



PROJECT CHINA STONE

Attachment G Responses to DSD SIA Advice

PROJECT CHINA STONE
RESPONSE TO DEPARTMENT OF STATE DEVELOPMENT SIA COMMENTS ON
DRAFT EIS
for
MacMines Austasia Pty Ltd

1 DSD SIA ADVICE

This is an attachment to the Supplement to the draft Environmental Impact Statement (draft EIS) for Project China Stone (the project). It provides the proponent's response to the comments received from the Coordinated Project Delivery (CPD) team within the Department of State Development (DSD) regarding the Social Impact Assessment (SIA) undertaken as part of the draft EIS. These comments were received from the CPD on 16 October 2015 and were provided separately to the formal public submissions on the draft EIS. Following this, the proponent, Hansen Bailey and representatives from the CPD team met in January 2016 to discuss the comments and confirm the required actions and responses. These are included in the proponent's responses within this attachment.

This attachment presents the CPD team comments on the draft EIS in tabular format, as provided to the proponent, followed by the proponent's response.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
1.	General Comment	Project Timing	What is the current timeline for the commencement of the project given reliance on Adani Project and associated Rail Line?

The Carmichael Coal Mine and Rail Project (CCM&RP) is much further advanced in the approval process than Project China Stone, having been issued key approvals from State and Federal Government regulatory agencies. However, the unanticipated and repeated legal challenges from anti-mining groups have delayed the anticipated commencement of construction of the CCM&RP. Similar challenges may also potentially delay subsequent progression of the approval process for Project China Stone. These ongoing legal challenges mean that it is not possible to accurately predict the timing of commencement of construction of the CCM&RP or the subsequent commencement of Project China Stone.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
2.	General Comment	Proposed start date of project unclear in current economic environment and reflects on the usefulness and relevance of the current SIA once the project commences. In addition the SIA does not reflect current social and economic environment this includes but not limited to baseline data, workforce management, arrangements, cumulative impacts and also arrangements and commitments for stakeholder and community consultation and engagement processes.	<p>SIA needs to reflect current social and economic downturn and this document does not do this clearly enough and therefore fails to describe most update situation in regard to key aspects of the SIA in particular workforce arrangements, cumulative impacts.</p> <p>Review of all aspects of the SIA 12 months prior to the commencement of construction including:</p> <ul style="list-style-type: none"> • Review and renegotiation of existing and development of new mitigation and management impact strategies. • These must reflect the current social and economic environment. • Must provide timelines for implementation. • Need to describe the outcomes to be achieved. • This would include the development of all plans strategies and commitments contained in the current SIA document and delivered with the Review. <p>Provide as part of the Additional Information Request the Stakeholder and Community Consultation and Engagement Strategy see requirements at item 12 below.</p> <p>This SIA review is required given the potential for changing social and economic environment before the commencement of the project. Current start date 2016 will not be possible without provision of the rail line to be constructed by Adani.</p>

An SIA review will be conducted 12 months prior to the commencement of construction. This new commitment is included in Attachment I – Additional Commitments.

In addition, the following suite of new management plans have been prepared and are presented in Attachment H – Additional Information on SIA:

- Operations Phase Workforce Management Plan;
- Housing and Accommodation Management Plan;
- Health and Community Wellbeing Management Plan;
- Local Content Plan; and
- Cumulative Impact Management Plan.

Each plan includes the following information:

- Description of the key issues;
- Description of the desired outcomes;
- List of management commitments;
- An outline of the stakeholder engagement process to facilitate plan preparation and implementation; and
- Timeline for plan preparation and list of key inputs.

Each plan includes a commitment by the proponent to reviewing the plan contents 12 months prior to the commencement of construction and following the completion of the SIA review.

These new management plans, together with the suite of new commitments provided in Attachment I – Additional Commitments, address the CPD concerns in relation to the validity of the baseline data reported in the draft EIS Socio-Economic Impact Assessment Report (Appendix N).

A Stakeholder Engagement Plan for all phases of the project is provided in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
3.	<i>Socio Economic Impact Assessment Report</i> (Appendix N- Labor Supply 6.3.3.)	<u>Workforce Planning</u> There is a commitment to develop a strategy for the operational workforce. There is a commitment to undertake another Labor Study.	<ul style="list-style-type: none"> • Will require an Operational Workforce Management Plan for the project – as figures based on current planning have the potential to be subject to change over time. This will be required 12 months prior to the commencement of operations. Will likely be conditioned. Government policy on Fly-in Fly-out (FIFO) will need to be reflected in Revised SIA and Operational Workforce Management Plan. • Labour Study will need to be undertaken 12 months prior to construction as part of the Review of the SIA. • Plan to be developed in conjunction with appropriate state agencies local government and other stakeholders.

