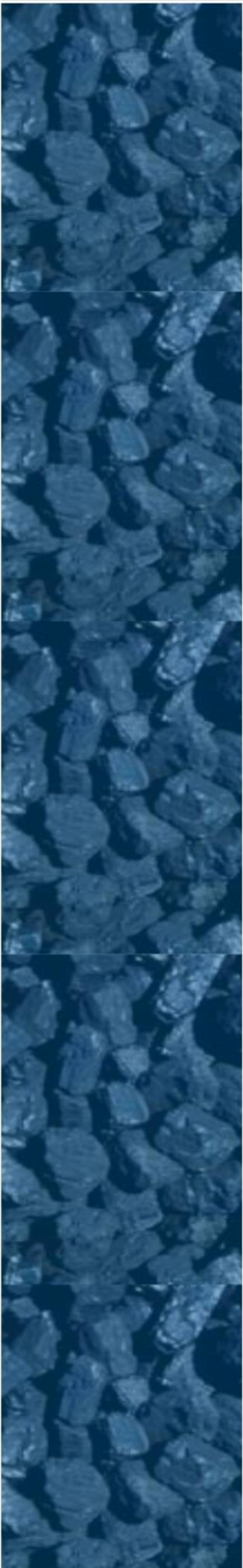




Adani Mining Pty Ltd

adaniTM



Carmichael Coal Mine and Rail Project SEIS

Report for Draft Social Impact
Management Plan

1 April 2014





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1. Introduction

1.1 Project overview

Adani Mining Pty Ltd (Adani, the Proponent), commenced an Environmental Impact Statement (EIS) process for the Carmichael Coal Mine and Rail Project (the Project) in 2010. On 26 November 2010, the Queensland (Qld) Office of the Coordinator General declared the Project a 'significant project' and the Project was referred to the Commonwealth Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC) (referral No. 2010/5736). The Project was assessed to be a controlled action on the 6 January 2011 under section 75 and section 87 of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The controlling provisions for the Project include:

- World Heritage properties (sections 12 & 15A)
- National Heritage places (sections 15B & 15C)
- Wetlands (Ramsar) (sections 16 & 17B)
- Listed threatened species and communities (sections 18 & 18A)
- Listed migratory species (sections 20 & 20A)
- The Great Barrier Reef Marine Park (GBRMP) (sections 24B & 24C)

The Qld Government's EIS process has been accredited for the assessment under Part 8 of the EPBC Act in accordance with the bilateral agreement between the Commonwealth of Australia and the State of Queensland.

The Proponent prepared an EIS in accordance with the Terms of Reference (ToR) issued by the Qld Coordinator-General in May 2011 (Qld Government, 2011). The EIS process is managed under section 26(1) (a) of the *State Development and Public Works Act 1971* (SDPWO Act), which is administered by the Qld Government's Department of State Development, Infrastructure and Planning (DSDIP).

The EIS, submitted in December 2012, assessed the environmental, social and economic impacts associated with developing a 60 million tonne (product) per annum (Mtpa) thermal coal mine in the northern Galilee Basin, approximately 160 kilometres (km) north-west of Clermont, Central Queensland, Australia. Coal from the Project will be transported by rail to the existing Goonyella and Newlands rail systems, operated by Aurizon Operations Limited (Aurizon). The coal will be exported via the Port of Hay Point and the Point of Abbot Point over the 60 year (90 years in the EIS) mine life.

Project components are as follows:

- The Project (Mine): a greenfield coal mine over EPC 1690 and the eastern portion of EPC 1080, which includes both open cut and underground mining, on mine infrastructure and associated mine processing facilities (the Mine) and the Mine (offsite) infrastructure including a workers accommodation village and associated facilities, a permanent airport site, an industrial area and water supply infrastructure
- The Project (Rail): a greenfield rail line connecting to mine to the existing Goonyella and Newlands rail systems to provide for the export of coal via the Port of Hay Point (Dudgeon Point expansion) and the Port of Abbot Point, respectively including:



- Rail (west): a 120 km dual gauge portion running west from the Mine site east to Diamond Creek
- Rail (east): a 69 km narrow gauge portion running east from Diamond Creek connecting to the Goonyella rail system south of Moranbah
- Quarries: five local quarries to extract quarry materials for construction and operational purposes.

Figure 1 shows the Project location.

1.2 Purpose of this report

The final Project terms of reference (ToR) were issued in May 2011 by the Queensland Coordinator-General which specified the requirement of a Social Impact Assessment (SIA) and a Social Impact Management Plan (SIMP) as part of the EIS.

The SIMP has a range of functions, including:

- Summarise the social impacts and affected stakeholders as identified through the SIA process
- Describe Adani's impact management activities and commitments to minimise the negative social impacts and enhance the benefits to the communities and other stakeholders
- Describe the mechanisms to monitor the impacts to adjust mitigation strategies and Action Plans
- Identify stakeholders to be included in the development and implementation of mitigation strategies throughout the life of the Project
- Determine a timeframe for the development and implementation of the management strategies
- Provide guidance to Adani's social performance activities.



Figure 1 Project location



1.3 Social impact management plan methodology

The Project ToR stipulated that the draft SIMP should be consistent with the Queensland Government Social Impact Assessment: Guideline to Preparing a Social Impact Management Plan (2010).

In July 2013 the Office of the Coordinator General (OCG) introduced the new Social Impact Assessment Guidelines outlining the Queensland Government's new approach to SIA and development of social impact management strategies. The new SIA approach focuses on assessing and managing benefits and impacts that are directly related to the project and applying adaptive management strategies to avoid, manage and mitigate impacts. The guidelines outline key themes for impact management, namely:

- Community and stakeholders engagement
- Workforce management
- Housing and accommodation
- Local business and industry content
- Health and community wellbeing.

This SIMP has been developed in accordance with the Project ToR, but also draws upon the approach outlined in the new Draft SIA Guidelines (March 2013) and advice received from OCG.

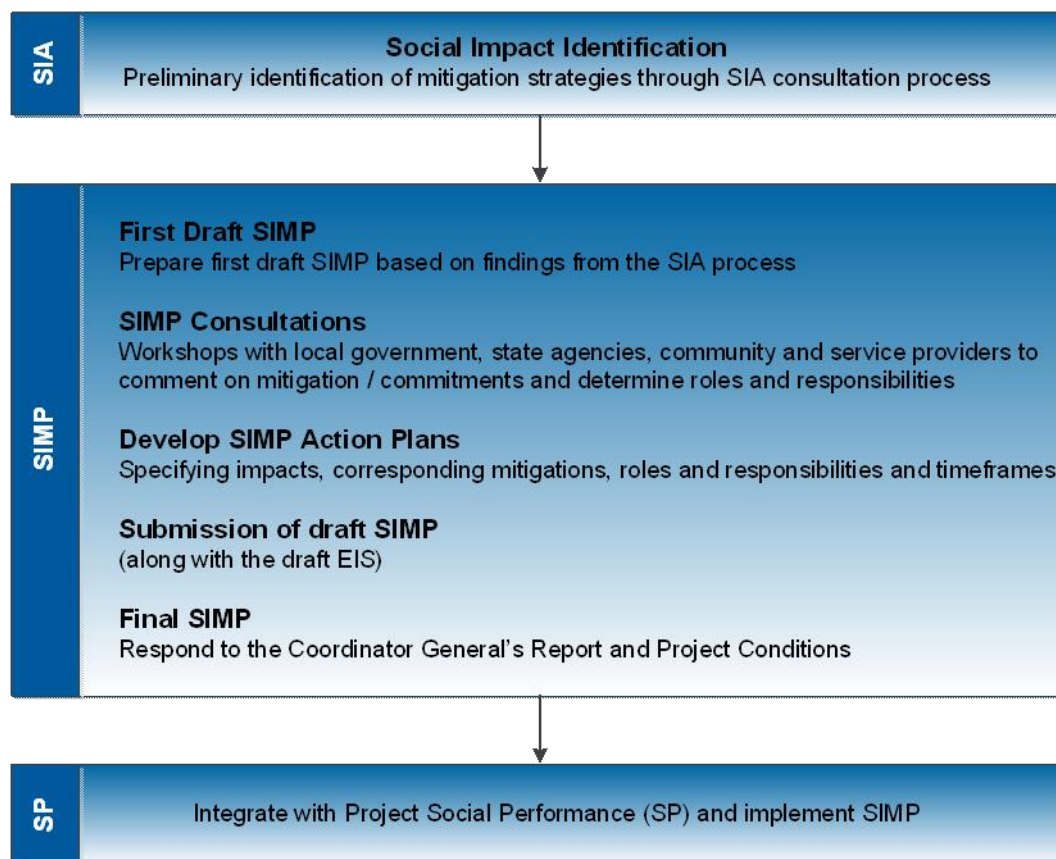
An overview of the SIMP methodology for this Project is graphically represented in Figure 2. The SIMP is based on rigorous and methodical foundations of the SIA process (refer to SIA Report in the SEIS Volume 4, Appendix D1). The SIA process identified and prioritised impacts and identified a set of mitigation strategies through consultations with the OCG, local governments, state agencies, communities and service providers. Specific engagement that influences the content of this SIMP included:

- Ongoing discussions with Adani's management and technical leads , including a workshop to identify mitigation strategies
- Workshops during EIS and SEIS with local government, state agencies, communities and service providers to comment on mitigation strategies developed for the Project. The objective of the workshops was to determine roles and responsibilities and future actions particularly where specific mitigations are not developed.

Based on the outcomes of the workshops and the findings of the SIA, action plans were developed for each of the priority impact areas and compiled into the draft SIMP report (this report).

In accordance with advice from OCG this SIMP will be reviewed, updated (if required) and reported to OCG on an annual basis during construction and for the first two years of operations. Thereafter the review, monitoring and updating process will be included in Adani's annual review and reporting cycles.

Figure 2 SIMP methodology



1.4 Stakeholder engagement for the SIA and SIMP

Consultation undertaken as part of the SIA process was closely integrated with the whole of EIS public consultation process. An SIA team member participated in relevant public consultation events. Table 1 summarises the stakeholder consultation activities undertaken to inform the SIA and the SIMP.

Table 1 Summary of stakeholder consultations for the SIA and SIMP

Timing	Component of EIS	Stakeholder	Purpose/outcome
EIS phase			
March 2011	EIS Public consultations	Government agencies	EIS Agency briefings
March 2011	EIS Public consultations	Community in the regional study area	Community information sessions (EIS commencement and Project introduction)
March 2011	SIA milestone meeting #1	SIAU	Confirmation of SIA scope, method and social and cultural area of influence
March 2011	SIA	Isaac Regional Council (IRC)	Initial discussion on SIA methodology



Timing	Component of EIS	Stakeholder	Purpose/outcome
June 2011	SIA baseline study consultation	IRC	Meetings with council representatives and officers to collect, verify and interpret regional baseline data
June 2011	SIA baseline study consultation	Service providers (Clermont and Moranbah)	Focus groups meetings to collect, verify and interpret regional baseline data
June 2011	SIA milestone meeting #2	SIAU	Meeting with SIAU for a progress update and outline initial findings of the regional baseline
August 2011	EIS public consultations	Community in the regional study area	Progress update on preliminary findings of EIS technical studies
November 2011	SIA	IRC and CTCRC	Meetings with council representatives and officers in Moranbah and Clermont for impact identification in regional study area
November 2011	SIA	Service providers (Clermont and Moranbah)	Focus groups for impact identification in the regional study area
November 2011	SIA	Landholders	Landholder case studies for baseline and impact identification in the local study area
December 2011	SIA	Cross Agency Reference Group	Presentation of identified social impacts and preliminary mitigation strategies
July 2012	SIMP	SIAU	Meeting
July - August 2012	SIA (SIMP – management and monitoring)	Service Providers, stakeholders and Councils within the regionals study area	Meetings in Townsville, Emerald, Clermont, Moranbah, Mackay, Charters Towers and Brisbane
SEIS phase			
Ongoing	EIS submissions	Landholders	Inform landholders of project environmental assessments and design development, including flood modelling
March 2013	EIS submissions	QPS	Discuss stakeholder submissions and key issues and actions
April 2013	EIS submissions	DATSIMA	Discuss stakeholder submissions and key issues and actions
July 2013	SIA approach	OCG	Discuss SIA approach
July 2013	EIS submissions	IRC	Discuss stakeholder



Timing	Component of EIS	Stakeholder	Purpose/outcome
			submissions and key issues and actions

1.5 Structure of the SIMP

The SIMP includes the following:

- Summary description of the Project
- Purpose and methodology
- Summary of social impacts identified through the SIA process
- Existing policy and planning framework to develop mitigations
- Impact management strategies, including stakeholder engagement
- Action plans for key impact areas, along with monitoring and reporting framework.



