

Nowa Nowa Iron Project

East Gippsland, Victoria

Stakeholder Engagement Plan



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Executive Summary

This *Stakeholder Engagement Plan* has been prepared for the Nowa Nowa Iron Project ('the Project') to support a referral to the Minister for Planning for advice as to whether an Environment Effects Statement is required for the Project pursuant to the *Environment Effects Act 1978* ('EES Referral').

This document forms Eastern Iron's commitment to the effective and inclusive engagement of Project stakeholders and has been prepared having regard for the requirements of the *Mineral Resources (Sustainable Development) Act 1990*, the *Mineral Resources Development Regulations 2002* and the *Community Engagement Guidelines for Mining and Mineral Exploration in Victoria* (DPI, 2008).

It summarises engagement undertaken for the Project to date and outlines a framework for ongoing stakeholder engagement and consultation activities throughout the life of the Project. This includes:

- A summary of identified stakeholders;
- Preliminary analysis of community and other stakeholder issues;

- Methods, tools and an initial schedule for ongoing engagement with community and other stakeholders; and
- A feedback and complaints mechanism.

The overall aim of public and stakeholder consultation is to enhance the sustainable development outcomes of the Project through effective, inclusive and equitable involvement of Project stakeholders. In meeting these objectives, Eastern Iron aims to ensure the long-term viability of the Project and enhance potential Project benefits.

Eastern Iron will engage with relevant stakeholders at all stages of Project development using appropriate consultation and disclosure methods. These methods will be used to build and maintain effective relationships with stakeholders that lead to better Project outcomes.

1 INTRODUCTION

This *Stakeholder Engagement Plan* has been prepared for the Nowa Nowa Iron Project ('the Project') to support a referral to the Minister for Planning for advice as to whether an Environment Effects Statement is required for the Project pursuant to the *Environment Effects Act 1978* ('EES Referral').

It summarises engagement to date and outlines a framework for ongoing stakeholder engagement and consultation activities over the life of the Project. This includes design, construction, operation and decommissioning.

As the Project is in the early stages, this plan provides the overall strategy for engaging and consulting with the community and for fulfilling the company's duty to consult under the *Mineral Resources (Sustainable Development) Act 1990* (refer to Section 1.4 below).

The Plan focuses on stakeholder engagement activities associated with the components of the Project within Victoria. Stakeholder engagement associated with works within New South Wales (NSW) are being conducted in accordance with relevant State and local planning processes.

The Plan will be updated as the Project proceeds in accordance with relevant legislation and guidelines, subject to approvals required.

1.1 Objectives

Community engagement is recognised as an important element in the planning and decision-making process of the Victorian mining industry (DPI, 2008). It also helps Project owners achieve and maintain a 'social license to operate' allowing the Project to maximise benefits, both for the Project and stakeholders, and minimise negative consequences.

The key objectives of this *Stakeholder Engagement Plan* are to:

- Identify the relevant stakeholders and stakeholder attitudes, expectations and concerns;
- Undertake stakeholder analysis to establish the most appropriate mechanism for consultation with stakeholders;

- Summarise the consultation undertaken to date;
- Provide a framework for stakeholder consultation and engagement throughout the life of the Project, including:
 - » Indicative timeframes for stakeholder input into the Project design/approval process;
 - » Detail the type of consultation and engagement which will be undertaken at different stages with different stakeholder groups;
 - » Provide a process by which Project planning can take into account matters raised by stakeholders at the earliest possible stage;
 - » Outline how inputs from stakeholders will be recorded, considered and addressed.

In meeting the above objectives, Eastern Iron aims to:

- Establish clear lines of communication with the community and other Project stakeholders;
- Provide factual, accurate information about the Project and its likely environmental, social and economic impacts where there is a genuine requirement or request for such information;
- Identify and understand community values, concerns and interests;
- Ensure that stakeholder feedback and Project consultation is documented;
- Ensure that any affected communities or other stakeholders are well informed of the progress of Project activities, safety information, employment opportunities, etc;
- Provide a robust mechanism for recording and resolving Project related issues and grievances;
- Evaluate community acceptance of the Project; and
- Reduce the potential for stakeholder disaffection as a result of a misunderstanding of the Project and exclusion from the environmental and social assessment process.

1.2 Project Overview

1.2.1 Brief Project Description

The Project is located approximately 7 km north of the township of Nowa Nowa, which is situated on the Princes Highway between Bairnsdale and Orbost in East Gippsland, Victoria (37° 39' 45"S, 148° 6' 43"E). The site is wholly within the Tara State Forest.

The Project is a greenfield development of a high grade magnetite/hematite deposit generally referred to as '5 Mile'.

The Project involves an open cut mining operation from a single pit with dry processing at the site to upgrade the material to a saleable product. It is anticipated that the Project will produce up to 1Mt of ore per annum, over an initial mine life of 10 years. The mine will be operated using a local mining contractor and local employees (i.e. no FIFO workforce).

It is proposed to transport the processed ore by road to the existing South East Fibre Exports (SEFE) wharf at the Port of Eden in Edrom, NSW ('the Port'). The majority of the transport route between the mine and the Port is via the Princes Highway.

The main components of the Project at the mine site will include:

- Open Pit;
- Mine Infrastructure (includes the Run of Mine (ROM) pad, processing plant and Mine Operations Centre);
- Waste Rock Dump;
- Temporary Low Grade Ore Stockpile;
- Mine Access and Haul Roads; and
- Ancillary Infrastructure.

Further details of the Project, including the design and layout of the mine site, are provided by the *Project Description and Proposed Work Plan* (EES Referral Attachment 1).

1.2.2 Proponent Details

The Project Proponent is Eastern Iron Limited ('Eastern Iron'), through its wholly owned subsidiary Gippsland Iron Pty Ltd. Eastern Iron is a minerals exploration and development company that was listed on the ASX in May 2008 (ASX:EFE). Eastern Iron has its main office in New South Wales, Australia and has the objective of discovering and delineating iron

ore projects in eastern Australia. Since listing the company has drilled and announced maiden resources at four project areas – Cobar iron pisolite project in western NSW, Eulogie and Hawkwood iron-vanadium projects in Queensland and the Nowa Nowa Iron Project.

