





Boggabri Coal Operations Pty Ltd

Social Impact Management Plan

August 2021







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BCOP Page i



Contents

		Page number
1. Intro	oduction	1
1.1	Overview	1
1.2	Background	1
1.3	Purpose and Scope	2
1.3.1	Purpose	2
1.3.2	Scope of SIMP	2
1.4	Document Structure	2
2. Stat	tutory Requirements and Policy Setting	4
2.1	Leases and Approvals	4
2.2	Project Approval Conditions and Statement of Commitments	5
2.2.1	Farming Communities Conditions	6
2.2.2	Housing Commitment	6
2.3	Voluntary Planning Agreement	9
2.4	Community Consultative Committee	12
2.5	Other Guidelines	12
2.6	Governance	13
2.6.1	Regional Plan	13
2.6.2	Narrabri and Gunnedah Shire Council Policy Settings	14
3. Exis	sting Operations	15
3.1	Introduction	15
3.2	Overview	15
3.2.1	Construction Workforce	15
3.2.2	Operations Workforce	16
3.2.3	Workforce Residential Location	17
3.2.4	Workforce Arrangements	18
3.2.5	Workforce Training	
3.3	Property Purchases	18
4. Soc	ial Baseline	19
4.1	Statistical Geography	
4.2	Social Area of Influence	
4.3	Project Social Setting	
4.4	Population and Demography	
4.4.1	Population	
4.5	Population Mobility	
4.6	Population Projections	
4.7	Housing Profile	22



	4.8	Household Composition	26
	4.8.1	Socio-Economic Disadvantage	27
	4.9	Employment and Industry	28
	4.10	Community Services and Facilities	31
	4.10.1	Education	31
	4.10.2	Children's Services	33
	4.10.3	Medical and Emergency Services	33
	4.10.4	Mining Development and Major Projects	35
	4.10.5	Community Issues and Concerns	37
5.	Socia	al Impacts	40
	5.1	Methodology	40
	5.2	Background	40
	5.3	Predicted Impacts	41
	5.3.1	Negative Impacts	41
	5.3.2	Opportunities	50
	5.4	Decommissioning	53
6.	Com	munications and Community Engagement	55
	6.1	Community Consultative Committee	55
	6.2	Community Complaints Register	56
	6.3	Community Liaison	56
7.	Mana	agement and Monitoring	57
	7.1	Management	57
	7.2	Monitoring	62
	7.3	Reporting and Review	62
	7.4	Roles and Responsibilities	62
R	Refe	rences	63



List of tab	les P	age number
Table 2.1	Summary of Key Leases, Licences and Approvals	4
Table 2.2	Project Approval Conditions - Condition 77	5
Table 2.3	Agricultural Production Conditions	6
Table 2.4	Housing Strategy Conditions	6
Table 2.5	Voluntary Planning Agreement 2012	9
Table 2.6	Breakdown of VPA Contributions (to end 2019)	10
Table 2.7	BCOP Local Spend 2013 - 2019	11
Table 2.8	BCOP Community Contributions 2012 - 2019	12
Table 2.9	Narrabri and Gunnedah Shire Council Plans and Strategies	14
Table 3.1	Residential Locality of BCOP Employees - 2020	17
Table 3.2	Residential Locality of Contractor Employees (June 2020)	17
Table 3.3	BCOP owned properties	18
Table 4.1	Population Growth 2006-2016	21
Table 4.2	Aboriginal and Torres Strait Islander 2006-2016	21
Table 4.3	Population Mobility	22
Table 4.4	Population Projections 2016-2041	22
Table 4.5	Median Weekly Rent 2006-2016 – Census Data	23
Table 4.6	Median Weekly Rent By Postcode – Houses	24
Table 4.7	Housing Availability September 2020	25
Table 4.7	Dwelling Type 2016	26
Table 4.9	÷ • • • • • • • • • • • • • • • • • • •	26
	Household Composition 2016	26
Table 4.10	Household Composition 2016	20 27
Table 4.11	Population Diversity and Vulnerability Indicators 2016	
Table 4.12	Community Socio-Educational Advantage Rating Trend Data - Selected Scho	
Table 4.13	Early Childhood Services in Narrabri LGA and Gunnedah LGA	33
Table 4.14	Nearby Existing Operations and Approved Projects Projects in the Development Approved Projects	35 36
Table 4.15 Table 5.1	Projects in the Development Approvals Process Summary of Producted Social Impacts From the 2013 SIMP	40
Table 5.1	Summary of Predicted Social Impacts From the 2013 SIMP Children's Services	42
Table 5.2		43
Table 5.3	Community Cohesion Agricultural Productivity	43
Table 5.4 Table 5.5	Cultural Heritage	45
	Traffic Management	46
Table 5.6 Table 5.7	Housing and Short-Term Accommodation	47
Table 5.7	· · · · · · · · · · · · · · · · · · ·	49
Table 5.6	Cumulative Social Impacts Employment and Training Opportunities	50
Table 5.9	Indigenous Employment and Training Opportunities	50 51
Table 5.10	Social Infrastructure Enhancements	52
Table 5.11	Local Business Development Opportunities	52 52
Table 5.12	• • • • • • • • • • • • • • • • • • • •	53
Table 5.13	Cumulative Economic Benefits of Mining Local and Regional Economic Impact of Mining 2018-2019	53 53
Table 5.14	· · · · · · · · · · · · · · · · · · ·	55 55
Table 6.1	Communications and Community Engagement Activities CCC Condition	56
Table 0.2 Table 7.1		58
Table 1.1	Summary of Proposed Management and Monitoring Framework	50
List of gra		
Graph 4.1	Housing Tenure 2016	23
Graph 4.2	Labour Force Size, 2010 - 2020	29
Graph 4.3	Unemployment Rate, 2010 - 2020	30
Graph 4.4	Industry of Employment 2016	31
Graph 4.5	Regional High School Enrolments 2008 - 2019	32
Graph 4.6	Enrolments at Small Local Schools 2008 - 2019	32
Graph 4.7	Complaints Analysis 2011 - 2020	38
Page iv		ВСОР



List of figures

Figure 1	Regional Locality
Figure 2	Area of Influence
Figure 3	Approved Mining Operations

List of appendices

Appendix A	DPIE Endorsement	67
Appendix B	Record of Stakeholder Consultation	68
Appendix C	Social Impact Significance Assessment Methodology	71

BCOP Page v



Abbreviations

Abbreviation	Term
ABS	Australian Bureau of Statistics
ASCF	Aboriginal Stakeholder Consultation Forum
ASA	Agricultural Suitability Assessment
ATSI	Aboriginal and Torres Strait Islander
ВСМ	Boggabri Coal Mine
BCM CCC	Boggabri Coal Mine Community Consultative Committee
ВСОР	Boggabri Coal Operations Pty Ltd
BOAs	Biodiversity Offset Areas
ВТМ ССС	Boggabri - Tarrawonga - Maules Creek Community Consultative Committee
CCC	Community Consultative Committee
СНМР	Cultural Heritage Management Plan
СНРР	Coal Handling and Preparation Plant
DIDO	Drive-In / Drive-Out
DPE	Department of Planning and Environment
DPIE	Department of Planning, Industry and Environment
EA	Environmental Assessment
EIS	Environmental Impact Statement
ELF	Early Learning Facility
ERP	Estimated Resident Population
FIFO	Fly-In / Fly-Out
FTE	Full Time Employment
GISERA	Government Industry Spatial and Environmental Research Alliance
IAR	Idemitsu Australia Resources
IDEMITSU KOSAN	Idemitsu Kosan
IPP	Indigenous Participation Plan
Km	Kilometres
LEP	Local Environment Plan
LCP	Local Content Plan
LGAs	Local Government Areas
MCCM	Maules Creek Coal Mine
MDSIMP	Mine Decommissioning Social Impact Management Plan
МОР	Mining Operations Plan
Mtpa	million tonnes per annum
NENW	New England North West Regional Plan
NSC	Narrabri Shire Council
NSW	New South Wales
PAC	Planning Assessment Commission
RAPs	Registered Aboriginal Parties
SIMP	Social Impact Management Plan
SSC	State Suburb

Page vi BCOP



SSD	State Significant Development 09_0182	
TCM	Tarrawonga Coal Mine	
TMP	Traffic Management Plan	
VPA	/oluntary Planning Agreement	
Whitehaven	Whitehaven Coal Limited	

BCOP Page vii



1. Introduction

1.1 Overview

The Boggabri Coal Mine (BCM) is an open cut coal mine located 15 kilometres north-east of the township of Boggabri in north-western New South Wales (NSW). BCM is located within the Leard Forest Mining Precinct (Figure 1). This precinct also includes the existing Maules Creek Coal Mine (MCCM) and the Tarrawonga Coal Mine (TCM), both of which are managed by Whitehaven Coal Limited (Whitehaven).

The BCM is managed by Boggabri Coal Operations Pty Ltd (BCOP), which is a wholly owned subsidiary of Idemitsu Australia Resources (IAR) Group. IAR is a subsidiary of the Japanese company Idemitsu Kosan Co Ltd (Idemitsu Kosan). BCM is a joint venture between IAR (80%), Chugoku Electric Power Australia Resources Pty Ltd (10%) and NS Boggabri Pty Limited (10%).

Environmental assessments first commenced at BCM in 1976 followed by grant of approval for the project in 1989, and the commencement of operations in 2006. In 2009, BCOP lodged a major project application under the now-repealed Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This Project Approval 09_0182 (now declared to be a State Significant Development Approval (SSD)) 09_0182), was granted by the NSW Planning Assessment Commission (PAC) in June 2012 for the Continuation of Mining Project. SSD 09_0182 (as modified on six occasions to date), provides approval for the production of up to 8.6 Mtpa of product coal until December 2033 and the transport of up to 10 Mtpa of product by rail (up to 8.6 Mtpa from BCM and up to 3 Mtpa from TCM (subject to agreement)).

1.2 Background

Schedule 3, Condition 77 of SSD 09_0182 requires BCOP to prepare a Social Impact Management Plan (SIMP). A SIMP was developed in 2013 in consultation with Narrabri Shire Council (NSC), Gunnedah Shire Council (GSC), BCM's Community Consultative Committee (CCC), Aboriginal stakeholders, relevant Government agencies and service providers, and other mine operators in the Leard Forest Mining Precinct (refer to Appendix B). The 2013 SIMP was submitted to and approved by the former NSW Department of Planning and Infrastructure (DPI) on 21 April 2014.

The 2013 SIMP assessed the social impacts likely to be experienced by local stakeholders as a result of construction, operation and decommissioning of the BCM, and established management measures to mitigate the negative impacts and enhance the identified benefits. In this instance, 'construction' referred to the activities, including development of new infrastructure, required to facilitate the expansion of BCM consistent with the 2012 approval. Construction commenced in 2012 and concluded in 2015.

The draft 2016 SIMP covered the reporting period 2016 - 2018 and was issued to the former Department of Planning, Industry and Environment (DPIE) in June 2016. The draft 2016 SIMP was also distributed to the BCM CCC, NSC and GSC for review and feedback.

In the context of the SIMP, the Local Area has been defined as the Narrabri and Gunnedah Local Government Areas (LGAs) (Figure 2). The regional area refers to the New England North West area. The social area of influence is further described in Section 4.2.



1.3 Purpose and Scope

1.3.1 Purpose

This document is the 2020 SIMP for the BCM. The purpose of the 2020 SIMP is to provide a documented roadmap for the management and monitoring of potential social impacts and opportunities associated with the ongoing operation of the BCM for the calendar period 2020-2022.

The objectives of the 2020 SIMP are to:

- Identify the potential negative impacts and opportunities of the operations phase of the BCM;
- Document specific strategies and actions to avoid, mitigate or manage the identified impacts and enhance opportunities; and
- Provide clear definition of the roles and responsibilities for social impact management that apply to all BCM employees, contractors and subcontractors.

1.3.2 Scope of SIMP

Since the submission of the draft 2016 SIMP the BCM has transitioned to become the mine operator directly running mining operations. The 2020 SIMP is therefore focussed on the identification and assessment of impacts and opportunities associated with the operations phase of the Project for the period 2020-2022. The assessment focusses on the impacts and opportunities likely to be experienced by local stakeholders, including residents of Boggabri, Narrabri, Gunnedah and Baan Baa. The management measures and corresponding monitoring requirements documented in the draft 2016 SIMP have been updated to reflect the impacts and opportunities likely to occur over the next three years of operations.

The SIMP has been developed with consideration of the *New England North West Regional Plan* 2036 (NENW Regional Plan) which was released by DPE in August 2017. This plan contains a number of actions relating to the effective management of the social impacts of mining and coal seam gas developments in the region.

Ongoing consultation with stakeholders has been undertaken throughout the operations phase of the BCM. The CCC has been the key mechanism through which consultation between BCOP, local communities of interest and local government authorities has occurred.

1.4 Document Structure

The 2020 SIMP is structured as follows:

- Section 1: Forms the introduction to the SIMP and includes:
 - A summary of the BCM including current approvals; and
 - ▶ A description of the purpose and scope of the SIMP document.
- Section 2: Outlines the statutory requirements associated with the 2020 SIMP;

Page 2 BCOP



- Section 3: Provides an overview of the existing operations at BCM, including a workforce profile;
- Section 4: Presents the social baseline for the social area of influence;
- Section 5: Presents the reforecast impacts and opportunities for the period 2020-2022 and includes consideration of potential cumulative impacts and opportunities;
- Section 6: Details the communication tools employed by BCOP to engage with its workforce, key stakeholders and residents of nearby communities; and
- Section 7: Outlines the management measures that will be implemented to mitigate the potential negative impacts and enhance the potential benefits of the BCM. Section 7 also identifies monitoring and performance reporting requirements.



2. Statutory Requirements and Policy Setting

2.1 Leases and Approvals

The key leases, licences and approvals under which the BCM operates are summarised in Table 2.1.

Table 2.1 Summary of Key Leases, Licences and Approvals

Lease/licence/approval	No.	Granted	Expires	Approved under
Mining Lease	CL 368	15/11/1990	14/11/2032	Mining Act 1992
Mining Lease	A355	19/07/1984	11/04/2018	Mining Act 1992
Mining Lease	A339	11/04/1984	11/04/2022	Mining Act 1992
Mining Lease	ML1755	30/06/2017	30/06/2038	Mining Act 1992
Project Approval	09_0182	18/07/2012	31/12/2033	Environmental Planning and Assessment Act 1979 (EP&A Act)
Project Modification	1	Withdrawn	31/12/2033	Section 75W of the (EP&A Act)
Project Modification	2	17/02/2015	31/12/2033	Section 75W of the (EP&A Act)
Project Modification	3	17/03/2014	31/12/2033	Section 75W of the (EP&A Act)
Project Modification	4	23/03/2015	31/12/2033	Section 75W of the (EP&A Act)
Project Modification	5	30/03/2016	31/12/2033	Section 75W of the (EP&A Act)
Project Modification	6	07/07/2017	31/12/2033	Section 75W of the (EP&A Act)
Project Modification	7	27/05/2019	31/12/2033	Section 75W of the (EP&A Act)
Environment Protection Licence	12407	11/01/2006	In force until surrendered	Protection of the Environment Operations Act 1997

Source: Annual Review, 2019 and DPIE, 2019.

The BCM PA was originally granted under the former Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The BCM operation was a transitional Part 3A project under schedule 6A of the EP&A Act and accordingly a number of modifications were sought to the SSD under the former section 75W of the EP&A Act.

In 2012, BCOP was granted SSD 09_0182 to expand the BCM. This allowed for extraction of up to 7 Mtpa of product coal until 2033, and involved development of additional infrastructure, including a new rail load out facility and a new coal handling and preparation plant. This construction work was undertaken between 2012 and 2015.

The SSD provides approval for the production of up to 8.6 Mtpa of product coal until December 2033 and the transport of up to 10 Mtpa of product by rail (i.e. up to 8.6 Mtpa from BCM and up to 3 Mtpa from TCM (subject to agreement)).

Page 4 BCOP



2.2 Project Approval Conditions and Statement of Commitments

Table 2.2 details Schedule 3, Condition 77 of the PA, which requires BCOP to develop and implement a SIMP for the BCM. Table 2.2 also identifies where in this document, each requirement is addressed. As required by the PA, this plan has been prepared by suitably qualified persons endorsed by DPIE (Appendix A).

 Table 2.2
 Project Approval Conditions - Condition 77

Condition	Requirement	SIMP Reference
77	The Proponent shall prepare and implement a Social Impact Management Plan for the Project to the satisfaction of the Secretary to manage the potential impacts of the Project. This plan must: a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;	This plan has been prepared by a qualified and experienced person/s endorsed by DPIE (refer Appendix A)
	b) be prepared in consultation with Narrabri Shire Council, Gunnedah Shire Council, the CCC, Aboriginal stakeholders and other relevant Government agencies and service providers, other mine operators in the Leard Forest Mining Precinct and submitted to the Secretary for approval within 12 months of Project approval;	Appendix B
	 take into consideration relevant actions related to social impacts identified in the Strategic Regional Land Use Plan for New England North West¹; 	Section 2.6.1
	d) identify the social impacts resulting from the various stages of the Project (including construction, operational and decommissioning stages) in both the local and regional context, including but not limited to:	Section 5.3
	 soft infrastructure such as housing, medical, education, childcare and emergency services; 	
	 hard infrastructure such as local and regional roads and rail; 	Section 5.3
	economic/business development;	Section 5.3
	 workforce demand/supply factors, such as training needs; and 	Section 3.2.5 and 5.3
	 labour availability impacts on other sectors, such as agricultural enterprises; 	Section 4.9 and 5.3
	e) incorporate the housing availability and affordability initiatives identified in the EA, including the BCOP Housing Commitment;	Section 2.2.2, 4.7 and 5.3.1
	f) identify proposed initiatives for promoting workforce opportunities for residing in the area/region as opposed to FIFO/DIDO;	Section 3.2.3 and 5.3.2
	g) include a management and mitigation program to minimise and/or mitigate social impacts; and	Section 7
	h) include a monitoring program, incorporating key performance indicators and a review and reporting protocol, including reporting in the annual review.	Section 7

¹ Note: The Strategic Regional Land Use Plan for New England North West was replaced by the New England North West Regional Plan 2036 (DPE 2017).



2.2.1 Farming Communities Conditions

BCOP has committed to implement strategies related to the maintenance of sustainable agricultural production on BCOP owned land and on land acquired for the BCM due to impacts on residential receivers (primarily noise affected land). Environmental Performance Conditions 73 and 74 of Schedule 3 of the SSD are reproduced in Table 2.3.

Table 2.3 Agricultural Production Conditions

Condition	Requirement
73	The Proponent shall use its best endeavours to ensure that the agricultural productivity of land that is Project related (including remaining agricultural land on properties forming the biodiversity offset area) is maintained and enhanced
74	The Proponent shall ensure that any properties primarily used for agricultural production that are acquired by the Proponent due to impacts on residential receivers continue to be operated and maintained for sustainable agricultural production, unless they have been incorporated into an approved biodiversity offset area. This condition ceases to have effect if the Proponent disposes of the property.

The purpose of Conditions 73 and 74 are to ensure that impacts to agricultural productivity are minimised and to mitigate the cumulative pressures on the farming community.

BCOP provides opportunities for the agriculture sector in times of drought and low productivity, notably in terms of alternative employment opportunities. BCOP also intends to continue agricultural operations, predominantly cattle grazing, on approximately 4,000 hectares of country that it holds. BCOP, in accordance with the recommendations made in the Agricultural Suitability Assessment², undertake cropping and grazing activities under private lease agreements with local landholders. Any farming operations will be subject to performance guidelines to preserve both agricultural and environmental values of the land and to safe guard the operations of the BCM. In accordance with Condition 74, agricultural properties purchased by BCOP continue to be maintained for sustainable agricultural production where possible.

2.2.2 Housing Commitment

Commitment No. 30 of the Project Statement of Commitments (Appendix 5 of SSD 09_0182) states that BCOP will implement strategies 'to ensure the Project does not have a material impact on housing availability and affordability in the Narrabri and Gunnedah LGAs'. Commitment No. 30 is also referred to as the Boggabri Housing Commitment. Condition 75 of Schedule 3 of the SSD 09_0182 provides for the implementation of Commitment 30 (Table 2.4).

Table 2.4 Housing Strategy Conditions

Condition	Requirement
75.	The Proponent shall implement the BCOP Housing Commitment identified in the EA, in consultation with Council, to provide for:
(a)	Construction of a minimum of 10 dwellings in Boggabri, within a timeframe agreed by Council;
(b)	Construction of a minimum of 20 dwellings in Narrabri, within a timeframe agreed by Council; and

² Appendix G of the Biodiversity Management Plan (BCOP, 2015)

Page 6



Condition	Requirement
(c)	Implementation of remaining commitments within the terms of the approved Social Impact Management Plan (see condition 77 of Schedule 3).
	If there is any dispute between Council and the Proponent regarding the timing of construction, then either party may refer the matter to the Director-General for resolution, whose decision shall be final.

The purpose of the Boggabri Housing Commitment is to mitigate the cumulative pressure on housing availability and affordability in both Narrabri LGA and Gunnedah LGA (Hansen Bailey, 2011, pp. 39).