2. Social impact assessment

2.1 Introduction

A comprehensive Social Impact Assessment has been undertaken and is included in the SEIS Volume 4 Appendix D1. To view this report in the context of the Project's impact assessment a summary of the SIA is included in this section.

2.2 Social and cultural area of influence

2.2.1 Local Study Area

The local study area of influence is the previous Belyando Shire, now part of Isaac Region. The Belyando Shire includes the majority of the Project footprint (with the exception of a very small area within Charters Towers region), the landholders directly impacted by the project and those with land adjacent to the mine site and rail line, as well as the localities of Clermont and Moranbah. Clermont and Moranbah are included in this area as they are the closest townships to the Project. Clermont is approximately 160 km south-east of the proposed mine, and the eastern most extent of the proposed rail line is close to Moranbah approximately 200 km east of the proposed mine. It is anticipated a significant intensity of activities are likely to impact this area.

2.2.2 Regional Study Area

The regional study area includes the following areas:

- Charters Towers region
- Townsville city
- Whitsunday region
- Mackay region
- Isaac region
- Central Highlands region.

2.2.3 State

The state of Queensland forms the wider social, cultural and economic context for the Project and is included as part of the area of influence of the Project where data is available.

2.3 Overview of workforce profile

This section provides a brief overview of the Project's workforce numbers. A detailed workforce profile is developed and included in the SIA (SEIS Volume 4, Appendix D1). It is anticipated that the Project (Mine and Rail) construction will commence in 2014, with operations activities commencing in 2015 and first coal expected in 2016. It is expected that the Project will reach peak workforce in 2016 with approximately 4,158 workers as a result of some overlap between construction workforce and operations workforce.

Operations activities will commence in 2015 with a workforce of approximately 800 workers. It is expected that the Project will reach peak operational workforce in 2024 with approximately



3,945 workers, including corporate office support. There will be a small ongoing construction component of the workforce as there will be new infrastructure to be constructed as the Mine develops. The workforce drops significantly from 2015 – 2018 as the scale of construction activities reduces, particularly the rail construction. The total anticipated workforce for the Project in its initial years up until 2028 is shown Figure 3 with the skills breakdown in Figure 4.

The Mine is expected to reach full production of 60 Mtpa from 2022 onwards and, for the purposes of the SIA, it is assumed that workforce numbers will be relatively consistent after this time, ranging between 3,500 – 3,900 workers. It is not considered valid to assess social impacts of workforce after this time due to likely changes in demographic and socio-economic characteristics of local and regional populations, as well as changes in government policies and planning frameworks, mining technology and other factors out of the sphere of Project influence. Detailed workforce data is presented in Appendix A.

Figure 3 Total anticipated project workforce (Mine and Rail)

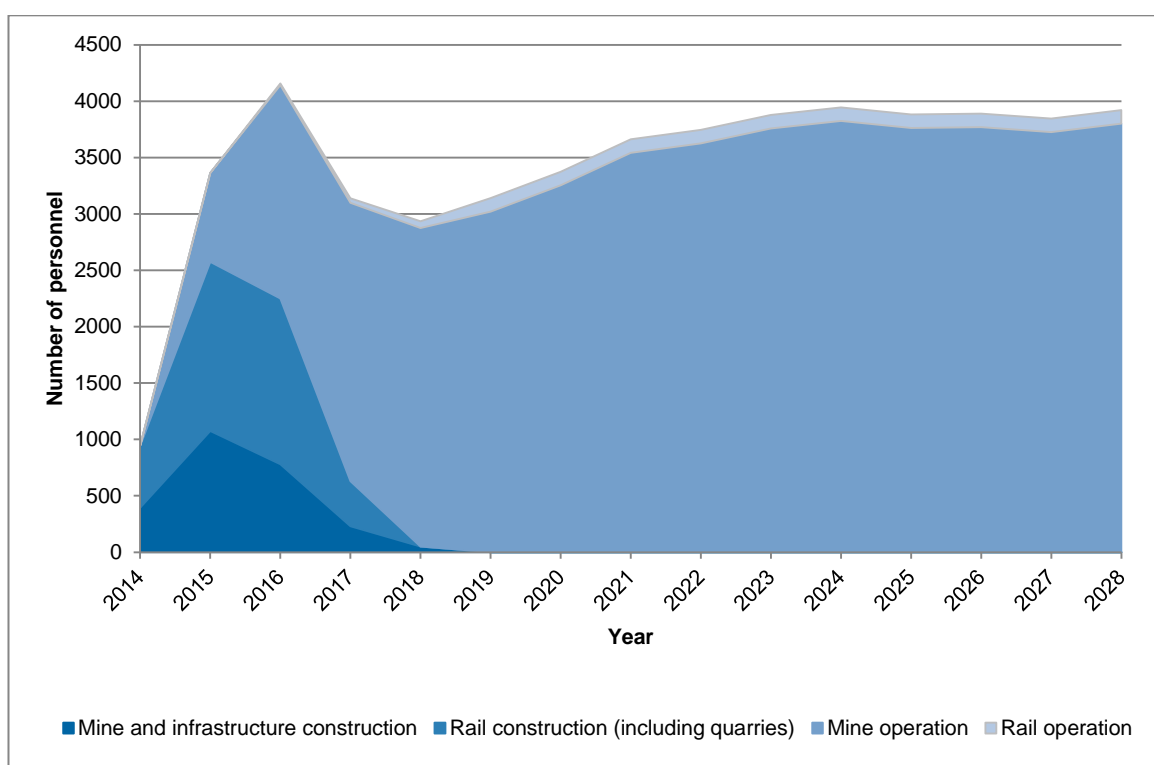


Figure 4 shows the skill breakdown of the workforce for the first ten years of construction and operation. The construction phase for the Project (Mine) will include works such as construction of the open cut and underground mining operations, haul roads, train load out and coal handling processing plant (CHPP), conveyors, feeders, workshops, equipment storage, administration building, and other components within the mine infrastructure area, as well as offsite infrastructure. The offsite infrastructure will include council road upgrade, airstrip construction, dams and pipelines and workers accommodation facilities.

Operation of the Project will require workers in the following categories:

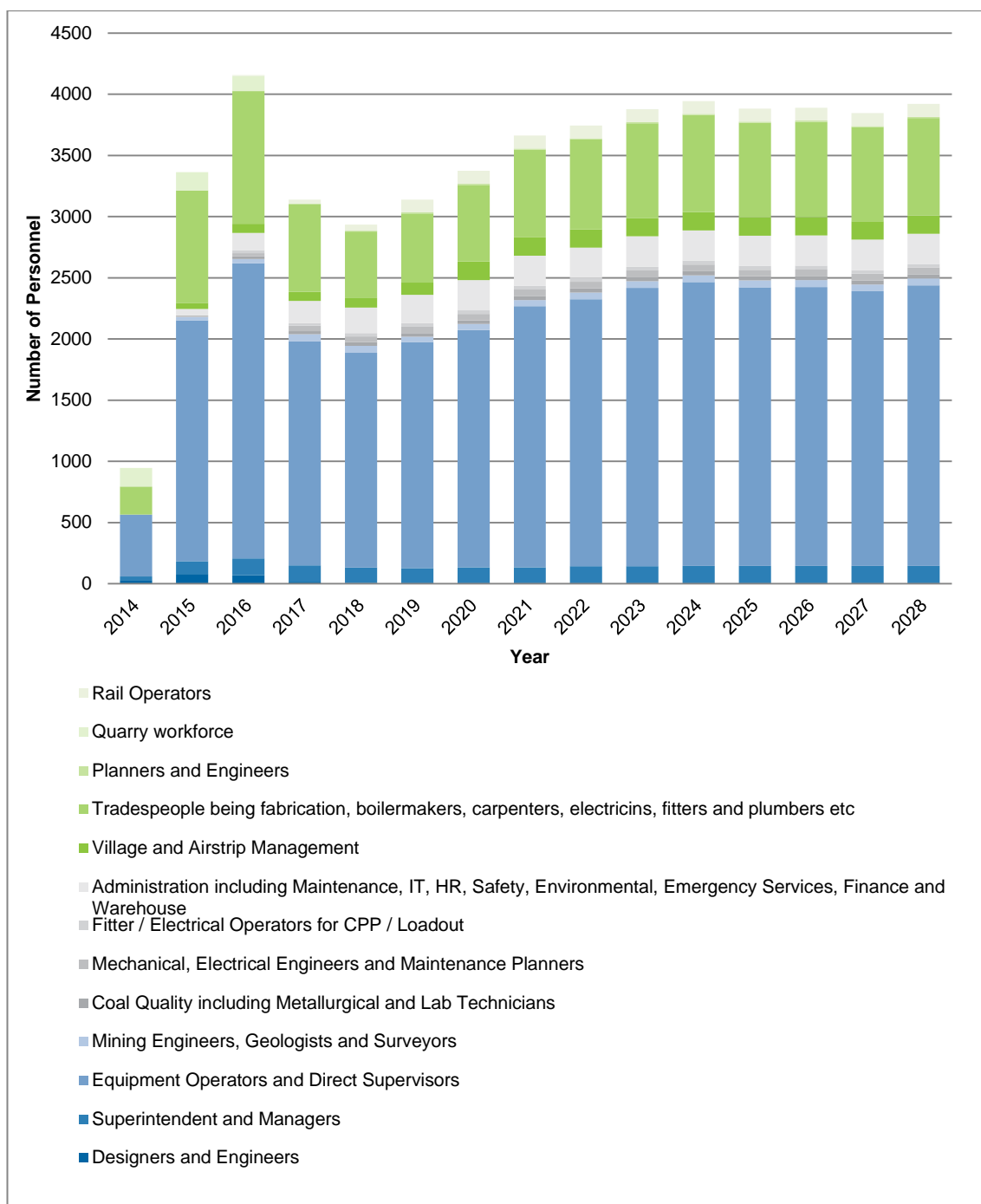
- Open cut and underground mine operators including operation of excavators, dozers, drag lines and longwall mining equipment
- CHPP operators



- Tradespeople including diesel fitters and electrical tradespeople and mechanical fitters
- Technical services and support including: geological, engineering, health safety and environment services and laboratory and quality control.
- Machinery operation and maintenance workers
- Managers and production supervisors
- Administrative and support areas such as office staff, catering, cleaning and transportation
- Rail services and maintenance staff for maintenance of engines, rolling stock, rail lines and rail facilities.



Figure 4 Total workforce skills (Mine and Rail)



Both construction and operation workforces are intended to be sourced on a fly in-fly out (FIFO) basis with Adani providing flights between the proposed airport at the mine site and major population centres on the east coast of Queensland. During the early stages of construction, existing airstrips at Doongmabulla, Labona or Moray Downs will be used, until the proposed air strip is constructed. Workers constructing the eastern end of the proposed rail alignment will be flown to Moranbah airport and transported by bus to temporary accommodation camps along the rail alignment.



During construction, mine construction workforce and some of the rail construction workforce will be accommodated at the workers accommodation village close to the proposed mine and airport. Three additional temporary accommodation camps will be established along the proposed rail alignment for rail construction workers.

During operation, all workers will be accommodated at the worker accommodation village near the proposed mine.

Depending on interest, workers for the operation phase may also be recruited from local and regional communities such as Clermont, Emerald and Charters Towers and would be transported to the mine site on a bus in-bus out (BIBO) basis. Due to road distances, there is no opportunity for workers to travel between the proposed mine and their homes between shifts; all workers will be required to stay at the workers accommodation village when on-roster.