EASTERN IRON LIMITED

Level 1, 80 Chandos Street,
St Leonards NSW 2065

T: +61 2 9906 7551

F: +61 2 9906 5233

W: www.easterniron.com.au

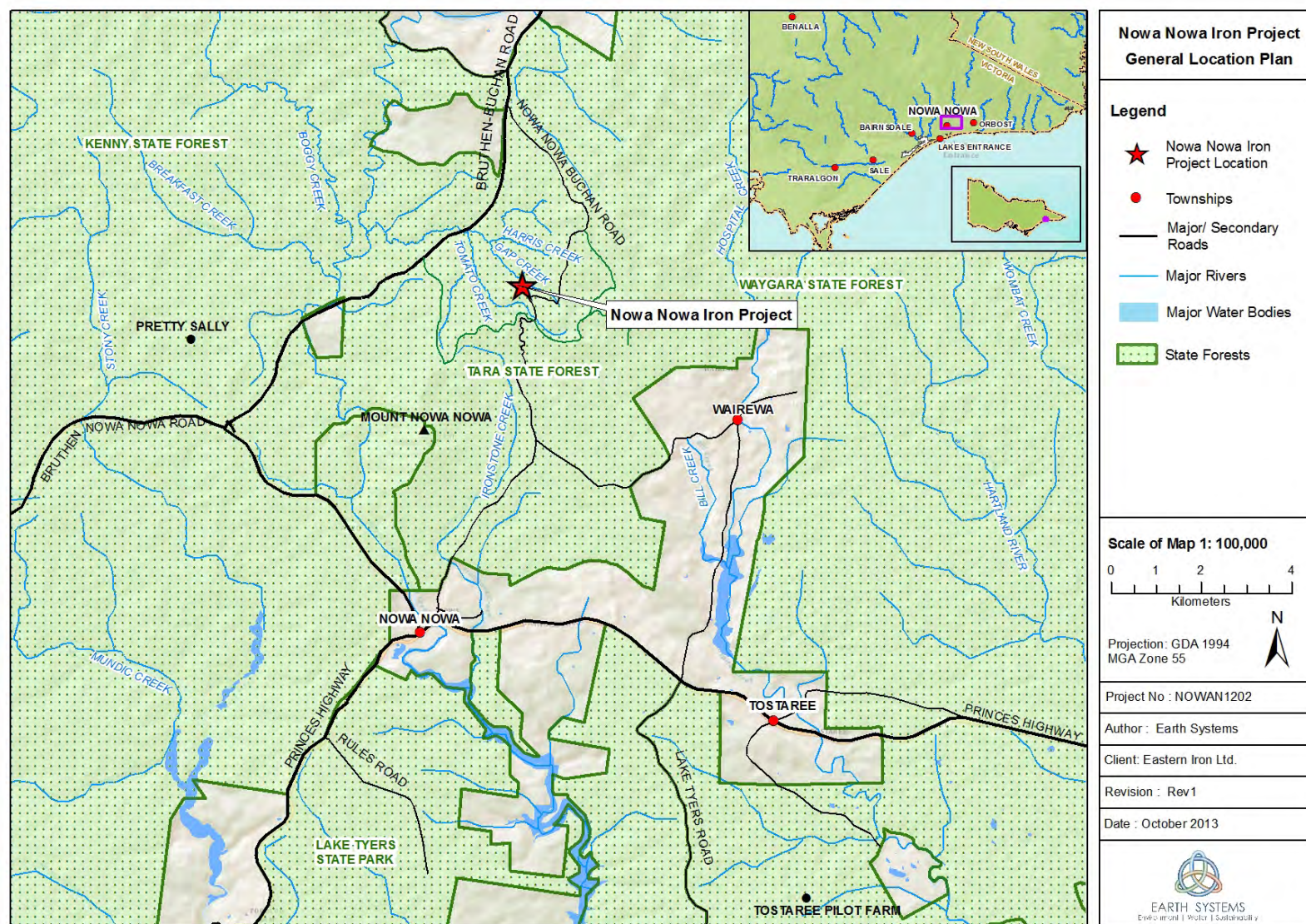


Figure 1.1 Project Location

1.3 Environmental and Social Setting

The proposed mine site is located within the Tara State Forest, approximately 7 km north of the township of Nowa Nowa and 18 km northeast of Lakes Entrance.

There are no nearby residential areas in the area surrounding the mine site, which is predominantly State forest managed for logging. The nearest residential communities to the mine site are the small township of Nowa Nowa (approximately 7 km south) and the farming hamlet of Wairewa (approximately 4 km southeast).

A number of regional centres are within the broader area, including Lakes Entrance, Orbost and Bairnsdale.

1.4 Legislation and Regulatory Requirements

1.4.1 Key Legislation

Key legislation relevant to the consultation aspects of the Project include:

- *Mineral Resources (Sustainable Development) Act 1990*
- *Mineral Resource Development Regulations 2002*
- *Environment Effects Act 1978*
- *Planning and Environment Act 1987*
- *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*
- *Native Title Act 1993 (Cth)*
- *Aboriginal Heritage Act 2006*
- *Environmental Protection Act 1970*

Mineral Resources (Sustainable Development) Act 1990

The *Mineral Resources (Sustainable Development) Act 1990* is the main framework for the development of mineral resources in Victoria. Section 39A stipulates that licensees have a duty to consult with the community throughout the period of the license by sharing information and giving community members an opportunity to express their views. Section 40 requires that a Community Engagement Plan be

prepared as part of any Work Plan to provide a framework for consultation and to document the consultation commitments made by the licensee.

Mineral Resources Development Regulations 2002

Schedule 13 of the *Mineral Resources Development Regulations 2002* specifies the requirements for Work Plans associated with a Mining Licence and requires a Community Engagement Plan that:

- a) *identifies any community likely to be affected by mining activities authorised by the licence; and*
- b) *includes proposals for—*
 - i. *identifying community attitudes and expectations; and*
 - ii. *providing information to the community; and*
 - iii. *receiving feedback from the community; and*
 - iv. *analysing community feedback and considering community concerns or expectations- in relation to mining activities authorised by the licence; and*
- c) *includes a proposal for registering, documenting and responding to complaints and other communications from members of the community in relation to mining activities authorised by the licence.*

It is submitted that the requirements of schedule 13 are satisfied by this *Stakeholder Engagement Plan*.