Scope of Boggabri Housing Commitment

The full scope of BCOP's commitment is documented in the *Boggabri Coal Mine Residual Matters Report* (Hansen Bailey, 2011, pp. 40) and replicated below:

- 1. Construct a minimum of 10 dwellings in Boggabri on land already owned by BCOP.
- Underwrite the construction (through guaranteed rental for a period as required to be negotiated and agreed with the relevant builders to incentivise them) of a minimum of 20 dwellings in Narrabri on NSC approved subdivision land.
- 3. Monitor the effect of increasing employment numbers at BCOP on housing affordability and availability in the Narrabri and Gunnedah LGAs. This will be monitored over the next two years or until BCM reaches peak operational employment numbers as stated in the EA.
- 4. If this monitoring determines that the population increase, as a result of employment growth at BCM, is unreasonably increasing the cost of housing within Narrabri and/or Gunnedah LGAs, BCOP will commit to an underwriting of dwelling construction to a maximum of a further 20 dwellings (60 per cent Narrabri Township; 30 per cent Gunnedah Township; 10 per cent Boggabri Township).
- 5. If employment growth at BCM still affects housing availability and affordability, and the points above will not be enough to keep housing costs at a reasonable level, then consideration will be given to the provision of additional accommodation services based on the anticipated forecast workforce. If necessary, BCOP will investigate underwriting some village style accommodation (either at Boggabri or Narrabri Township) to a maximum of 100 units and/or the underwriting of a maximum of a further 20 dwellings (60 per cent Narrabri Township; 30 per cent Gunnedah Township; 10 per cent Boggabri Township).
- 6. At every stage, BCOP commits to consulting with the NSC and GSC on their proposals.

Housing Commitment Assessment

BCOP has commenced fulfilling the housing commitment with the construction of the Boggabri Early Learning Facility (ELF) which comprised of a 7 month build time and was opened on 28 June 2021.

The NSC identified the need for the ELF within the Boggabri township during consultations in 2018. BCOP subsequently sought the relevant approvals and complete the construction of the ELF in late 2020. The ELF was constructed to satisfy a portion of BCOP's housing commitment.



Notwithstanding, additional dwellings will be constructed to meet the initial dwelling commitment, unless alternative arrangements are agreed with NSC.

BCOP has met with NSC on multiple occasions to discuss BCOP's housing commitment. Whilst timing has not been confirmed with NSC to date, these discussions have identified the opportunity for BCOP's housing commitment to be incorporated into the NSC Housing Strategy, which is scheduled for preparation by end of June 2022. The NSC Housing Strategy is a council initiative which has been identified as an action under *Strategic Direction 3: Progressive and Diverse Economy* and to address *Strategy Objective 3.4 – Adequate Housing Options will be Available to Meet Demands Across the Shire* within the *Narrabri Shire Operational Plan 2021/2022* (NSC, 2021). Further consultation is proposed with NSC in Q3 of 2021 in order to identify the key requirements to be satisfied by BCOP's housing commitment.

BCOP participated in GSC's recent 2021 consultation round table for their GSC's *Local Housing Strategy* which is currently being prepared.

During 2021, BCOP engaged with an architect to prepare housing design plans. Final detailed plans are scheduled to be available by the end of 2021 (subject to consultation with NSC) with construction planned to commence in 2022, following the receipt of the necessary planning approvals from NSC.

The analysis of housing data presented in this SIMP and in the BCOP Annual Review (2018, 2019 and 2020) suggests changes have recently occurred in the Narrabri Shire housing market, particularly in Boggabri. Recent analysis of the housing market in both Boggabri and Narrabri (Section 4.7) shows very low vacancy rates across both locations. Housing market analysis undertaken to inform the draft 2016 SIMP showed moderate to high vacancy rates of 4.8% in Narrabri and 7.8% in Boggabri. Housing trends in the Local Area are further described in Section 4.7.

As part of each Annual Review, and in accordance with Schedule 3, Condition 77 of, BCOP conduct a monitoring review, inclusive of housing data (i.e. housing availability, affordability and dwelling/stock type). This housing data is also presented in Section 4.7.

Since the preparation of the Environmental Assessment (EA) in support of SSD 09_0182, Civeo has developed accommodation villages on the outskirts of Boggabri and Narrabri. The availability of accommodation at these accommodation villages during the construction phase of BCM substantially reduced the potential for housing market impacts within the Narrabri and Gunnedah LGAs. The operations phase workforce associated with BCM is accommodated across the Local Area in permanent residential housing (i.e. not in the accommodation villages). BCOP uses the existing various accommodation types including the workforce accommodation village in Boggabri for contractors.

BCOP also leases its properties which are no longer required for the BCMs activities to members of the local community.

The housing supply in the Local Area will be carefully assessed in advance of any material increase in workforce size or material change in mining contractor arrangements over the next three years to determine the likely influence on housing demand.

Page 8 BCOP



2.3 Voluntary Planning Agreement

A Voluntary Planning Agreement (VPA), executed under Section 93F of the EP&A Act, was established between DPIE, BCOP and NSC in 2012. This VPA discussed with NSC the benefits detailed in Table 2.5. The VPA substantially fulfils the Community Commitment (No.29) contained in the Consolidated Statement of Commitments, which is included within Appendix 5 of PA. The latter states that the value of this commitment is 'up to \$9.67 million' contributed to the NSC together with 'full satisfaction' of any requirements under Section 94 of the EP&A Act.

Table 2.5 Voluntary Planning Agreement 2012

Paranishia.	Amount to Be	Dura Data
Description	Contributed	Due Date
Funds to be utilised on the upgrade of Boggabri Caravan Park and Swimming Pool Complex.	\$1,600,000	1 July 2013
Community contribution to the Boggabri Home and Community Care Centre to assist in the purchase of its current premises and any upgrades as required.	\$200,000	1 July 2012
Funds to be utilised on the replacement of the bridge across the Namoi River and other works on Harparary Road.	\$4,300,000	1 July 2014
Funds to be utilised on the upgrade of the Narrabri Aquatic Centre to assist in it becoming a 365-day facility.	\$2,500,000	1 July 2013
Funds to be held in trust for 'Environment' projects within proximity of the Boggabri Mining Precinct to be administered by the BCOP Community.	\$100,000	1 July 2013
Consultative Committee (CCC). The aim is to set up a 'pool of funds' with all current and future mines being compelled to contribute \$100,000 as a once only upfront fee to commence the fund. The Council and BCOP will work through the CCC to administer the funds through a grant application process to be in place by the 30th June 2013. The first round of applications will be called for in the 2013/14 financial year. Funds to be expended on: 1. Road works to be undertaken in close confines to the mine precinct in the first instance and then radiating out at Council's discretion. 2. Allocation to infrastructure projects including environmental projects at Council's discretion.	\$0.075 per tonne of coal produced from the Project and is liable for royalty payment under the Mining Act (Tonnage Payment). See Schedule for indexation and review conditions.	1 July 2013 payment monthly at the same time royalty is paid.
BCOP to provide Council on an annual basis 25,000 tonnes of basic material suitable for Council roads buildings subject to appropriate approvals being obtained. Should BCOP need crushed gravel, then the Council would provide this at nil cost.	Gravel 25,000 tonnes per annum at nil cost to Council.	Annual Basis



Since the VPA's commencement in 2013, a total of \$12,048,039 has been provided to fund projects in the Narrabri LGA. Royalty payments have increased in parallel with attainment of full production. Table 2.6 confirms contributions made to date by BCOP. Contributions will continue to be paid in accordance with the VPA.

In addition to the VPA, BCOP has provided ongoing sponsorships and grants to local community initiatives. Some of the community initiatives and events that BCOP has supported to date include:

- Boggabri Drovers Campfire;
- Boggabri and Maules Creek Campdraft;
- Boggabri Public School Facilities Upgrades;
- Narrabri Business Awards;
- Narrabri and District Chamber of Commerce;
- Boggabri Public School Annual Presentation;
- Gunnedah Fire Brigade;
- The Courier 'Live & Leard Locally' Promotion;
- NSW Police Country North; and
- Spring Fair and Food Festival.

During 2019, BCOP had a direct local spend of \$21.3 million (Table 2.7). Direct local spend encompasses engaging local trades to perform work on site and the use of local suppliers wherever possible.

Table 2.6 Breakdown of VPA Contributions (to end 2019)

Description	Amount Contributed	Date Contributed
Upgrade to Boggabri Caravan Park and Swimming Pool Complex	\$1,600,000	1 July 2013
Community contribution to the Boggabri Home and Community Care Centre applied to the purchase of its current premises and any upgrade of those premises	\$200,000	31 May 2013
Funds applied to the replacement of the bridge across the Namoi River (and other works) on Harparary Road	\$4,300,000	1 July 2014
Funds applied to the upgrade of the Narrabri Aquatic Centre to assist in it becoming a 365 day per year facility	\$2,500,000	1 July 2013
Funds applied to 'Environment' developments within proximity of the BCOP Mining Precinct, as directed by the BCOP CCC	\$100,000	1 July 2013
Royalties	\$3,348,039.64	Paid since 1 March 2013
Total	\$12,048,039.64	

Source: BCOP, 2019.

Page 10 BCOP



Local trades and suppliers benefiting from local spend include, but are not limited to (Chart 2.1):

- Trades Plumbers, fabricators, fitters, mechanics, auto electricians;
- Earthmoving;
- Car dealers;
- Services;
- Printeries; and
- Small shops and businesses.

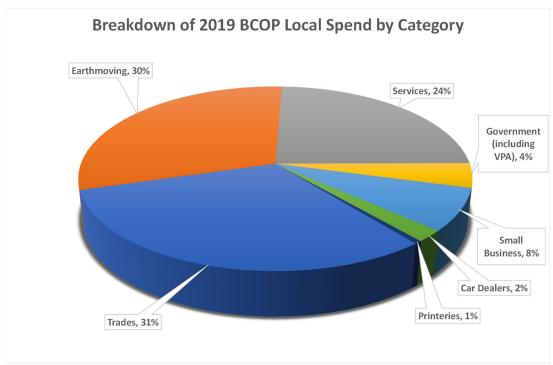
Details of the BCOP's expenditure within the local area are presented within each Annual Review.

Table 2.7 BCOP Local Spend 2013 - 2019

Year	Total Local Spend (exc. GST)
2013	\$27,757,129
2014	\$23,580,672
2015	\$8,460,064.68
2016	\$12,704,398.46
2017	\$15,348,559.78
2018	\$20,426,923.31
2019	\$21,281,152
Total	\$129,558,889

Source: BCOP, 2021.

Chart 2.1 Breakdown of BCOP 2019 Local Spend by Category





BCOP also contributes donations and sponsorships for local community groups and events (Table 2.8).

Table 2.8 BCOP Community Contributions 2012 - 2019

Year	Total Contributions
2012	\$98,876
2013	\$39,100
2014	\$52,000
2015	\$64,254
2016	\$80,441
2017	\$125,141
2018	\$130,510
2019	\$185,750
Total	\$776,072.00

Source: BCOP, 2019.

2.4 Community Consultative Committee

Schedule 5, Condition 7 of the SSD requires BCOP to operate a CCC for the Project to the satisfaction of the Secretary of DPIE. The purpose of a CCC is to provide a forum for open discussion between representatives of the company, the community, the applicable local council(s) and other stakeholders.

The BCM CCC is operated generally in accordance with the NSW Government DPE *Community Consultative Committee Guideline 2019* (DPE 2019). The BCM CCC was established in 2011 to provide a forum for ongoing communication between the BCOP, local communities and local government authorities. The BCM CCC meets quarterly to discuss issues directly relating to BCM's operations, including environmental performance and community relations. Whilst its membership has varied over the years, it generally comprises Councillors from the Gunnedah and Narrabri LGAs, representatives of local community organisations and representatives from the local Indigenous community. The BCM CCC meetings minutes are provided on Idemitsu's Project website (https://www.idemitsu.com.au/mining/operations/boggabri-coal/community/community-consultative-committee/).

BCOP is also a member of the Boggabri - Tarrawonga - Maules Creek (BTM) CCC, which was established to discuss cumulative impacts and their management between the projects in the area.

2.5 Other Guidelines

The NSW Government does not have legislation and or specific guidance for the preparation of a SIMP document for onshore mining and petroleum operations.

The NSW Department of Planning and Environment (DPE) Social Impact Assessment Guidelines for State Significant mining, petroleum and extractive industry development (DPE 2017a) (SIA Guideline) documents the approach to the preparation of Social Impact Assessment (SIA) for State Significant resource projects. Accordingly, the approach taken to prepare this SIMP is generally in accordance with the 2013 SIMP and the framework guidance of the SIA Guideline. The SIA Guideline details the approach required for the assessment of impacts; the impacts outlined in Section 5 were identified and assessed using the SIA Guideline (2017).

Page 12 BCOP



2.6 Governance

The following sections describe governance arrangements in the Project's area of influence. The assessment of impacts was informed by the planning priorities identified by the relevant regional and local governments. The 2020 SIMP has been developed with consideration of the:

- Regional Plan for New England North West;
- Narrabri Local Environment Plan 2012 (Narrabri LEP);
- Gunnedah Local Environment Plan 2012 (Gunnedah LEP);
- Narrabri Community Strategic Plan 2017-2027; and
- Gunnedah Community Strategic Plan 2017-2027.

2.6.1 Regional Plan

The Project is located in the New England North West Region of NSW. The regional area is governed by the *New England North West Regional Plan 2036* (Regional Plan) (DPE 2017). This plan contains a number of actions relating to the effective management of the social impacts of mining and coal seam gas developments in the region. The Regional Plan, published by the NSW Government in 2017 (DPE 2017) replaces the former *New England North West Strategic Regional Land Use Plan* (SRLUP) (DPI 2012).

The Regional Plan encompasses the LGAs of Armidale, Glen Innes, Severn, Gunnedah, Gwydir, Inverell, Liverpool Plains, Moree Plains, Narrabri, Tamworth, Tenterfield, Uralla, and Walcha. The Regional Plan provides an overarching framework to guide subsequent and more detailed land use plans, development proposals and infrastructure funding decisions in the New England North West Region. The Regional Plan is a tool to guide the NSW Government's land use planning priorities and decisions over the next 20 years. The Plan will be reviewed and adjusted every five years, or as necessary. The vision for the New England North West Region is articulated in four regionally focused goals:

- Have a strong and dynamic regional economy the BCM provides employment and procurement opportunities and benefits, whilst also committing to local spend. The BCM encourages a strong regional economy;
- Encourage a healthy environment with pristine waterways the potential environmental impacts of the BCM are minimised through project design, compliance with regulatory requirements and through the implementation of a number of environmental management plans;
- Develop strong infrastructure and transport networks for a connected future through the
 delivery of the Boggabri ELF, the fulfilment of the Boggabri Housing Commitment and
 investments facilitated by the BCM VPA and BCOP community sponsorships and donations
 the BCM supports improvements in social infrastructure across the Local Area; and
- Encourage attractive and thriving communities the BCM employs a locally based workforce which in turn supports population stability and contributes to community strength. The BCM VPA and community investments by BCOP support the development of thriving local communities.



2.6.2 Narrabri and Gunnedah Shire Council Policy Settings

Table 2.9 summarises the objectives and desired outcomes of the relevant NSC and GSC strategies and plans.

Table 2.9 Narrabri and Gunnedah Shire Council Plans and Strategies

DI 101 1	
Plan / Strategy	Summary
Narrabri LEP	The aims of the Narrabri LEP include:
(2012) 1	 orderly management, development and conservation of natural, mineral, agricultural and heritage resources;
	diversity of settlement and living options; and
	diversity of business enterprise and employment options.
Narrabri Community	NSC's vision is to develop as a strong and vibrant regional growth centre, including:
Strategic Plan (2017-2027) ²	 Narrabri LGA as a regional centre with an airport and infrastructure of regional quality;
	adequate health services to meet the needs of a regional centre;
	expanded tertiary educational facilities;
	adequate accommodation available to meet demand;
	sustainable land use;
	ensure a clean, green environment for the future; and
	a safe place to live, work and experience cultural activities.
Gunnedah LEP (2012) ³	The aims of the Gunnedah LEP include:
(2012)	 conserve and enhance local ecological integrity, heritage and significance;
	 promote local economic wellbeing in a socially and environmentally responsible way;
	 proper management of productive agricultural land, avoiding fragmentation;
	facilitate a range of new housing and housing choice;
	 facilitate provision and co-ordination of community services and facilities;
	 seek provision of adequate infrastructure to meet future needs of development;
	 provide direction and guidance in the management of growth and development;
	environmental hazards associated with development;
	conserve the cultural and environmental heritage of Gunnedah; and
	minimise risk of environmental hazards associated with development.
Gunnedah Community Strategic Plan	The strategic plan is based on a vision for a prosperous, caring and proud community which includes:
(2017-2027) 4	welcoming and supporting one another, working in partnership;
	embracing and preserving heritage, natural resources and social fabric; and
	 enjoying access to services and facilities in Gunnedah and Tamworth while valuing the tranquillity, safety, beauty and friendliness of a rural community.

Source/s:

- 1. NSW Government, 2012.
- 2. Narrabri Shire Council, 2017.
- 3. NSW Government, 2012a.
- 4. Gunnedah Shire Council, 2017.

Page 14 BCOP



3. Existing Operations

This section provides an overview of the BCM and describes the relevant socio-economic characteristics of the existing BCM.

3.1 Introduction

The BCM is an open cut coal mine located 15 km north-east of Boggabri, 20 km east of Baan Baa, 41 km north of Gunnedah and 49 km south-east of Narrabri. The approved mining operations of BCM is illustrated in Figure 3.

3.2 Overview

Mining operations at the BCM occur on a 24 hour/7 days a week basis using excavator/shovel and truck open cut mining methods to extract up to 8.6 Mtpa of coal from the Maules Creek formation including coal from the Herndale seam down to the Merriown seam. Up to 4.2 Mtpa of ROM coal can be processed through the Coal Handling and Preparation Plant (CHPP) with the remaining ROM coal produced bypassing the beneficiation process.

Coal is mined and processed on-site to produce an export quality steaming coal and product suitable for pulverised coal injection applications. The product coal is transported via rail from BCM to the Port of Newcastle, where it is exported to overseas markets.

Whilst the BCM is approved to receive, process, stockpile and load onto trains up to 3 Mtpa of coal from the neighbouring TCM, no commercial agreement has been reached with Whitehaven to enable this to occur.

At June 2020, BCM was staffed by approximately 750 personnel this includes employees and contract workers. A number of other short-term contractors and consultants are also employed at BCM for temporal projects and maintenance activities.

3.2.1 Construction Workforce

When the BCM commenced operation in 2006, approximately 105 people were employed, many of whom were drawn from the Local Area. This workforce comprised 90 mining services employees and 15 transport services employees. Between 2012 and 2015, the workforce increased due to construction activities on site and an increased production profile at BCM. Based on a review of construction employment, the peak construction workforce was approximately 600 people. The size of the construction workforce steadily declined leading into operations.

During construction, BCOP prioritised the hiring of locals and encouraged its contractors to do the same. A high percentage of the earthworks and civil trade roles during construction were taken up by locals. The construction work generated substantial employment opportunities for local workers, peaking at over 200 jobs in June 2014.

For non-local workers, agreements were established with construction contractors whereby they were required to provide regular forecasts of anticipated workforce numbers to BCOP, so that temporary accommodation could be booked for construction personnel. BCOP made arrangements with local accommodation providers to house the majority of the construction workforce during construction activities.



3.2.2 Operations Workforce

Construction activities concluded in late 2015, at which point the BCM shifted to being solely operational. BCM is now into its fifth year of operations since the grant of PA.

At the end of December 2017, the BCM shifted to a combination of owner-operator (i.e. BCOP personnel) and mining contractor operated. The major mining contractors operating on site at this time were BGC and One Key. As at January 2020, BGC are now operating as Goldings Contractors Pty Ltd (Goldings). During the first six months of 2019, the majority of operational One Key personnel became BCOP employees.

As at July 2020 the major mining contractors on site included Goldings, Orica Australia Pty Ltd (Orica), Action Drill & Blast Pty Ltd (Action Drilling) and One Key.

All contractors and company ownership personnel working at BCM are required to operate in compliance with the SIMP.

At June 2020, BCM was staffed by approximately 750 personnel including employees and contract workers.

BCOP Employees

The largest share of the total workforce at BCM in July 2020 was attributed to BCOP. During this time, the BCOP team at BCM consisted of 454 employees, of which 80 employees worked a five-day Monday to Friday shift roster, and 374 worked in operations and processing.

Major Mining Contractors

As at July 2020, the Goldings workforce consisted of 161 employees including staff, contractors and maintainers, One Key consisted of 55 operations personnel, Orica consisted of 37 personnel and Action Drilling consisted of 38 personnel.

Indigenous Employees

In 2019, approximately 7% of personnel on site identified as being Aboriginal or Torres Strait Islander.

Implications of COVID 19

Since March 2020 and due to the COVID 19 restrictions many BCOP workers have, where possible, worked from home. BCOP also introduced staggered shift starts on site. A combination of having locally based workers and the introduction of COVID 19 management practices on site e.g. restrictions on the number of people in a vehicle in and around the pit, has meant the BCM operation has been relatively unaffected by COVID 19.

Future Workforce Changes

Mining operations at BCM has reached steady state production and as such, workforce numbers have stabilised. Modification 7 to SSD 09_0182 was granted in May 2019 and is unlikely to impact workforce numbers.

Page 16 BCOP



3.2.3 Workforce Residential Location

BCOP Employees

A breakdown of the localities where the 454 permanent BCOP employees reside is presented in Table 3.1. The majority of BCOP employees reside in the town of Gunnedah.

Table 3.1 Residential Locality of BCOP Employees - 2020

Locality	BCOP Employee Residency
Boggabri	56
Baan Baa	4
Curlewis	5
Gunnedah	186
Manilla	20
Moore Creek	2
Narrabri	42
Other NSW	82
QLD	7
Sommerton	2
Tamworth	46
Willala	2
Total	454

Source: BCOP, 2020

Mining Contractors

Table 3.2 presents a breakdown of the localities where the contractor workforce resides. The majority of contractors reside in Gunnedah.