2.4 Key stakeholder issues

2.4.1 Landholder issues

Landholders have various attitudes towards mining in the area and varying concerns. For many landholders their attitude is shaped by the potential social and environmental issues associated with mining development. Engaging in purposeful landholder negotiation and giving appropriate compensation has an impact on property owner attitudes towards mining. Some of the issues include, but are not limited to:

- Potential changes to the living environment from increased noise and dust and reduced visual amenity
- Potential changes to the natural environment from changes to overland flow paths with potential for increased ponding/flooding
- Restriction of stock movements and increased labour requirements to manage the cattle operations
- Impacts on drinking water supplies, water bores and groundwater
- Increased fire risk along the rail corridor.

2.4.2 Local/Regional community issues

Mine development can deliver positive outcomes for local communities but can also have negative impacts. Some of the issues identified at the community level include, but are not limited to:

- Draw of labour from local business into the mining sector reducing the ability of local business to meet demands for goods and services
- Housing availability and affordability issues and related higher cost of living
- Increased pressure on emergency (social) housing as a result of increased mining activity
- Increased traffic on the local roads and the Gregory Development Road and the resultant safety issues, delays to emergency response services and increase need for upgrade and road maintenance



- Increased demands on emergency services, including police, as well as health and education services and telecommunication services as a result of an increased population in the Project area
- Increased demands on social services to respond to the needs of the FIFO workforce
- Potential or perceived increase in crime and antisocial behaviour from the workforce in camps impacting on social values of the communities.

2.4.3 Indigenous community issues

Some of the issues expressed by the two Indigenous groups consulted to date are:

- Consider each indigenous group separately
Each group has had differing experiences in the past (in terms of the degree of alienation from their traditional country), different leadership and community structures and cultural/spiritual responsibilities
- Involve indigenous people in projects from the outset
Across much of the area there has been significant disturbance of cultural and natural values of the land and waterways due to clearing of the timber, changes to waterways and poor waste water treatment in previous mining operations. This has meant there have been significant changes in the flora of the area and the existence and migratory patterns of local fauna. The result has been that even Indigenous people that were intimately familiar with their country have had to re-learn it. By involving people in projects from the outset they may better understand the Project and can be a part of changes as they happen to their country
- Respect and acknowledge differing cultural practices and requirements of Indigenous and non-Indigenous groups of people
- High values on water quality and waterways in particular
In the past waterways around the Nebo area (outside of the Project area) were a focus for food gathering (ducks and seafood) and drinking water supply. Poor previous mining practices in the past has degraded these waterways to they can no longer be used for food gathering
- Maintain the ability for indigenous people to access country
One Aboriginal group currently uses trips to their traditional lands to reconnect disengaged Indigenous youths from the region, teaching them the history and understanding of the country of their people, showing them hunting and survival skills involving camping, hunting and fishing. It is important that this activity can still be undertaken.

2.5 Potential social impacts

The potential impacts of the Project have been identified through SIA consultations, desktop review of literature, and information from discussions with landholders undertaken by Adani personnel.



Adani is already working with landholders regarding land acquisition and compensation. Land acquisition processes can be stressful and time consuming for landholders and Adani is following established protocols in this regard. Landholders also have access to support from valuers, legal advisers and other professionals at no cost to themselves as part of the land acquisition and compensation process.

The proposed rail line and, to a lesser extent the proposed mine, will sever properties and create access issues for landholders. As part of land negotiations stock and occupational crossing locations will be agreed so as to minimise these impacts. It is also proposed to fence the majority of the proposed alignment.

Noise and air quality studies for the mine and rail have determined that noise and dust emissions from these components of the project are within levels specified in State government environmental protection policies and impacts on landholders and other members of the community are not expected. A visual impact assessment was also undertaken and found minimal impact on landholders and the community.

Given the proposed workforce strategy, including accommodation of all workers in accommodation village or camps, and remoteness of the project from the nearest communities, negative social impacts commonly associated with non-resident workforces are not expected for the Project. During construction, there is some potential for workers from the eastern temporary accommodation camps to visit Moranbah when not on shift, however the numbers involved will be small and significant issues are not expected.

Workforce behaviour in the community, in accommodation facilities and while at work is an important issue and Adani will develop a code of conduct for workers that will set out its expectations in relation to behaviour. Terms of employment will include consequences for workers not in accordance with this code of conduct.

Recent studies have indicated that worker wellbeing can be affected by separation from families and social networks while on roster and that tensions may arise in family relationships as a result of FIFO work. Adani intends to incorporate employee wellbeing and support programs into its health and safety management plans to assist workers and their families to manage these issues, as well as their general health.

The project does offer significant employment opportunities. As there are skills shortages in some of the areas required for mine and rail construction and operation there are also opportunities to gain training and qualifications. Skills shortage is a risk to the project and Adani will need a coherent workforce recruitment, education and training program to ensure a stable and sustainable workforce.

While unemployment is very low in the Isaac Region, Adani will look into opportunities to recruit people already residing in the local area. It is likely that a number of employees will be employed from within the regional study areas, and elsewhere in Queensland. Travel distances to the mine site preclude workers returning home after each shift, and this is likely to discourage workers and their families from relocating to local and regional centres.

Resident population growth associated with the Project is expected to be limited. The proposed workforce arrangements will limit workers and their families relocating to the local and regional area. Economic stimulation in the local and regional study area as a result of Adani's Local Buying Policy and proposed local industry participation plan may result in indirect population growth if businesses seek to employ more workers to service contracts with Adani. Such



growth is likely to be within population growth forecasts for the region as Office of Economic and Statistical Research factors this type of population growth into its forecast methodology.

On this basis, increased pressure on housing affordability and availability and on community services and infrastructure is not expected. Through membership of the Clermont Preferred Futures Group and ongoing liaison with regional councils, Adani will track demographic changes potentially arising from the Project and if adverse impacts appear likely, Adani will work with these stakeholders to develop mitigation approaches.

The hazard and risk assessment conducted for the EIS identified that accidents involving person or vehicle interactions with the proposed rail line were a significant risk, as were accidents associated with interactions with construction traffic. This has been addressed through design measures wherever possible, such as grade separation of all but minor road crossings and fencing of much of the alignment. Construction traffic management plans and road use management plans will also be a critical part of addressing this risk.

One particular concern is the potential impact on emergency service providers, who are reporting resourcing concerns and challenges associated with the remoteness of the area and unpredictability in relation to projects and associated population growth. Adani will seek to be as self sufficient as possible in relation to medical and fire fighting services and will also have security at the workers accommodation village. However, there are instances when emergency services support will be required, for example, if injured or sick persons need to be transported, or if a crime is suspected and police are required to investigate. Fire services may also be required to assist if a large fire occurs, and if road accidents occur, Queensland Police Service (QPS), Queensland Fire and Rescue Services (QFRS) and Queensland Ambulance Service (QAS) are likely to be required to attend.

Adani will continue to liaise with emergency services and involve emergency services in development of emergency management and response plans for the mine and the workers accommodation village. Adani will also provide regular information updates to emergency service providers and provide support to emergency services personnel required to attend the proposed mine.

Table 2 presents a summary of the potentially social impacts associated with the Project as identified through the SIA. For the detailed social impact assessment refer to the SEIS Volume 4, Appendix D1.

Table 2 Summary of key social impacts and significance

Impact	Timing / project phase	Status of impact	Unmitigated L/C rating	Impacted party	Mitigated L/C rating
Housing and accommodation					
Mine					
Higher cost of living in Clermont as a result of higher housing prices, rental prices as workers in support industries seek to reside in the local community	Construction and Operation	Negative	Medium	Local and regional communities, and smaller centres in the regional area	Low



Impact	Timing / project phase	Status of impact	Unmitigated L/C rating	Impacted party	Mitigated L/C rating
Workforce management					
Mine					
Physical and mental health isolation, separation from families, etc)	Construction and Operation	Negative	Medium	Workforce	Low
Impacts on families in source communities through separation	Construction and Operation	Negative	Medium	Workforce and families	Low
Rail					
Physical and mental health isolation, separation from families, etc)	Construction and Operation	Negative	Medium	Workforce	Low
Impacts on families in source communities	Construction and Operation	Negative	Medium	Workforce and families	Low
Economic growth and regional development					
Mine					
Employment, apprenticeships, training associated with local businesses to attract and retain people within the local community working for local businesses.	Construction and operation	Positive	High	Local community	High
Provision of goods and services to the project from local businesses in Clermont increasing the ability of local business to remain stable or grow	Construction and operation	Positive	Medium	Local community	Medium
Providing employment and training opportunities for Indigenous people	Construction and operation	Positive	Medium	Indigenous community	Medium
Development of the local and parts of the wider regional area through Royalties for the Region	Operation	Positive	High	Local and parts of the regional community	High
People move from being employed in local business into the mining sector reducing the ability of local business to meet demands for goods and services.	Construction and operation	Negative	Medium	Local community	Low
Rail					
Employment, apprenticeships, training within local businesses in Clermont and Moranbah supplying the rail construction	Construction	Positive	High	Local community	High
Provision of goods and services to the project from local businesses in Clermont increasing the ability of local business to remain stable or grow	Construction	Positive	Medium	Local community	Medium



Impact	Timing / project phase	Status of impact	Unmitigated L/C rating	Impacted party	Mitigated L/C rating
Providing employment and training opportunities for Indigenous people	Construction and operation	Positive	Medium	Indigenous community	Medium
People move from being employed in local business to take advantage of potential higher paid construction work reducing the ability of local business to meet demands for goods and services	Construction	Negative	Medium	Local community	Low (no DIDO)
Roads, traffic and safety					
Mine					
Traffic disruption along the Gregory Development Road and Flinders Highway (from Townsville), Peak Downs Highway (from Mackay), during construction	Construction	Negative	Medium	Road users	Medium
Increased traffic on the Gregory Development Road, including safety of tourist traffic not familiar with large heavy vehicles on narrow roads	Operation	Negative	Medium	Road users	Medium
Increased maintenance requirements on local and state roads as a result of mine construction and operation	Construction and operation	Negative	Medium	Road users, Council and Transport and Main Roads	Low
Rail					
Traffic disruption along the Gregory Development Road and Flinders Highway (from Townsville), Peak Downs Highway (from Mackay), during construction	Construction	Negative	Medium	Road users	Medium
Delays to traffic, including emergency services as a result of level crossings along the rail corridor	Operation	Negative	Medium	Road users	Low
Landholder and amenity impacts					
Mine					
Changes to the living environment from increased noise and dust and reduced visual amenity.	Construction and operation	Negative	Medium	Landholders	Low (bought property)
Disruption to cattle operations and increased labour requirements	Construction and operation	Negative	Medium	Landholders	Low (landholder agreements in place)
Rail					
Changes to the living environment from increased noise and dust and reduced visual amenity	Construction and operation	Negative	Medium	Landholders	Low (design located away from homesteads)



Impact	Timing / project phase	Status of impact	Unmitigated L/C rating	Impacted party	Mitigated L/C rating
Changes to the natural environment from changes to overland flow paths with potential for increased ponding	Construction and operation	Negative	Medium	Landholders	Low
Disruption to cattle operations and increased labour requirements.	Construction and operation	Negative	Medium	Landholders	Medium
Increased fire risk along the rail corridor.	Construction and operation	Negative	High	Landholders	Medium
Impacts on social services and infrastructure					
Mine					
Increased demands on emergency services, including police, as well as health and education services as a result of an increased population at the mine site.	Construction and operation	Negative	Medium	Government agencies and services	Low
Increased demands on social services to respond to the needs of the FIFO population.	Construction and operation	Negative	Medium	Service providers in the local community as well as source communities	Low
Rail					
Increased demands on emergency services, including police, as well as health and education services as a result of populations in construction camps	Construction	Negative	Medium	Government agencies and services	Low
Increased demands on social services to respond to the needs of construction workers	Construction	Negative	Medium	Service providers in the local community as well as source communities	Low
Impacts on community values					
Mine					
Increased crime and antisocial behaviour within the local communities from the FIFO workforce.	Construction and operation	Negative	Low	Local communities	Low
Rail					
Increased crime and antisocial behaviour within the local communities from the FIFO workforce.	Construction	Negative	Low	Local communities	Low

2.6 Management response

Adani has developed a range of strategies to address key social impacts. Table 3 shows the extent to which the various strategies address identified social impacts. Draft action, monitoring and reporting plans are provided in Section 3. Management and mitigation of social impacts will also be supported by a stakeholder engagement plan as set out in Section 4.