Refer response to Item 2.

Table 1 of Attachment 24-2 Project Commitments Register already includes a commitment to update the existing project labour study (Appendix D of Appendix N) prior to the commencement of the construction phase.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
4.	<i>Socio-Economic Impact Assessment Report</i> (Appendix N)	<u>Workforce Management</u> FIFO work practices and alignment with Government commitments.	<ul style="list-style-type: none"> FIFO reporting requirement will be required. CG will not accept a 100% FIFO workforce and there must be strategies for local and regional workers included in the Workforce Operation Management Plan. Bus-in Bus-out (BIBO) does not include Mackay Whitsunday Region or Isaac Region, only includes Townsville and Emerald. Proponent to provide additional information on the detail behind the intended strategies as this is not clear

Table 1 of Attachment 24-2 Project Commitments Register already includes a commitment to keep the State Government, Charters Towers Regional Council (CTRC) and Isaac Regional Council (IRC) informed of the size of the non-resident worker population associated with the project.

The project is not 100% FIFO. Any worker who lives within a one-hour commute of the project site is permitted to drive on a daily basis to work. This issue has been clarified in the Workforce Management Plan described in Attachment H – Additional Information on SIA.

As stated in Section 4.4.1 of the draft EIS Socio-Economic Impact Assessment Report (Appendix N) the proponent will not support Drive-in Drive-out (DIDO) for employees who live more than a one-hour commute from the project site for fatigue safety reasons. Potential BIBO locations will be reviewed as part of the preparation of the Operations Workforce Management Plan described in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
5.	<i>Socio-Economic Impact Assessment Report</i> (Appendix N)	<u>Workforce Management</u> Local Employment opportunities and recruitment practices. Recognizing increased unemployment.	Insufficient attentions paid to the opportunities to employ local and regional workers were these opportunities exist. These need to be reflected in the EIS clearly and needs to include strategies for employment, training and skills development opportunities in the following areas: Moranbah, Charters Towers, Clermont, Dysart, Emerald, Barcaldine and Mackay, Whitsunday and Fitzroy Regions. What mitigation and management strategies will the proponent implement? The detail of these to be included in the EIS.

An outline of the Operations Phase Workforce Management Plan, including key commitments to employment, training and skill development in regional communities is included in Attachment H – Additional Information on SIA.

Training, employment and skill development strategies will be considered in detail in the new Operations Phase Workforce Management Plan, which the proponent has committed to preparing 12 months prior to the commencement of the construction phase (Refer response to Item 2 and 3).

Table 1 of Attachment 24-2 Project Commitments Register already includes a commitment to update the existing project labour study (Appendix D of Appendix N) prior to the commencement of the construction phase. The updated labour study will inform the content of the Operations Phase Workforce Management Plan. Employment, training and skill. Development opportunities in regional communities such as Moranbah, Charters Towers, Dysart, Emerald, Barcaldine and the Regions of Mackay Isaac Whitsunday and Fitzroy will be considered in new Operations Phase Workforce Management Plan.

The Operations Phase Workforce Management Plan will include a detailed stakeholder engagement process to facilitate implementation. An outline of the engagement process is provided in Attachment H – Additional Information on SIA. The proponent sees little value in providing any further detail regarding mitigation and management in the draft EIS at this stage.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
6.	<i>Socio-Economic Impact Assessment Report (Appendix N)</i>	<u>Workforce Management</u> Roster Arrangements.	<ul style="list-style-type: none"> Clarification required - are resident workers expected to live on the camp during the Roster period, in the same way as non – resident are expected to. Clarify the roster arrangements for the operational work force are they 7 on 7 off as for construction. Assume no leave days during roster period if 7 on 7 off for operational workers.

This has been clarified in the Operations Phase Workforce Management Plan and Housing and Accommodation Management Plan provided in Attachment H – Additional Information on SIA. If a worker lives within a one-hour commute of the project site, they will be permitted to drive to work each day and return to their home each night.

Roster arrangements for the operations workforce are described in Section 4.4.3 of the draft EIS Socio-Economic Impact Assessment Report (Appendix N).

There will be no leave days during the roster period if 7 on 7 off for operational workers.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
7.	<i>Socio-Economic Impact Assessment Report (Appendix N - 5.0 Profile of the Areas of Influence)</i>	<u>Workforce Management</u> Labor source areas and home base locations.	<ul style="list-style-type: none"> Labour source and Home base locations are too limited and need to consider opportunities presented in the following towns and regions Moranbah, Emerald, Clermont, Dysart Barcaldine, Charters Towers, Mackay Region and Fitzroy Region.