Table 3.2 Residential Locality of Contractor Employees (June 2020)

Locality	One Key Employees (operators and maintainers)	Goldings	Orica	Action Drill and Blast
Boggabri	4	12	8	3
Gunnedah	25	42	10	3
Narrabri	3	11	2	5
Other NSW	21	88	13	21
QLD	2	8	4	6
Total	55	161	37	38

Source: BCOP, 2020.



3.2.4 Workforce Arrangements

A large portion of the BCM workforce are permanent residents of the Local Area (i.e. both Narrabri and Gunnedah LGAs). The remaining portion of the BCM workforce currently drive-in / drive-out (DIDO) for block shifts. The BCM DIDO workforce typically resides in private rental properties located in Gunnedah, Narrabri and Boggabri.

3.2.5 Workforce Training

BCOP sources and conducts a wide variety of training (both internal and external) based upon the needs of the workforce and of the business. BCOP currently provide training and upskilling programmes for all levels of personnel, including:

- Health Safety Representative Course;
- Frontline Leadership Program;
- Certificate IV Training and Assessment and Assessor Training Program;
- Emergency Response Team Training;
- Trainee Program New/Unskilled Operators;
- Upskill and Optimisation Training Programs;
- Skills and Competency Trainings i.e. Confined Space / Working at Heights; and
- Procedural and Information sessions and training.

BCOP will continue to provide quality training both internally and externally to ensure the workforce has the required skills and knowledge to keep personnel safe, and to operate to the highest level.

3.3 Property Purchases

BCOP has purchased a total of 34 properties since 2006. These properties include agricultural land holdings for biodiversity, residential lots, lots for project use and infrastructure, closed roads and crown land. Limited property acquisition for the purpose of mining is anticipated between 2020 and 2022. Table 3.3 identifies the locations of BCOP owned properties.

Table 3.3 BCOP owned properties

Census Geographical Area	Number of Properties Owned
Boggabri SSC	1
Narrabri LGA	28
Gunnedah LGA	4
Kelvin SSC	1
Total	34

Source: BCOP, 2019.

Page 18 BCOP



4. Social Baseline

This section presents a social baseline summary of the BCM communities of interest i.e. Narrabri and Gunnedah LGAs, as well as Boggabri State Suburb (SSC).

4.1 Statistical Geography

The social profile draws primarily on the most recently available 2016 Australian Bureau of Statistics (ABS) Census data as well as the 2006 and 2011 ABS time series data. The social profile also draws on more recent data available i.e. 2018-2020 in relation to housing and economic data. This section provides data against which future monitoring of social data through the SIMP and Annual Review process can be measured. Census data presented in this section is for the geographical areas of Narrabri and Gunnedah LGAs and the significant urban areas within those LGAs, being the towns of Narrabri, Boggabri and Gunnedah. The Census SSC of Baan Baa has also been profiled, as the Project is located within this SSC. Data is also provided for the NENW Statistical Area 4 (NENW SA4) and the State of NSW for comparative purposes.

4.2 Social Area of Influence

The social area of influence of the project consists of the people that will potentially be impacted (adversely or positively) by project activities. The social area of influence of the BCM extends along the Namoi Valley from Wee Waa in the north-west, to Narrabri Township, Baan Baa, Boggabri, and Gunnedah Township to the south of the mine. Gunnedah Township is the main mining industry service centre of the Gunnedah Basin.

For the purpose of the SIMP, the social area of influence has been defined as the Australian Bureau of Statistics (ABS) LGA's of Narrabri and Gunnedah, including areas and towns within these LGAs, the Boggabri SSC and the New England North West Region.

4.3 Project Social Setting

Kamilaroi

The Project is located within the Kamilaroi people's traditional nation.

Boggabri

Boggabri, the closest town to the Project, is approximately 10 km south-west of BCM. The town of Boggabri had a population of approximately 1,130 people in 2016. Boggabri is a small rural township that historically was a grazing area. Boggabri boasts a heritage-listed railway station established in 1882 that originally serviced the surrounding region. The history and character of Boggabri remain largely that of a small rural community, despite the influence of the mining industry in the past few decades.

Narrabri LGA

Narrabri LGA has an area of 13,015 km² and a population of approximately 13,084 people. The LGA is home to the Namoi River valley and the Pilliga State Forest offering a range of recreational opportunities.



The town of Narrabri was settled during the 1860s and over time, land use in the LGA has diversified from grazing and crop cultivation to cotton production, coal mining and coal seam gas production. Narrabri provides district level services and provides services to Boggabri, Wee Waa, Baan Baa and Maules Creek. Narrabri is located approximately 70 km north-west from the BCM.

Gunnedah LGA

As of 2016, the Gunnedah LGA had an area of 4,987 km² and a population of approximately 12,215 people (ABS 2017; ABS 2018).

Gunnedah township was established in the 1850s to support the development of the wheat industry, and later, the construction of a railway that opened in 1879. Coal mining began in the area in the 1880s, however significant population and housing development did not occur until the 1950s and 1960s, responding to the growth of Australia's wool industry. Gunnedah township is located approximately 57 km south from BCM.

Gunnedah LGA's major land uses include urban settlement and agriculture (a combination of cropping, grazing and livestock breeding) as well as coal mining. Gunnedah is the LGA's largest town and service centre, providing district level services. The main transport connections through Gunnedah LGA are the Kamilaroi Highway, the Oxley Highway, the north-western railway line and a small airport.

New England North West Region

The Narrabri and Gunnedah LGAs are located within the south-west area of the NENW Region³, for which the closest regional city is Tamworth. NENW has a diverse economy and grows around a fifth of NSW's agricultural produce and is rich in mineral, energy and renewable resources (DPE 2017).

4.4 Population and Demography

The following data, primarily sourced from the ABS 2016 Census, provides an overview of the population and key demographic characteristics of the geographic areas relevant to the SIMP.

4.4.1 Population

Table 4.1 presents the population growth in all relevant Project areas for 2006, 2011 and 2016.

In 2016, the Boggabri SSC had an estimated resident population (ERP) of 1,130 people (ABS, 2017a) and nearby Baan Baa SSC, an ERP of 163 people in 2016. The population of Baan Baa increased between 2006 and 2011 and decreased dramatically from 2011 to 2016. The initial increase can be explained by the commencement of Narrabri Underground Mine construction in 2009; the decrease in population can be attributed to population dispersal into other towns and the de-amalgamation of local areas from 2011 to 2016.

Between 2006 and 2016, Boggabri and Gunnedah experienced a steady population increase (5.1% and 5.7%, respectively) in comparison with the surrounding Narrabri LGA, which experienced a decrease of 0.2%. NENW Region also experienced a steady population increase between 2006 and 2016 (5%). This reflects the population growth trend in the wider area of NSW (12%).

BCOP

³ Defined by the ABS as the New England North West Region Statistical Area SA4 Page 20



Table 4.1 Population Growth 2006-2016

Area	2006	2011	2016	2006-2016 (% change)
Boggabri SSC	1,072	1,189	1,130	5.1
Baan Baa SSC	211	525	163	-29.4
Gunnedah LGA	11,524	12,065	12,215	5.7
Narrabri LGA	13,113	12,926	13,084	-0.2
NENW (SA4)	172,396	176,193	181,555	5.0
NSW	6,549,174	6,917,656	7,480,228	12.4

Source: ABS 2007, ABS 2012 and ABS 2017.

Data for 2020 indicates that the ERP for the Gunnedah LGA was 12,690 people (.id, 2021) and 13,049 people for the Narrabri LGA (REMPLAN, 2021). This latest data represents the ongoing increasing and decreasing trends in populations for the Gunnedah and Narrabri LGAs respectively.

Table 4.2 presents ATSI population data for the BCM area of influence. The Indigenous population is a significant component of the population of both Narrabri and Gunnedah LGAs, comprising 13% of the population of Gunnedah LGA and 12% of the population of Narrabri LGA. The Indigenous population of Gunnedah LGA is the highest of all the relevant Project areas. Boggabri township also has a high percentage of ATSI persons (11%).

Baan Baa experienced growth in ATSI population between 2006 and 2011 with a decline to 2016, which may be attributed to de-amalgamation of local towns during this time. NENW SA4 did not amalgamate until 2011, and thus this data was not reported in 2006.

Table 4.2 Aboriginal and Torres Strait Islander 2006-2016

Area	2006	2011	2016	2006-2016 (% change)
Boggabri SSC	68	65	127	46.46
Baan Baa SSC	8	21	11	27.27
Gunnedah LGA	1,169	1,363	1,568	25.45
Narrabri LGA	1,201	1,388	1,595	24.70
NENW (SA4)	N/A	15,797	18,415	14.22 ¹
NSW	138,506	172,620	216,176	35.93

Source: ABS 2007, ABS 2012 and ABS 2017.

Note:

1. Note that this % change is 2011-2016.

4.5 Population Mobility

Population mobility levels provide some indication of community cohesion, as retaining a stable community population over time supports a stronger community.

Table 4.3 highlights relatively stable levels of mobility in the population of the communities of interest. Over half of the population in each area of interest have lived at the same reported address as five years ago. All reported areas mimic the NSW averages. The slight variance suggests that there is a relatively proportionate influx and outflow of people in these areas. The data also reflects the transition from construction to operations at BCM in 2016.



Table 4.3 Population Mobility

Area	Same usual address in 2016 as:		
Alea	1 Years ago (%)	5 Year ago (%)	
Boggabri SSC	77	55	
Baan Baa SSC	122	81	
Narrabri LGA	77	58	
Gunnedah LGA	77	55	
NENW (SA4)	76	55	
NSW	77	54	

Source: ABS, 2017.

4.6 Population Projections

The NSW Government releases population projections for LGAs in NSW, taking into account findings from the 2016 ABS Census, preliminary ERPs published by the ABS for the period 2006-2016, and the latest data and expertise on fertility, mortality and migration. These projections do not take into account in-migration within NSW and the workforces associated with potential projects such as mining related projects. Table 4.4 presents the NSW DPIE population projections from 2016 to 2041 for the areas of interest.

Table 4.4 Population Projections 2016-2041

Area	2016	2026	2036	2041	2016- 2041
Narrabri LGA	13,367	13,176	12,765	12,505	-6.5%
Gunnedah LGA	12,491	12,698	12,693	12,618	1.0%
NENW (SA4)	185,681	191,348	191,894	190,965	2.8%
NSW	7,732,858	9,011,010	10,077,964	10,572,696	36.7%

Source: DPIE, 2019.

Table 4.4 shows that Gunnedah LGA and NEMW SA4 are both expected to grow at a slower rate than NSW between 2016 and 2041. In comparison Narrabri LGA population is expected to decline by 6.5% during the period of 2016-2041. This projected decline could be anticipated to coincide with the population impacts associated with the approvals of both Maules Creek and Boggabri ending during this time period.

During consultations with GSC, it was identified that the NSW Government populations projections are a contentious issue and may underrepresent the extent of population growth and scale of infrastructure projects which are currently underway or planned at some point in the future.

4.7 Housing Profile

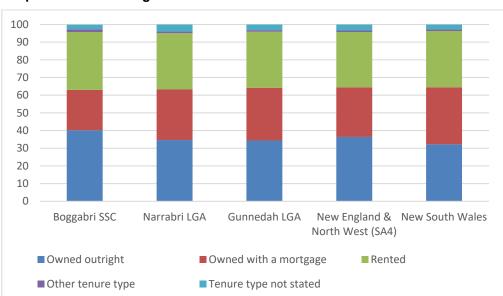
The following data, sourced from the 2016 Census and SQM Research and realestate.com.au, provides an overview of the key housing characteristics of the geographic areas relevant to the SIMP. The review of baseline housing conditions in the Project's social area of influence shows notable changes in housing market conditions in key locations since the draft 2016 SIMP was prepared. The housing data shows some tightening of the housing market across the Boggabri, Narrabri and Gunnedah localities.

Page 22 BCOP



Housing Tenure

Graph 4.1 shows housing tenure for the areas of interest. It is notable that housing tenure arrangements are similar across all areas of interest. All reported areas have relatively high levels of home ownership, either outright or with a mortgage. This suggests a longer-term population base in all areas.



Graph 4.1 Housing Tenure 2016

Source: ABS, 2017.

Median Rent

Table 4.5 outlines the median rent over time based on ABS Census data for the areas of interest. Table 4.5 shows a trend of increasing median rent from 2006 to 2016 across all areas of interest, with the most significant increase (150%) experienced in Boggabri SS. This can be partly attributed to the expansion of operations at BCM and the popularity of Boggabri as a locality for mining staff and families.

Table 4.5 Median Weekly Rent 2006-2016 – Census Data

Area	2006	2011	2016	2006-2016 (% change)
Boggabri SSC	100	150	250	150
Narrabri LGA	110	141	200	81
Gunnedah LGA	120	180	240	100
NENW (SA4)	130	175	220	69
NSW	210	300	380	81

Source: ABS, 2018.

Table 4.6 shows median weekly rent for houses for the postcode areas of Boggabri, Narrabri and Gunnedah for selected years. These areas are different to the ABS Census areas presented in Table 4.5. Table 4.6 shows increasing weekly rental values between 2017 and 2020 for all areas of interest. In August 2020, median weekly rent in:

Boggabri was lower than the value recorded in 2013;



- Narrabri was the same as the median weekly rent recorded in 2013;
- Gunnedah was higher than the median weekly rent recorded in 2013.

Table 4.6 Median Weekly Rent By Postcode – Houses

Area	2013	2017	2018	2019	2020
Boggabri (2382)	330	290	290	300	310
Narrabri (2390)	360	330	350	360	360
Gunnedah (2380)	350	330	350	370	370

Notes: Values are recorded for August of each year.

Source: Residex, 2020a,b,c

Residential Vacancy Rates⁴

Between 2009 and 2020, residential vacancy rates in Narrabri (postcode 2390) fluctuated significantly from less than 1% (two vacancies) in 2009, to a peak of around 5% (55 properties) in December 2015 and a current vacancy rate of 1.6% (22 vacancies) in August 2020 (SQM Research 2020). Rental vacancy rates reflect demand for rental accommodation. Median rent is also a measure of rental demand. As shown in Table 4.6, between 2017 and 2020 median rents in Narrabri increased by approximately 10% between 2017 and 2020.

Between 2009 and 2020, vacancy rates in Boggabri (postcode 2382) peaked in September 2013 at around 14% (25 vacancies) before dropping to a ten-year low of around 2% (4 vacancies) in September 2014. Between 2014 and 2019, vacancy rates in Boggabri fluctuated with another low of 2% in May 2018 before increasing to 4.6% in April 2019, and then decreasing to a current rate of 2.6 (eight vacancies) (SQM Research 2019).

Between 2009 and 2020, vacancy rates in Gunnedah (postcode 2380) peaked in both May 2013 and August 2015 at around 6% (more than 75 vacancies and more than 80 vacancies respectively). Over the 11-year period, vacancy rates dropped to a low of around 1% in September 2014 before increasing through to the August 2015 high. The current residential vacancy rate in Gunnedah is 1% (17 vacancies).

The significantly low residential vacancy rate recorded in 2014 in both the Boggabri and Gunnedah residential markets coincides with a peak in the BCM construction workforce, as well as the construction period for neighbouring mines in the region (i.e. Maules Creek and Tarrawonga).

The current low residential vacancy rates across Narrabri, Boggabri and Gunnedah and the corresponding increase in median weekly rent may reflect the global repercussions of the Covid-19 pandemic and a corresponding increase in demand for accommodation. People who have previously commuted from other locations to Narrabri Shire and Gunnedah Shire for block shifts may have taken up permanent residence in these Shires in order to continue working.

Covid 19 has also increased the attractiveness of regional rural centres and there is anecdotal evidence of people moving from significant urban centres such as Sydney to regional centres such as Narrabri. Job losses in Sydney during COVID 19 may also have resulted in former residents of these Shires returning to the location, attracted by the relatively inexpensive housing. The

Page 24 BCOP

⁴ Note: Residential vacancy rates were available via postcode data only. When referring to Narrabri, Gunnedah and Boggabri the text refers to the postcode areas.



attractiveness of rural areas across NSW as residential locations has also increased with the breaking of the drought.

Housing Availability

Table 4.7 presents rental housing availability in the communities of interest at September 2020.

Table 4.7 Housing Availability September 2020

Property Type and Location	Lowest Rent (\$p/w)	Highest Rent (\$p/w)	Number of Properties				
	Boggabri (Postcode 2382)						
All Properties	280	600	6				
3-bedroom + houses	340	600	3				
2 bedroom houses	280	280	1				
Narrabri (Postcode 2390)							
All Properties	185	475	22				
3-bedroom + houses	300	475	6				
2 bedroom houses	200	390	11				
	Gunnedah	(Postcode 2380)					
All Properties	160	500	24				
3-bedroom + houses	235	500	15				
2-bedroom houses	160	310	3				
Baan Baa (Postcode 2390)							
All Properties			0				

Source: www.realestate.com.au accessed September 2020.

A review of housing data (houses for sale) available on realestate.com.au (accessed 18 September 2020) showed:

- 30 residential properties for sale in Boggabri (Postcode 2382) the majority of which were three or four bedroom homes. Properties ranged in price from \$115,000 to \$525,000;
- 133 residential properties for sale in Narrabri (Postcode 2390) the majority of which were three or four bedroom homes (112). Properties ranged in price from \$129,000 to \$639,000;
- 120 residential properties for sale in Gunnedah (Postcode 2380) the majority of which were houses with three or more bedrooms. Properties ranged in price from \$95,000 to \$1,150,000; and
- Zero residential properties for sale in Baan Baa (Postcode 2390).

Dwelling Type

Table 4.8 shows the total number of dwellings and dwelling type in the areas of interest. Table 4.8 shows that the dominant housing type in the areas of interest is a "separate house", which in 2016 formed:



- 93.4% of the Boggabri SSC housing stock;
- 89.1% of Narrabri LGA housing stock; and
- 89.7% of housing stock in Gunnedah LGA.

Boggabri SSC has a significantly higher proportion of separate housing in comparison with all other areas of interest including NSW. Boggabri SSC also has a correspondingly lower proportion of flat, unit or apartment housing stock when compared with the other areas of interest.

Table 4.8 Dwelling Type 2016

Location	Separate House	Semi- detached	Flat, Unit or Apartment	Other Dwelling	Total Dwellings (no.)
		% Total D	wellings		
Boggabri SSC	93.4	0.00	3.8	1.6	423
Narrabri LGA	89.1	3.4	5.4	1.5	4,625
Gunnedah LGA	89.7	3.5	5.5	0.8	4,527
New England and North West (SA4)	88.5	5.4	3.9	1.4	66,307
NSW	66.4	12.2	19.9	0.9	2,604,314

Source: ABS, 2017.

Household Projections

Table 4.9 presents the NSW DPE housing projections from 2016 to 2041 for the areas of interest. The number of households in Gunnedah LGA and New England North West Region are both expected to grow at a slower rate than NSW between 2016 and 2041. In comparison household projections for Narrabri LGA indicate a decline of 0.8% during the period of 2016-2041. This is consistent with the NSW population projections for Narrabri LGA. This suggests a forecast reduction in demand for housing in Narrabri into the future.

Table 4.9 Household Projections 2016-2041

Area	2016	2026	2036	2041	2016-2041 (% change)
Narrabri LGA	5,377	5,442	5,416	5,336	-0.8
Gunnedah LGA	5,069	5,344	5,552	5,586	10.2
New England and North West (SA4)	75,743	80,371	82,493	82,674	9.2
NSW	2,903,516	3,443,630	3,910,857	4,130,248	42.2

Source: DPIE, 2019.

4.8 Household Composition

Table 4.10 presents household composition in the areas of interest. Table 4.9 shows that Boggabri SSC has a significantly lower proportion of couple family households with children compared to the other areas of interest. Boggabri also has a significantly large proportion of one parent family households and lone person households when compared to the other areas of interest.

Table 4.10 Household Composition 2016

Page 26 BCOP



	Couple family with:				Lone person	Group
Location	no children (%)	with children (%)	One parent family (%)	Other family (%)	households (%)	households (%)
Boggabri SSC	27.42	21.28	16.08	0.71	30.97	3.55
Narrabri LGA	28.74	28.30	11.74	0.80	27.61	2.81
Gunnedah LGA	28.16	28.78	11.22	1.10	28.21	2.52
New England and North West (SA4)	28.94	26.03	12.03	1.09	28.81	3.10
NSW	25.76	33.61	11.36	1.25	23.84	4.19

Source: ABS, 2017.

4.8.1 Socio-Economic Disadvantage

Table 4.11 presents key indicators of cultural diversity and potential community vulnerabilities for the areas of interest. The data suggests that cultural diversity in the areas of interest is considerably lower than NSW.

In 2016, 5.4% of the NSW population identified as needing assistance with core activities, which denotes moderate to severe disability. Disability indicators for all areas of interest were comparable to NSW.

Table 4.11 Population Diversity and Vulnerability Indicators 2016

Area	People born overseas	Language other than English spoken at home	Disability (need for core assistance)	SEIFA¹
Boggabri SSC	3.0%	1.8%	5.5%	889
Narrabri LGA	4.8%	2.2%	5.5%	938
Gunnedah LGA	4.2%	1.8%	4.4%	943
New England and North West (SA4)	7.0%	3.7%	5.6%	N/A ²
NSW	27.7%	25.2%	5.4%	1000

Source: ABS, 2018a.

Note:

The Socio-Economic Indices for Areas (SEIFA) is a composite index of factors affecting socio-economic advantage and disadvantage, measured against an Australian benchmark index of 1,000. A lower SEIFA score indicates that an area is relatively disadvantaged compared to an area with a higher score. SEIFA scores from the 2016 ABS Census have been considered in this assessment. Table 4.10 shows that in 2016 all areas of interest experienced relative disadvantage compared to NSW. Boggabri SSC experienced the most disadvantage of the areas of interest.

Socio-Economic Indexes for Areas (SEIFA) ranks areas in Australia according to relative socio-economic advantage and disadvantage.