As discussed in the SIA, social impact assessment and management is very temporal in nature, and changes in demographic characteristics, micro and macro economic performance and a range of other factors can significantly change the nature and significance of impacts associated with a project. Hence, the management strategies presented in this SIMP are based on an adaptive approach and intended to be regularly reviewed.

While Adani will have overall responsibility for the development, implementation and monitoring of the impact management strategies, some responsibilities of impact management will be devolved by and allocated to the relevant construction and operations contractors. Based on advice from OCG, Adani will monitor and review impacts and management strategies on an annual basis during each year of construction and on an annual basis during the first two years of operations. It is anticipated that thereafter the operations impacts arising from the Project will stabilise. From that point onwards impacts will be monitored and management strategies will be updated annually and reported in the company's annual reporting processes.

Table 3 Impacts and key mitigations matrix

Impacts	Mitigation strategies										
	Project design	Landholder agreements and land management	Stakeholder Engagement	Housing and accommodation	Workforce management - behaviour	Workforce management - recruitment, education and training	Workforce Management Health, Safety and Wellbeing	Local Industry Participation Plan	Community health and safety	Emergency services planning and Consultation	Community Development
Housing and accommodation											
Increased cost of housing			✓	✓				✓			✓
Workforce management											
Physical and mental health isolation, separation from families, etc)						✓	✓				
Impacts on families in source communities							✓				
Economic growth and regional development											
Employment, apprenticeships, training			✓			✓	✓	✓			
Local business supply of goods and services			✓	✓				✓			
Retention of staff in local businesses			✓				✓	✓			✓
Indigenous employment			✓			✓	✓	✓			✓

Impacts	Mitigation strategies										
	Project design	Landholder agreements and land management	Stakeholder Engagement	Housing and accommodation	Workforce management - behaviour	Workforce management - recruitment, education and training	Workforce Management Health, Safety and Wellbeing	Local Industry Participation Plan	Community health and safety	Emergency services planning and Consultation	Community Development
Community health, safety and security											
Road, traffic and safety											
Traffic disruption during construction	✓	✓	✓						✓	✓	
Increased traffic during construction and operation	✓	✓	✓						✓	✓	
Increased maintenance requirements for roads	✓		✓								✓
Delays to emergency services at rail crossings	✓		✓						✓	✓	
Landholder and amenity											
Increased noise and dust and reduced visual amenity	✓	✓	✓								
Changes to overland flow paths and increased flooding	✓	✓	✓								
Disruption to cattle operations and increased labour requirements	✓	✓	✓								
Increased fire risk along the rail corridor	✓	✓	✓							✓	
Social infrastructure and services											
Increased demands on emergency services, health and education			✓				✓			✓	✓
Increased demands on social services			✓	✓			✓				✓
Community values and change											
Increased crime and antisocial behaviour			✓		✓						✓

Other technical study management plans that will also influence the management of potential social impacts and opportunities include:

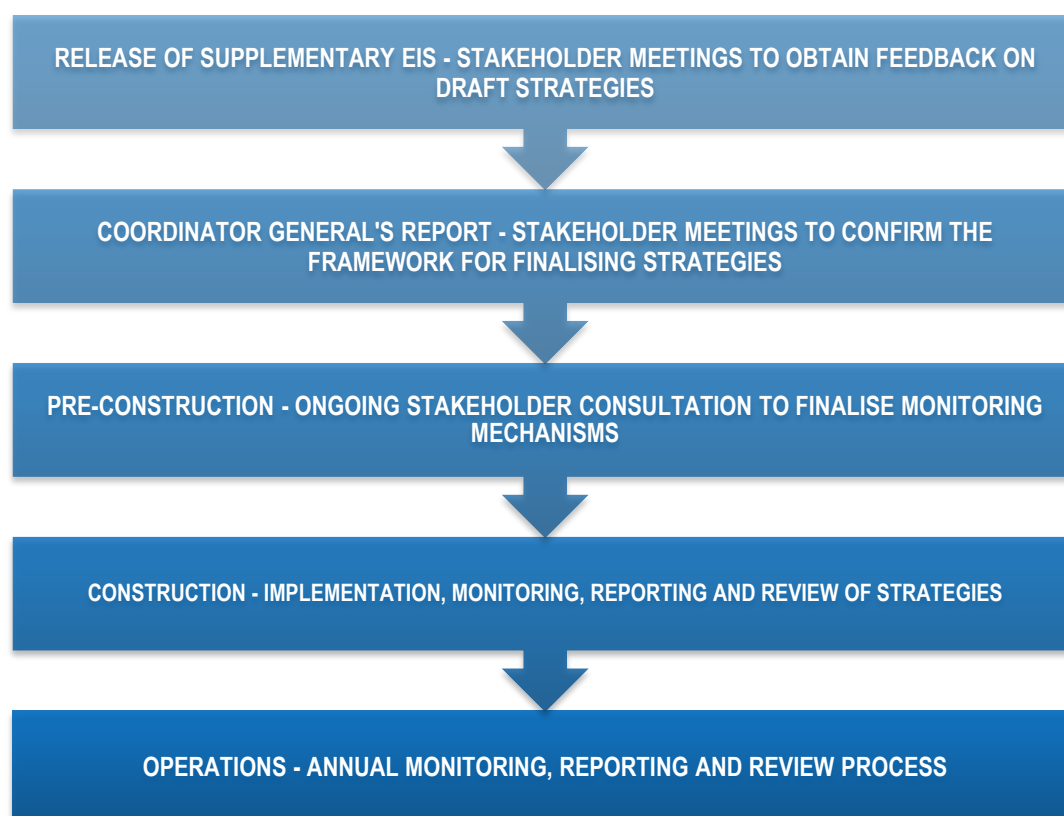
- Environmental Management Plan (construction and operation)
- Cultural Heritage Management Plan
- Traffic Management Plan
- Emergency Response Plan.

3. Draft action plans, monitoring and reporting

3.1 Introduction

This section consolidates the various mitigation and management measures developed in the Project SIA report (SEIS Volume 4 Appendix D1) into key/overarching management strategies that will be implemented by Adani. It also outlines monitoring mechanisms and stakeholders who will be involved in the finalisation and implementation of the strategies. Figure 5 details the consultation steps to finalise and implement the social impact management strategies with key stakeholders.

Figure 5 Social impact management strategy finalisation and implementation process



For details on specific contents of some of the management strategies refer to the mitigation and management strategies section in the project SIA report.

Implementation and monitoring of the management strategies will be delivered as stated in Section 2.6.

The key social impact management strategies developed for the Carmichael Coal Mine and Rail Project are detailed in Sections 3.2 to 3.8.

3.2 Project design strategy

Draft action plan	Project design
Approach	
Summary of issues	<ul style="list-style-type: none"> There are a number of potential impacts on landholders and road users that can be addressed through project design. In particular, issues relating to access, rail safety, road safety and flooding can be addressed through design.
Management objectives	<ul style="list-style-type: none"> Design measures respond to safety risk profile for community, road users and landholders Impacts on access via road network or within properties are minimised Land productivity in flood prone areas is not further degraded by flooding and afflux.
Mitigation approach	<ul style="list-style-type: none"> Alignment of the rail corridor to follow property boundaries as far as practicable Optimisation of the rail corridor, temporary construction areas and off-site mine infrastructure to avoid dwellings, other farm buildings, stock yards and other farm infrastructure wherever possible Grade separation between rail and existing roads at Gregory Development Road, Kilcummin Diamond Downs Road, Amaroo Road and Avon Road Railway design to manage stream and overland flows such that ponding and exacerbation of flooding is controlled Fencing of the alignment Stock and occupational crossings as negotiated with landholders Upgrade of Carmichael Moray Road and intersection with Gregory Developmental Road (Adani is finalising discussions with the IRC about upgrading and realigning the road to support the construction and operation of the Project. These discussions are likely to result in a formal agreement between the IRC and Adani). Construction access routes to minimise impacts on local road users.
Preliminary performance indicators	<ul style="list-style-type: none"> Incidents involving members of the public Design criteria are met Satisfaction of landholders as per Action Plan for Landholder Agreements and Land Management Accreditation as railway Infrastructure and Operations Manager compliance with legislative requirements in relation to rail safety
Monitoring and reporting	
<ul style="list-style-type: none"> Incident reporting in relation to incidents involving members of the community through construction and operation Evidence of timely response to complaints and enquiries from Consultation Manager database Design checklist. 	
Stakeholders	
<ul style="list-style-type: none"> Adani Landholders Road users IRC 	
Timeframe	
<ul style="list-style-type: none"> Preconstruction/design development 	

Draft action plan	Project design
<ul style="list-style-type: none"> • Mine construction and operation • Rail construction and operation 	

3.3 Land access and landholder management strategy

Draft action plan	Landholder agreement and land management
Approach	
Summary of Issues	<ul style="list-style-type: none"> • Minimal impacts on amenity are predicted • Rail line in particular will sever properties and affect property and stock management • Concern regarding potential for exacerbation of flooding and afflux • Concerns regarding potential for fire from trains and vehicles.
Management objectives	<ul style="list-style-type: none"> • Impacts on landholdings are minimised • Impacts on landholders and their activities in the property are minimised • Positive ongoing landholder relations.
Mitigation approach	<ul style="list-style-type: none"> • Land access protocols , including (but not limited to) permissions to enter the property, accessing different parts of the property, opening and closing of fence gates, speed of Adani vehicles on private properties, protocols relating to weed management. • Statutory requirements in relation to land acquisition and compensation are followed • Close consultation with landholders regarding project design measures to minimise impacts • Ongoing program of landholder liaison during preconstruction, construction and operation in Stakeholder Engagement Strategy • Develop programs to foster integration between the Adani, project workforce and the local community • Fire and dust management programs implemented through the Project EMP.
Preliminary performance indicators	<ul style="list-style-type: none"> • Evidence of regular interfacing with landholders • Satisfaction with acquisition and compensation process, as measured through complaints and appeals • Compliance with agreed land access protocols.
Monitoring and reporting	
<ul style="list-style-type: none"> • Evidence that statutory processes have been adhered to from compensation and acquisition records • Evidence of timely response to complaints and enquiries from Consultation Manager database • Quantitative Monthly Reports via Consultation Manager database • Note that outcomes of compensation and acquisition negotiations will remain confidential between Adani and landholders. 	
Stakeholders	
<ul style="list-style-type: none"> • Adani • Landholders 	
Timeframe	
<ul style="list-style-type: none"> • Preconstruction/design development • Mine construction and operation • Rail construction and operation 	

3.4 Housing and accommodation strategy

Draft action plan	Housing accommodation
Approach	
Summary of issues	<ul style="list-style-type: none"> Stakeholders identified pressure on housing availability and affordability Proposed workforce strategy requires all construction and operation workers to utilise accommodation village/temporary construction camps and thus, there will be no direct increase in demand for housing Rail operations workforce may live locally at Bowen or Mackay but will be a very small number Population growth may occur due to economic stimulation in the local and regional study areas but is likely to be within population forecasts.
Management objectives	<ul style="list-style-type: none"> Utilisation of Adani accommodation village/temporary construction camps by construction and operations workforce Respond to housing and accommodation issues in local and regional communities if required.
Mitigation approach	<ul style="list-style-type: none"> Provision of accommodation in village/temporary construction camps for all construction and operation workers All mine workers resident in worker accommodation village while on roster Integrated Housing Strategy to be updated as Project planning progresses. Draft Integrated Housing Strategy is included in Appendix B Collaboration with Clermont Preferred Futures Group, the Isaac Affordable Housing Trust, Regional councils of Isaac, Townsville, Charters Towers, Whitsunday, Mackay and Central Highlands, Department of State Development, Infrastructure and Planning (DSDIP) and active industry networks in the region to monitor changes to population, housing demand in the region, verify the assessment of potential housing impacts in the SIA and consider any potential cumulative impacts of multiple rail and port projects in the Bowen and Mackay regions Additional measures if impacts attributable to the project are identified.
Preliminary performance indicators	<ul style="list-style-type: none"> Utilisation of Adani worker accommodation village/temporary accommodation camps Worker satisfaction with worker accommodation village/temporary accommodation camps Further mitigation if project related population growth in local and regional communities exceeds population forecasts.
Monitoring and reporting	
<ul style="list-style-type: none"> Rail construction workforce accommodation statistics Growth in employee numbers in local businesses due to project related contracts and demand on local and regional housing Worker satisfaction surveys regarding accommodation. 	
Stakeholders	
<ul style="list-style-type: none"> Adani Workers Clermont Preferred Futures Group IRC 	