Environment Effects Act 1978

The Minister administering the *Environment Effects Act 1978* may require the preparation of an EES for the Project. Should this be required, a consultation plan is required to be developed and implemented. Any EES is also publically exhibited prior to a decision on its approval.

Planning and Environment Act 1987

Where an EES is not required for the Project, a planning permit will need to be obtained from the East Gippsland Shire Council pursuant to the *Planning and Environment Act 1987*. This process ensures that any application will be subject to an appropriate level of public consultation and will provide an opportunity for interested persons to make submissions before a decision is made.

Environment Protection and Biodiversity Conservation Act 1999 ('EPBC Act')

A referral for the Project will be made to the Commonwealth in accordance with the requirements of the EPBC Act. Any referral or

subsequent assessment will provide an opportunity for public comment.

1.4.2 Australian Standards and Guidelines

In developing this *Stakeholder Engagement Plan*, due consideration was also given to Australian guidelines on public consultation and disclosure. The documents reviewed included (but were not limited to):

Victoria

- *Community Engagement Guidelines for Mining and Mineral Exploration in Victoria, Department of Primary Industries (2008)*. These guidelines provide assistance to the minerals industry about the requirements for community

engagement under the Mineral Resources (Sustainable Development) Act 1990 and the Mineral Resources Development Regulations 2002.

- *Work Plan Guidelines for a Mining Licence, Department of Primary Industries (2002)*.

Australia

- *Leading Practice Sustainable Development Program for the Mining Industry: Community Engagement and Development, Department of Resources, Energy and Tourism (2006)*.
- *Leading Practice Sustainable Development Program for the Mining Industry: Working with Indigenous Communities, Department of Resources, Energy and Tourism (2006)*.

2 STAKEHOLDER IDENTIFICATION

Building rapport with key stakeholders is crucial to the success of the Project, particularly in the preliminary stages. Stakeholder identification and analysis has been undertaken to identify stakeholders with an interest in the Project, including Government authorities, local communities, organisations or interest groups.

The list of stakeholders will continue to evolve over the life of the Project. An overview of key stakeholders for the Project and the potential level of impact on each group is provided in Table 2.2 below.

The 'Level of Impact' on each community or stakeholder group was evaluated using the definitions provided in the *Community Engagement Guidelines for Mining and Mineral Exploration* (DPI, 2008, page 19 - 20).

2.1 Community of Standing

As per the *Community Engagement Guidelines for Mining and Mineral Exploration* (DPI, 2008), Communities of Standing are defined as stakeholders "that have a special or legal interest in the land". Key members of the Community of Standing for the Project and the potential level of impact on each group are summarised in Table 2.1.

Table 2.1 Community of standing - stakeholders with special or legal interest

Identified Community and Type	Stakeholders	Impact Level	Role in Project
Federal Government	<ul style="list-style-type: none"> Department of Environment (Cth) 	M	<ul style="list-style-type: none"> Regulatory role in accordance with the EPBC Act
Victorian State Government	<ul style="list-style-type: none"> Department of Environment and Primary Industries (DEPI) Department of Transport, Planning and Local Infrastructure Department of State Development, Business and Innovation Environmental Protection Authority VicRoads Regional Development Victoria 	H	<ul style="list-style-type: none"> Regulatory role under various State legislation Facilitator of investment in State and region
Local Government	<ul style="list-style-type: none"> East Gippsland Shire Council 	H	<ul style="list-style-type: none"> Regulatory role under East Gippsland Planning Scheme Facilitator of investment in municipality Representative of local community interests
Traditional Land Owners	<ul style="list-style-type: none"> Gunaikurnai Land & Waters Corporation (GLaWAC) 	M	<ul style="list-style-type: none"> Native Title holders of land affected by Project Registered Aboriginal Party under <i>Aboriginal Heritage Act</i> 2006
Water managers and catchment authorities	<ul style="list-style-type: none"> Southern Rural Water East Gippsland Water East Gippsland Catchment Management Authority 	H	<ul style="list-style-type: none"> Regulatory role under State legislation Management and mitigation of downstream water quality Management and mitigation of water resources required for the Project

Identified Community and Type	Stakeholders	Impact Level	Role in Project
Emergency services	<ul style="list-style-type: none"> Local police Country Fire Authority Victoria Metropolitan Fire Brigade Ambulance Volunteer emergency services 	L	<ul style="list-style-type: none"> Management of potential operational impacts / risks

NB: According to the *Community Engagement* guidelines (DPI, 2008), high impact means significant, repetitive, regular or frequent aspects of the Project that will affect people's lives and lifestyles. Medium impact refers to occasional, or regular but infrequent, aspects of the Project, such as noise or dust issues and visual issues that may be partial or avoidable/manageable. Low impact refers to infrequent and very occasional aspects of the Project (occasional dust and noise issues).

2.2 Community of Place

As per the *Community Engagement Guidelines for Mining and Mineral Exploration* (DPI, 2008), Communities of Place are defined as stakeholders

"surrounding a geographic location, such as neighbouring properties". Key members of the Community of Place for the Project and the potential level of impact on each group are summarised in Table 2.2.

Table 2.2 Community of Place - communities surrounding a geographic location

Identified Community and Type	Stakeholders	Impact Level	Role in Project
Local community	<u>Residents of communities in surrounding area:</u> This group will include the two communities closest to the proposed Project: <ul style="list-style-type: none"> Nowa Nowa Township Wairewa 	M	<ul style="list-style-type: none"> Increase in employment opportunities Potential amenity impacts Potential increase in population Indirect benefit from employment and investment in local economy
	<u>Residents along transportation routes:</u> This group will include residents of communities along the proposed product transport route, including: <ul style="list-style-type: none"> Nowa Nowa Tostaree Wombat Creek Newmerella Orbost Cann River Genoa 	M	<ul style="list-style-type: none"> Potential increase in traffic and/or amenity impacts Indirect benefit from employment and investment in local economy
	<u>Communities associated with any proposed transport depot:</u> The location of the depot will be at the discretion of the transport contractor and subject to separate approval, which will involve its own public consultation.	M	<ul style="list-style-type: none"> Potential increase in traffic and/or amenity impacts [noting that a site has not been selected] Indirect benefit from employment and investment in local economy
Service towns in the vicinity of the Project	Residents of Townships / population centres within the service catchment (health, education,	M	<ul style="list-style-type: none"> Potential increase in population

Identified Community and Type	Stakeholders	Impact Level	Role in Project
	emergency services) of the Project: <ul style="list-style-type: none"> • Lakes Entrance; • Orbost; and • Buchan 		<ul style="list-style-type: none"> • Indirect benefit from employment and investment in local economy

NB: According to the *Community Engagement* guidelines (DPI, 2008), high impact means significant, repetitive, regular or frequent aspects of the Project that will affect people's lives and lifestyles. Medium impact refers to occasional, or regular but infrequent, aspects of the Project, such as noise or dust issues and visual issues that may be partial or avoidable/manageable. Low impact refers to infrequent and very occasional aspects of the Project (occasional dust and noise issues).