^{2.} SEIFA data is not available at the SA4 level.



Table 4.12 presents the Index of Community Socio-Educational Advantage (ICSEA) for schools in Boggabri, Narrabri, Gunnedah and Maules Creek for 2019. The ICSEA value provides an indication of the socio-educational backgrounds of students. The lower the ICSEA value, the lower the level of educational advantage of students who go to the school. ICSEA is set at an average of 1,000. This figure of 1,000 is used as an ICSEA benchmark.

Table 4.12 shows that students at majority of the schools in the areas of interest have a lower level of educational advantage than the average. This is consistent with the 2016 SEIFA findings for Boggabri SSC, Narrabri LGA and Gunnedah LGA. Changes in ICSEA value, relative to school enrolment changes between 2008 and 2019, is likely attributed to outmigration of students from primary school to high school, and or the closure of mines (i.e. loss of jobs and family income) within the area.

Table 4.12 Community Socio-Educational Advantage Rating Trend Data - Selected Schools

Census Geographic Area	ICSEA 2008	ICSEA 2014	ICSEA 2019
Boggabri			
Boggabri Public School	911	861	852
Sacred Heart Primary School	983	1,035	983
Narrabri LGA			
Narrabri High School	1,008	939	913
Narrabri Public School	873	921	861
Narrabri West Public School	894	947	911
St Francis Xavier's Primary School	949	1,020	1,032
Fairfax Public School	946	1035	1,013
Wee Waa High School	873	843	878
Gunnedah			
Carinya Christian School Gunnedah	983	1,008	1,000
Gunnedah High School	886	851	830
Gunnedah Public School	789	714	750
Gunnedah South Public School	902	914	888
St Mary's College	964	982	981
St Xavier's Primary School	966	1,006	1,013
GS Kidd Memorial School	NA	NA	899

Source: ACARA, 2019.

4.9 Employment and Industry

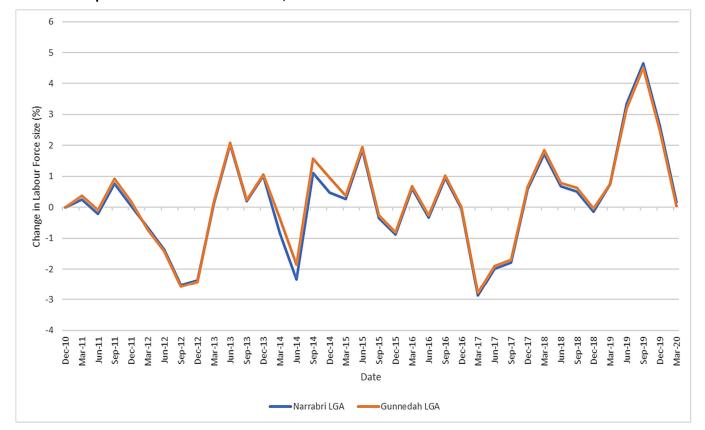
Labour Force Characteristics

In March 2020, Narrabri had a labour force of 7,405 persons and Gunnedah had a labour force of 6,671 persons (DESE, 2020). Labour force size in the LGAs of interest has fluctuated significantly from 2010 to 2020. Graph 4.2 shows the change in labour force size in the Gunnedah and Narrabri LGAs for the period December 2010 to March 2020. There is a strong alignment of labour market conditions between Narrabri LGA and Gunnedah LGA, indicating that this area operates as a

Page 28 BCOP



single labour region, within which labour likely reallocates in order to equalise, and follows trends within industries i.e. mining.

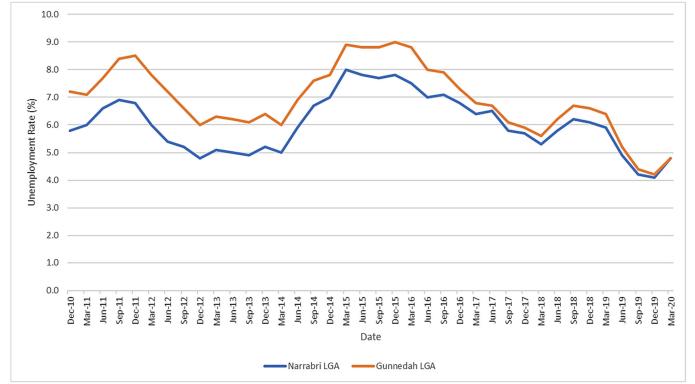


Graph 4.2 Labour Force Size, 2010 - 2020

Source: Department of Education, Skills and Employment, 2020.

In March 2020, the LGAs of Gunnedah and Narrabri had an unemployment rate of 4.8%, equating to 317 persons in the Gunnedah LGA and 352 persons in the Narrabri LGA (DESE 2020). Both LGAs had slightly higher unemployment rates than the current NSW rate of 4.6% (DJSB 2019). Graph 4.3 shows the unemployment rate across the Narrabri and Gunnedah LGAs for the period 2010-2020. Both LGAs show a similar unemployment trend. Gunnedah LGA maintains a slightly higher unemployment rate than Narrabri, however the data suggests that in later years (2017-2018) the unemployment rate gap between Narrabri and Gunnedah closed marginally, before becoming equivalent i.e. 4.8% in 2020. Data for March 2021 showed that unemployment rose to 5.2% within the Gunnedah LGA (GSC, 2021) and rose to 5.8% within the Narrabri LGA for December 2020 (REMPLAN, 2021).





Graph 4.3 Unemployment Rate, 2010 - 2020

Source: Department of Education, Skills and Employment, 2020.

Industry of Employment

2016 ABS Census data is the latest available data that describes industry of employment at the LGA level. A comparison of industry of employment data for 2016 for the Boggabri SSC, Narrabri LGA and Gunnedah LGA (Graph 4.4) shows that:

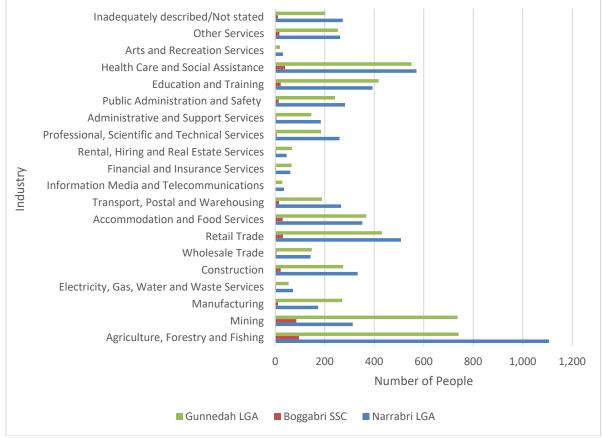
- Employment in the Narrabri LGA is concentrated in the Agriculture, Forestry and Fishing, sectors, Health Care and Social Services sector and the Retail Trade sector; and
- Employment in the Boggabri SSC and Gunnedah LGA is concentrated in the Agriculture,
 Forestry and Fishing sector and the Mining sector.

A review of the available employment data for the period 2014 to 2017 indicates that employment levels within the Agriculture, Forestry and Fishing sector within the Narrabri and Gunnedah LGA's has varied between 2014 and 2017. Within the Narrabri LGA, jobs within this sector varied from 1,358 jobs in 2014, down to 1,096 in 2016 and then ramping up to 1,351 jobs in 2017. Similarly, within the Gunnedah LGA, employment in the Agriculture, Forestry and Fishing sector varied from 605 in 2014 down to 566 in 2016 and up to 630 in 2017. At the same time, jobs within the mining industry have steadily increased from 454 in 2014 to 629 in 2017 in Gunnedah LGA and from 213 in 2014 to 291 in 2017 within the Narrabri LGA (ABS, 2021). Whilst there may be some impacts to available labour within the Agriculture, Forestry and Fishing sector within the Narrabri and Gunnedah LGA's, this sector is also likely to be influenced by rainfall conditions and the introduction of new technologies within the agricultural sector.

The Health Care and Social Services sector within the Narrabri LGA has fluctuated, with a minor overall increase in employment from 625 in 2014 to 739 in 2017. The Retail Trade sector has also experienced small fluctuations with a minor reduction in employment from 768 employees in 2014 to 748 employees in 2017.

Page 30 BCOP





Graph 4.4 Industry of Employment 2016

Source: ABS, 2017.

Overall, there is no clear evidence in available data or in the findings of consultation with the NSC, GSC and the CCC to suggest there have been any significant changes in the distribution of labour across the different industries as a result of mining operations within the region.

4.10 Community Services and Facilities

This section provides a brief overview of social infrastructure provision and services relevant to the communities of Boggabri SSC, Narrabri LGA and Gunnedah LGA. Narrabri and Gunnedah townships are the service hubs for each LGA and support the needs of the surrounding and smaller rural towns such as Boggabri.

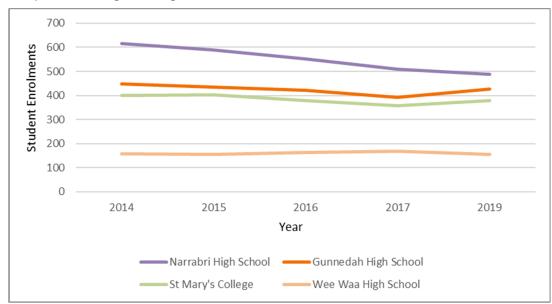
4.10.1 Education

The LGAs of Gunnedah and Narrabri are well serviced with educational facilities. Gunnedah LGA has two higher education facilities, two high schools (Gunnedah High School and St Mary's College) and five primary schools. In addition, there are five primary schools located in the surrounding villages (GSC 2019).

Narrabri LGA has two higher education facilities, two high schools (Narrabri High School and Wee Waa High School) and 12 primary schools, including two primary schools located in Boggabri and one school located in Maules Creek (NSC 2017). As Boggabri only offers primary school education, children attend high school in the larger regional centres or go to boarding school.



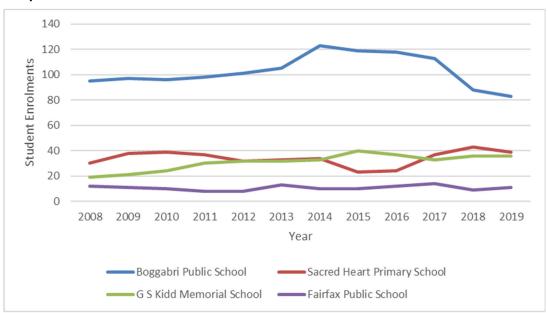
Graph 4.5 provides a summary of annual enrolments for high schools in the areas of interest between 2008 and 2017. Graph 4.5 shows that all high schools within the areas of interest have experienced a steady decline in enrolment numbers since 2015, with the exception of Wee Waa High School where enrolments have remained relatively stable. This decline may be attributed to a growing trend of boarding school education or a shift to accessible private education options.



Graph 4.5 Regional High School Enrolments 2008 - 2019

Source: ACARA, 2020.

Enrolment records for all primary public schools in Gunnedah LGA, Narrabri LGA, and Boggabri SSC indicate fluctuating student numbers, with no significant trends observed (Graph 4.6).



Graph 4.6 Enrolments at Small Local Schools 2008 - 2019

The fluctuating school enrolments in the areas of interest could be attributed to families who have lived in the area for many years not having school aged children.

Page 32



4.10.2 Children's Services

The availability of childcare services is a key priority identified in both NSC and GSC LEPs. For some time, both NSC and GSC have reported a shortage of childcare services, particularly in village areas or small rural communities (Woods, S 2016).

A small number of childcare services and out of school hours care arrangements are available in the Gunnedah and Narrabri LGAs (Table 4.13). The Boggabri community currently has access to a mobile family resource unit that operates during school terms on nominated days only (Ooranga, 2018). Boggabri therefore does not have consistent childcare provision, long day care or any available childcare during holiday periods. Childcare services are typically accessed through Narrabri and Gunnedah. In early 2019, Idemitsu lodged a development application for the establishment of a childcare facility i.e. ELF in Boggabri. The ELF was constructed in 2020 and opened in June 2021. The ELF provides much needed childcare to the residents of Boggabri.

Table 4.13 Early Childhood Services in Narrabri LGA and Gunnedah LGA

Services	Service Location
Community Kids - Narrabri Early Education Centre	Narrabri
Nurruby Child care Centre and Pre-school	Narrabri
Nurruby OOSH	Narrabri
Gumnut Cottage Child care and Pre-school	Narrabri
Jungle Babies Early Learning Centre	Narrabri
Sherpa Kids St Francis Xaviers Narrabri	Narrabri
Narrabri West Public Preschool	Narrabri
Kogil Street Pre-school	Narrabri
The Platypus Club Long Day-care and Preschool Centre	Gunnedah
Gunnedah Baptist Community Pre-School	Gunnedah
Gunnedah Preschool	Gunnedah
Mary Ranken Child Care Centre (pre-school and daycare)	Gunnedah
Goodstart Early Learning	Gunnedah
Connections 4 Kids	Gunnedah
Gunnedah Family Day Care Scheme	Gunnedah
Gunnedah PCYC Kidzcare	Gunnedah
Mary Ranken Occasional Child Care Centre	Gunnedah
Lil Achievers (Pre-School & Daycare)	Gunnedah
Sherpa Kids St Xaviers	Gunnedah
Winanga-Li Early Learning and Care Service	Gunnedah
Ooranga Family Mobile Resource Unit / Boggabri Preschool	Boggabri
Nurruby Wee Waa Community Child Care Centre and Preschool	Wee Waa

Source: GSC, 2017 and NSC, 2017.

4.10.3 Medical and Emergency Services

The Narrabri LGA has hospitals and aged care facilities in the towns of Narrabri, Boggabri and Wee Waa. The Narrabri Hospital has a 28 bed inpatient unit and the emergency department has on call visiting medical officers (NSW Government, 2021a).



The community help service includes a range of services such as speech pathology, social work, physiotherapy, occupational therapy, dietetics. The hospital also has a community nursing service, which includes women's health, child and family health services, Aboriginal Maternal and Infant Health Services, and Aboriginal Child and Family Health Services.

The Boggabri SS has a Multi-Purpose Service (hospital) that services the Boggabri community. The Multi-Purpose Service includes acute and sub-acute care with four beds, an emergency department with two beds, a residential aged care facility with 16 beds, a medical centre and an ambulance service. A further round of consultation was undertaken for BCOP in January and February 2021 for the purposes of a Social Impact Assessment (SIA) which was being prepared at the time. This consultation with health service representatives indicated that the Boggabri Multi-Purpose Service is experiencing higher demand than average due to a greater number of people from Gunnedah accessing the service. This is likely due to the doctor shortage in the Gunnedah LGA, referred to below.

The Gunnedah LGA has a modern hospital of 43 beds and the emergency department has on call visiting medical officers (CDM Smith, 2020). The community health services include child and family health, Aboriginal health, chronic and aged services, physiotherapy and X-Ray facilities (NSW Government, 2021b). The Gunnedah Hospital also has a helipad and can access the Westpac Helicopter Service and Child flight services to Newcastle. Other health facilities in Gunnedah are NSW Ambulance and a pathology service. The Air Ambulance and Childflight Neonatal Helicopter serve the community on request.

A range of community services and groups are available within the Narrabri and Gunnedah LGAs. Some of these key services and groups include:

- GoCo provides aged and community care within the Gunnedah LGA. Consultation
 findings with a representative of GoCo indicate that GoCo provides community transport
 for up to 400 people and home care packages for up to 40 peole.
- Boggabri Home and Community Care (HACC) a partially government funded non-for profit organisation providing community services i.e. transport, meals on wheels and social support to 72 clients in the Boggabri SS.
- Boggabri Rotary Club operates with nine members and is a volunteer based and social support organisation.
- Narrabri Summit Community Services provides home care for aged persons and disabled persons.
- Narrabri and District Community Aid Service (NDCAS) offers community information and referrals to appropriate services; acts as a community resource directory (Narrabri Shire Council, 2019).

BCOP contacted local healthcare service providers via telephone during early 2020 to evaluate the effects that BCM may have had on healthcare services in recent years. At the time, the feedback received indicated that the demand on local services has remained stable in recent years and that local providers are sufficiently staffed to cope with the number of patient visits they typically receive.

Page 34 BCOP



A further round of consultation undertaken by BCOP in January and February 2021 for the SIA identified that consultation findings align with the consultation undertaken during 2020 which indicated that current demand upon health services is manageable. However, the 2021 SIA findings indicated that there is currently a doctor shortage in the Gunnedah LGA and that flow-on impacts and increased demand to other nearby health services is being experienced.

Further to the above, GSC has advised that access to health care within the Gunnedah LGA is a critical and ongoing challenge being experienced.

4.10.4 Mining Development and Major Projects

Gunnedah LGA and Narrabri LGA have significant resources of thermal and coking coal, and both LGAs contain underground and open cut coal mines and projects. The coal mining industry has expanded in the both LGAs over the past several decades. BCM is one of six mines located in the region. Whitehaven Coal operates four open cut mines and one large underground mine in the surrounding area, including the adjoining Maules Creek.

Existing mining operations, approved projects and currently proposed projects located in the vicinity of BCM are presented in Table 4.14 and Table 4.15. These tables provide some insight as to the potential scale of future planned development and land use activities in the areas of interest. The social and economic environment of the communities within which BCM operates has the potential to change if one or more of the projects currently progressing through the regulatory approvals process are approved and progress to construction and operation within the next three years.

In 2020 the Vickery Extension Project was approved. This project is located within the BCM Local Area and has a sizeable workforce, the majority of which is anticipated to reside locally. The cumulative impacts of the Vickery Extension Project and the BCM are considered in Section 4.10.4.

Table 4.14 Nearby Existing Operations and Approved Projects

Project	Description	Location	Project life	Workforce
Existing Mining Ope	rations			
Werris Creek	Open cut coal mine	Liverpool Plains LGA	2005-2032	Approx. 70 FTE jobs
Tarrawonga Coal	Open cut coal mine	Narrabri LGA	2006-2029	Approx. 120 FTE jobs
Rocglen Coal	Open cut coal mine	Gunnedah LGA	2008-2020	Approx. 55 FTE jobs
Narrabri North Coal	Underground coal mine	Narrabri LGA	2010-2031	Approx. 330 FTE jobs
Narrabri Coal - Stage 2 (Modification 6)	Approved Modification	Narrabri LGA	2010-2031	N/A
Maules Creek	Open cut coal mine	Narrabri LGA	2013-2034	Approx. 450 FTE jobs
Sunnyside Coal	Open cut coal mine	Gunnedah LGA	2009-2020	Up to approx. 40 FTE jobs
Whitehaven Coal Handling and Preparation Plant (CHPP)	СНРР	Gunnedah LGA	2002-2022	Approx. 10 FTE jobs



Project	Description	Location	Project life	Workforce
Approved Projects				
Narrabri Gas Project	Approved petroleum extraction.	Narrabri LGA	20 year project life	Construction approx. 1,300 FTE jobs; operation approx. 200 FTE jobs.
Watermark Coal Project	Approved open cut coal mine	Gunnedah LGA	30 year mine life	Construction approx. 600 FTE jobs; operation approx. 600 FTE jobs.
Vickery Coal Project	Approved open cut coal mine	Gunnedah LGA	2014-2044	Operation approx. 250 FTE
Narrabri South Solar Farm, Canadian Solar	Approved solar farm	Narrabri LGA	30 year operational life	Construction approx. 200 FTE jobs; operation approx. 4 jobs.
Vickery Mine Extension	Approved open cut coal mine	Narrabri LGA and Gunnedah LGA	30 year mine life	Construction approx. 500 FTE jobs; operation approx. 450 FTE jobs.
Orange Grove Solar Farm	Approved solar farm	Gunnedah LGA	30 year project life	Construction approx. 100 FTE jobs; operation 3 FTE jobs.
Wilga Park Power Station (MOD 7)	Approved MOD Power Station	Narrabri LGA	One month	NA
Narrabri Gas – Dewhurst Exploration Modification 3	Approved MOD	Narrabri LGA	NA	NA

Source: DPIE, 2020a.

 Table 4.15
 Projects in the Development Approvals Process

Project	Status	Location	Project life	Workforce
Inland Rail (Narromine to Narrabri, Narrabri to North Star (Phases 1 and 2))	EIS Preparation (Narromine to Narrabri). Determination approved (Narrabri to North Star Phase 1) and More Information Required (Narrabri to North Star Phase 2).	Narrabri LGA and others	48 months construction (Narromine to Narrabri); 44 months construction (Narrabri to North Star Phase 1), expected to be operational in 2025.	Construction approx. 500 jobs (Narrabri to North Star Phase 1)
Wee Waa Solar Farm	EIS Preparation	Narrabri LGA	30 year project life	Construction approx. 80 FTE jobs; operation approx. 3 FTE jobs.
Silverleaf Solar Farm	Response to Submissions	Narrabri LGA	35 year operational life	Construction approx. 120 FTE jobs; operation 6 FTE jobs.
Narrabri Underground Mine - Stage 3	EIS Preparation	Narrabri LGA	20 year project life	Continued operational employment of 370 employees
Narrabri Grain Storage and Rail Transfer Facility	EIS Preparation	Narrabri LGA	NA	NA

Source: DPIE, 2020a.

Page 36 BCOP



4.10.5 Community Issues and Concerns

Community Consultative Committee

The BCM CCC meets regularly and the minutes provide an overview of key Project issues and how they are being managed. The BCM CCC minutes indicates that over the past eight years, key concerns have shifted from a focus on construction to operations and largely relate to environmental issues, including groundwater quantity and impacts to individual bores, air quality (i.e. dust levels) and noise due to traffic and blasting. Some CCC members raised issues relating to employment, in particular, potential loss of employment as BCM transitioned from construction to operations, as well as the change of operators from Downer Group to BGC Contracting/ One Key Resources.