Draft action plan	Housing accommodation
<ul style="list-style-type: none"> Townsville City Council Charters Towers Regional Council Whitsunday Regional Council Central Highlands Regional Council DSDIP QPS QFRS Regional housing agencies DHPW 	
Timeframe	
<ul style="list-style-type: none"> Preconstruction (to establish baseline data) Mine construction and operation Rail construction and operation 	

3.5 Workforce management strategy

Draft action plan	Workforce management
Approach	
Summary of issues	<ul style="list-style-type: none"> Presence of non-resident workforces causes community concern in relation to behaviour and increased demand on community services and infrastructure The proposed workforce approach will minimise presence of workers in existing communities There is a current skills shortage in some key areas required for construction and operation The project provides significant opportunities for employment and training for residents at the regional level as well as throughout Queensland and Australia Data is emerging regarding potential health and wellbeing impacts on people working remotely from their home or family base, and effects on families when one adult is away at work There are stringent requirements regarding workplace health and safety that must be complied with at all worksites and accommodation village/temporary construction camps.
Management objectives	<ul style="list-style-type: none"> A positive, tolerant and safety oriented culture is established amongst the workforce Recruitment and training programs address skills shortages and sustainably maintain a reliable, skilled workforce Recruitment and training programs address potential hurdles to traditionally under-represented groups joining the mining industry Worker health, safety and wellbeing is recognised as fundamental to successful operations.
Mitigation approach	<ul style="list-style-type: none"> A code of conduct will be in place with clear consequences for employees and contractors if the code is not followed Workers security, behaviour and offending issues will be managed through ongoing engagement with QPS for advice to manage security, behaviour and offending issues at the workers accommodation village All construction and operation workers to be accommodated in worker accommodation village/temporary accommodation camps Revised workforce data will be provided to DETE at the time of

Draft action plan	Workforce management
	<p>Financial Investment Decision (FID)</p> <ul style="list-style-type: none"> Develop a workforce contracting strategy for operations phase A recruitment, education and training plan will be developed in consultation with Department of Education, Training and Employment (DETE) to address skill shortages by both Adani and contractors, this will include among other things engagement with FIFO Coordinators from potential source communities in Queensland Specific training targets will be developed by FID for Adani and contractor workforce Work with DETE to provide information on the type and skills of overseas workers incase required Engage in ongoing consultations with Aboriginal and Torres Strait Islander and Multicultural Affairs (DATSIMA) and local Indigenous community through the Cultural Heritage Management Plan (CHMP) and native title processes to develop suitable training and cultural awareness programs Develop a structured apprentice and trainee program to work with existing training providers to employ and train apprentices and trainees. The first stage of that plan has been implemented with Adani having made a commitment to commence with a total of 6 apprentices by early 2013 through programs such as the “Unified to Qualified” program based in the Whitsunday region Commitment to adhere to requirements of the <i>Coal Mining (Safety and Health) Act 1999</i> and <i>Work Health and Safety Act 2011</i> Health and safety plans will include a wellbeing program, including safe work practices, fatigue management, management of medical conditions, fitness and emotional and mental health and programs for financial planning A final Workforce Management Plan will be developed by FID.
Preliminary performance indicators	<ul style="list-style-type: none"> Development and compliance with the final Workforce Management Plan Training targets achieved by Adani and contractors.
Monitoring and reporting	
<ul style="list-style-type: none"> Proportion of traditionally under-represented groups recruited and trained Proportion of workers from regional study area and from Queensland Number of employees undertaking or completed traineeships, apprenticeships and other training activities Results of annual worker health and wellbeing survey Workforce retention rates. 	
Stakeholders	
<ul style="list-style-type: none"> Adani Workers Training and recruitment providers DETE FIFO Coordinators from potential source communities in Queensland – Cairns, Gold Coast and Wide Bay DATSIMA QPS Health services providers 	
Timeframe	
<ul style="list-style-type: none"> Mine construction and operation 	

Draft action plan	Workforce management
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- Rail construction and operation

3.6 Local industry participation strategy

Draft action plan	Local industry participation plan
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Approach

Summary of issues	<ul style="list-style-type: none"> • There are a number of business in the regional study area that provide goods and services that will be required during the construction and operation phases • A large, long term mining operation can provide significant opportunities for smaller regional businesses • Targeted strategies and interaction with community representative bodies will be required if project benefits are to flow to the regional communities • As smaller businesses can find it difficult to compete with large businesses, proactive strategies are required to maximise local employment opportunities and benefits to regional businesses.
Management objectives	<ul style="list-style-type: none"> • Maximise opportunities for businesses in the regional area to provide local employment, goods and services to the project • Comply with Adani Local Buying Policy (refer to Appendix C) • Comply with the Queensland Resources and Energy Sector Code of Practice for Local Content (the Code) • Comply with Adani's Australian Industry Participation Plan (AIP Plan).
Mitigation approach	<ul style="list-style-type: none"> • Adani will provide full, fair and reasonable opportunity to capable local industry to participate in its Project by implementing the strategies outlined in its AIP Plan and the Code • Prepare an Indigenous Participation Plan in consultation with DATSIMA, local Indigenous Community and involvement in the CHMP and Native Title processes • Collaborate with Central Highlands, Isaac, Townsville, Whitsunday and Charters Towers Regional Councils, Clermont Preferred Futures Group, and local businesses in conjunction with the Office of Advanced Manufacturing and the Industry Capability Network (ICN) in identifying eligible local businesses and providing these businesses with full, fair and reasonable opportunity to supply the Project • Adani will appoint an Australian Industry Opportunity Officer to further identify opportunities for local engagement • Adani has a Local Buying Policy (see Appendix C) in place and has committed to implementation of its Australian Industry Participation Plan and the Code
Preliminary performance indicators	<ul style="list-style-type: none"> • Adani will monitor and evaluate local content strategy effectiveness and will report annually on the effectiveness of the Code's implementation • Under its AIP Plan commitments, Adani will report to AusIndustry on activities undertaken to further local industry involvement in the Project • Any gaps in Australian industry capability activities undertaken to further local industry engagement.

Monitoring and reporting

Draft action plan	Local industry participation plan
<ul style="list-style-type: none"> Number, proportion and value of contracts for business based in Clermont Number, proportion and value of contracts for business based in the Isaac, Charters Towers, Central Highlands, Townsville, Mackay and Whitsunday Regions Adherence to Local Buying Policy and its Australian Industry Participation Plan and the Code. 	
Stakeholders	
<ul style="list-style-type: none"> Adani Regional businesses Isaac, Charters Towers, Central Highlands, Townsville, Whitsunday and Mackay Regional Councils Clermont Preferred Futures Group Office of Advanced Manufacturing ICN AusIndustry Queensland Resources Council 	
Timeframe	
<ul style="list-style-type: none"> Mine operation Rail operation 	

3.7 Community safety strategy

Draft action plan	Community health and safety
Approach	
Summary of issues	<ul style="list-style-type: none"> Increased risk of accident involving project-related vehicles and trains was a key concern of stakeholders including landholders, road users and emergency service providers and was a significant risk identified in the hazard and risk assessment, requiring mitigation Operation of rail facilities is subject to legislative requirements The hazard and risk assessment did not identify any significant community health and safety issues associated with the mine or other significant risks associated with the rail.
Management objectives	<ul style="list-style-type: none"> No increase in risk of accidents to landholders and road users.
Mitigation approach	<ul style="list-style-type: none"> Design measures including fencing of the railway, grade separation of all but minor road crossings and provision of occupational and stock crossings for landholders Adherence to Australian standards and all legislative requirements in relation to safe operation of the rail component Preparation and implementation of traffic management plans in consultation with Queensland Department of Transport and Main Roads, IRC and emergency service providers Communication with road users regarding potential traffic changes and delays Road and intersection upgrades as required to address increased traffic volumes Stock routes managed through agreement with landholders, IRC and Department of Transport and Main Roads (DTMR).
Preliminary performance indicators	<ul style="list-style-type: none"> Incidents involving members of the public Design criteria are met Accreditation gained and maintained as Railway Infrastructure Manager and a Railway Operations Manager under the provisions of the Transport (Rail Safety) Act 2010.

Draft action plan	Community health and safety
Monitoring and reporting	
<ul style="list-style-type: none"> Incident reporting in relation to incidents involving members of the community through construction and operation, with frequency and manner of reporting to be determined in consultation with key stakeholders during the finalisation of the SIMP Design checklist Information releases regarding traffic changes and potential delays As required in relation to Railway Operations and Infrastructure Manager accreditation. 	
Stakeholders	
<ul style="list-style-type: none"> Adani Road users Landholders DTMR IRC Emergency service providers 	
Timeframe	
<ul style="list-style-type: none"> Mine construction and operation Rail construction and operation 	

3.8 Community health and emergency services strategy

Draft action plan	Emergency services planning and consultation
Approach	
Summary of issues	<ul style="list-style-type: none"> Emergency service providers indicated concern regarding resources and ability to respond, particularly to large and remote incidents Although Adani seeks to be self-sufficient in relation to emergency management, there are some circumstances where Queensland Police Service (QPS) or Queensland Ambulance Service (QAS) has statutory responsibilities Legislative requirements are in place regarding workplace health and safety management as well as fire safety in buildings and other installations Stakeholder concern about Project's demand on health services.
Management objectives	<ul style="list-style-type: none"> Provide medical, security and fire fighting services to minimise additional pressure on health and emergency services Proactively engage with emergency services in relation to emergency response planning and provision of information required to allow forward planning by emergency services.
Mitigation approach	<ul style="list-style-type: none"> Initial and ongoing consultation with Queensland Ambulance Service, Queensland Fire and Rescue Service (QFRS) and Queensland Police Service in relation to emergency response planning Involvement of emergency services in the development of the site emergency management plan, including evacuation procedures, collaboration between site and emergency services personnel, patient transport and emergency response Provision of information regarding workforce size, activities being undertaken and emergency response services and facilities at the mine site Ongoing consultation with Queensland Health regarding medical services provision and Project demand on health services in the region and develop health management plan for project workforce

Draft action plan	Emergency services planning and consultation
	<ul style="list-style-type: none"> • Making resources available to emergency service providers when at the mine site, ranging from office space to use of equipment • Registration of the proposed airstrip with the Royal Flying Doctors Services (RFDS).
Preliminary Performance Indicators	<ul style="list-style-type: none"> • To be agreed with emergency services during consultation
Monitoring and reporting	
<ul style="list-style-type: none"> • Incident reporting in relation to incidents involving members of the community through construction and operation, with the quantum and frequency of reporting to be determined in consultation with key stakeholders during the finalisation of the SIMP • Reporting to emergency services on agreed indicators (for example workforce numbers, on-site facilities, upcoming activities) 	
Stakeholders	
<ul style="list-style-type: none"> • Adani • QPS • QAS • QFRS • Queensland Health • RFDS • Contractors and sub-contractors 	
Timeframe	
<ul style="list-style-type: none"> • Mine construction and operation • Rail construction and operation 	

3.9 Stakeholder engagement strategy

Draft action plan	Project design
Approach	
Summary of issues	<ul style="list-style-type: none"> • Engagement with stakeholders is an important component to managing and monitoring the potential social impacts and opportunities of the Project. Stakeholder consultations will continue throughout the Project. Outlined below is a framework which is being used to guide the development of the strategy.
Management objectives	<ul style="list-style-type: none"> • Identify and inform stakeholders about the project's scope, timing and potential impacts and benefits • Engage stakeholders through a variety of channels and capture their concerns and opinions about the project to inform the project team's decision making process • Ensure early identification of potential stakeholder issues and implement timely and appropriate mitigation strategies • Create awareness and acceptance of the project with stakeholders • Manage land access and acquisition processes to minimise project delays • Position Adani as a good corporate neighbour that values community input.
Mitigation approach	<ul style="list-style-type: none"> • The strategy will focus on developing and maintaining partnerships. • Adani will continue to work with the Clermont Preferred Futures Group in line with Isaac Regional Council's (IRC) preference for this group to represent the Northern Galilee Basin and will continue to

Draft action plan	Project design
	<p>work with local businesses, IRC and relevant State agencies in the development of the group to address stakeholder interests in the North Galilee Basin.</p> <ul style="list-style-type: none"> Engagement undertaken and relationships developed during the EIS stage of the project will continue and all conditions within the EIS approval will be incorporated into the strategy/plan. Adani will work in partnership with affected landowners and develop a communication approach to suit both parties. All contact with landholders will be coordinated and a single point of contact for landholders will be provided through a landholder liaison officer. Adani is actively in discussions with other mining proponents in the North Galilee Basin to discuss potential for a coordinated approach to a range of infrastructure. These discussions are preliminary only and the outcome will depend upon the commercial decision of each of the proponents, however the relationships have been established and the discussions will continue.
Preliminary performance indicators	<ul style="list-style-type: none"> Key partnerships are identified and established Stakeholders are accurately informed of project activities Project feedback mechanisms are in place and operating effectively
Monitoring and reporting	
<ul style="list-style-type: none"> Reporting in relation to key stakeholder communication activities Evidence of timely response to enquiries, issues and complaints from Consultation Manager database Reporting on partnership initiatives and outcomes 	
Stakeholders	
<ul style="list-style-type: none"> Adani Landholders Regional Councils (Isaac, Charters Towers, Whitsunday and Mackay) State departments and agencies (DSDIP, QPS, QFRS, QAS, DHPW, DATSIMA) Local communities Industry groups (AusIndustry, QRC) 	
Timeframe	
<ul style="list-style-type: none"> Design development Mine construction and operation Rail construction and operation 	

Further details of the stakeholder engagement framework are provided in section 4.