2.3 Community of Interest

As per the *Community Engagement Guidelines for Mining and Mineral Exploration* (DPI, 2008), Communities of Interest are defined as stakeholders "of similar practice, such as local community groups, sports groups, residents' associations, service clubs, farmers' groups, rate payers' associations, local businesses, local schools, local sports clubs, tourist or seasonal groups and other associated groups". Key members of the Community of Interest for the Project and the potential level of impact on each group are summarised in Table 2.3.

Table 2.3 Community of Interest - communities of similar practice

Identified Community and Type	Stakeholders	Impact Level	Role in Project
Local facilities / service providers	<ul style="list-style-type: none"> • Hospitals, schools, education and employment providers • Volunteer emergency services • Tourism bodies 	M	<ul style="list-style-type: none"> • Potential increase in population may require additional investment in existing facilities and services
Local business / industry	<ul style="list-style-type: none"> • Service providers and local businesses • Local chambers of commerce 	M	<ul style="list-style-type: none"> • Increase in employment opportunities • Indirect benefit from employment and investment in local economy • Interaction between existing businesses and Project
Community and interest groups	<ul style="list-style-type: none"> • Downstream residents and recreational users, including: <ul style="list-style-type: none"> ◦ Nowa Nowa; ◦ Lake Tyers Aboriginal Trust; and ◦ Lake Tyers Beach. • Recreational users of Tara State Forest • Other community and interest groups 	M	<ul style="list-style-type: none"> • Downstream areas and water users susceptible to any impact on water quality attributable to the Project • Relationship of Project to existing tourism uses • Environmental considerations
Local and regional media	Print and radio media including: <ul style="list-style-type: none"> • Radio East Gippsland • Bairnsdale Advertiser • East Gippsland News • Lakes Post 	L	<ul style="list-style-type: none"> • The media will be used during consultation activities

NB: According to the *Community Engagement* guidelines (DPI, 2008), high impact means significant, repetitive, regular or frequent aspects of the Project that will affect people's lives and lifestyles. Medium impact refers to occasional, or regular but infrequent, aspects of the Project,

such as noise or dust issues and visual issues that may be partial or avoidable/manageable. Low impact refers to infrequent and very occasional aspects of the Project (occasional dust and noise issues).

3 ENGAGEMENT TO DATE

Subsequent to the decision to proceed with permitting for the Project in late 2012, Eastern Iron has actively engaged at all levels of government and the community.

The following sections summarise the engagement already undertaken to date.

3.1.1 Government Departments and Agencies

Eastern Iron, and its representatives, have consulted the following government departments and agencies in relation to the design of the Project and regulatory requirements:

- Department of Environment (Cth)
- Department of State Development, Business and Innovation
- Department of Environment and Primary Industries
- Department of Transport, Planning and Local Infrastructure
- East Gippsland Shire Council
- VicRoads
- Southern Rural Water
- East Gippsland Catchment Management Authority

Eastern Iron has incorporated the advice of the abovementioned agencies in the final design of the Project and is committed to working with government through the relevant approvals process.

3.1.2 Gunaikurnai Land and Water Aboriginal Corporation (GLaWAC)

GLaWAC is the Prescribed Body Corporate (PBC) for the purposes of the Native Title Act 1993 and holds Native Title over much of Gippsland, including the Project area. It is also the Registered Aboriginal Party for the Project area under the Aboriginal Heritage Act, 2006.

Eastern Iron maintains an existing Native Title Agreement with GLaWAC for its exploration activities under EL4509.

Eastern Iron has commenced negotiations associated with entering into a Native Title Agreement (NTA) for the development of the Project and these negotiations are well advanced. The parties are

aiming to reach agreement on the terms of any NTA by the end of 2013.

As part of this process, Eastern Iron and its representatives have engaged in cultural heritage awareness programs with GLaWAC and organised site visits to communicate the proposed Project and welcome any feedback.

Eastern Iron has engaged Cultural Heritage Advisor, Tim Stone, to prepare a Cultural Heritage Management Plan (CHMP) pursuant to the Aboriginal Heritage Act 2006. As part of this process, GLaWAC has been continually consulted on the preparation of the CHMP. Representatives of GLaWAC were also in attendance at the field surveys undertaken to date.

3.1.3 Other Stakeholder Consultation

Eastern Iron, and its representatives, have also engaged with the following parties who have a demonstrated interest in the Project:

- Local residents within Nowa Nowa
- Local businesses within Nowa Nowa, Lakes Entrance and Bairnsdale
- Councillors and Members of Parliament
- W-Tree Promotion and Progress Association
- Service and infrastructure providers
- Emergency services

4 FRAMEWORK FOR STAKEHOLDER ENGAGEMENT

4.1 Approach

Eastern Iron will engage all stakeholders with a variety of consultation and disclosure tools. These tools will be used to build and maintain effective relationships with stakeholders that lead to better Project outcomes. The consultation program will be developed in accordance with Victorian Department of Primary Industries' *Community Engagement Guidelines for Mining and Mineral Exploration in Victoria* (2008), the *International Associations of Public Participation* (IAP2) and other relevant guidelines and legislation. Based on the Community Engagement Guidelines, the following principles underpin the consultation process in this Plan (DPI, 2008):

- Commitment is demonstrated when the need to understand, engage and identify the community is undertaken early in the process.
- Integrity occurs when engagement is conducted in a manner that fosters mutual respect and trust.
- Respect is created when the rights, cultural beliefs, values and interests of the community in the land and waters within or surrounding the Project are recognised.