In 2018, BCOP's housing commitment (Section 2.2.2) was raised at a BCM CCC meeting. Concern was raised in relation to the removal of housing stock from Boggabri by BCOP employees and the impact of this removal on housing availability. Since 2018, no concerns have been raised in relation to the BCOP Housing Commitment.

During the August 2020 BCM CCC meeting, attendees positively acknowledged the progress made with the ELF construction, and recognised the service it would provide to BCM employees and other local families.

The BTM CCC was established to discuss cumulative impact issues. The focus of the BTM CCC is largely on environmental issues, such as cumulative air and noise emissions.

A review of BTM CCC meeting minutes for the last eight-nine years highlighted issues in relation to the following social impact areas:

- Local business opportunities;
- Local, including Indigenous, employment opportunities;
- Continuity of employment i.e. potential loss of employment as BCM transitioned from construction to operations, and the change of operators from Downer Group to BGC Contracting;
- Individual property bore water management and concern for quantity of water for use by private landholders;
- Amenity concerns, particularly in relation to noise and blasting;
- Project miscommunication, particularly with the Indigenous Elders community; and
- Conflicting views in relation to the need to implement the housing commitment.

Complaints Register

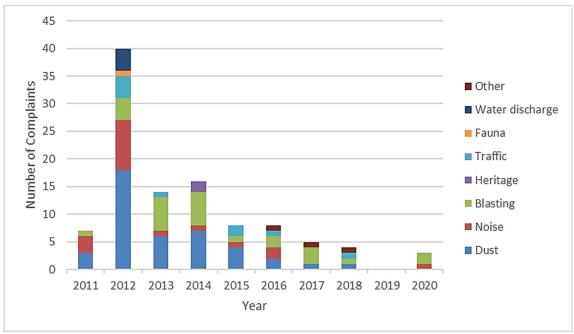
A review of the BCM Complaints Register (2011-2020) indicates that the complaints lodged since the start of construction in 2012 mirror the issues raised in both CCCs. Complaints have largely been associated with dust, noise due to traffic and construction activities, blasting (including vibration), and traffic, particularly with regard to safety.



Two issues that were raised as key concerns during the development of the 2013 SIMP by the CCC - housing affordability and availability, and impacts on the long-term sustainability of agriculture in the region - have not been raised to date through the Complaints Register.

Graph 4.7 presents an analysis of the complaints received by BCOP between 2011 and 2020. Over the nine year period, BCOP has received less than 120 complaints in total, this includes complaints during the recent construction phase. The majority of complaints received during the construction phase related to dust, noise and blasting.

Fewer complaints have been received since the transition to mine operations; of the complaints received during operations, blasting complaints are the most common. Several complaints regarding water discharges were raised in 2012, while heritage was raised several times as an issue in 2014. It is noted that only four complaints were received in 2018 and there were no complaints received in 2019. As at September 2020, only three complaints had been raised over the course of the year. These complaints were primarily in relation to noise and blasting impacts, including fume. Analysis of the BCM Complaints Register indicates that social impacts have been raised infrequently.



Graph 4.7 Complaints Analysis 2011 - 2020

Source: BCOP, 2020.

Broader Public Issues and Concerns

Community issues and concerns relevant to the presence of resource activities in the Narrabri and Gunnedah LGAs have been captured most recently in a number of State Significant Development applications (SSDs) e.g. Vickery Extension Project, the assessment of Modification 7, as well as CCC meeting minutes and research studies (e.g. those undertaken by the Gas Industry Social and Environment Research Alliance (GISERA)).

Recent consultation findings reported for major projects in the Narrabri LGA suggest the cost of living and access to affordable housing in the wider area are two areas of concern for ageing community members, lower income families and for some Aboriginal community members.

Page 38 BCOP



Key concerns identified through recent research carried out by GISERA (Walton & McCrea 2017) relate to water contamination and possible futures (i.e. job retainment). During recent GISERA research residents of Boggabri reported significantly less satisfaction with environmental quality than residents from Narrabri and Gunnedah. The findings of GISERA research relevant to the Boggabri community also indicates a perceived low level of economic opportunity.

When surveyed for the Narrabri Gas Project (Walton & McCrea 2017), the community of Boggabri, indicated that social benefits would likely continue to be experienced at Gunnedah/Narrabri, but not in Boggabri. Community members raised the issue that Boggabri was considered to be a passers-by town and as a result there are increased volumes of through traffic heading to Narrabri or Gunnedah. Concern for road safety was raised as an issue in the community. Recent concerns have also encompassed thought on what will happen to the community identity at mine closure. Boggabri community members are also aware of cumulative project impacts and the change in character of Boggabri. Population impacts, and community cohesion have not been raised as an issue.



5. Social Impacts

This section discusses the social impacts predicted to occur over the next three years of operation (i.e. 2020 - 2022). The focus of this SIMP is the three years to 2022.

5.1 Methodology

Potential social impacts for the period 2020-2022 were identified based on a review of the 2013 SIMP and the draft 2016 SIMP, analysis of relevant social baseline data and trends, a review of the BCM Complaints Register and CCC minutes, and examination of recent consultation findings for major projects and industry research in the region.

The significance of each predicted social impact was assessed with reference to the significance assessment methodology described in the NSW SIA Guideline (2017). A full description of the significance assessment process is provided in Appendix C. The outcomes of the significance assessment are presented in Sections 5.3.1 and 5.3.2. Each impact is assigned a significance rating based on likelihood and consequence (e.g. Moderate D3).

5.2 Background

The 2013 SIMP identified a range of potential positive and negative impacts likely to occur between 2013 and 2016 i.e. primarily during the construction phase of the Project (Table 5.1). The 2013 assessment focussed on the impacts likely to be experienced by local stakeholders i.e. those located in the Narrabri and Gunnedah LGAs.

Table 5.1 Summary of Predicted Social Impacts From the 2013 SIMP

Category	Predicted Impact	Stakeholders	Significance and Nature of Impact
Housing affordability and availability	Increased demand for rental and owner occupied housing in Narrabri and Gunnedah LGAs potentially impacting on housing affordability and availability.	 Local residents Narrabri SC Gunnedah SC Housing associations Service providers 	High and Negative
Employment and training	Increased employment, education and training opportunities.	 Local residents Narrabri SC Gunnedah SC Indigenous groups TAFE and other local education providers 	High and Positive
Local business development	Increased supply chain and business development opportunities.	 Local businesses Indigenous businesses Local Chambers of Commerce Government agencies 	High and Positive
Social and community infrastructure	Increased demand for social and community infrastructure in Narrabri and Gunnedah LGAs	Local residentsNarrabri SCGunnedah SCService providers	High and Negative

Page 40 BCOP



Category	Predicted Impact	Stakeholders	Significance and Nature of Impact
	potentially impacting on service levels and availability.	 Government agencies Hunter New England Local Health District 	
Community cohesion	Decreased wellbeing and lack of integration of the Project workforce with the existing communities	Local residentsProject workforceService providers	Medium and Negative
Farming communities	Loss of long term agricultural productivity and decrease in farming community.	Local famersLocal landownersFarm suppliers	Medium to High and Negative (some positive)
Indigenous opportunities	Increased benefits for local Indigenous communities in opportunities from mining.	 Local Aboriginal community and stakeholders Service providers 	Medium and Positive
Traffic management	Minimise traffic impacts on local roads in Narrabri and Gunnedah LGAs.	Local residentsAdjoining landownersProject workforce	Medium and Negative

Source: BCOP, 2013.

5.3 Predicted Impacts

This section presents and discusses the predicted social impacts of the continued operations of the BCM for the period 2020-2022. Not all impacts outlined in the 2013 SIMP are relevant to the 2020 SIMP. This is because the BCM has transitioned to operations and the impacts associated with the construction phase have been experienced.

Consistent with the requirements of Condition 77 the draft 2016 SIMP considered the potential impacts and opportunities associated with the construction and early operations phases of BCM. As the mine is now at full production, this SIMP considers the operational impacts for the period 2020-2022. Potential impacts associated with decommissioning would be considered in future SIMPs.

5.3.1 Negative Impacts

The potential negative social impacts associated with the ongoing operation of the BCM relate primarily to:

- Ongoing demand by the BCM workforce for social and community infrastructure in Narrabri and Gunnedah LGAs, particularly children's services;
- Ongoing traffic impacts on local roads in Narrabri and Gunnedah LGAs;
- Ongoing demand for skilled labour and the resulting reduction to the labour pool available for other industries, including agricultural enterprises;
- Loss of long-term agricultural productivity and decrease in farming community;
- Ongoing loss or damage to items of cultural heritage value due to continuation of operations;



- Ongoing impacts to community cohesion;
- Demand for housing generated by any new BCM workers and also a spike in demand for shortterm accommodation during BCM maintenance shutdowns; and
- Cumulative impacts to social and community infrastructure (such as health care, schools and local housing and rental stocks) from parallel operations of other mines in the BTM Complex and other resource projects in the Narrabri and Gunnedah LGAs, notably the Vickery Extension Project.

Social and Community Infrastructure

Condition 77(d)(i) requires the SIMP to identify social impacts resulting from various stages of the project on social and community infrastructure i.e. housing, medical, education, childcare and emergency services. Concerns relating to social infrastructure and services were not raised through the community complaints mechanism or during the CCC meetings, with the exception of childcare. Issues were raised in relation to the limited childcare services available in Boggabri and accessibility for mining and non-mining workers.

With respect to health service provision, recent consultation in January and February 2021 has identified that the demand on local health services has increased and that there is currently a shortfall in doctors (particularly within the Gunnedah LGA), which is creating pressure on other services within the region. These increased demands on health care services is expected to be associated with population increases resulting from cumulative employment within the mining other related industry across the region.

This section therefore considers the impacts of operations on access to children services and health services. Housing impacts are considered below in later sections.

Table 5.2 Children's & Health Services

Category	Impact Description	Stakeholder	Significance
Social and community infrastructure	Reduced accessibility to children's services for existing residents and new residents due to demand of the Project workforce and the lack of available and varied services in Boggabri.	 Local residents 	Moderate (D3)
Social and community infrastructure	Reduced accessibility to health services for existing residents and new residents due to demand of the Project workforce and increased waiting list times and limited capacity of existing services to accept new patients.	 Local residents 	Moderate (D3)

The 2013 SIMP predicted that there would be an increase in demand on social and community infrastructure in the Narrabri and Gunnedah LGAs, which would impact service levels and availability. BCM is unlikely to generate any significant and additional demand on the majority of community infrastructure and services in the 2020-2022 period as the operations phase workforce has stabilised in recent years.

Page 42 BCOP



Demand continues to be generated in Boggabri for children's services, particularly childcare services. Childcare services in Boggabri were previously restricted to a mobile family resource unit. This service does not operate during school holidays, placing additional pressure on parents to find appropriate care for their children during these periods. Boggabri residents and other local residents who are employed on a full time basis or who cannot provide care were previously forced to seek childcare in the nearby regional centres of Narrabri and Gunnedah. Numerous childcare facilities exist in the wider area, however many of these service providers are at capacity.

To satisfy demand for childcare services, BCOP constructed a new ELF in Boggabri during 2020 and was opened in June 2021. This facility is expected to make a significant contribution to managing local demand for childcare. The capacity and interest of the childcare will be monitored to ensure that local demands are met.

Further consultations during early 2021 identified that demand for health care services, in particular access to health professionals is an urgent and ongoing issue within the Gunnedah LGA. It is understood that existing health professionals are operating above capacity, with extended waiting lists and minimal capacity of existing health care services to accept new patients. BCOP will continue to liaise with health service providers to monitor ongoing demands. Although BCOPs employees (and contractors) have likely had a partial impact on this, it is the cumulative impact of the population increase within the region with other more recent mining and related industries which will have had the greatest effect on these services.

Community Cohesion

Table 5.3 Community Cohesion

Category	Impact Description	Stakeholder	Significance
Community cohesion	Ongoing impacts to community cohesion due to a lack of integration of the Project workforce with existing communities.	Local residentsProject workforceService providers	Low (C1)

The 2013 SIMP anticipated that the BCM would impact the existing social structure and cohesion within the local communities due to an increase in workforce.

Anecdotal evidence suggested that there were community cohesion issues during the BCM construction phase. It was suggested that housing the mining workforce (not just the workers associated with BCM) in temporary accommodation facilities (e.g. Civeo Boggabri Village) away from local communities created an 'us and them' mentality. In other words, it created a division in the community between the workforce and the remaining community members (Hasham 2012).

There were also concerns raised about workforce behaviours, which appears to have influenced cohesion. This included concerns raised during the CCC meetings, including a BTM CCC meeting in relation to the workforce engaging in feral pig chases as a form of entertainment. This involves chasing or hunting feral pigs across multiple properties causing a disturbance to local landholders, and often resulting in the trampling of native vegetation.

The commencement of operations resulted in a reduction in the size of the workforce and the number of workers housed at temporary accommodation facilities. In comparison to the construction phase, a higher proportion of the BCM workforce now reside permanently in the Local Area (e.g. Boggabri, Gunnedah and Narrabri), and contribute to the community as residents.



It is possible that nearby communities, particularly Boggabri experienced a significant change in population size and social structure as the Project transitioned from construction to operations. The BCM project transition coincided with Maules Creek construction being completed which may also have contributed to population changes. The departure of the construction phase workforce at BCOP is likely to have impacted existing social connections. Some of the incoming resident workforce may have different values, expectations and aspirations to the existing community. It will take time for the community(ies) to stabilise following the shift to operations.

To contribute to cohesion, BCM employees and contractors are encouraged to attend fundraiser events in the local communities; free tickets to local shows and events are given out to employees to encourage attendance. For example, local sponsorship of the Boggabri Drovers Camp Draft also includes bus tours of the BCM mining operations over the two days which generates a very positive response from the community.

BCOP continues to provide annual financial support (through grants and sponsorships) to a range of local community initiatives that seek to support community cohesiveness. BCOP also has an employee code of conduct to minimise the impact of anti-social behaviour within the workforce and ensure positive interactions with the existing residential community.

Labour Draw

Stakeholder engagement has identified concerns that BCM, and the mining industry in general, with its higher wages will likely attract existing skilled and experienced employees away from their current jobs in the Local Area.

Given that BCM's operations have now reached its approved annual production rates, any potential impacts of the draw of skilled labour from other industries within the Local Area has already largely occurred. As previously indicated, a review of annual statistical data for the Local Area does not provide any clear indication that the BCM has significantly affected the distribution of labour across key sectors.

BCOP monitors the local labour supplies as part of its annual monitoring of the local demography. The census data between 2011 and 2016 shows that the labour force within the Gunnedah LGA has increased and that the number of unemployed persons has decreased over the same period. Conversely, the Narrabri LGA labour force decreased and there was also a small increase in unemployment over the same period.

BCOP will continue to monitor the local labour supplies and encourage its contractors to adjust their local labour recruitment practices and rates accordingly to minimise the effects on other industries.

Farming Communities

Table 5.4 Agricultural Productivity

Category	Impact Description	Stakeholder	Significance
Farming communities	Loss of long term agricultural productivity and decrease in farming community.	Local famersLocal landownersFarm suppliers	Low (D2)

Page 44 BCOP



The 2013 SIMP predicted that there would be a loss of long-term agricultural productivity as a result of the BCM. To date, any impacts to agricultural operations have largely been associated with the acquisition of land. The BCM required approximately 12,000 hectares of land to be set aside for buffer zones and conservation offsets. BCOP planned to continue to use available land for agricultural operations, predominately cattle grazing.

In 2013, BCOP prepared an Agricultural Suitability Assessment (ASA) for the BCM's Biodiversity Offset Areas (BOAs). The ASA identified areas of high, medium and low agricultural suitability within the BOAs and made recommendations for their continued use as agricultural land. Cropping and grazing within BOAs continues to be undertaken in accordance with the recommendations made in the ASA (i.e. under private lease agreements with local landholders). The land management practices implemented in those areas, such as fencing, weed management, cattle grazing, sowing, harvesting, and crop rotation, are generally consistent with those being implemented on the same parcels of land prior to acquisition by BCOP. Additional properties owned by BCOP that are not within BOAs, have also continued to be managed for agricultural purposes under private lease agreements with local landholders. These land uses will continue during the 2020-2022 period.

During the construction phase, drought contributed to changes in agricultural productivity. A number of farming families and agribusinesses had to downsize or sell their operations, and in some instances, the families left the region (Whitehaven Coal, 2016).

Concerns relating to changes in agricultural production were not raised through the community complaints mechanism or during the CCC meetings.

Given the BCM is into its eighth year of operations and eighth year since the grant of SSD 09_0182 in 2012, any further land acquisitions are likely to be limited to a small number of properties. These acquisitions are unlikely to result in significant impact the agricultural sector.

Cultural Heritage

Table 5.5 Cultural Heritage

Category	Impact Description	Stakeholder	Significance
Cultural Heritage	Ongoing loss of or damage to items of cultural heritage value due to project continuation.	 Indigenous groups 	Low (D2)

Some loss of or damage to items and or sites with cultural heritage value is anticipated as mining activity progresses. A Cultural Heritage Management Plan (CHMP) has been developed and is implemented consistent with the Project's conditions of approval. The current CHMP was approved in January 2016, and describes:

- The policies and practices for the preservation of sites during construction and operations;
- Other facets of cultural heritage practices including salvage of sites as required and the practice of due diligence inspections; and
- Other relevant cultural heritage considerations including consultation with the Aboriginal community.



In line with the CHMP, it is standard practice to engage with Registered Aboriginal Parties (RAPs) when site works may impact on cultural heritage values. This has included engagement as part of the ongoing land clearing process, which provides an opportunity for Aboriginal stakeholders to be employed by BCOP to identify and collect stone artefacts previously unrecorded. Archaeological salvage activities continue throughout operations.

The CHMP will continue to be applied during the operations phase. This will help to mitigate any impacts to cultural heritage values, and ensure that the conditions of approval (including Conditions 55, 56, and 57) are met.

Given the ongoing implementation of the CHMP, it is not anticipated that there will be any new and significant impacts on cultural heritage values during the period of this SIMP.

Traffic Management

Table 5.6 Traffic Management

Category	Impact Description	Stakeholder	Significance
Traffic management	Increased traffic on the local road network leads to reduced road safety conditions.	Local residentsNSCGSC	Moderate (C2)

The 2013 SIMP predicted that there would be an increase in traffic related impacts along local roads as a result of the BCM. The focus was on roads within the Narrabri and Gunnedah LGAs.

During the construction phase, there were a number of complaints lodged relating to traffic management and traffic was a common issue raised at the CCC meetings. This included concerns relating to noise and dust generated by vehicles as well as road conditions that have anecdotally, deteriorated due to increased use by the workforce. There have been a number of requests to upgrade roads or improve signage during the CCC meetings.

BCOP developed a Traffic Management Plan (TMP), in line with the conditions of approval. During construction, traffic impacts have largely been associated with vehicle travel along local roads close to the BCM. These impacts reduced following the completion of construction, as the number of traffic movements decreased. Further, the completion of construction of the train loading facility, rail loop and rail spur line facilitated the transport of coal by rail from BCM.

BCOP has approval to transport up to 10 Mtpa of product coal (including up to 8.6 Mtpa from BCM and up to 3 Mtpa from Tarrawonga Coal Mine (subject to commercial agreement) via the BCM train loading facility, rail loop and rail spur line to the Werris Creek to Mungindi Railway Line for sale to the export market. The southern portion of the rail spur line is shared with the Whitehaven Coal Maules Creek Mine which has approval to transport up to 12.4 Mtpa of product coal from the site. To date, there is no commercial agreement with Whitehaven Coal to transport product coal from the neighbouring Tarrawonga Coal Mine. BCOP regularly consults with Whitehaven Coal where various operational interactions (including management of shared section of the rail spur line) are discussed.

Road traffic related impacts have now been further alleviated with the opening of a new mine access road extending from the Kamilaroi Highway to the BCM. All operations phase employees now access the BCM directly from the Kamilaroi Highway. The VPA between BCOP and NSC also provides for financial contributions and gravel for the upkeep of local roads.

Page 46 BCOP



The potential for increased traffic on the local road network to result in reduced road safety conditions for users is considered low.

Following consultation with NSC, it is understood members of the public are concerned over the increase in rubbish along the verges of roads used to access the BCM.

BCOP details its waste management protocol in Section 2.3.8 of the approved MOP which is in in accordance with the objectives of the *Waste Avoidance and Resource Recovery Act 2007* and the waste management hierarchy of avoid, reduce, reuse, recycle and dispose.

In light of the feedback from NSC, BCOP will conduct environmental awareness training with BCM employees and contractors to make them aware of this community issue and to ensure they are aware of their responsibilities in relation to littering. BCOP also regularly conducts inspections of the local roads in close proximity to the BCM. If substantial rubbish is identified, BCOP will arrange for roadside rubbish to be collected. Details of these inspections and any rubbish collection that took place will be reported within the Annual Review.

Housing Availability

This section considers the impacts of operations on access to housing services. Sections 4.7 and 4.8 presents an analysis of the current and trend housing data, including housing availabilities i.e. vacancy rate, dwelling type and median rent.

Table 5.7 Housing and Short-Term Accommodation

Category	Impact Description	Stakeholder	Significance
Housing	Increased demand for housing due to the recruitment of new non-local employees. Increased demand for short-term accommodation during maintenance shutdown periods.	Local residentsService providersVisitors to the area	Low (D2)

The 2013 SIMP predicted that during construction there would be an increased demand for accommodation, which would reduce the availability and affordability of housing in the Narrabri and Gunnedah LGAs. At the time (i.e. 2012), anecdotal evidence suggested that the Narrabri LGA was experiencing a range of impacts as a result of mining activities in the area, including impacts on the housing market. In particular, it was suggested that rental prices had increased, and tourists had been squeezed out of motels in favour of miners.