4. Stakeholder engagement strategy

4.1 Overview

Engagement with stakeholders is an important component to managing and monitoring the potential social impacts and opportunities of the Project. Stakeholder consultations will continue throughout the Project. Outlined below is a framework which is being used to guide the development of the strategy.

4.2 Goal and objectives

The development of the strategy will seek to achieve the following goal and objectives.

Goal

To establish and maintain a social licence to operate where the community respects and trusts Adani through:

- Building awareness, understanding, and acceptance of the project by community stakeholders to avoid and/or minimise their dissatisfaction
- Establishing and maintaining community partnerships that benefit a range of stakeholders
- Enhancing Adani's understanding of stakeholder needs, issues and expectations.

Objectives

- Identify and inform stakeholders about the project's scope, timing and potential impacts and benefits
- Engage stakeholders through a variety of channels and capture their concerns and opinions about the project to inform the project team's decision making process
- Ensure early identification of potential stakeholder issues and implement timely and appropriate mitigation strategies
- Create awareness and acceptance of the project with stakeholders
- Manage land access and acquisition processes to minimise project delays
- Position Adani as a good corporate neighbour that values community input.

4.3 Communication and engagement approach

The communication and engagement approach will be guided by the core values and principles of the International Association for Public Participation (IAP2). From an engagement perspective, a core principle will be to clearly communicate the level of involvement stakeholders and the community will have in the various aspects of the project.

IAP2 has developed a spectrum to define the level of public participation as shown in Figure 6. In most cases the level of participation for this project is anticipated to be Inform and Consult, however it is expected that through memberships of groups such as the Clermont Preferred Futures Groups and others, that a level of Involve will be appropriate.

Figure 6 IAP2 spectrum of engagement

INCREASING LEVEL OF PUBLIC PARTICIPATION 					
	Inform	Consult	Involve	Collaborate	Empower
Public participation goal	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solutions.	To place final decision-making in the hands of the public.
Promise to the public	We will keep you informed.	We will keep you informed, listen to you and acknowledge concerns and aspirations and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.
Example techniques	<ul style="list-style-type: none"> ■ Fact sheets ■ Website ■ Open houses 	<ul style="list-style-type: none"> ■ Public comment ■ Focus group ■ Surveys ■ Public meetings 	<ul style="list-style-type: none"> ■ Workshops ■ Deliberative polling 	<ul style="list-style-type: none"> ■ Citizen advisory committees ■ Consensus-building 	<ul style="list-style-type: none"> ■ Ballots ■ Citizen juries ■ Delegated decision ■ Referendum

Source: International Association for Public Participation (www.iap2.org)

4.4 Strategic approach

The strategy will focus on developing and maintaining partnerships.

Relationships developed during the EIS will be further developed with a view of taking a partnership approach to many relationships. Adani is going to be a member of the Isaac and wider community for many years and will seeking to establish itself as a responsible corporate member of the community through a partnership approach. Adani is a member of the Clermont Preferred Futures Group in line with IRC's preference for this group to represent the Northern Galilee Basin. They are also a member of the Whitsunday Industry Workforce Development Steering Group, whose functions are now incorporated with the Whitsunday Marketing and Development Ltd. Adani is at present also exploring membership of a range of other groups within the wider region.

Engagement undertaken and relationships developed during the EIS stage of the project will continue and all conditions within the EIS approval will be incorporated into the strategy/plan.

Adani will work in partnership with affected landowners and develop a communication approach to suit both parties. All contact with landholders will be coordinated and a single point of contact for landholders will be provided. All communication with landholders, not already agreed, will be through that single contact.



Collaboration

Adani is actively in discussions with other mining proponents in the Galilee Basin to discuss potential for a coordinated approach to a range of infrastructure. These discussions are preliminary only and the outcome will depend upon the commercial decision of each of the proponents, however the relationships have been established and the discussions will continue.

4.5 Key principles of engagement

The following key principles of engagement will be included in the strategy:

- Be accessible to stakeholders and the community
- Be responsive and provide information in a timely manner
- Be open and honest to develop trust and respect, communicate to the public what you are doing and where possible show them.

4.6 Communication tools and techniques

The following tools and techniques are to be considered, but not limited to, in the strategy:

- Membership of relevant community development groups (such as Clermont Preferred Futures Group) - The proposed adoption of the Claremont Preferred Futures Group to provide the function of the Northern Galilee Consultative Group for all north Galilee mining proponents and other key stakeholders (note this will be subject to the agreement of the existing groups membership) Community Liaison
- A full-time Community and Landholder Liaison role, based within the region
- Visitor Centre/Shop front or virtual portal - A fixed presence in the regional area, possibly as space within an existing community premise where people can come to view more information about the project and at set times possibly meet with and speak to a representative. Alternatively, given distances between centres, a virtual portal to Adani and the Project may be more practical
- 1800 enquiry line A 1800 telephone number has been established by Adani for the duration of the Project
- Stakeholder meetings and agency briefings - Face-to-face stakeholder meetings and agency briefings will be conducted as required
- Notification letters - A range of notification letters will be prepared and distributed to stakeholders as required throughout the project
- Email updates - Updates on the project's key milestones will be regularly emailed to key stakeholders
- Stakeholder database - A stakeholder and consultation database will be maintained for the project
- Records of contact - Records of contact will be prepared when meeting with or speaking to a stakeholder and entered into the consultation database
- Protocol documents - A series of protocol documents will be prepared identifying Adani standards and guidelines relating to stakeholder interactions, land access and any other relevant issues as they arise. The purpose of these documents is to ensure a consistent,



professional representation of Adani in the public arena and ensure staff are aware of what is and is not acceptable when on private property. These documents will be distributed to field staff and other relevant staff at tool box talks

- Email enquiry address - An email enquiry address will be established for the duration of project
- Reply paid postal address - A reply paid postal address will be established, where required and based on stakeholder feedback
- Public displays - Public displays will be conducted as required
- Presentations - Presentations will be provided to a range of key stakeholder groups at key milestones throughout the project, and on request when possible
- Newsletters - Project newsletters will be developed on a regular basis. In addition to reporting on activities at the mine, upcoming events, etc, the newsletter can also provide a snapshot of KPIs as they relate to mine operation with the intention of providing up-to-date, realistic information on forecasts for mining operations, workforce (including contractors) and project changes
- Fact sheets and posters - Project fact sheets and posters will be developed for key milestones
- Website and text updates - Website text will be prepared for the project
- Public notices - Public notices will be developed at key milestones
- Frequently Asked Questions (FAQs) - An FAQ document will be prepared and uploaded to the website.

5. References

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Appendices





Appendix A Workforce Profile



Table A1 Construction phase workforce profile - Mine

Construction phase workforce profile - infrastructure					
	2014	2015	2016	2017	2018
Train Loadout, CPP and Conveyors, Feeders	0	300	300	100	50
Site workshop	0	150	100	50	0
Site offices	0	150	100	50	0
Site Haul Roads	0	100	50	0	0
Council Road upgrade	180	120	50	0	0
Airstrip Construction	45	45	30	0	0
Dams and Pipelines	20	50	50	30	0
Village Construction	150	120	60	0	0
Power	0	40	40	0	0
TOTAL	395	1,075	780	230	50
Occupation <i>composed of:</i>					
Superintendents and managers	20	50	40	10	5
Designers and engineers	20	50	40	5	5
Tradespeople being fabrication, boilermakers, carpenters, plumbers and electrical	100	300	275	115	30
Construction – equipment operators and supervision	255	675	425	100	10

Table A2 Operational phase workforce profile¹ - Mine

Operational phase workforce profile - Mine															
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Total Headcount	0	789	1893	2469	2825	3020	3254	3542	3626	3758	3825	3762	3770	3726	3801
Occupation composed of:															
Superintendent and Managers	0	25	64	112	118	122	129	129	139	139	141	141	141	141	141
Equipment Operators and Direct Supervisors	0	443	1136	1481	1745	1849	1939	2135	2180	2273	2319	2276	2279	2244	2293
Mining Engineers, Geologists and Surveyors	0	26	34	58	58	44	49	49	56	56	56	56	56	56	56
Coal Quality including Metallurgical and Lab Technicians	0	2	23	25	30	30	30	34	34	34	34	34	34	34	34
Mechanical, Electrical Engineers and Maintenance Planners	0	12	25	45	45	52	52	52	54	54	54	54	54	54	54
Fitters	0	166	272	350	380	423	491	580	598	638	657	637	642	637	663
Electricians	0	2	68	80	76	76	72	72	72	72	72	72	72	68	68
Auto Electricians	0	3	7	11	18	20	20	20	20	20	20	20	20	20	20

¹ Note that this also includes construction of pits, access roads into pits and other associated "construction" work, excluding permanent haul roads which are include in "Construction Phase Workforce Profile – Infrastructure".

Operational phase workforce profile - Mine

Boilermakers	0	3	7	11	18	20	20	20	20	20	20	20	20	20	20
Other Trades	0	4	16	18	24	24	24	24	24	24	24	24	24	24	24
Fitter / Electrical Operators for CPP / Loadout	0	0	22	22	28	28	30	30	30	30	30	30	30	30	30
Administration including Maintenance, IT, HR, Safety, Environmental, Emergency Services, Finance and Warehouse	0	53	143	181	210	233	248	248	248	248	248	248	248	248	248
Village and Airstrip Management	0	50	75	75	75	100	150	150	150	150	150	150	150	150	150

Table A3 Construction phase workforce profile - Rail

	2014	2015	2016	2017
Total Headcount	550	1,500	1,470	400
Occupation <i>Composed of:</i>				
Superintendents and Managers	10	30	30	10
Designers and Engineers	10	30	30	10
Tradespeople being fabrication, boilermakers, carpenters, fitters, and electrical	130	440	440	130
Construction – equipment operators and supervision	250	850	850	250
Quarry workforce	150	150	120	0



Table A4 Operational phase workforce profile - Rail

Operational phase workforce profile - Rail															
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Total Headcount	0	0	15	40	60	120	120	120	120	120	12	120	120	120	120
Occupation composed of:															
Superintendents and Managers	0	0	3	3	4	5	5	5	5	5	5	5	5	5	5
Planners and Engineers	0	0	5	5	6	10	10	10	10	10	10	10	10	10	10
Rail Operators	0	0	7	32	50	105	105	105	105	105	105	105	105	105	105



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Appendix B Integrated Housing Strategy



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Appendix C Adani Local Buying Policy



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Local Buying Policy

Adani is committed to procuring from Australian suppliers where possible and will endeavour to maximise local content on its Project where it is capable and competitive.

1. Objectives

To provide full, fair and reasonable opportunity for local industry to participate in Adani's Australian activities throughout our supply chain.

To support the Clermont, Queensland and Australian industry by procuring locally where possible, thereby building local capabilities.