- Transparency is demonstrated when community concerns are responded to in a timely, open and effective manner.
- Inclusiveness is achieved when a diverse representation of community and broad participation is encouraged and supported by appropriate participation opportunities.
- Trusting relationships are built through exploring community values and interests and finding common ground.
- Good communication is achieved when open and meaningful dialogue is carried out and processes established to allow this to occur.
- Build trust by establishing processes to record and disseminate information on how community feedback contributed to decision making.

The DPI guidelines also outline a community engagement spectrum (Figure 4.1). The spectrum is designed to assist with the selection of different levels of community engagement based on their role in the consultation process. It also recommends different consultation tools and methods for different stages.

This *Stakeholder Engagement Plan* envisages a combination of consultation techniques, with both formal and informal engagement activities proposed to maximise participation. The level of engagement proposed for each community or stakeholder group is shown in Table 4.1. Various consultation tools and methods are outlined in Sections 4.2 and 4.3.

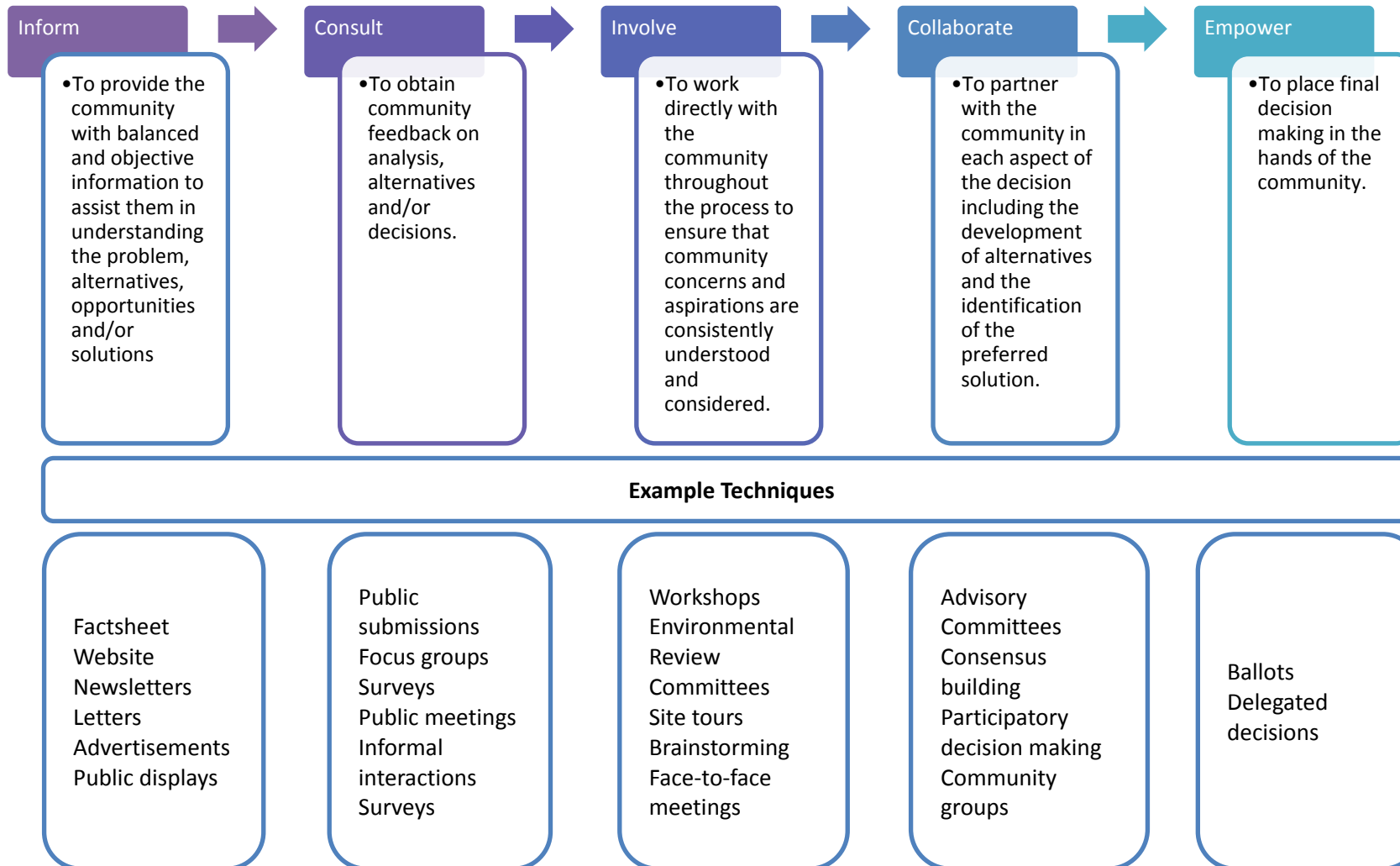


Figure 4.1. DPI community engagement spectrum based on the IAP2 public participation spectrum (Adapted from DPI, 2008)

Table 4.1 Proposed level of engagement for each stakeholder or community group

Identified Community and Type	Stakeholders	Level of engagement
Community of Standing		
Federal Government	<ul style="list-style-type: none"> Department of Environment (Cth) 	Involve / Collaborate
Victorian State Government	<ul style="list-style-type: none"> Department of Environment and Primary Industries (DEPI) Department of Transport, Planning and Local Infrastructure Department of State Development, Business and Innovation Environmental Protection Authority VicRoads Regional Development Victoria 	Involve / Collaborate
Local Government	<ul style="list-style-type: none"> East Gippsland Shire Council 	Involve / Collaborate
Traditional Land Owners	<ul style="list-style-type: none"> Gunaikurnai Land & Waters Corporation (GLaWAC) 	Involve
Water managers and catchment authorities	<ul style="list-style-type: none"> Southern Rural Water East Gippsland Water East Gippsland Catchment Management Authority 	Involve / Collaborate
Emergency services	<ul style="list-style-type: none"> Local police Country Fire Authority Ambulance Volunteer emergency services 	Consult / Involve
Community of Place		
Local community	<u>Residents of communities in surrounding area:</u> This group will include the two communities closest to the proposed Project: <ul style="list-style-type: none"> Nowa Nowa Wairewa 	Consult / Involve
	<u>Residents along transportation routes:</u> This group will include all residents of communities along the proposed product transport route: <ul style="list-style-type: none"> Tostaree Wombat Creek Newmerella Orbost Cann River Genoa 	Consult / Involve
	<u>Communities associated with any proposed transport depot:</u> The location of the depot will be at the discretion of the transport contractor and subject to separate approval, which will involve its own public consultation.	Consult / Involve
	<u>Service towns in the vicinity of the Project:</u> <ul style="list-style-type: none"> Lakes Entrance; Buchan; and Orbost 	Inform / Consult
Community of Interest		
Local facilities / service providers	<ul style="list-style-type: none"> Hospitals, schools, education and employment providers Volunteer emergency services Tourism bodies 	Inform / Consult
Local business / industry	<ul style="list-style-type: none"> Service providers and local businesses Local chambers of commerce 	Inform / Consult
Community and interest groups	<ul style="list-style-type: none"> Downstream residents and recreational users, including: <ul style="list-style-type: none"> Nowa Nowa; 	Involve

