Key

Department of Environment, Land, Water and Planning Impact Assessment (DELWP-IA)

Department of Environment, Land, Water and Planning Biodiversity (DELWP-BIO)

Department of Environment, Land, Water and Planning Regional Planning (DELWP-RP)

Department of Jobs, Precincts and Regions - Agriculture Victoria (DJPR-AV)

Department of Jobs, Precincts and Regions - Earth Resources Regulation (DJPR-ERR)

Environment Protection Authority (EPA)

Aboriginal Victoria (AV)

Heritage Victoria (HV)

Parks Victoria (PV)

Department of Health and Human Services (DOHH)

Southern Rural Water (SRW)

Catchment Management Authority (CMA)

Horsham Rural City Council (HRCC)

Department of Agriculture, Water and Environment (DAWE)