BCOP implemented a number of measures to manage the potential impacts on housing affordability and availability. This included:

- employing locals, and encouraging contractors to do the same;
- accommodating workers at temporary accommodation facilities, as set out in the Construction Workforce Accommodation Plan; and
- accommodating workers at BCOP owned properties.



The draft 2016 SIMP recognised that the Project had entered the operational phase with a stable workforce. Housing data analysed for the draft 2016 SIMP for the period 2012-2016 showed considerable relaxation across the housing markets of the Narrabri and Gunnedah LGAs with an increase in property listings and increasing residential vacancy rates

Impacts associated with housing affordability and availability in the next three years are predicted to be low. The mine has reached maximum workforce numbers and the workforce is anticipated to remain stable i.e. 750 persons. Yet, it should be noted that trend data indicates a substantial increase in median rent across the Narrabri and Gunnedah LGAs and specifically Boggabri. In addition, a review of housing data also indicates that the vacancy rates in Boggabri, Narrabri and Gunnedah are all very low, and the availability of rental properties in these areas is limited. The increase in housing rent has implications particularly for Boggabri given the SEIFA rating of the community and the prevalence of single parent families and lone person households who may have increased vulnerability to changes in rental conditions. There are a number of properties for sale across the Narrabri and Gunnedah LGAs.

The costs associated with the delivery of BCOP's housing commitment within the Narrabri LGA have been included in the BCOP operations budget. As discussed in Section 2.2.2, BCOP has commenced with the delivery of this housing commitment with the construction of the ELF in Boggabri during 2020 (opening in June 2021). BCOP is in ongoing discussions with the NSC in relation to the housing commitment. Whilst no timeframe has been agreed with NSC for the delivery of the housing commitment, BCOP has engaged an architect to develop house designs and is planning to commence construction during 2022.

Maintenance shutdowns at BCM currently occur every four weeks for the CHPP and every six weeks for the bypass system. With these shutdowns, there is an increase of contractors on site completing specialty work. The majority of the shutdowns run for approximately 12 hours. Major shutdowns occur six monthly for the CHPP and can run for 120 hours and annually for the Bypass. To minimise the impact of the increase of contractors to the area, various accommodation types including the Boggabri Civeo Camp facilities are used to house the contractors.

BCOP uses four essential indicators to monitor the local housing affordability and availability in the Narrabri and Gunnedah LGAs. These indicators include:

- Workforce characteristics data supplied by other mining companies in Annual Reviews;
- Changes in rental prices as monitored quarterly by NSW Housing, Housing Analysis and Research 'Rent and Sales Reports';
- Changes in housing sale prices as monitored quarterly by RP Data and 'Your Investment Property' magazine; and
- Dwelling construction data provided by NSC and GSC.

BCOP also engages with local real estate agents in Boggabri, Gunnedah and Narrabri to obtain updates on dwelling data and land costs in the Local Area.

BCOP provides annual updates on employment demographics within its Annual Reports. BCOP also meets regularly with NSC and GSC to discuss operational performance, including employment levels at BCM.

Page 48 BCOP



As discussed previously, BCOP is scheduled to meet with NSC in Q3 2021 to discuss possible approaches to address housing availability and affordability as part of the NSC Housing Strategy under preparation.

Cumulative Impacts

The existing social environment has the potential to experience significant change over the next three years, if any or all of the projects identified in Section 4.10.4 transition to construction and/or operation.

These projects also have the potential to impact the BCM operations, the BCM workforce and existing local residents. The potential negative cumulative social impacts associated with other mining developments in proximity to BCM are discussed in Table 5.8.

Table 5.8 Cumulative Social Impacts

Category	Impact Description	Stakeholder	Significance
Other mining development	Cumulative social impacts arising from the presence of multiple mining operations in proximity to BCM.	 Other mining operations (i.e. Maules Creek and Tarrawonga,) Local residents NSC GSC Service providers Government agencies 	High (B3)

Potential negative cumulative impacts associated with operations phase relate to:

- Impacts on housing availability;
- Increased demand for social infrastructure and services;
- An increase in local traffic; and
- Adverse changes in residential amenity.

Any potential impact to housing availability will depend on changes in the workforce size and composition of neighbouring mining operations and/or the introduction of additional workforces associated with approved or future projects currently in the approvals process. Sudden increases in workforce requirements due to construction activities or other changes can cause "shocks" to the local accommodation stock. However, the presence of the two Civeo villages now provides a buffer to absorb such shocks and lessen impacts on the community. Furthermore, BCM has completed its construction works and settled into a stable operations phase, which will continue for the foreseeable future. No further housing demands are anticipated to be generated by the BCM. The Vickery Extension Project will increase demand for both short-term and permanent accommodation in the Narrabri and Gunnedah LGAs. The timing for delivery of the Vickery Extension Project is unknown.



Any potential increase in local traffic, may contribute to an increase in congestion, public safety issues and deterioration of the existing infrastructure. However, these impacts are being managed through a variety of traffic management plans and road upgrades, which are being implemented by the various mining operators. This includes the opening of the new mine access road extending from the Kamilaroi Highway to the BCM.

The addition of a new workforce or any sudden increase in the workforce requirements of neighbouring mines due to construction activities or other changes will increase demand for community infrastructure and services and likely reduce accessibility for the existing resident population (which includes the existing BCM workforce). It is anticipated that the VPA commitments of existing operations and any new VPA commitments for future operations will address any increase in demand for infrastructure and services.

BCOP's commitment to the funding of a new childcare facility in Boggabri and the provision of regular financial and in-kind contributions to the broader community will make a significant contribution to alleviating the impacts of increased service demand in Boggabri.

Numerous other mining projects and large scale developments in the wider area currently contribute and have the potential to contribute further to a reduction in residential amenity. Impacts to residential amenity are likely to become more substantial as existing mining operations expand or additional mining operations commence. As BCM is in full operation and has an existing environmental management system, full compliance with the existing conditions of consent is the key strategy to managing any future contribution to cumulative amenity impacts.

5.3.2 Opportunities

The BCM has and will continue to present significant positive opportunities for surrounding communities. The potential positive impacts of the BCM were identified in the 2013 SIMP. These opportunities are anticipated to continue through the life of the 2020 SIMP and beyond. BCOP has facilitated increased local employment and access to stable employment opportunities, as well as providing contributions and funds to support local initiatives, businesses, services and infrastructure. It is expected that the mining sector will continue to positively contribute to the local economy through ongoing employment and business opportunities. As a major employer in the Region, BCOP is committed to delivering positive benefits to its workforce and nearby local communities.

Employment and Training

Table 5.9 Employment and Training Opportunities

Category	Opportunity Description Stakeholder		Significance
Employment and training	Ongoing employment, education and training opportunities facilitated by BCOP.	 Local residents NSC GSC Indigenous groups TAFE and other local education providers 	Moderate (B1)

Page 50 BCOP



In line with BCOP's commitment to 'employing locally', there were a range of employment opportunities provided to locals during construction. To support local recruitment during the transition to BGC and One Key, employment assessment centres were established in Gunnedah for locals to attend and encourage applications by locals for positions at BCM.

Mining operations at BCM has reached steady state production and as such, workforce numbers have stabilised. Subsequently any direct local employment opportunities will be confined to 'replacing' workers who choose to leave BCM or employment to support maintenance shutdown periods. BCOP does not have a formal process for prioritising the hiring of a local workforce. However, BCM's contractors (i.e. BGC and One Key) prioritise local employment and will continue to prioritise local employment when any future recruitment is required.

BCOP also continues to encourage new recruits to live locally through the provision of a remote housing allowance to staff and financial assistance for relocation.

As discussed in Section 3.2.4, BCOP continues to support ongoing education and skill development in the existing workforce (based upon the needs of the workforce and of the business).

Table 5.10 Indigenous Employment and Training Opportunities

Category	Impact Description	Stakeholder	Significance
Indigenous opportunities	Ongoing benefits for local Indigenous communities in opportunities from mining.	 Local Aboriginal community and stakeholders 	Moderate (C2)
		 Service providers 	

The 2013 SIMP predicted that there would be a range of opportunities for local Indigenous stakeholders to benefit from the Project. This included employment and business development opportunities as well as opportunities for Indigenous people relating to archaeology, cultural interpretation and environmental rehabilitation.

In relation to employment, steps have been taken to encourage and support Indigenous employment at BCM. BCOP facilitates an Aboriginal Stakeholder Community Forum (ASCF). The ASCF provides a forum for raising general issues by stakeholders. The forum met quarterly during the construction phase and meets bi-annually during the operations phase. Topics of discussion include upcoming opportunities for employment and ongoing management of Aboriginal cultural heritage at the BCM. Meeting minutes from ASCF meetings indicate Aboriginal stakeholder perceptions regarding impacts associated with the BCM on Aboriginal heritage and employment opportunities were generally positive.

A number of work opportunities have been made available by BCOP and its contractors to members of the local community, including the local Indigenous community. BCOP's contractors also have various apprenticeship and training programs which are available to the local community. The BCM operations phase workforce has recently stabilised and therefore any future recruitment activity will focus principally on replacing any departing workers. However, BCOP and its contractors will continue to identify opportunities to grow the pool of Indigenous employees within approved workforce numbers.



Table 5.11 Social Infrastructure Enhancements

Category	Impact Description	Stakeholder	Significance
Social Infrastructure	Ongoing VPA and corporate contributions made to community each year.	■ NSC ■ GSC	High (A2)

The BCM VPA is in place for the duration of the BCM life and provides funding to NSC for the delivery of infrastructure and services to the communities impacted by the BCM. Since the commencement of construction, BCOP has contributed more than \$12 Million to the NSC through the VPA. VPA contributions to date have supported a range of investments including:

- Upgrades to Boggabri Caravan Park and Swimming Pool Complex;
- The repurpose and upgrade of the Boggabri Home and Community Care Centre;
- Replacement of the bridge across the Namoi River (and other works) on Harparary Road; and
- Upgrades to the Narrabri Aquatic Centre.

Table 5.12 Local Business Development Opportunities

Category	Impact Description	Stakeholder	Significance
Local business development	Ongoing supply chain and business development opportunities.	 Local businesses Indigenous businesses Local Chambers of Commerce Government agencies 	High (B3)

The 2013 SIMP indicated that the BCM would require goods and services, some of which would be sourced from local businesses. In 2015, the direct local spend totalled approximately \$8.4 Million. During 2019, BCOP had a direct local spend of \$21.3 Million. Direct local spend encompasses engaging local trades to perform work on site and use local suppliers wherever possible.

This is supported by BCOP's commitment to capitalise on local content opportunities, including opportunities to source goods and services from local businesses. This includes businesses owned by local Indigenous stakeholders.

The current business opportunities are likely to remain stable. There is an opportunity to continue to support the purchase of goods and services from local businesses, including Indigenous owned businesses, and where new goods and services are required to purchase these from a local business. This will continue to be facilitated through BCOP's local content commitment.

Cumulative Opportunities

The presence of existing and proposed nearby operations is likely to increase the cumulative economic benefits of mining in the Narrabri and Gunnedah LGAs and the broader Region.

Page 52 BCOP



Table 5.13 Cumulative Economic Benefits of Mining

Category	Impact Description	Stakeholder	Significance
Local business development	Cumulative economic benefits of mining in the New England and North West Region for the communities of the Narrabri and Gunnedah LGAs.	Local businessesResidentsService and infrastructure providers	High (B3)

The economic contributions from the mining sector to the Narrabri and Gunnedah LGAs are detailed in Table 5.14. BCOP (and its contractors) employed 271 employees who resided within the Gunnedah LGA and 150 employees who resided within the Narrabri LGA. Based on the proportion of BCOP employees residing within these LGAs, the value added for BCOP is equivalent to approximately \$116 Million in the Gunnedah LGA and \$66 Million for the Narrabri LGA.

Table 5.14 Local and Regional Economic Impact of Mining 2018-2019

Locality	Total Estimated Value Added (\$M)	Residing Employees (FTEs)	Total Employees (FTEs)	% of Total Regional Employment	Total Direct Spending (\$M)	No. of Businesses Directly Supported
Gunnedah LGA	314.2	729	1,034	50.8	140.9	159
Narrabri LGA	177.5	399	1,351	26	77.7	112

Note:

5.4 Decommissioning

Mine closure planning is a long term and iterative process which commences upon the initial definition of the mine plans within planning approvals documents. BCM is currently permitted to conduct mining operations until the end of 2033, although further coal reserves are known to exist which will need to be subject to future approvals.

The Boggabri EA first detailed a Conceptual Final Landform design to identify the mine rehabilitation to be progressively developed during mining operations. The existing Mining Operations Plan (MOP) provides details of progressive mine rehabilitation activities to achieve mine closure and is regularly reviewed and updated in consultation with relevant regulatory authorities.

An assessment of the potential social impacts of mine closure will be undertaken at least 5 years prior to the planned mine closure and decommissioning of BCM in relation to the term of SSD 09_0182 (i.e. mining is permitted until the end of 2033). The outcomes of the social impact assessment will be documented in a Mine Decommissioning SIMP (MDSIMP). The MDSIMP will be prepared to coincide with the mine closure planning activities required for the preparation of the Final Void and Mine Closure Plan in accordance with Schedule 3, Condition 72 of SSD 09_0182.

Lawrence Consulting, 2020.



BCOP will engage with all relevant stakeholders during the preparation of the MDSIMP to ensure all relevant aspects are considered. The MDSIMP will be prepared to cover a 10 year period covering the five years prior to completion of planned mining and for the period of five years after closure. To meet current closure and rehabilitation requirements, mine closure is planned across five years to allow for the decommissioning of site infrastructure and rehabilitation over time.

The MDSIMP will address impacts associated with workforce decline, withdrawal of sustained economic benefit, community dislocation, rehabilitation, land use restoration to agricultural uses, and legacy plans.

Page 54



6. Communications and Community Engagement

Effective community engagement and communications is essential to promoting informed discussion of the BCM operation and enhancing the capacity of BCOP to proactively identify and address issues. BCOP is committed to proactive communications and engagement and building upon established mechanisms, including the existing BCM CCC and BTM CCC and regular dialogue with NSC and GSC. The primary communications and community engagement activities undertaken by BCOP are detailed in Table 6.1.

Table 6.1 Communications and Community Engagement Activities

Activity	Details	
Community Consultative Committee	 BCOP established the BCM CCC in 2011. The BCM CCC meets quarterly and is facilitated by an independent chair. The BCM CCC membership includes a representative of the Maules Creek Community Council. BCOP participates in biannual meetings of the BTM CCC. 	
Meetings with NSC and GSC	BCOP meets on an as needed basis with the NSC and GSC.	
Community focussed website	A BCM website has been established and provides the following information: A description of current operations including ownership arrangements; Current and future approval processes; Operational information and monitoring outcomes; Environmental management activities and outcomes; Approvals, plans and reports; Details of the information/complaints line; and Contact details for BCM. https://www.idemitsu.com.au/mining/operations/boggabri-coal/	
Local media updates	BCOP advertises the 1800BOGGABRI community contact each quarter in the Namoi Valley Independent and the North West Courier newspapers.	
Queries and complaints protocol	 BCOP has established a formal complaints and grievances mechanism for the community. This mechanism includes procedures for handling, responding, closing out and reporting community feedback and complaints. BCOP has an established database for recording and managing stakeholder contact. 	
Aboriginal Stakeholder Community Forum	BCOP facilitates a biannual Aboriginal stakeholder community forum to encourage Aboriginal participation, and to also understand culturally significant issues.	

Source: BCOP, 2013 and BCOP, 2018.

6.1 Community Consultative Committee

Condition 7 of Schedule 5 of the SSD provides further requirements for the operation of the CCC for the BCM. This is reproduced in Table 6.2.



Table 6.2 CCC Condition

No.	Details
7	The Proponent shall operate a Community Consultative Committee (CCC) for the project to the satisfaction of the Director-General. This CCC must be operated in general accordance with the <i>Community Consultative Committee Guideline: State Significant Project</i> (DPE 2019 or latest version) and be operating within 6 months of the date of approval.
	The CCC must include one member representing the MCCC (if the MCCC is still operating and agreed to by the MCCC), one member from Aboriginal stakeholder groups, and seek to include some joint membership with CCCs for other operating coal mines within the Leard Forest Mining Precinct, unless otherwise agreed by the Director-General.
	Notes
	 The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Proponent complies with this approval; and
	 In accordance with the Department's guideline, the CCC should be comprised of an independent chair and appropriate representation from the Proponent, Council, recognised environmental groups and the local community.

Source: BCOP, 2018.

Notes to table:

- 1. Council in this condition refers to Narrabri Shire Council.
- 2. MCCC refers to the Maules Creek Community Council.

6.2 Community Complaints Register

BCOP has an established Complaints Management Procedure. BCOP has a dedicated complaints hotline (1800BOGGABRI (1800 264 422 74)). All complaints received are recorded in a company database for follow-up and are also tabled at BCM CCC meetings. As a minimum, BCOP records the following information for each complaint:

- Date the complaint was logged;
- Personal details provided by the complainant;
- Nature of the complaint;
- Action taken regarding the complaint, or if no action was taken, the reason why; and
- Follow-up contact with the complainant.

6.3 Community Liaison

All community liaison is managed through the 'Idemitsu Group Management Stakeholder Relations – Operations' and generally undertaken by the BCM General Manager, the Health Safety and Environment Manager and the Environmental Superintendent.

All external complaints, where practicable are managed by the BCM Environmental Superintendent with guidance from the Idemitsu Group Management Stakeholder Relations - Operations, as necessary. The BCM Environmental Superintendent and BCM team understand the transparent management of grievances fosters trust and facilitates the establishment and maintenance of good stakeholder relationships.

Page 56 BCOP



7. Management and Monitoring

This section identifies the measures that will be implemented to mitigate the impacts predicted to occur over the next three years. The SIMP is one of several management plans that are in place to manage the social and environmental impacts of the BCM.

7.1 Management

As the operations phase has commenced at BCM, the reforecast impacts are predicted to be ongoing in nature. The previous approved SIMP was completed prior to and during the construction phase of the project and therefore some previously identified impacts are not predicted to occur during the operations phase. This means that some of the management measures that were implemented are no longer required, others will continue to be implemented, and some additional measures may be recommended.

Table 7.1 identifies the measures that have been recommended to avoid, mitigate and/or manage the predicted negative impacts and enhance the predicted opportunities. These management measures include a continued focus by BCOP on:

- Employing locally, and procuring goods and services locally; and
- Supporting existing local communities through social investment activities.

BCOP will continue to engage with local stakeholders over the next three years through a range of established processes, including:

- BCM CCC, which meets quarterly. BCOP will review the frequency of meetings from time to time to ensure that the frequency meets the needs of the CCC and broader community as well as BCOP;
- Ad hoc engagement with local and State government agencies, including representatives from NSC and GSC;
- The community complaints mechanism, which is available to the community 24 hours a day. All
 complaints are reported, investigated and responded too in accordance with the established
 Complaints Management Procedure; and
- Attendance and involvement in key community events, as well as encouraging community and student visits to BCM facilitated by BCM pit tours.



Table 7.1 Summary of Proposed Management and Monitoring Framework

Impact Category	Management		Monitoring	
Category	Performance Goals	Proposed Measures	Actions	Timing*
Housing affordability and availability	 Minimise the impact of additional non-local workers on housing affordability and availability in Narrabri and Gunnedah LGAs. Minimise the impact of the temporary maintenance shutdown workforce on short-term accommodation availability in Narrabri and Gunnedah LGAs. Promote local living to project workforce. 	 Continue to engage with other local mining operators and other development project operators regarding monitoring and managing the potential cumulative impacts on local housing. Review the potential for impacts on housing availability and affordability where changes to the size of the local workforce are anticipated. Continue to liaise with NSC and GSC in relation to identifying possible opportunities for alternative and innovative housing options to accommodate short to medium term contract workers, including feedback on the NSC Housing Strategy and GSC Local Housing Strategy which are currently being prepared. Continue to supply and support remote housing allowances for staff, as well as the implementation of relocation policies. Continue to run assessment centres in Narrabri and Gunnedah when a recruitment drive is required. Encourage the maintenance shutdown workforce to utilise existing workforce accommodation villages for short term accommodation requirements. 	residential location of	Report on outcomes in the Annual Review.
Employment and training	 Maximise access to employment and training opportunities for the communities in Narrabri and Gunnedah LGAs. Maximise opportunities for local Indigenous communities to gain access to employment and training. 	 Identify ways to formalise the BCOP Local Employment Strategy. Investigate the need of an Indigenous Participation Plan (IPP) including mapping details of Indigenous businesses. Continue to support school-based education opportunities. Continue to conduct and source a wide variety of training opportunities both internal and external based upon the needs of the workforce and the business. Continue to explore opportunities to grow the Indigenous workforce at BCM. Develop a strategy within the hiring process to capture previous industry of employment for new recruits in order 	residential location of	Report on outcomes in the Annual Review.