The selection of home base locations will be informed through the SIA review to be undertaken 12 months prior to the commencement of the construction phase. The Operations Workforce Management Plan, which will also be prepared 12 months prior to the commencement of the construction phase, will identify the preferred home base locations and will provide justification as to why certain locations are not considered suitable. An outline of the Operations Phase Workforce Management Plan including key components and proponent commitments is provided in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
8.	<i>Socio-Economic Impact Assessment Report</i> (Appendix N - 6.2 Population and Demographics)	<u>Workforce Management</u> Population impacts.	<ul style="list-style-type: none"> Based on the proponent's current recruitment and employment strategy they suggest that impacts from population increase resident workers are only likely to affect Charters Towers with 1% increase or 29 persons approximate. What are the intended strategies for any town impacted given operational recruitment needs to reflect Gov Policy on FIFO work practices. On what basis was this figure reached for Charters Towers. There needs to be consideration of the housing market particularly housing availability and the projects impact on affordability at the time the project commences and the cumulative impacts of ADANI given China Stone is reliant on that project proceeding. How will the proponent response to demand generated by population growth (6.2.4 of Appendix N Management Action 1). Clear mitigation and management strategies to be provided to understand their response in resolving population impacts.

This submission is concerned with:

- The project's potential to result in significant population increases in regional centres with resulting impacts on housing availability and affordability; and
- Cumulative impacts.

The proponent will undertake a review of the SIA 12 months prior to the commencement of the project construction phase. This review will include a review of the social baseline and the potential impacts and management measures. Importantly, this review will test the suitability of the locations identified as home base locations in the draft EIS and will inform the identification of additional and preferred home base locations for the workforce. The review will also enable greater clarity around the size and location of any potential project induced population growth.

The proponent has committed to the preparation of an Operations Phase Workforce Management Plan 12 months prior to the commencement of the construction phase. The Operations Phase Workforce Management Plan will document the proponent's response to potential population growth, including a process for engaging with key stakeholders to identify suitable management measures. An outline of the Operations Phase Workforce

Management Plan, including key commitments from the proponent to the management of impacts associated with project induced population growth is provided in Attachment H – Additional Information on SIA.

The proponent has also committed to the preparation of a Cumulative Impact Management Plan 12 months prior to the commencement of the construction phase. The Cumulative Impact Management Plan will document the proponent's response to the management of potential impacts primarily arising as a result of the project's interaction with the proposed Carmichael Coal Mine and the Moray Power Project. The Cumulative Impact Management Plan will detail how the proponent intends on engaging with Adani Mining Pty Ltd (Adani) and other relevant stakeholders e.g. CTIRC and state government agencies, to manage potential impacts. An outline of the Cumulative Impact Management Plan, including key commitments from the proponent to the management of cumulative impacts is provided in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
9.	<i>Socio-Economic Impact Assessment Report</i> (Appendix N - 6.2.4 Man Actions 1 to 3)	<u>Workforce Management</u> Engagement and consultation in relation to Labour Sourcing and Workforce Number. Potential Population Growth. Supporting Sustainable Growth	Proponent to provide additional information on the detail behind the intended strategies as this is not clear. This should include: <ul style="list-style-type: none"> • Frequency and range and mechanism for discussion negotiation and liaison with Local and State Government in relation to labour sourcing strategies and workforce numbers and project induced permanent resident population growth. See Stakeholder and Community Consultation and Engagement Strategy requirement. • What form will the support take if population impacts are realised. Provide information of mitigation and management strategies. • Explain what strategies will be employed by extending Employee Wellbeing Plan to selected FIFO location. • Describe what regular communication means as part of a more detailed Stakeholder and Community Consultation and Engagement Strategy. This relates to project timing, project labour force requirements and project induced population growth.

Refer response to item 2.

A Stakeholder Engagement Plan for all phases of the project is provided in Attachment H – Additional Information on SIA. This strategy details the approach to engaging with interested and affected stakeholders across all stages of the project in relation to key areas of interest including population growth, labour sourcing, workforce numbers, infrastructure requirements etc.