Identified Community and Type	Stakeholders	Level of engagement
	<ul style="list-style-type: none"> ○ Lake Tyers Aboriginal Trust; and ○ Lake Tyers Beach. ● Recreational users of Tara State Forest ● Other community and interest groups 	
Local and regional media	Print and radio media including: <ul style="list-style-type: none"> ● Radio East Gippsland ● Bairnsdale Advertiser ● East Gippsland News ● Lakes Post 	Inform

4.2 Methods for Providing Information to the Community

Key methods for providing information to the community on the Project include:

- Fact Sheets, Information Sheets and Frequently Asked Questions (FAQs);
- Website;
- Media and Advertising;
- Newsletters and Direct Mail; and
- Annual Reports.

These are outlined briefly below.

4.2.1 Information Sheet, Frequently Asked Questions (FAQs) and Fact Sheets

Several written communication materials will be used during the stakeholder consultation program. These include Fact Sheets, Information Sheets, and 'Frequently Asked Questions' (FAQs).

The fact sheets prepared for the Project will contain information that does not need regular updating such as Project design features. They will contain photos and diagrams to visually represent Project components.

Information sheets will contain information about Project milestones and be updated to provide the most recent information.

The FAQs sheet will anticipate questions that are likely to be raised by stakeholders. It will be informed by preliminary stakeholder issues and commonly asked questions from Project consultations to date.

These materials will be written in clear and simple English and will be appropriate for a non-technical audience. They will be made available where appropriate such as on the website and during information sessions, briefings and other stakeholder consultation meetings. Translated versions will also be provided, if required.

4.2.2 Website

Websites allow information to be readily available, as well as providing the opportunity for the information to reach a wider audience. A dedicated webpage will be established on Eastern Iron's main website to provide information on the Project.

This will include updates on the Project, as well as Frequently Asked Questions (FAQs), advice for stakeholders on how to engage with the Project and a feedback form or inquiry service for stakeholders to provide comments on the Project.

4.2.3 Media and Advertising

Local, metropolitan and trade media present important channels for communicating with stakeholders and reaching a wider audience. Media related activities should involve media releases or advertisements on key milestones.

Media may also be used prior to any information sessions to communicate details, where relevant.

4.2.4 Newsletters and Direct Mail

Newsletters and direct mail are an effective way of informing specific people regarding the proposed Project and will be used throughout the consultation process. Regular newsletters will also describe the community activities that Eastern Iron is involved in, as well as provide information on how the Company is responding to community concerns.

Any person with an email address may also subscribe to Eastern Iron's public announcements via the company's website.

4.2.5 Annual Reports

Eastern Iron produces an annual report each year presenting information on the Project's development. The annual report will include a summary of the implementation of its environmental and social management program.

This report is made available on the Eastern Iron website and will be distributed to selected stakeholders and relevant regulatory authorities.

4.3 Methods for Identifying Community Attitudes and Expectations

All stakeholder communication will be kept clear, concise and culturally appropriate. Wherever possible, stakeholder contacts will be combined to minimise the risk of creating consultation fatigue in the community. Community engagement will be as inclusive as possible to ensure relative issues are identified and that any marginalised groups are also included.

Key methods and tools for identifying community attitudes and expectations during the Project include:

- Website;
- Contact Information;
- Briefings;
- Information Centre;
- Community Information Sessions; and
- Site Tours.

Each of these methods and tools are described briefly below. These tools are not exclusive for identifying attitudes and expectations – they are also relevant for providing information to the community. Unlike the methods and tools listed in the previous section, which are specifically focused on information dissemination, these methods and tools encourage two-way communication and require community involvement.

4.3.1 Website

As outlined above, a dedicated webpage will be established on Eastern Iron's main website to provide general information on the Project.

This will include Project updates, advice for stakeholders on how to engage with the Project, and a feedback form or inquiry service for stakeholders to provide comments on the Project.

4.3.2 Contact Information

Email and Postal Addresses

An email and postal address will be provided on the Project website to encourage feedback and questions from stakeholders and consultation activities. These details will also be included on Project communication materials provided throughout the consultation Project.

Telephone Number

The details of the Company's main telephone number will be included on information associated with the Project and provided for the local community and stakeholders.

Feedback received through this method will be addressed or passed on to the person responsible for the implementation of this Plan.

4.3.3 Briefings

Briefings are a method of providing information on a specific issue to a targeted audience such as industry or government, and are typically followed by detailed discussions, using a question and answer format (DSE, 2005).

Regular briefings regarding the Project will be conducted for key stakeholders to keep them informed regarding the Project and to receive feedback. Briefings will also be tailored to the information requirements of the relevant stakeholder group.

4.3.4 Information Centre

Eastern Iron proposes to establish an information centre within the local community at varying times throughout the approvals process. The information centre will be manned during business hours by personnel with an understanding of the Project.

This mechanism will provide an informal process for stakeholders to attend and receive one-on-one information on the Project or ask specific questions. It is intended that this tool would aid those who would otherwise be reluctant to involve themselves in a public forum (such as the Community Information Sessions below).

4.3.5 Community Information Sessions

Community information sessions provide an opportunity for information regarding the Project to be shared with the local community. Eastern Iron will organise community meetings in the local community during the development approvals stage of the Project, as required.