Page 58



Impact	Management		Monitoring	
Category	Performance Goals	Proposed Measures	Actions Timing*	
		to support future planning for skills development and future monitoring of labour drawn from the non-mining sector. Investigate a formal system for capturing the cultural background of employees to facilitate reporting of workforce diversity.	 Investigate opportunities to maintain a record of the cultural background of all new recruits to inform monitoring of trends in workforce diversity. Annual monitoring of Indigenous employment numbers. 	
Local business development	 Facilitate opportunities for local businesses in the Narrabri and Gunnedah LGAs to access procurement opportunities associated with the BCM. Maximise opportunities for the local Aboriginal business to gain access to contracts at the BCM. 	 Investigate the development of a Local Content Plan (LCP) for operations. The LCP would include a register of local businesses. The LCP would also identify strategies that support increased in local content in the BCM supply chain e.g. packaging business opportunities so that smaller businesses can participate. Continue to work with the Chambers of Commerce to identify local business opportunities. Continue to facilitate biannual Aboriginal Stakeholder Community Forums. 	Maintain a record of local spend as a percentage of total operational expenditure. Report on outcomes in the Annual Review.	
Social and community infrastructure	Minimise the pressure on community services and infrastructure in Narrabri and Gunnedah LGAs.	 Continue to monitor workforce residential location, and presence of families. Use this information to assess potential pressures on community services and infrastructure. Undertake regular dialogue with service and facility providers (including health care providers) in Narrabri and Gunnedah LGAs to understand demand and supply issues. Follow-up with Boggabri community following completion of new childcare centre to understand the extent to which the centre has addressed demand issues. 	 Maintain a record of the residential location of employed workers. Maintain a record of the number of workers that annually relocate to Narrabri and Gunnedah LGAs to take up a position with BCOP or its contractors, including the size of the worker's family. Monitor the number of complaints received in relation to community services and infrastructure. 	



Impact Category	Management		Monitoring	
Category	Performance Goals	Proposed Measures	Actions	Timing*
			 Record the meetings undertaken with Narrabri and Gunnedah LGA staff where demands on community services and infrastructure are discussed. 	
Community cohesion	 Identify opportunities to increase positive interaction between the workforce and local resident communities. Minimise anti-social behaviour within the workforce, including drug and alcohol problems. 	 Continue to support local community activities. Continue to implement the employee code of conduct. Continue community engagement with project workforce and local residents regarding BCM approvals and modifications. 	 Record and monitor the number of complaints relating to community cohesion received by BCOP through the Complaints Register. 	Report on outcomes in the Annual Review.
Labour Draw	 Minimise potential impacts to non- mine related industries within the Narrabri and Gunnedah LGA's during mine recruitment activities. 	 Regularly monitor local labour supplies to assist in determining labour recruitment strategies which minimise the effect to other industries. 	 Report on the labour demographics within the Local Area in Annual Report 	Report on outcomes in the Annual Review.
Farming communities	 Minimise loss of agricultural production capacity in Narrabri and Gunnedah LGAs. 	 Regularly liaise with adjacent landowners to discuss issues and concerns relating to the operation of BCM, including land use practices, and record the results. Continue to maintain company owned land in agricultural production wherever possible. 	Evidence e.g. record of discussion, of liaison with adjacent landowners.	Report on outcomes in the Annual Review.
Indigenous opportunities	 Maximise opportunities for local Aboriginal people to gain access to employment at the BCM. Maximise opportunities for local Aboriginal businesses to gain access to contractors at the BCM. Provide ongoing opportunities for local Aboriginal people regarding archaeology, cultural interpretation and environmental rehabilitation. 	 Continue to implement the CHMP. Investigate the development of an IPP for operations. Investigate the development of a LCP for operations. 	 Record and monitor the number of Indigenous employees, as a percentage of the overall employment. Record and monitor the local spend, as a percentage of total operational expenditure. Record and monitor the number of Indigenous stakeholders engaged as part of the CHMP. 	Report on outcomes in the Annual Review.

Page 60



Impact Category	Management		Monitoring	
Category	Performance Goals	Proposed Measures	Actions Timing*	
Traffic management	 Minimise the number of workforce vehicles using local roads for purposes other than travelling to and from home. Minimise the wear and tear, dust, noise and safety issues on rural roads surrounding BCM. Minimise rubbish on the local rural roads. 	Continue to implement the Traffic Management Plan.	 Record and monitor the number of complaints relating to traffic management received by BCOP through the Complaints Register. Conduct regular roadside inspections to identify presence of rubbish which requires removal. Annually record the data, or as required by the Annual Review. 	
Cumulative Impacts	Contribute to the ongoing avoidance, mitigation or management of cumulative impacts.	 Meet periodically with staff at NSC and GSC to understand social and community infrastructure issues. Follow-up with Boggabri community following completion of new child care centre to understand the extent to which the centre has addressed demand issues. Participation in the BCM CCC and the BTM CCC. Ongoing implementation of BCM Complaints Management Protocol. Continue to undertake cropping and grazing activities within the BOAs, in accordance with the recommendations made in the Agricultural Suitability Assessment. 	 Monitor social baseline data and conduct trend analysis to identify cumulative impacts. Monitor the number of complaints relating to amenity impacts received by BCOP through the Complaints Register. Conduct internal reviews annually. Report on outcomes in the Annual Review.	

^{*}Monitoring and reporting will occur annually as part of the Annual Review, as per Condition 77 of the Project Approval



7.2 Monitoring

Table 7.1 includes actions, or steps that will be taken, to monitor the effectiveness of the proposed management measures. This includes collecting data and using this data to assess whether the established performance goals have been met. Table 7.1 also sets out the frequency in which the monitoring will occur.

7.3 Reporting and Review

Monitoring data will be reported to the BCM CCC annually, and a summary of the monitoring results will be presented in the BCM Annual Review.

The 2020 SIMP will be reviewed and updated in 2023. This review will involve assessing the effectiveness of the SIMP, reviewing the predicted impacts (in light of changing local conditions), and revising the SIMP to align with the predicted impacts.

The outcomes of the SIMP review will be presented to the BCM CCC, and the draft 2023 SIMP will be made available for review to NSC, GSC, the DPIE, CCC and representatives from the local Indigenous communities.

Review of the SIMP will be undertaken in accordance Schedule 5, Condition 5 of SSD 09_0182 within 3 months of the submitting the following:

- Annual Review under Schedule 5, Condition 4 of SSD 09 0182;
- Incident report under Schedule 5, Condition 8 of SSD 09_0182;
- Audit under Schedule 5, Condition 10 of SSD 09 0182; and
- A modification to SSD 09_0182.

Where this review results in revisions to the SIMP, then within 4 weeks of the completion of the revision, unless the Secretary agrees otherwise, the revised document will be submitted to the Secretary for approval.

7.4 Roles and Responsibilities

The BCOP General Manager is responsible for implementation of the 2020 SIMP, including ongoing monitoring and reporting. BCOP will maintain overall responsibility and will be responsible for working with its contractors to ensure that the management measures are implemented, and the relevant monitoring data is collected.

Page 62 BCOP



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Page 64 BCOP



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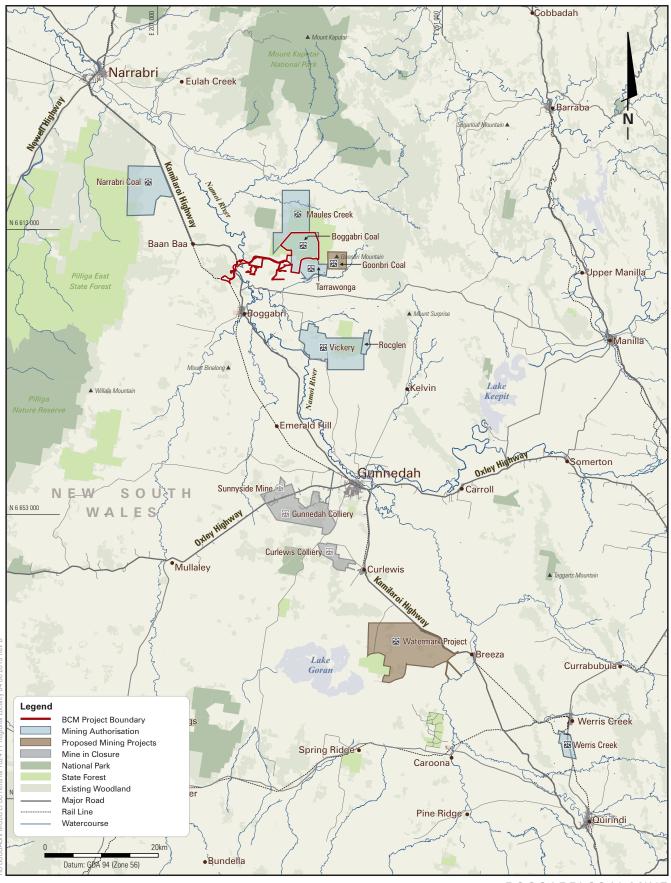
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BCOP Page 65



Figures

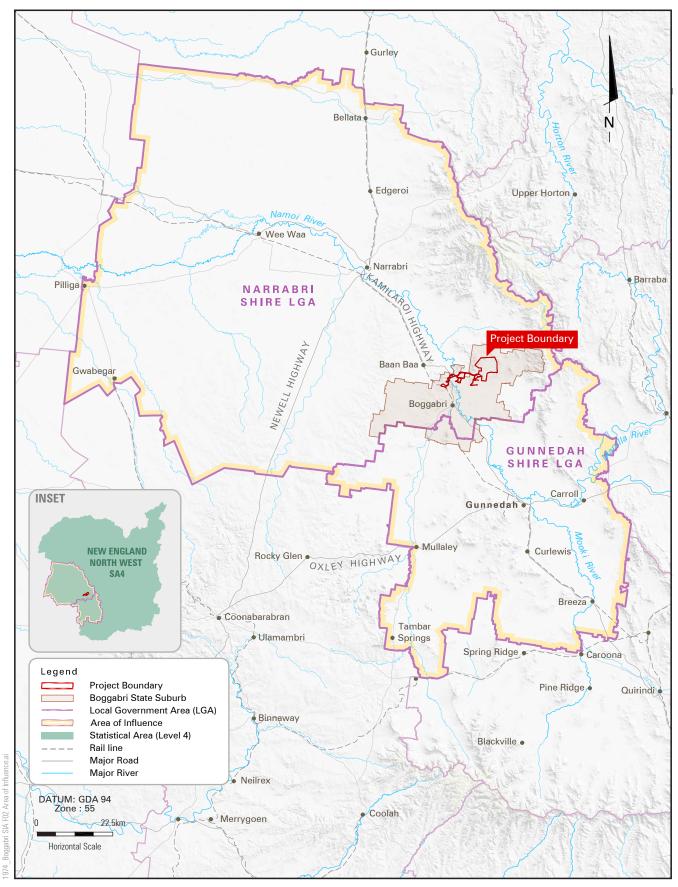


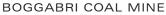




BOGGABRI COAL MINE

Regional Locality

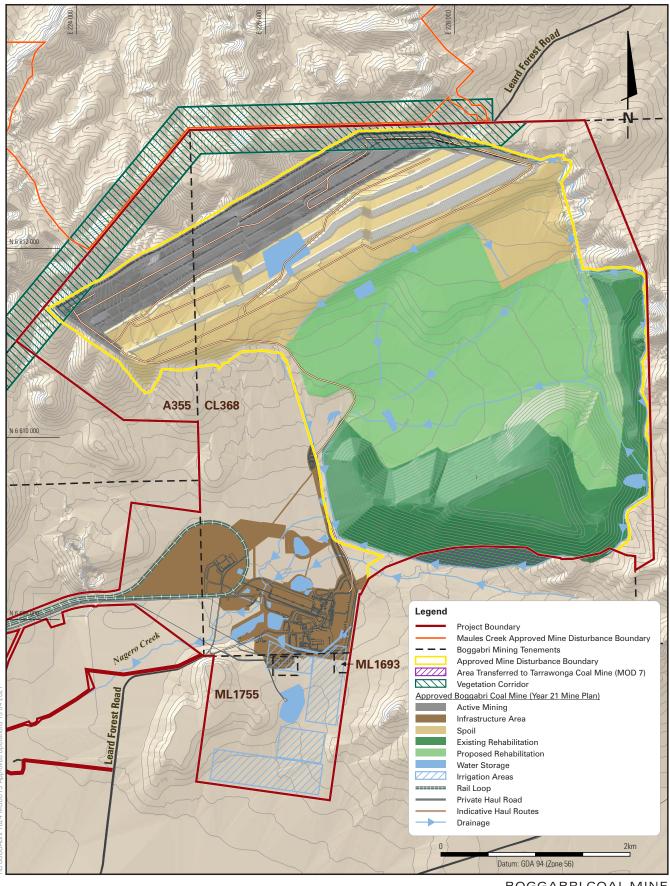




Area of Influence











BOGGABRI COAL MINE



Appendix A DPIE Endorsement



Mr Hamish Russell Environmental Superintendent Boggabri Coal Pty Limited

26 August 2021

Dear Mr Russell

Boggabri Coal (MP09_0182) Social Impact management Plan

I refer to the revised Social Impact Management Plan which was submitted in accordance with Condition 77 of Schedule 3 of the condition of consent for the Boggabri Coal (MP09_0182-PA-20).

The Department has carefully reviewed the document and is satisfied that it generally addresses the requirements of the condition.

Accordingly, the Secretary has approved the revised Social Impact Management Plan (Revision 7, dated August 2021). Please ensure that the approved plan is placed on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Charissa Pillay on 02 99955944.

Yours sincerely

Stephen O'Donoghue Director Resource Assessments As nominee of the Secretary



Planning Services
Resource and Energy Assessments
Contact: Jacob Ward

Telephone: 8217-2028

Email: Jacob Ward@planning.nsw.gov.au

Mr Peter Forbes Health Safety and Environment Manger Boggabri Coal Operations Pty Ltd

By email: peter.forbes@boggabricoal.com.au

Dear Mr Forbes,

Boggabri Coal Mine (09_0182) Social Impact Management Plan

I refer to your letter dated 1 April 2019, seeking the endorsement of suitably qualified and experienced persons to prepare a revised Social Impact Management Plan (SIMP) for the Boggabri Coal Mine, in accordance with Condition 77(a), Schedule 3 of PA 09_0182.

The Department has carefully considered the information you provided and is satisfied that the nominated persons are suitably qualified and experienced.

As such, the Secretary has approved Bronwyn Pressland and Lauren Jessup of Hansen Bailey to prepare the revised SIMP for Boggabri Coal Mine.

If you wish to discuss the matter further, please contact Jacob Ward on 8217 2028.

Yours sincerely,

Stephen O'Donoghue

Acting Director

Resource and Energy Assessments

as nominee of the Secretary



Appendix B Record of Stakeholder Consultation

Table B.1 Record of Consultation Specific to the BCM SIMP

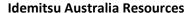
Consultation	Date	Details	Response (and where addressed within the 2020 SIMP)
Meeting with Narrabri Shire Council (NSC).	03.10.2012	Consultation meeting in the preparation of the 2013 SIMP prior to submission.	Comments raised during consultation included: Workforce accommodation; Housing; Community Services; and Benefits from mining operations
Meeting with Boggabri Coal Indigenous Advisory Group.	08.10.2012	Consultation meeting in the preparation of the 2013 SIMP prior to submission.	Comments raised during consultation included: Opportunities for Indigenous employment; Community development; and Heritage issues.
Boggabri CCC Meeting October 2012	16.10.2012	Consultation meeting in the preparation of the 2013 SIMP prior to submission.	Comments raised during consultation included: Operation of the CCC; Impact from current operations; Community services; and Community development.
Meeting with Gunnedah Shire Council (GSC).	28.11.2012	Consultation meeting in the preparation of the 2013 SIMP prior to submission.	Comments raised during consultation included: Workforce accommodation; Housing; Community Services; and Benefits from mining operations
Meeting with Namoi Catchment Management Authority	28.11.2012	Consultation meeting in the preparation of the 2013 SIMP prior to submission.	Comments raised during consultation included: Catchment management; Environmental values; and Regional impacts on agriculture.
Meeting with Boggabri Progress Association	28.11.2012	Consultation meeting in the preparation of the 2013 SIMP prior to submission.	Comments raised during consultation included: Community development; Community services; Impact of mining operations in the area; Local employment; and Benefits of mining operations.
Meeting with Red Chief Local Aboriginal Land Council	28.11.2012	Consultation meeting in the preparation of the 2013 SIMP prior to submission.	Comments raised during consultation included: Community development; Indigenous issues; Opportunities for Indigenous employment; and Heritage issues.
Draft 2016 SIMP for BCM sent to Department of Planning & Environment (DPE) for comment.	30.06.2016	The Draft SIMP was presented to DPE for comment prior to finalisation.	No response received.
Draft 2016 SIMP for BCM sent to GSC for comment	16.12.2016	The Draft SIMP was presented to GSC for comment prior to finalisation.	No response received.
Draft 2016 SIMP for BCM sent to NSC for comment.	16.12.2016	The Draft SIMP was presented to NSC for	NSC provided comments regarding the SIMP on the 11.01.2017, including:



Consultation	Date	Details	Response (and where addressed within the 2020 SIMP)
		comment prior to finalisation.	 Initiatives for promoting workforce opportunities of those residing in the Local Area; Labour availability impacts; Effects of mining operations on the existing water table; BCM housing commitment; Local spend summary; Indigenous employment; Roadside rubbish; and Mine closure forecasting.
Draft 2016 SIMP for BCM sent to the CCC for comment.	August 2016	The Draft SIMP was presented to the CCC for comment prior to finalisation.	Feedback was provided to BCOPL in the August 2016 CCC meeting and included: Concern that new dwellings are needed in Boggabri to attract new families to the area although the statistics do not support the requirement. Current rental pool of houses were not suitable; Concern no housing was planned for Gunnedah and it's indigenous population; and Indigenous employment rates on site;
Draft 2020 SIMP for BCM sent to Department of Planning, Industry & Environment (DPIE) for comment.	01.11.2020	The Draft SIMP was presented to the DPIE for approval.	DPIE requested consultation be undertaken on the revised 2020 SIMP.
Draft 2020 SIMP for BCM sent to DPIE for comment.	08.12.2020	The Draft SIMP was presented to the DPIE for comment prior to finalisation.	No response received.
Draft 2020 SIMP for BCM sent to GSC for comment	08.12.2020	The Draft SIMP was presented to GSC for comment prior to finalisation.	No response received.
Draft 2020 SIMP for BCM sent to GSC for comment	28.06.2021	Follow up email to GSC on any comments on the SIMP following receipt of DPIE comments.	No response received.
Draft 2020 SIMP for BCM sent to GSC for comment	19.07.2021	Follow up email to GSC on any comments on the SIMP following receipt of DPIE comments.	No response received.
Draft March 2021 SIMP for BCM sent to GSC for comment	30.07.2021	GSC requested the recently updated SIMP dated March 2021.	No response received.
Draft March 2021 SIMP for BCM sent to GSC for comment	04.08.2021	Follow up email to GSC on any comments on the SIMP.	GSC comments received 04.08.2021, including ■ Medical and emergency services (Sections 4.10.3 and 5.3.1); ■ Housing (Section 3.2.2 and 5.3.1 and Table 7.1); ■ Employment (Section 5.3); ■ Statistics (Section 4);



Consultation	Date	Details	Response (and where addressed within the 2020 SIMP)
			 Economic Impact (Section 5.3.2); Community Issues & Concerns (Section 5.2) Social Infrastructure Enhancements.
Draft 2020 SIMP for BCM sent to NSC for comment.	08.12.2020	The Draft SIMP was presented to NSC for comment prior to finalisation. Further detail was added to the SIMP to clarify NSC queries. Added further BCM mitigation measures regarding roadside rubbish impacts.	NSC provided comments regarding the SIMP on the 14.01.2020, including: Definition of the 'Local Area' (Sections 1.2 and 4.2); Initiatives for promoting workforce opportunities of those residing in the Local Area (Sections 3.2.3 and 5.3.2); Labour availability impacts (Sections 4.9 and 5.3); BCM housing commitment (Section 2.2.2); Local spend summary (Table 2.7); Roadside rubbish (Section 5.3.1); and Mine closure forecasting (Section 5.4).
Draft 2020 SIMP for BCM sent to Maules Creek Coal Mine (MCCM) for comment.	08.12.2020	The Draft SIMP was presented to MCCM for comment prior to finalisation.	No response received.
Draft 2020 SIMP for BCM sent to Tarrawonga Coal Mine (TCM) for comment.	08.12.2020	The Draft SIMP was presented to TCM for comment prior to finalisation.	No response received.
Draft 2020 SIMP for BCM sent to the CCC for comment.	09.12.2020	The Draft SIMP was presented to the CCC for comment prior to finalisation.	Response dated 13.01.2020 stating no comments from the CCC members were received.
Boggabri Coal Aboriginal Stakeholders Community Forum (ASCF) meeting.	03.12.2020	The Draft SIMP was presented to RAPs for comment prior to finalisation. Further detail was added to the SIMP to clarify the RAPs queries.	Comments received related to: Workforce accommodation (Section 5.3.1); Indigenous employment (Sections 5.3.1 and 5.3.2); and Social housing impacts (Section 5.3.1).





ABN 76 600 191 455

A Member of the Idemitsu Australia Resources Group

386 Leard Forest Rd Boggabri NSW 2382

PO Box 12 Boggabri NSW 2382

Telephone: 02 6749 6000

Ref: 05-115-738

8/12/2020

Chairperson
Boggabri Coal Mine Community Consultative Committee
PO Box 943
INGLEBURN NSW 1890
ATTENTION: Mr David Ross

Dear David

RE: BOGGABRI COAL MINE – 2020 DRAFT SOCIAL IMPACT MANAGEMENT PLAN

Boggabri Coal Operations Pty Limited (BCOP) has operated the Boggabri Coal Mine (BCM) on behalf of Idemitsu Australia Resources (IAR) and its joint venture partners since 2006. BCM is approved to recover up to 8.6 Million tonnes per annum (Mtpa) of Run of Mine (ROM) coal via open cut mining methods until 31 December 2033 in accordance with State Significant Development approval (SSD) 09_0182.