Additional information in relation to the Employee Wellbeing Plan is provided in the Operations Phase Workforce Management Plan and the Health and Community Wellbeing Management Plan contained in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
10.	<i>Socio-Economic Impact Assessment Report</i> (Appendix N-6.3.5 Skills Enhancement 6.3.6 Impact Management)	<u>Workforce Management</u> Apprenticeships and Traineeships graduate and mature age placement programs. Skills enhancement – proponent committed to direct provision and investment in education and training opportunities. Develop and implement Employee Wellbeing Project. Flexible employment opportunities in relation to Women and other disadvantaged groups. Workforce diversity. Indigenous Employment, training and development programs	Provide details of intended programs including what will be provide, when it will commence, how it will be implemented, who will be consulted, what will be likely targets be. Will there be a program to support mining and non-mining supply chain industries and tertiary education in local and regional centers. Provide details of what will be provided in terms of investment and the development of opportunities. Current descriptions and commitments do not commit to measurable outcomes in majority of cases. The narrative is broadly focused on Charters Towers and needs to be widened to clearly show consideration and initiatives for other towns and regional centers. Provide detail of all these initiatives and intended outcomes in the EIS and include as part of the Recruitment and Training Strategy.

Refer to response to Issue 2.

The proponent has committed to the preparation of an Operations Phase Workforce Management Plan 12 months prior to the commencement of the construction phase. An outline of the Operations Phase Workforce Management Plan is provided in Attachment H – Additional Information on SIA. This outline includes:

- An overview of the training and skill development initiatives the proponent intends to progress for the project; and

- A strategy for the planning and implementation of these initiatives including any required stakeholder engagement and long term monitoring of program success.

Table 1 of Attachment 24-2 Project Commitments Register already includes a commitment to update the existing project labour study (Appendix D of Appendix N) prior to the commencement of the construction phase. The labour study review will inform the selection of home base locations. The Operations Workforce Management Plan, which will also be prepared 12 months prior to the commencement of the construction phase, will identify the preferred home base locations and will provide justification as to why certain locations are not considered suitable.

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11.	<i>Socio-Economic Impact Assessment Report</i> (Appendix N-6.4 Employee Health and Wellbeing)	<u>Workforce Management</u> Workforce Health and Wellbeing is supported by the proponent and a Plan to be developed.	Explain how it will be supported and what are the associated mitigation and management strategies to achieve this. This needs to cover issue on and off the mine site for the workforce and their families.

Refer response to Item 2.

Section 6.4 of the draft EIS Socio-Economic Impact Assessment Report (Appendix N) provides details of the mitigation and management strategies to support employees on and off the site.

Additional commitments by the proponent to the management of employee health and wellbeing including mental health are described in the Health and Community Wellbeing Management Plan provided in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
12.	<i>Socio-Economic Impact Assessment Report</i> (Appendix N-7.0 Management Strategies and monitoring Approach)	<u>Workforce Management</u> Proposed plans.	<p>The following plans need to be available now as part of the additional information or developed and available 12 months prior to construction as part of the Review of the SIA and how they will be communicated more broadly where this is appropriate.</p> <ul style="list-style-type: none"> • Indigenous Participations Plan – as part of current EIS. • Recruitment Plan – 12 months prior to construction. • Workforce Diversity Policy – 12 months prior to construction. • Training and Skilling Plan – 12 months prior to construction. • Employee Wellbeing Plan– 12 months prior to construction. • Workforce Code Of Conduct – 12 months prior to construction. • Main Contractor Social Management Plan – 12 months prior to construction if appropriate.

These plans have been incorporated into the following management plans, which are provided in Attachment H – Additional Information on SIA:

- Operations Phase Workforce Management Plan;
- Housing and Accommodation Management Plan;
- Health and Community Wellbeing Management Plan;
- Local Content Plan; and
- Cumulative Impact Management Plan.

Additional commitments have been included in Attachment I – Additional Commitments in relation to the conduct of an SIA review and the review of all SIA management plans 12 months prior to the commencement of construction.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
13.	Consultation Chapter 3 <i>Socio Economic Impact Assessment Report</i> (Appendix N Stakeholder Communication Strategy 7.6 and Table 26) Terms Of Reference	<p><u>Stakeholder and Community Consultation and Engagement</u></p> <p>Consultation and Engagement to date. Process lacks detail. Current consultation strategy does not provide sufficient information to assess suitability of process described or proposed during EIS development phase pre-construction, construction and operation. Proponent commits to early consultation and engagement but this is not reflected in the EIS currently. Information provided in Chapter 3 only relates to what has been carried out to date. This information is limited, appears to be spread over 3 years but information on timing of these process's is limited and is not clear when specific consultation and engagement took place and when during these process's issues were raised.</p>	<p>Proponent to provide Community Consultation and Engagement Strategy and Grievance, Disputes and Complaints handling procedures as required by the Terms of Reference.</p> <p>Community Consultation and Engagement Strategy needs to be provided as part of the request for additional information by the CG. It should include pre-construction, construction and operations covering all stakeholders and provide details of the following information:</p> <ul style="list-style-type: none"> • Timelines and frequency to indicate when consultation and engagement will occur during all phases of the project. • The full range of methods to be adopted based on the level of impact for the stakeholder, whether individual or agency and the topic being addressed. • What targeted and or tailored consultation process will exist for those landholders, traditional owners' residents and sensitive receptors. • What staff resources/ contact points will the Proponent put in place for stakeholders? • The level of information that will be provided for each topic area. • How information will be provided. • What outcomes and/or mitigation and management strategies have been negotiated, agreed and implemented. • Provide details of collaborative and consultative arrangements to be developed across the region – particularly in relation to Cumulative Impacts. In accordance with the Terms of Reference. • Provide Grievance, Dispute and Complaints handling procedures