These meetings will provide an opportunity for stakeholders to learn more about the Project, as well as provide feedback to Eastern Iron personnel and technical consultants.

4.3.6 Site Tours

Site tours are a valuable mechanism for providing a deeper understanding of the Project. Site tours will be organised at appropriate times throughout the Project approval process and include government, traditional land owners or other key stakeholders; however, they will generally not be made available for the broader public.

After the commencement of the Project, key stakeholders which could benefit from site tours are reference groups, referral agencies and emergency service providers.

5 COMMUNITY FEEDBACK AND COMPLAINTS

A Feedback and Complaints mechanism is a locally based, formalised way to accept, assess and resolve community complaints concerning the performance or behaviour of a company, its contractors, or employees.

5.1 Rationale for Feedback and Complaints Mechanism

Eastern Iron will implement a Feedback and Complaints mechanism to track, manage and respond to feedback or complaints from the general public and / or specific Project stakeholders. This procedure will also cover how other communication (such as suggestions for improvement) from community members will be handled. The rationale and benefits for establishing this procedure include:

- Assists in building open and trustworthy relationships with the local community and stakeholders;
- Provides assurance to the community and stakeholders that the company will respond effectively and respectfully to any complaints or grievances;
- An effective, fair and accessible feedback and complaint handling practice will increase community satisfaction;
- Reduces the risk of *ad hoc* behaviours and responses;
- Establishing a systematic handling, tracking and reporting of community complaints helps identify issues that can be managed and mitigated before major consequences arise; and
- Assists in reducing the risk of public objections to proposed developments or legal cases over time.

The mechanism for the lodgement of feedback, inquiries complaints or other communications will be

well publicised and all impacted stakeholders will be informed of its existence.

5.2 Structure and Implementation

The proposed mechanism for receiving and responding to community feedback and complaints is outlined in Figure 5.1 and described below.

Complaints or feedback will be able to be lodged by telephone, email or letters. Contact details will be displayed on the website as well as on communication materials provided to the local community and stakeholders. A complaint or feedback form will also be available for download on the website or provided on request. All feedback will be recorded, monitored and management in accordance with the *Information Privacy Act 2000*.

In the event that a complaint is received, it will be reported and recorded by the company. The response will depend on the nature of the activity that generated the complaint and this will be dealt with by the relevant person within the company, or escalated to the Mine Manager, if necessary.

All parties involved in the complaint will be notified of the receipt of their complaint within 48 hours and contacted or consulted within seven business days. Urgent complaints will be addressed within 24 hours, wherever possible. All complaints should be addressed and closed out with the complainants within a month of the initial date of submission of the complaint. Any corrective actions and other recommendations, including modifications to procedures will be made and closed out under the direction of the Mine Manager.

A register of complaints and subsequent investigations shall be maintained. The register will be reviewed regularly to determine any areas of improvement for the Project if deemed necessary.

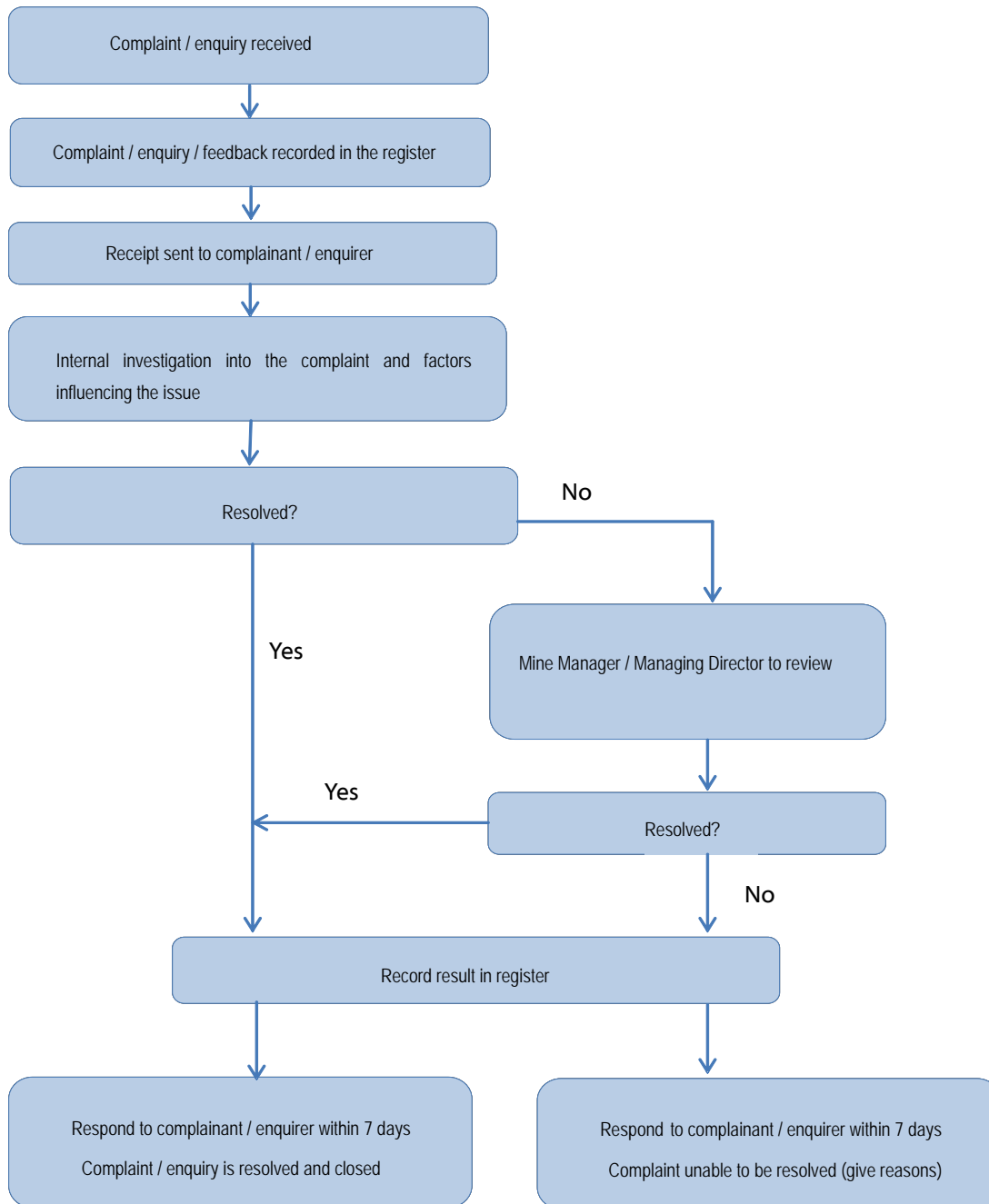


Figure 5.1 Feedback and Complaints Procedure

6 CONSULTATION PLAN AND SCHEDULE

A plan and schedule for the implementation of engagement activities is provided Table 6.1 below. The *Stakeholder Engagement Plan* will be implemented by Eastern Iron and its representatives and will be updated iteratively as the Project progresses (refer Section 7.2).