To actively promote opportunities for Australian companies to supply goods and services to the Project via open channels of communication and transparent procurement practices.

2. Key Strategies

- To communicate openly with local industry regarding upcoming tender opportunities as early as possible
- To utilise the ICN Gateway to ensure widespread promotion of opportunities
- To work with industry associations and communities to improve local industry participation, capability and competitiveness
- To assist commercially viable and competitive local businesses to pre-qualify to provide goods and services for the Project
- To ensure that payment terms accommodate the needs of smaller businesses
- To include successful local suppliers in our internal supplier database
- To ensure that all suppliers have access to our Local Industry Participation Plan
- To require all suppliers, contractors and sub-contractors to adhere to the Local Buying Policy and the Local Industry Participation Plan, thereby improving outcomes across Adani's supply chain.

This policy will apply to all suppliers and contractors engaged by Adani and will be reviewed and amended as future projects are considered. Progress in terms of local industry engagement will be regularly reported, and depending on outcomes, the policy will be reviewed as necessary.



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Appendix D Adani Draft Community Development Plan



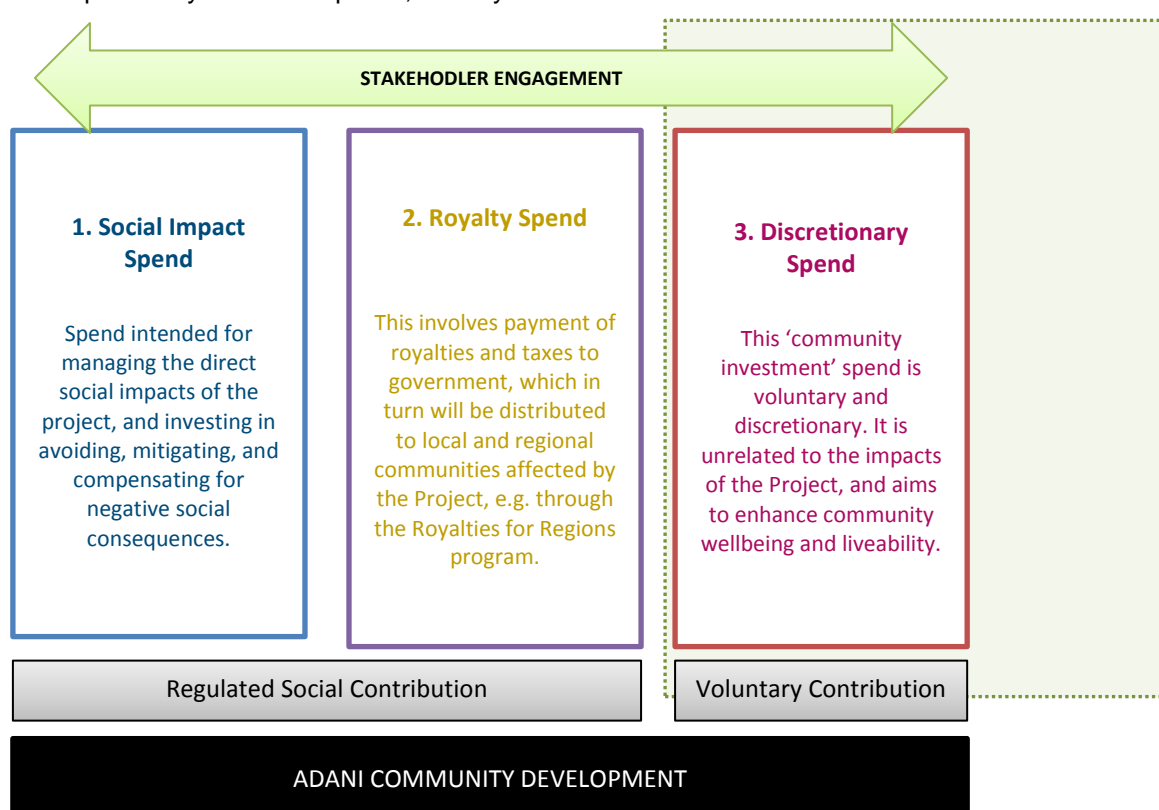
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Draft Community development plan

Introduction

As part of its Carmichael Coal Mine and Rail Project (the 'Project'), Adani seeks to make positive steps towards contributions for the community, and recognises that proactive community relations will provide benefits for both Adani and the communities in which we operate.

In line with these objectives, Adani will adopt an approach to community development that is underpinned by three core pillars, namely:



The benefits of adopting the three pillared approach to community development include:

- Appropriately mitigating the social impacts of the Project, while also facilitating maximum social and economic benefit for the community.
- Allowing the Project to act as a catalyst for positive change, and improving the quality of life and wellbeing of communities.
- Attracting, retaining and motivating employees.

The 'discretionary' (or community investment) component of Adani's community development approach forms the focus of this plan. Community investment is a core part of how companies manage their activities in communities to create a positive impact for both the business and communities. Internationally, companies and industries are becoming more aware of the need to be good corporate citizens and 'neighbours' to their communities, and to invest above and



beyond the direct requirements of the Project. In this regard, Adani will build community investment into its overall business and planning process, ensuring that it is not an 'add on' or 'nice to have', but is rather a core component of delivering effective business outcomes.

In the Project area, Adani will aim to leverage the socio-economic benefits of the Project through its community investment contributions; and will seek to do this in a transparent and genuine manner, as outlined in this plan.

Principles and objectives

Community investment for the Project will align with Adani's core values:

- **Courage** – we shall embrace new ideas and businesses.
- **Trust** – we shall believe in our employees and other stakeholders.
- **Commitment** – we shall stand by our promises and adhere to high standard of business.

The overarching objective of Adani's community investment approach is for investment to be proactive, rather than reactive or developed in response to a direct stakeholder request. It is envisaged that initiatives will be focused on identified and verified community needs, and serve to simultaneously mitigate social risk and create a positive legacy for both the Project and its communities. Investment opportunities will seek to empower community organisations to leverage additional benefits rather than relying only on short-term donations or sponsorships.

The implementation of this objective, and Adani's community investment activities, will be guided by a number of good practice guidelines, including:

- The International Finance Corporation's (IFC) *Strategic Community Investment: A Good Practice Handbook for Companies Doing Business in Emerging Markets* (2010). Although this handbook is focused on businesses in emerging markets, the overarching principles and methodologies for strategic investment are widely applicable to the Australian context.
- The International Council on Mining and Metals (ICMM) *Mining: Partnerships for Development Toolkit* (2012).
- The Australian Government's *Leading Practice Sustainable Development Program for the Mining Industry – Community Development and Engagement* (2006).

While the Project will likely not be able to adhere to all the principles, practices, and mechanisms outlined in these guidelines, Adani will proactively strive to meet the spirit and intent of these documents, and will make use of recommended tools where appropriate to the context of the Project.

In line with these guidance documents, Adani has established the following objectives for its community investment activities in the Project area. These are attached to implementation mechanisms to facilitate realisation of objectives.

Table D1 Community investment objectives and implementation mechanisms

Objective / principle	Implementation mechanism
To support projects that encourage community self-sufficiency and sustainability	Implementation of projects through partnerships with community and government. Defined exit strategies attached to each strategic investment initiative, which allow communities and governments to take over ownership and responsibility of projects. Ongoing stakeholder consultation with communities and government.
To focus on achieving genuine outcomes for communities	Qualitative and quantitative social monitoring and evaluation systems to ensure that genuine social change is achieved and measured.
To provide a flexible and proactive approach	Ongoing monitoring and evaluation with strong feedback loops. Undertaking community profiling at determined intervals to monitor changes. Ongoing stakeholder consultation to assess dynamic needs and priorities. Integrating community investment into the corporate business model.
To be visible and transparent	Regular third-party and independent review of activities Ongoing stakeholder consultation.
To enhance social return on investment through strategic reviews of outcomes	Application of a robust mechanism for measuring and reporting return on investment (both for the business and the community). Ongoing stakeholder consultation and community surveys.

Investment Priority Areas

Adani currently undertakes a range of community investment activities in its Indian operations through the 'Adani Foundation' and is focused on the following priority areas:

- **Education** – Promoting quality and equitable education opportunities.
- **Community Health** – Innovative projects to meet the local needs and facilitate basic healthcare to all, by bridging gaps.
- **Sustainable Livelihood Development** – Supporting marginalised groups to improve livelihood opportunities and thus the quality of life at the local community level.
- **Rural Infrastructure Development** - Need based quality infrastructure for better inclusive growth.

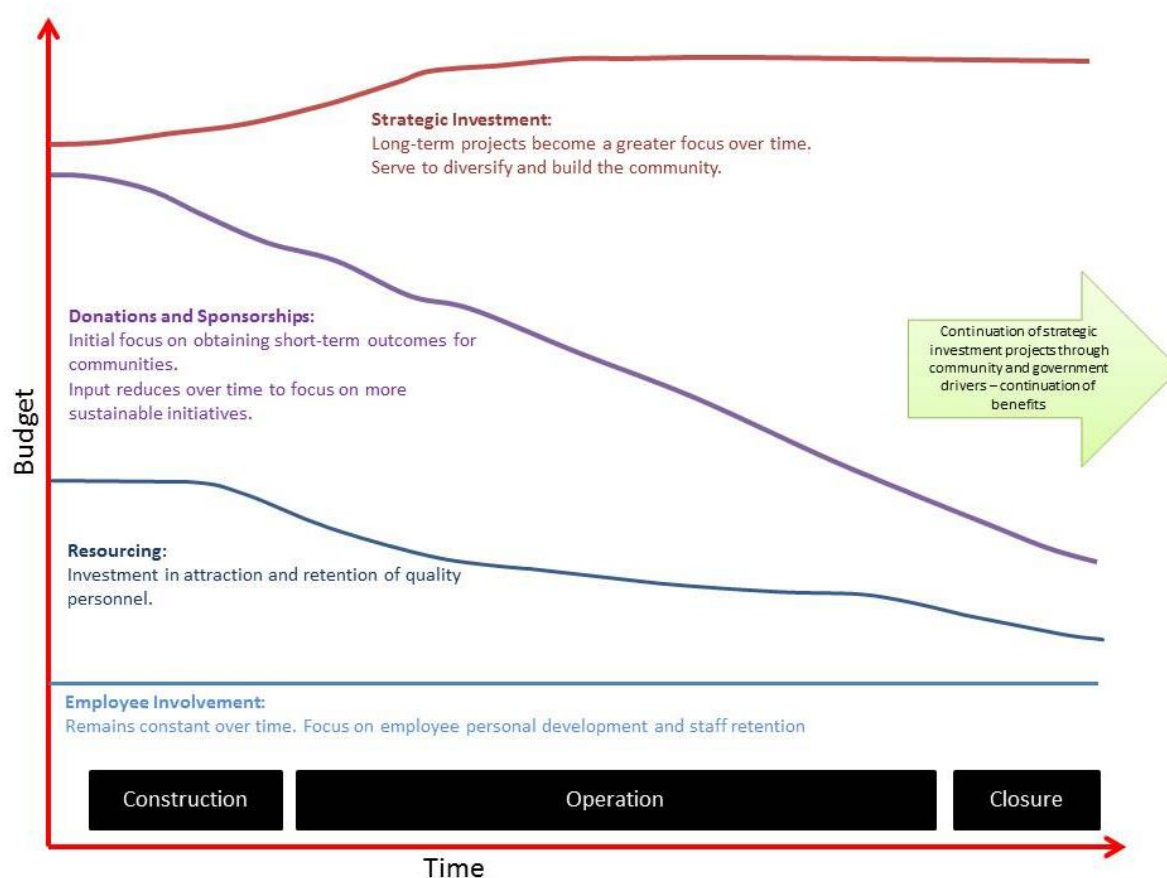
While these priority areas are focused on the developing and regulatory context of India, Adani may continue to focus on education, health, and sustainability within the more developed context of Australia. Specific priority areas for the Project, however, will be established through a robust community investment process as described in the sections which follow.

In general, Adani will focus on strategic, sustainable and long-term investment projects, rather than on shorter term donations and sponsorships. The Project will identify and form partnerships and alliances to implement projects that respond to the *cause* of an issue rather than the *effect*,

thereby supporting social change. It is intended that Adani's strategic focus will allow projects to be transformative in nature, instigating real social change. This may involve enterprise development or capacity building projects which are attached to clear exit strategies and community ownership plans, which outline clearly how the community and/or government will take ownership of each project and take it forward so that community benefits can be sustainably continued over the long term. The projects will aim, over time, to reduce dependence on Adani and empower communities to further develop and diversify into the future.