A Stakeholder Engagement Plan for all phases of the project is provided in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
14.	Consultation Chapter 3 <i>Socio Economic Impact Assessment Report</i> (Appendix N Stakeholder Communication Strategy 7.6 and Table 26) Terms Of Reference	<p><u>Stakeholder and Community Consultation and Engagement</u></p> <p>Submissions from landholders, traditional owners, residents and sensitive receptors and other stakeholders and the level of concerns raised points to a need for the proponent to provide clarity on the potential impacts across a range of social and environmental issues They appears to be</p> <ul style="list-style-type: none"> • A limited understanding how they will be mitigated or managed, • When will they be consulted in the future during pre-construction phases, construction and on-going during operations. • How will they receive information? • What information will they get. • What arrangements will be in place for on –going discussion, negotiation and engagement? <p>Terms of Reference requires: <i>Consistent with national and international good practice, and with regard to local and regional strategies for community engagement, the proponent should undertake a community engagement strategy to engage at the earliest practicable stage with likely affected parties to discuss and explain the project, and to identify and</i></p>	<p>The following areas need to be included in the Strategy requested above and the proponent needs to describe the stakeholder and community consultation and engagement process and intended mitigation and management strategies to be developed and implemented for each phase of the project to keep all stakeholders informed. These should include but not limited to:</p> <ul style="list-style-type: none"> • Water Management System Methodology, Impacts and Monitoring including – water resources, groundwater regime, surface water, flooding, hydrology, agricultural impacts raw water, water quality and bores. • Air Quality/Dust Methodology Impacts and Monitoring including agricultural Impacts and greenhouse gas. • Noise / Blasting/ Vibration Methodology, Impacts and Monitoring including agricultural impacts. • Road Safety/Traffic concerns and impacts, including agricultural impacts. • Visual Amenity Methodology and Impacts including Agricultural impacts. • Land Ownership and Land Use impacts – Land Access and landholder compensation protocols. • Emergency Response Planning with all key agencies and stakeholders. (Emergency Services Consultative Committee). • Collaborative arrangements in association with Adani and other proponents in the Galilee Basin to inform the communities affected by Cumulative Impacts. • Workforce Management Impacts and Monitoring including Labor sourcing, employment and recruitment process's, training and development opportunities.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
		<p><i>respond to issues and concerns regarding social impacts. The strategy should detail all existing relevant community forums, groups and any proposal to establish additional community engagement.</i></p> <p><i>Provide details of the community engagement processes used to conduct open and transparent dialogue with stakeholders. Such processes should include, but not be limited to, community reference group forums. Include any proposal to establish a common forum with other proponents and/or existing forums in the southern sector of the Galilee Basin.</i></p> <p><i>Include the project's planning and design stages and future operations including affected local and state authorities. Engagement processes should consider social and cultural factors, customs and values, and, where relevant, linkages between environmental, economic, and social impact issues.</i></p> <p><i>Discuss engagement strategies and processes, including how complaint resolution will be addressed, for all stages of the project.</i></p>	<ul style="list-style-type: none"> • Housing Impacts and Monitoring including housing market impacts, population growth impacts, accommodation village arrangements. • Local Content and Supply Chain Opportunities including procurement, capability and capacity building opportunities. • Local and Regional impacts, opportunities and benefits of FIFO workforce for Local Councils and Communities. • Indigenous Traditional Owners and indigenous communities including participation, cultural issues. heritage impacts, land use, visual amenity. • Air Traffic Methodology, Impacts including noise, proximity to accommodation village. • Stocks Route Impacts. • Tailings, waste, storage facilities, impacts and rehabilitation. • Subsidence impacts including rehabilitation. • Mine overburden rehabilitation. • Off Lease Infrastructure – Rail Corridor.