The format of engagement required for the Project (as part of the approval process) is dependent on the outcomes of State and Commonwealth Referrals, as this will ultimately determine the assessment route.

Consultation for Closure Planning

Formal stakeholder engagement for the Project will begin as part of Project approvals and will continue throughout operations and decommissioning of the Project to ensure that decisions regarding landform design, end land use, and revegetation are in-line with stakeholder expectations. As per the guidelines in the Leading Practice Sustainable Development

Program handbook on *Mine Closure and Completion* (DITR 2006), key stakeholders, both internal and external, who are likely to affect, be affected, or have an interest in mine closure planning, completion criteria, and outcomes will be consulted regarding end land uses or other aspects of closure planning. Key stakeholders with regards to closure planning will include the authorities responsible for the long term management of land and water resources at the mine site such as DEPI.

As part of the development of the Rehabilitation and Closure Plan, Eastern Iron will develop clear and measurable completion criteria in consultation with relevant government authorities, local communities and relevant stakeholders prior to Project commissioning. Criteria will be flexible enough to adapt to changing circumstances without compromising the objectives. As part of the annual update of the Rehabilitation and Closure Plan over the Project life, completion criteria will be reviewed, and may be revised in consultation with stakeholders.

Table 6.1 Summary of the planned stakeholder engagement schedule

Activity	Stakeholders / Community	Frequency / Timeline
<i>Pre-Construction / Prior to Project Commencement</i>		
Update website	All stakeholders	Monthly
Project email, postal address and contact details	All stakeholders	Once-off establishment
Develop and disseminate Feedback and Complaints Mechanism and communications procedures	All stakeholders	Once-off establishment
Fact Sheet and FAQ sheets	All stakeholders	As required, subject to any updates on the Project
Briefings	<ul style="list-style-type: none"> Victorian Government Commonwealth Government Local Government Local authorities 	As required, subject to the approvals process
Media and Advertising	All stakeholders	Ongoing
Newsletters	All stakeholders	As required, subject to any updates on the Project
Site tours	<ul style="list-style-type: none"> Government regulators Traditional Land Owners Emergency services 	As required
Personal meetings	Targeted stakeholders	As required
Information Centre	All stakeholders	Established at key stages of the Project approval and development process

Activity	Stakeholders / Community	Frequency / Timeline
Community Sessions	<ul style="list-style-type: none"> Residents of Nowa Nowa and Wairewa Land managers Local business Community and interest groups 	As required, subject to approvals route and feedback from the community
Briefings, Site Tours and Community Sessions - for development of the Rehabilitation and Closure Plan	<ul style="list-style-type: none"> Government authorities Local communities Additional relevant stakeholders Internal stakeholders 	Prior to Work Plan approval
Advertising / media release (update on milestones)	All stakeholders	Regular
Construction and Operations		
Ongoing community liaison including: <ul style="list-style-type: none"> Informal meetings Participation in community days and activities Phone line / website / etc 	Local community	Ongoing
Project updates through: <ul style="list-style-type: none"> Website Information sheets Newsletters Advertising / media releases Print materials 	All stakeholders	Monthly
Personal meetings	All stakeholders	Ongoing / as required
Responding to issues and inquiries as per Feedback and Complaints Mechanism	All stakeholders	Ongoing / as required
Annual reporting	All stakeholders	Annually

7 REPORTING

7.1 Consultation Records

Information obtained from ongoing consultation activities will be recorded and documented in a stakeholder consultation register. Information will include:

- All materials produced as part of the stakeholder engagement activities;
- Locations, dates and lists of participants at workshops and meetings;
- Summaries of issues and concerns raised; and
- Project responses to issues raised and how community feedback or concerns were

addressed and communicated back to stakeholders.

The community and stakeholders will be kept informed regarding the Project via a number of channels as outlined in Section 4.2.

7.2 Update and Review of the Plan

This *Stakeholder Engagement Plan* is considered a live document that will change and be updated as the consultation process and Project progresses. An updated *Stakeholder Engagement Plan* will be prepared as part of the approvals process.

Eastern Iron will implement an evaluation and continuous improvement plan for the consultation and engagement activities relating to the Project (Table 7-1).

Table 7.1 Evaluation and continuous improvement plan

Objective	Indicator / Target	Outcome
Design and develop the method for stakeholder consultation and community engagement	<i>Stakeholder Engagement Plan</i> completed and accepted by regulators	Consultation approach is endorsed
Identify key community values, attitudes and expectations	Stakeholder list and initial identification of community values, attitudes and expectations completed and accepted by regulators	Relationships developed with key stakeholders / community groups
Implement consultation plan and schedule	Consultation plan is implemented	Plan is implemented. Consultation feedback is incorporated into Project design and planning
Evaluate the stakeholder engagement plan, including effectiveness of consultation methods and stakeholder attitudes towards the Project	Stakeholder feedback, enquiries and complaints are effectively monitored and reviewed	Feedback from evaluation is incorporated in the plan as required

8 REFERENCES

Department of Sustainability and Environment
(2005) *Book 3: The Engagement Toolkit. Effective Engagement: Building relationships with community and other stakeholders.*

International Association of Public Participation
(2013) *Participation Spectrum.*

Victorian Department of Primary Industry (DPI)
(2008) *Community Engagement Guidelines for Mining and Mineral Exploration in Victoria.*

Department of Industry, Tourism and Resources
(2006) *Mine Closure and Completion, Leading Practice Sustainable Development Program handbook series.*