Adani's proposed investment in strategic initiatives over the lifespan of the Project is outlined in **Figure D2**. It can be seen that while donations and sponsorships will form part of Adani's initial investment activities, it is intended that strategic partnerships will form the core investment over the longer term. It should also be noted that Adani will include an 'employee involvement' component to its activities, based on the philosophy that community investment should be part of employees' lives, not just the responsibility of an individual or team, but of each person involved in the Project. It also facilitates awareness and integration at all levels of the organisation, and will encourage employee interaction with neighbouring and regional communities, thereby reducing social risk.

Figure D2 Community investment over the life of the Project



Alignment with regional planning

Adani's community investment activities for the Project will align strongly to State and regional government planning and strategies for the area. This will ensure a synergistic approach to community development, so that outcomes for communities are optimised. In particular, the objectives, strategies, and action plans of the following documents will be taken into consideration when planning for community investment:

- Isaac Region 2020 Vision 2009 – 2019 (Community Plan).
- Charters Towers - Our Region Our Future 2035 (Community Plan).

Key stakeholders

To ensure successful alignment with the above strategies, and also to facilitate genuine community input into the process, Adani will engage regularly with key stakeholders to plan and implement its community investment activities. Likely stakeholders include:

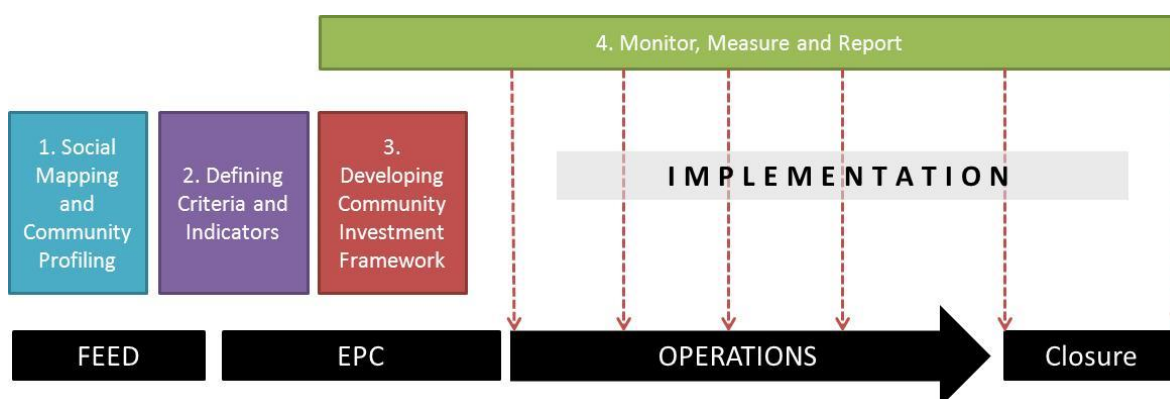
- Office of the Coordinator General
- Isaac Regional Council
- Charters Towers Regional Council

Where appropriate and contextually relevant, Adani will also consult with local community representative groups, for example the Clermont Preferred Futures Group and other similar groups. Before these groups are engaged, Adani will undertake a validation process to ensure that organisations are truly representative of communities' views and values.

Methodology and approach

Adani recognises that the process of community investment is as important as the outcome. In particular, adopting an open and transparent approach is essential for maintaining realistic community expectations. It is also important that the process is contextually relevant and fair, and provides equal access to a diverse range of groups. The process outlined below is focused on meeting these objectives:

Figure D3 Community investment methodology – Project lifecycle



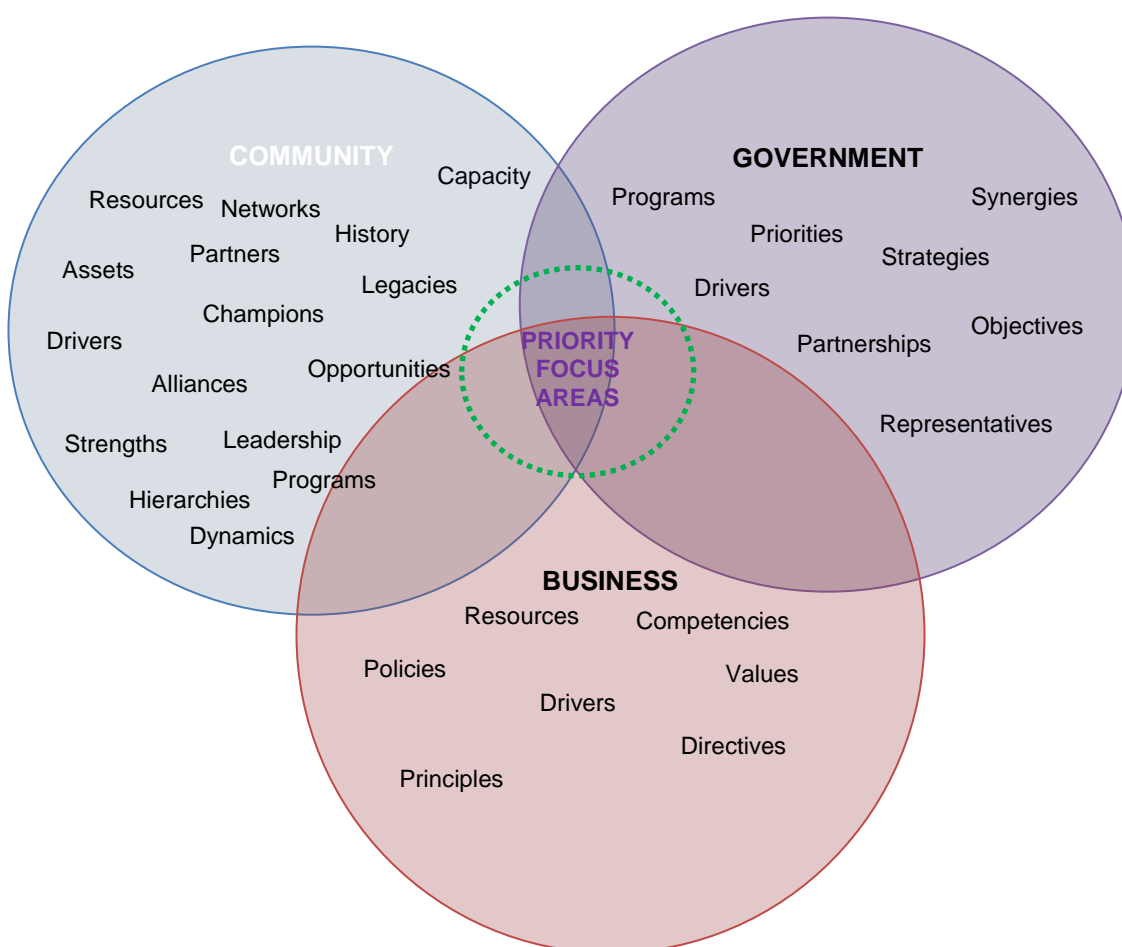
→ 1 Social mapping and community profiling

Adani will undertake a **targeted social mapping and community needs assessment** process. This will include defining and mapping the communities that will form the focus of the Project's community investment activities. The 'social mapping' process will chart the interactions of the

Project with communities closest to the Project. This will allow Adani to assess the Project's key communities to be prioritised for investment activities during the Project's lifecycle.

The community needs assessment will identify targeted areas of community need and aspiration. **Figure D4** shows how Adani will assess the needs and priorities of community, government, and internal (Adani / business) stakeholders to identify overlapping areas of interest and aspiration. These will form the priority focus areas for community investment by the Project.

Figure D4 Needs analysis and priority areas



→ 2 Defining criteria and indicators

Based on the outcomes of the social mapping and community needs assessment, Adani will work to **define specific indicators and criteria** for selecting investment projects. This will be essential to ensuring that an appropriate framework is established early in the Project to enable comparison of potential initiatives against one another; so that selected investments have the maximum capacity to deliver return on investment for both the Project and affected communities.

→ 3 Developing a community investment framework

Adani will develop a Community Investment Framework, which will describe clearly how investment will be allocated and administered for the Project. The framework will outline the

total contribution that Adani will make to community investment, as well as how much funding individual projects will be able to apply for. It will also set out eligibility requirements, priority communities, and investment focus areas, as well as Adani's principles and values in applying investment.

The Framework will be easily accessible to all stakeholders, and will include a range of tools to assist communities and governments in making applications for project funding. The Framework will also outline how potential partner organisations will be screened and selected, for example through the criteria below:

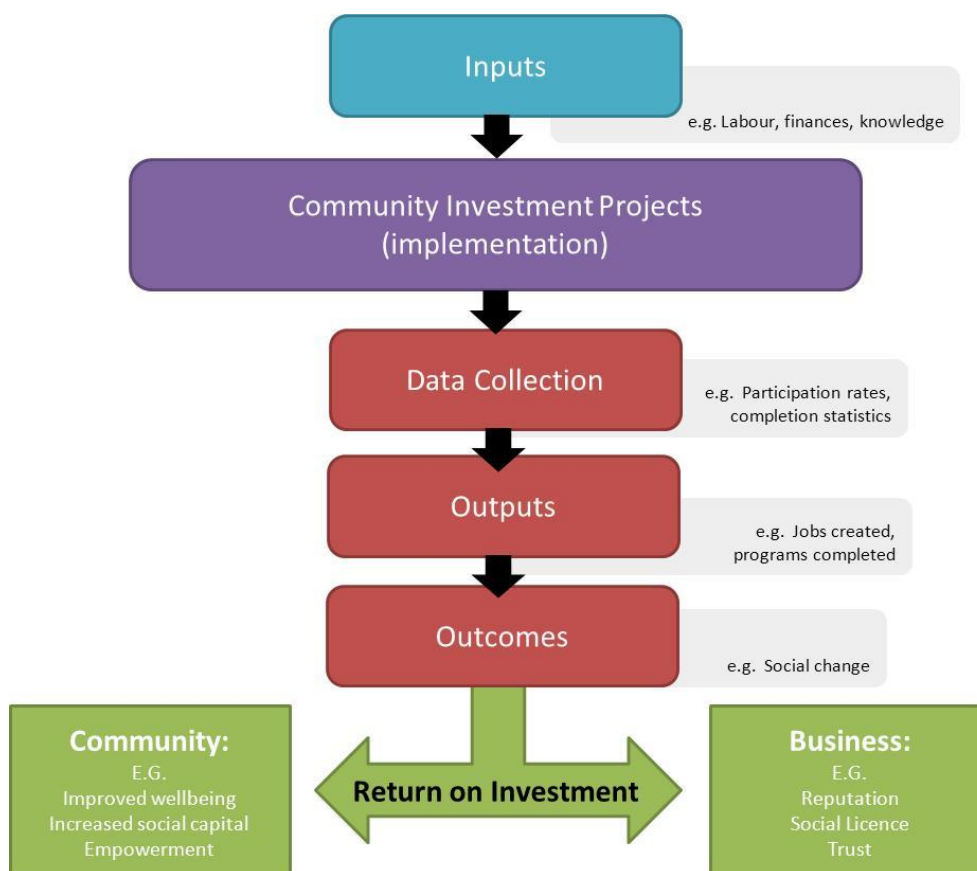
Potential partners must:

- Be aligned with Adani's values and objectives
- Have knowledge, resources or expertise that complement Adani
- Have local experience and a trusted relationship with the community
- Have ethical management systems
- Demonstrate management capability
- Demonstrate organisational stability
- Demonstrate success in similar ventures

→ **4 Monitor, measure and report on return on investment**

It is Adani's philosophy that monitoring and evaluation of community investment initiatives should be an integral part of project planning, rather than an 'add-on' or 'once-off' at the end of a project. In this regard, a mechanism for regularly measuring return on investment will be established. This mechanism will link to the criteria and indicators established at the outset of the project, and will measure and report on the outcomes of the project, and the 'return' for both Adani (e.g. in terms of social license, reputation), and for the community (e.g. in terms of building social capital) (**Figure D5**).

Figure D5 Monitoring and return on investment - process









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