Refer to response to Item 13.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
15.	Consultation Chapter 3	<u>Stakeholder and Community Consultation and Engagement</u> Consultation with Traditional Owners and indigenous community representatives.	Identify and discuss the level of consultation and engagement that has been undertaken with Traditional Owners and indigenous community representatives during the development of the EIS.

A Stakeholder Engagement Plan for all phases of the project is provided in Attachment H – Additional Information on SIA. This plan includes consultation with Traditional Owners and Indigenous community representatives across the life of the project.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
16.	Cumulative Impacts Chapter 23. <i>Socio-Economic Impact Ass Report</i> (Appendix N)	<u>Cumulative Impacts</u> Term of Reference requirements: <i>Evaluate and discuss the potential cumulative social impacts resulting from the project including an estimation of the overall size, significance and likelihood of those impacts. Cumulative impacts, in this context, is defined as the additional impacts on population, workforce, accommodation, housing, and use of community infrastructure and services, from the project, and other proposals for development projects in the area, which are publicly known or communicated by the office of the Coordinator-General, if they overlap the proposed project in the same timeframe as its construction period.</i>	Lack of discussion and clear mitigation and management strategies for cumulative impacts. Lack of acknowledgement that China Stone Project is reliant on the commencement of the Adani Project and therefore cumulative impacts are fundamental to the EIS and need to be fully addressed in the SIA. Not covered off sufficiently in the EIS given reliance on Adani Project and potential impacts of other Galilee Projects in relation to the following: <ul style="list-style-type: none"> SIA needs to consider and respond to Cumulative Impacts in relation to workforce management, housing and accommodation, local business and industry content, health, safety and community wellbeing and Community and stakeholder engagement. Detail of all mitigation and management strategies. Community Consultation and Engagement on Cumulative Impacts. Partnership to manage Cumulative Impacts (Round Table other mechanisms). Environmental impacts highlighted in the submissions provided by stakeholders and in particular existing landholders, including Water Management, Air Quality, Noise and Vibration, Road Safety and Traffic, Emergency response planning. Joint Community Consultative arrangements. Community safety off mine site.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
			<ul style="list-style-type: none"> • Project timing/labour sourcing and workforce requirements and numbers. • Skill Shortages. • FIFO Work Practices. • Increased permanent resident population growth in home based locations. • Labor draw. • Change in rural character. • Increased demand on emergency services. • Impacts on health services and social infrastructure. • Increased traffic movements and reduced road safety. • Impacts on the ability of local and regional industries to have fair and equitable access to business opportunities as part of the supply chain. What partnership arrangements with ADANI in the first instance. • Housing availability and affordability impacts if CS and Adani projects proceed which is required based on current scenario described by China Stone.

The identification and management of potential cumulative impacts will be considered in the Cumulative Impact Management Plan, an outline of which is included in Attachment H – Additional Information on SIA. The Cumulative Impact Management Plan will be prepared 12 months prior to the commencement of construction and will be informed through the review of the SIA baseline and impact assessment, which will also be undertaken 12 months prior to the commencement of construction. By this point in time there will be greater certainty as to the potential additional projects occurring within the vicinity of the project, namely the proposed Carmichael Coal Mine.

The following two new commitments have also been included in Attachment I – Additional Commitments:

- *The SIA (including social baseline, impacts and management measures) will be reviewed 12 months prior to the commencement of construction.*
- *The SIA management plans and their respective components as described in Attachment H – Additional Information on SIA will be developed 12 months prior to the commencement of construction.*

The SIA assumed that, given the CCM&RP has received approval from State and Federal government agencies, the CCM&RP would be developed prior to Project China Stone. As such, cumulative impacts with the CCM&RP were included in the SIA. There is currently

uncertainty regarding the timing of commencement of construction of the CCM&RP and other Galilee Basin projects arising from unanticipated and ongoing legal challenges from anti-mining environmental groups. Given this, the proponent proposes to revisit the cumulative impacts of the project as part of the review of relevant aspects of the SIA, 12 months prior to construction (refer item 1). At this point in time there will be greater certainty regarding the status and anticipated timing of all projects and cumulative impact management will be able to be discussed in more detail.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
17.	Housing Project Description 4.11 Accom. Village Socio-Economic Impact Assessment Report (Appendix N)	<u>Housing</u> Accommodation Village and other housing options to be provided.	Timing of Accommodation village needs to be clarified to ensure that it is before Mine infrastructure. Size of camp - What housing options will be provided if workers want to live locally. Proponent has stated that camp will house all construction workers. Does this include all contractors, sub-contractors, visitors and management. Narrative talks about sufficient accommodation to accommodate the entire operational workforce. Given that 100% FIFO is not acceptable to Government the EIS needs to be revised to reflect this requirement.

As stated in Section 4.14.2 of the draft EIS Socio-Economic Impact Assessment Report (Appendix N), it is anticipated there will be a 5 month establishment phase of the initial accommodation village prior to the commencement of construction of mine infrastructure.

The Housing and Accommodation Management Plan, to be prepared 12 months prior to the commencement of construction will document the proponent's approach to the supporting the provision of worker accommodation in home base locations i.e. Charters Towers. A commitment to assessing accommodation options in home base locations and developing a strategy to respond to potential impacts such as housing accessibility and affordability is included in Attachment H – Additional Information on SIA.

The proponent confirms that the accommodation village will house all construction workers, including contractors, sub-contractors, visitors and management.

The narrative issues are acknowledged. The terminology adopted in the draft EIS reflects the remote location of the project site and the reality that very few employees (i.e. less than 10) are likely to reside within a one-hour commute of the project site. The issue raised has been clarified in the Operations Phase Workforce Management Plan and the Housing and

Accommodation Management Plan included in Attachment H – Additional Information on SIA.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
18.	4.3.5 Workforce Accommodation <i>Socio- Economic Impact Assessment Report</i> (Appendix N)	<u>Housing</u> Housing of accommodation village construction workers will be housed in an existing exploration camp and progressively moved into first stage of village.	Where will the exploration camp be? How many workers will be in the camp? When will the camp be established? Has this been discussed with Regional Council?

The exploration camp is already established (although currently decommissioned) and is located on the Carmichael property adjacent to the project site i.e. outside the project MLAs. The Carmichael property is shown on Figure 5-3 of the draft EIS as the property containing receptor R3, which is the Carmichael Homestead. The exploration camp has capacity to accommodate 50 workers. The Stakeholder Engagement Plan described in Attachment H – Additional Information on SIA includes a requirement to consult with IRC and the CTRC in relation to the reinstatement of the exploration camp.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
19.	4.3.5 Workforce Accommodation <i>Socio- Economic Impact Assessment Report</i> (Appendix N)	<u>Housing</u> Accommodation impacts of construction workforce.	How many staff will be required to live locally and what positions will they be employed in. What strategies are being put in place by the proponent for those workers not in accommodation village – How will accommodation be provided for these workers by the proponent? Potential project and cumulative impacts-this needs to be considered in EIS and mitigation and management strategies need to be developed. Not covered off in EIS, No discussion about how CS would work with ADANI and other Galilee Basin mining projects to mitigate impacts. Housing cumulative impacts for construction and operation need to be addressed. Scenario is small towns that have small housing markets, potential for increased property speculation resulting in housing affordability and availability issues for locals. Charters Towers, Clermont, Barcaldine, Moranbah.

All workers are proposed to be housed in the accommodation village, with the exception of any employees who reside within a one-hour drive of the project site who will be free to commute on a daily basis.

Refer response to Items 8, 16 and 17.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
20.	6.8 Housing and Accommodation <i>Socio- Economic Impact Assessment Report</i> (Appendix N)	<u>Housing</u> Proponent considers housing impacts low risk.	Given reliance on Adani Project proceeding, this is not a realistic outcome given the potential cumulative housing impacts and governments' position on no 100% FIFO approvals.

The proponent's approach to management of cumulative social impacts was to, where possible, avoid targeting labour source locations and home base locations that were likely to be targeted by Adani. This approach seeks to minimize potential cumulative impacts at the outset. In addition, home base locations were identified based on their sizeable population base and ability to absorb any project related population growth. This approach and the assessment of potential housing impacts was discussed during adequacy review with CPD.

It is reiterated that the project is not 100% FIFO. Employees residing within a one-hour commute of the project site will be able to commute on a daily basis to work.

Refer response to Items 2, 8, 16, 17.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
21.	6.8 Housing and Accommodation <i>Socio- Economic Impact Assessment Report</i> (Appendix N)	<u>Housing</u> Housing and Accommodation Planning.	Proponent needs to develop a Housing and Accommodation Plan for the accommodation village, mitigation and management strategies for impacts on local housing markets based on increased employment opportunities as a result of workers choice or as part of job requirements to live locally. This needs to be based on current data 12 months prior to construction commencing and should form part of the overall review of the SIA at this time. Needs addressing more broadly than just Charters Towers.

Refer response to Item 2 and 17.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
22.	<i>Socio-Economic Impact Assessment</i> (Appendix N - 6.4.1)	<u>Community Health , Safety and Wellbeing and Cumulative Impacts</u> Workers access to health services.	What level of health and welfare services will be provided on the mine site for workers? This is not clear. What support will be given to Health services where they are impacted by project workforce increasing demand for services? (Charters Towers and home based locations potentially).

Refer to Section 4.4.6 and Section 7.5.1 of the draft EIS Socio-Economic Impact Assessment Report (Appendix N) which outlines the health and welfare services anticipated to be provided on the mine site for employees.

The Stakeholder Engagement Plan described in Attachment H – Additional Information on SIA includes proposed consultation with relevant health service providers to ensure project induced demands can be met. The Cumulative Impact Management Plan described in Attachment H – Additional Information on SIA also includes specific commitments to the management of cumulative impacts on health services and infrastructure over the life of the project.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
23.	<i>Socio-Economic Impact Assessment</i> (Appendix N - 6.6.9 Action 22)	<u>Community Health , Safety and Wellbeing and Cumulative Impacts</u> Community Road Safety impacts and cumulative Impacts.	What mitigation and management strategies will be implemented for community road safety impacts?

The proponent does not support long-distance DIDO due to potential fatigue safety issues. In addition, the SIA discusses a number of community road safety mitigation and management strategies including the development of a Traffic Management Plan (discussed in Section 7.5.2 of the draft EIS Socio-Economic Impact Assessment Report [Appendix N]) and Management Actions 26 and 28.

Additional commitments to the management of community road safety impacts are described in the Health and Community Wellbeing Management Plan and the Operations Phase Workforce Management plan provided in Attachment H – Additional Information on SIA. The Stakeholder Engagement Plan described in Attachment H – Additional Information on SIA includes proposed mechanisms to inform key stakeholders, including the community of potential project related health and safety issues on the road network.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
24.	<i>Socio-Economic Impact Assessment</i> (Appendix N - 7.4)	<u>Local Content</u> Lack of consideration in regard to Mackay/Whitsunday Region.	EIS needs to reflect opportunities that exist through supply chain and business capability and capacity to compete and to provide supply chain employment opportunities.

Procurement in the Mackay/Whitsunday Region will be considered as part of the development of the Local Content Plan, to be developed 12 months prior to construction.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
25.	<i>Socio-Economic Impact Assessment</i> (Appendix N - 7.4.1)	<u>Local Content and Supply Chain Development</u> Ensure early and ongoing engagement of local industry- A commitment made by the proponent	Include this information in the Community Consultation and Engagement Strategy requested above showing the mitigation strategies that will be implemented to inform educate and advise local and regional business in procurement and business opportunities.

The Stakeholder Engagement Plan described in Attachment H – Additional Information on SIA includes proposed consultation to inform, educate and advise local and regional business in procurement and business opportunities. The Local Content Plan to be prepared 12 months prior to construction will detail the specific strategies to inform, educate and advise local and regional business in procurement and business opportunities.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
26.	<i>Socio-Economic Impact Assessment</i> (Appendix N - 7.4.2)	<u>Local Content and Supply Chain Development</u> Development of Local Content Plan and associated strategies needs to be completed and implemented as early as possible before commencement of early works to realise maximum opportunities for local and regional business??	Proponent to provide information in the EIS on engagement with the Industry Capability Network regarding the development of A Local Content Delivery Framework, QRC in regard to the adoption of the Local Content Code Of Practice and Dept. of State Development in relation to Industry Programs. Local Content Plan to be completed prior to early works commencing and provide details of all mitigation management strategies to be introduced to provide opportunities for local and regional businesses.

The Stakeholder Engagement Plan described in Attachment H – Additional Information on SIA includes engagement with the Industry Capability Network and Queensland Resource Council in relation to the Local Content Plan.

Section 24 of the draft EIS contains a commitment to the development of a Local Content Plan prior to the commencement of construction, and in consultation with the CTRC, IRC and local businesses.

Item	Draft EIS Section	Description of Issue	CPD Proposed Solution
27.	<i>Socio-Economic Impact Assessment</i> (Appendix N)	<u>Local Content</u> Cumulative Impacts across supply chain in relation to Adani and other Galilee Projects running concurrently.	What engagement has there been with Adani in regard to joint mitigation and management strategies that will be implemented, to ensure Local and Regional businesses have capability and capacity to pursue supply chain opportunities.

Engagement with Adani in relation to mitigation and management strategies to address cumulative impacts across the supply chain will be undertaken as part of the development of the Local Content Plan. The Stakeholder Engagement Plan described in Attachment H – Additional Information on SIA includes engagement with Adani in relation to local content.