Schedule 3, Condition 77(b) of SSD 09_0182 states:

"Social Impact Management Plan

77. The Proponent shall prepare and implement a Social Impact Management Plan for the Project to the satisfaction of the Secretary to manage the potential impacts of the Project. This plan must:

b) be prepared in consultation with Narrabri Shire Council, Gunnedah Shire Council, the CCC, Aboriginal stakeholders and other relevant Government agencies and service providers, other mine operators in the Leard Forest Mining Precinct and submitted to the Secretary for approval within 12 months of Project approval"

The BCM Social Impact Management Plan (SIMP) was originally developed and was approved by the former NSW Department of Planning and Infrastructure (DPI) on 21 April 2014. Updates to the SIMP were completed in 2016. BCOP has recently completed further revisions to the SIMP (i.e. draft 2020 SIMP) to reflect the recent operational changes (i.e. transition from contractor operated to owner operated) to the BCM.

A copy of the draft 2020 SIMP can be found at https://www.idemitsu.com.au/mining/wp-content/uploads/2016/02/BCOP-DRAFT-2020-SIMP-FOR-CONSULTATION.pdf

Could you please arrange for the CCC member's review and provide any written comments on the draft 2020 SIMP to Nathan Cooper at Hansen Bailey (at ncooper@hansenbailey.com.au) before Friday, 15 January 2021. BCOP will then address stakeholder comments received during this period and resubmit to DPIE for their final approval.

Should you have any queries in relation to this letter, please do not hesitate to contact myself on 02 6749 6009 or Nathan Cooper at Hansen Bailey on 0475 679 339.

Yours sincerely

HAMISH RUSSELL

Environmental Superintendent

07 3222 5600 Facsimile:

07 3222 5665

Registered Office:

Brisbane QLD 4000

Brisbane QLD 4001

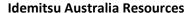
Level 9/175

Eagle Street

GPO Box 301

Telephone:







ABN 76 600 191 455

A Member of the Idemitsu Australia Resources Group

386 Leard Forest Rd Boggabri NSW 2382

PO Box 12 Boggabri NSW 2382

Telephone: 02 6749 6000

Ref: 05-115-739

8/12/2020

Team Leader - Compliance
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001
ATTENTION: Ms Heidi Watters

Dear Heidi

RE: BOGGABRI COAL MINE – 2020 DRAFT SOCIAL IMPACT MANAGEMENT PLAN

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Yours sincerely

HAMISH RUSSELL

Environmental Superintendent

IDEMITSU BOGGABBICON

Registered Office:

Brisbane QLD 4000

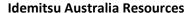
Brisbane QLD 4001

Level 9/175

Eagle Street

GPO Box 301

Telephone: 07 3222 5600





ABN 76 600 191 455

A Member of the Idemitsu Australia Resources Group

386 Leard Forest Rd Boggabri NSW 2382

PO Box 12 Boggabri NSW 2382

Telephone: 02 6749 6000

Ref: 05-115-742

8/12/2020

Director of Corporate and Community Services Narrabri Shire Council PO Box 261 NARRABRI NSW 2390 ATTENTION: Mr Lindsay Mason

Dear Mr Mason

RE: BOGGABRI COAL MINE – 2020 DRAFT SOCIAL IMPACT MANAGEMENT PLAN

Boggabri Coal Operations Pty Limited (BCOP) has operated the Boggabri Coal Mine (BCM) on behalf of Idemitsu Australia Resources (IAR) and its joint venture partners since 2006. BCM is approved to recover up to 8.6 Million tonnes per annum (Mtpa) of Run of Mine (ROM) coal via open cut mining methods until 31 December 2033 in accordance with State Significant Development approval (SSD) 09_0182.

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Should you have any queries in relation to this letter, please do not hesitate to contact myself on 02 6749 6009 or Nathan Cooper at Hansen Bailey on 0475 679 339.

Yours sincerely

HAMISH RUSSELL

Environmental Superintendent

Brisbane QLD 4000

Registered Office:

Level 9/175

Eagle Street

GPO Box 301 Brisbane QLD 4001

Telephone: 07 3222 5600







ABN 76 600 191 455

A Member of the Idemitsu Australia Resources Group

386 Leard Forest Rd Boggabri NSW 2382

PO Box 12 Boggabri NSW 2382

Telephone: 02 6749 6000

Ref: 05-115-740

8/12/2020

Director of Environmental and Planning Services Gunnedah Shire Council PO Box 63 GUNNEDAH NSW 2380 ATTENTION: Mr Andrew Johns

Dear Mr Johns

RE: BOGGABRI COAL MINE – 2020 DRAFT SOCIAL IMPACT MANAGEMENT PLAN

Boggabri Coal Operations Pty Limited (BCOP) has operated the Boggabri Coal Mine (BCM) on behalf of Idemitsu Australia Resources (IAR) and its joint venture partners since 2006. BCM is approved to recover up to 8.6 Million tonnes per annum (Mtpa) of Run of Mine (ROM) coal via open cut mining methods until 31 December 2033 in accordance with State Significant Development approval (SSD) 09_0182.

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Should you have any queries in relation to this letter, please do not hesitate to contact myself on 02 6749 6009 or Nathan Cooper at Hansen Bailey on 0475 679 339.

Yours sincerely

HAMISH RUSSELL

Environmental Superintendent

Telephone: 07 3222 5600

Registered Office:

Brisbane QLD 4000

Brisbane QLD 4001

Level 9/175

Eagle Street

GPO Box 301







ABN 76 600 191 455

A Member of the Idemitsu Australia Resources Group

386 Leard Forest Rd Boggabri NSW 2382

PO Box 12 Boggabri NSW 2382

Telephone: 02 6749 6000

Ref: 05-115-737

8/12/2020

Operations Manager Tarrawonga Coal Mine PO Box 56 BOGGABRI NSW 2382 ATTENTION: Mr Tian Oosthuizen

Dear Mr Oosthuizen

RE: BOGGABRI COAL MINE - 2020 DRAFT SOCIAL IMPACT MANAGEMENT PLAN

Boggabri Coal Operations Pty Limited (BCOP) has operated the Boggabri Coal Mine (BCM) on behalf of Idemitsu Australia Resources (IAR) and its joint venture partners since 2006. BCM is approved to recover up to 8.6 Million tonnes per annum (Mtpa) of Run of Mine (ROM) coal via open cut mining methods until 31 December 2033 in accordance with State Significant Development approval (SSD) 09_0182.

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Should you have any queries in relation to this letter, please do not hesitate to contact myself on 02 6749 6009 or Nathan Cooper at Hansen Bailey on 0475 679 339.

Yours sincerely

HAMISH RUSSELL

Environmental Superintendent

Level 9/175 Eagle Street

Registered Office:

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Brisbane QLD 4000

GPO Box 301 Brisbane QLD 4001

Telephone: 07 3222 5600







ABN 76 600 191 455

A Member of the Idemitsu Australia Resources Group

386 Leard Forest Rd Boggabri NSW 2382

PO Box 12 Boggabri NSW 2382

Telephone: 02 6749 6000

Ref: 05-115-741

8/12/2020

General Manager Maules Creek Coal Mine PO Box 56 BOGGABRI NSW 2382 ATTENTION: Mr Andrew Garratt

Dear Mr Garratt

RE: BOGGABRI COAL MINE – 2020 DRAFT SOCIAL IMPACT MANAGEMENT PLAN

Boggabri Coal Operations Pty Limited (BCOP) has operated the Boggabri Coal Mine (BCM) on behalf of Idemitsu Australia Resources (IAR) and its joint venture partners since 2006. BCM is approved to recover up to 8.6 Million tonnes per annum (Mtpa) of Run of Mine (ROM) coal via open cut mining methods until 31 December 2033 in accordance with State Significant Development approval (SSD) 09_0182.

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Yours sincerely

HAMISH RUSSELL

Environmental Superintendent



Registered Office:

Brisbane QLD 4000

Brisbane QLD 4001

Level 9/175

Eagle Street

GPO Box 301

Telephone: 07 3222 5600



Our Reference: CS:KDK:1833427
Your Reference: 05-115-742
Contact Name: Cara Stoltenberg

Mr. Nathan Cooper C/- Hansen Bailey

Emailed: ncooper@hansenbailey.com.au



Thursday, 14 January 2021

Re: Boggabri Coal Mine - 2020 Draft Social Impact Management Plan



Dear Nathan Cooper,

I refer to the letter dated 8 December 2020 requesting Narrabri Shire Council (Council) review and provide comments on the Boggabri Coal Mine (BCM) 2020 Draft Social Impact Management Plan (2020 Draft SIMP)

In accordance with Condition 77(b) of SSD 09_0182, the 2020 Draft SIMP is required to be prepared in consultation with Council.

Council has reviewed the 2020 Draft SIMP dated October 2020 and make the following comments for your consideration;

- Section 3.2.4 states that majority of the BCM workforce are permanent residents of the local area. However, Table 3.1 indicates only 13.2% of employees reside in the Narrabri Shire Local Government Area (LGA), and 42% in the Gunnedah LGA.
- 2. The information provided in the 2020 Draft SIMP regarding the identification of proposed initiatives for promoting workforce opportunities for residing in the area/region as opposed to FIFO/DIDO is insufficient. Similarly, labour availability impacts on other sectors, such as agricultural enterprises, are not discussed sufficiently.
- 3. Section 2.2.2 states that BCM committed to implementing the construction of a minimum of 10 dwellings in Boggabri. To date Council can find no records to confirm that this has occurred. Section 2.2.2 also states that BCM is also committed to the construction of a minimum of 20 dwellings in Narrabri. To date NSC can find no records to confirm that this has occurred. Therefore, Council requests BCM provide supporting information, including addresses, to justify these commitments. Further, there is no information given as to the monitoring used to determine if the project was unreasonably increasing the cost of housing in the area. Council requests this information be included in the SIMP, along with the results from the monitoring since 2012. This information is also required by condition 77(e) of the current SSD 09_0182.
- 4. Council previously requested that the local spend totals (Table 2.7) be broken down as to where this money is spent and on what and noted in the 2020 Draft SIMP.
- 5. Council also previously requested that consideration should also be given to the increase in rubbish along the verges of roads used to access BCM and potential measures to mitigate this.



Narrabri Shire Council 46 - 48 Maitland Street PO Box 261, Narrabri NSW 2390



P. (02) 6799 6866 F. (02) 6799 6888



E. council@narrabri.nsw.gov.au www.narrabri.nsw.gov.au

6. Further, Council previously requested information be provided as to how mine closure can be predicted five years ahead of time.

Council expects that BCM has, and will continue to, adhere to all conditions of approval pursuant to SSD 09_0182, and all applicable legislative requirements they are bound by.

Council appreciates the opportunity to review the 2020 Draft SIMP for the BCM and trusts that these comments will be considered in the current edition and revision of the document. I trust this information is to your satisfaction. If you require any further clarification please do not hesitate to contact Mrs Cara Stoltenberg, Strategic and Major Projects Planner, on (02) 67996866 or caras@narrabri.nsw.gov.au.

Yours faithfully,

Cara Stoltenberg

Strategic and Major Projects Planner



Social Impact Management Plan Update

A review of the Social Impact Management Plan (SIMP) has been completed in accordance with Schedule 3 Condition 77 of the Project Approval.

Currently undertaking the required consultation process.

Once comments have been reviewed, the SIMP will be submitted to the Department of Planning Industry and Environment (DPIE) for approval.

Changes from the previous version include:

- Boggabri Coal Mine transitioned to owner-operator
- Increase in workforce numbers (including major contractors)
- The review found that social impacts have remained consistent with previous versions.

The SIMP is available on the website.









Social Impact Management Plan Update

Impact	Proposed Management Measures
Housing affordability and availability	 Encourage maintenance shutdown workforce to utilise CIVEO camp facilities Continue to run assessment centres in Narrabri and Gunnedah when a recruitment drive is required.
Employment and training	 Identify ways to formalise the BCOP Local Employment Strategy Investigate the need for an Indigenous Participation Plan (IPP) and map details of Indigenous businesses Continue to explore opportunities to grow the Indigenous workforce at BCM Develop a strategy within the hiring process to capture previous industry of employment for new recruits and Investigate a formal system for capturing cultural background of employees.
Local business development	 Investigate the development of a Local Content Plan (LCP) including Local Business Register Continue to work with the Chambers of Commerce to identify local business opportunities Continue to facilitate biannual ASCF.









Social Impact Management Plan Update

Impact	Proposed Management Measures
Social and community infrastructure	 Monitor and report workforce residential location to assess potential pressures on community infrastructure Undertake regular dialogue with service and facility providers in Narrabri and Gunnedah LGAs to understand demand and supply issues.
Community cohesion	 Continue to support local community activities Continue community engagement with workforce and local residents regarding BCM approvals and modifications
Farming communities	 Continue liaising with neighbouring landowners to discuss issues and concerns Continue to maintain company owned land in agricultural production wherever possible
Indigenous opportunities	 Continue implementing the CHMP Investigate the development of an IPP Investigate the development of LCP Continue to explore opportunities to grow the Indigenous workforce at BCM
Cumulative impacts	 Meet periodically with NSC and GSC regarding social and community infrastructure issues Participate in BCM CCC and BTM CCC.









Social Impact Management Plan Update 2020 Comments/Feedback Form

Name (s)	Organisation	Date
Curdy foley	Condey Golley	B.12.20
If you would like to provi	de comments or feedback	please
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Responses may be posted to PO Box 12, Boggabri NSW 2382 or send by email to: sarah.torrance@boggabricoal.com.au

PLEASE SEND YOUR COMMENTS BY 15th JANUARY, 2021



Social Impact Management Plan Update 2020 Comments/Feedback Form

Name (s)	Organisation	Date
GNES GNIFFISHS	WONNARUT CALL OINECT DESCENSANT IMOTIONAL OWNER	1/11/2020

If you would like to provide comments or feedback please outline below......

THENK ARE MANY WAYS MINING CAN IMPACT ON A ABORIGINAL COMMUNIST WHICH I BELIEUE CAN HAVE A VENT POSITIVE AFFEIT IN MANY ASPECTS WITH SOME OF THEM BONG EMPLOYMENT. GONNEDAH ABONIGINAL EMPLOYMENT RATE SINCE 2010 TO ZOIG WENT FROM IAY DOWN TO 18% THE FIRST IN THIS TOWN'S HISTORY AND I BECIEVE IT IS ATTRIBUTED TO MINING. AND SHOULD COME COUNT AGAIN AT THE SENSES THENE AND MANT YOUTH ACTIVITIES IN GUNNEDAH THAT ABORIGINAL YOUTH AND INVOLVED IN AND THE COULD BE A OPPORTUNITY FUN BOGGABAI COAL TO FIND THEM AND PLAT A ROLE IN ASSISTING THEM WITH THONK COMMITMENT TO OUR CHILDREN AND YOUTH HERE IN GUNNEDAY THENT ANT ALREADY 4 SOCIAL HOUSING PROVIDERS IN GUNDEDAY (REDCHIEF LAKE, MINMIN, GUNIDA GUNYAH

Responses may be posted to PO Box 12, Boggabri NSW 2382 or send by email to : sarah.torrance@boggabricoal.com.au

PLEASE SEND YOUR COMMENTS BY 15th JANUARY, 2021



Social Impact Management Plan Update 2020 Comments/Feedback Form

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GREG GRIFFITHS / III
DINECT DESCENDANT OF ANEA
TRADITIONAL OWNER
AND ELDER



Mr Hamish Russell Environment Superintendent Boggabri Coal Pty Limited Boggabri, NSW 2382

22/06/2021

Dear Mr Russell

Boggabri Coal (MP09_0182-PA-20) Social Impact Management Plan (SIMP) - request for additional information

The Department requires additional information relating to the SIMP submitted under the conditions of consent for the Boggabri Coal (MP09 0182-PA-20).

Please submit a revised document that addresses the requirements in the attached comments table.

Please provide the information or notify us that you will not provide the information by Friday 02 July 2021. If this timeframe is not achievable, please provide and commit to an alternative timeframe for providing this information.

If you have any questions, please contact Charissa Pillay on 0299955944 / at Charissa.Pillay@planning.nsw.gov.au.

Yours sincerely

Stephen O'Donoghue

Director

Resource Assessments



Social Impact Management	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
Agricultural Production on Project-Owned Land				
73. The Proponent shall use its best endeavours to ensure that the agricultural productivity of land that is project related (including remaining agricultural land on properties forming the biodiversity offset area) is maintained or enhanced.	Yes	Section 2.2.1 includes the condition.		
Agricultural Production on land acquired due to impacts on residential receivers				
74. The Proponent shall ensure that any properties primarily used for agricultural production that are acquired by the Proponent due to impacts on residential receivers continue to be operated and maintained for sustainable agricultural production, unless they have been incorporated into an approved biodiversity offset area. This condition ceases to have effect if the Proponent disposes of the property	Yes	Section 2.2.1 includes the condition.		
Housing Strategy			-	
75. The Proponent shall implement the Boggabri Coal Housing Commitment identified in the EA, in consultation with Council, to provide for: (a) construction of a minimum of 10 dwellings in Boggabri, within a timeframe agreed by Council; (b) construction of a minimum of 20 dwellings in Narrabri, within a timeframe agreed by Council; and (c) implementation of remaining commitments within the terms of the approved Social Impact Management Plan (see condition 77 of Schedule 3).	Partial	Section 2.2.2 includes the commitments but stated that the commitments have not been implemented to date.	Include a discussion on when the construction of the dwelling will be undertaken. Include consultation undertaken with council to date on the housing strategy.	
If there is any dispute between Council and the Proponent regarding the timing of construction, then either party may				



Social Impact Management	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
refer the matter to the Secretary for resolution, whose decision shall be final				
Construction Workforce Accommodation				
76. Prior to construction activities commencing, the Proponent shall prepare and implement a Construction Workforce Accommodation Plan, in consultation with Council, and to the satisfaction of the Secretary. The plan must: (a) provide details of the construction workforce numbers throughout all stages of construction including local vs. non-local hiring; and	N/A	Project is in operational stage 2020- 2022	-	
(b) for off-site accommodation options, demonstrate that the construction workforce can be suitably housed in approved accommodation facilities.	-	-	-	
The Proponent shall prepare and implement a Social Impact Management Plan for the project to the satisfaction of the Secretary to manage the potential impacts of the project. This plan must:				
(a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;	No	Appendix A has been referenced to address the condition. There is no evidence to confirm the condition is addressed.	Submit evidence to confirm the SIMP was prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;	
(b) be prepared in consultation with Council, Gunnedah Shire Council, the CCC, Aboriginal stakeholders and other relevant Government agencies and service providers, other mine operators in the Leard Forest Mining Precinct and submitted to the Secretary for approval within 12 months of project approval;	Partial	Appendix B provides a Table which details comments raised during consultation. In some sections of the Table(2020) no response was received from GSC, Tarrawonga Coal Mine and Maules Creek Coal mine.	Include in Appendix B Table C1, where the responses in the SIMP have been addressed. Continue to seek a response from GSC on the SIMP.	



Social Impact Management	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
		Appendix B, Table C1 contains the responses from the respective agencies but no reference where in the SIMP the comments have been addressed.		
		Duplication of Table C1.		
 c). take into consideration relevant actions related to social impacts identified in the Strategic Regional Land Use Plan for New England North West; 	Yes	Section 2.6.1 includes the condition	-	
 (d) identify the social impacts resulting from the various stages of the project (including construction, operational and decommissioning stages) in both the local and regional context, including but not limited to: 				
soft infrastructure such as housing, medical, education, childcare and emergency services;	Partial	Section 4.10.1 assessed if there were any impacts related to education. Section 4.10.2 addresses childcare impacts. Section 4.10.3 includes feedback from the local healthcare providers that the demand on local service remains stable. Consultation was undertaken via telephone and no evidence submitted as record.	Include other consultation methods carried out with healthcare providers (such as emails, meetings) to identify the social impacts arising during the operational phase.	



Social Impact Management	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
hard infrastructure such as local and regional roads and rail;	Partial	Section 5.3 and SIMP includes discussion on road impacts and measures to be implemented. SIMP does not discuss any impacts that may result from the train loading facility, rail loop and rail spur line during the operational stage of the project or the commercial agreement with Whitehaven which has not been completed.	Include details if there are any impacts associated with transporting coal for neighbouring mines.	
economic/business development; and	Yes	Section 4 and Section 5.3 address the condition.	-	
 workforce demand/supply factors, such as training needs; and 	Yes	Section 5.3 identifies the impacts	-	
 labour availability impacts on other sectors, such as agricultural enterprises 	Yes	Section 4.9 and section 5.3 address the condition.	-	
(e). incorporate the housing availability and affordability initiatives identified in the EA, including the Boggabri Coal Housing Commitment;	Partial	Appendix B includes details of NSC raising a comment on BCM housing commitment, it is unclear what exactly was their comment and where their comment has been addressed.	Include details of NSC consultation regarding the BCM housing commitment, include the construction and timeframe agreed with NSC.	
		Section 2.2.2 states BCM has not constructed the initial 10 dwellings referenced in Condition 75(a). No timeframe has been agreed with		



Social Impact Management	Sufficient Document reference and comment		Action Required	Company Response
		NSC for the delivery of the 10 dwellings at this stage.		
(f) identify proposed initiatives for promoting workforce opportunities for residing in the area/region as opposed to FIFO/DIDO;	Yes	Section 5.3.2 addresses the condition.	-	
(g)include a management and mitigation program to minimise and/or mitigate social impacts; and	Yes	Section 7 addresses the condition	-	
(h) include a monitoring program, incorporating key performance indicators and a review and reporting	Yes	Section 7 addresses the condition	-	
Schedule 5				
5. Revision of Strategies, Plans and Programs Within 3 months of the submission of: (a) an annual review under condition 4 above; (b) an incident report under condition 8 below; (c) an audit under condition 10 below; and (d) any modification to the conditions of this approval, the Proponent shall review the strategies, plans, and programs required under this approval. Where this review results in revisions to any such document, then within 4 weeks of the completion of the revision, unless the Secretary agrees otherwise, the revised document must be submitted to the Secretary for approval	No	SIMP does not include the condition.	Include a commitment to revise the SIMP consistent with Condition 5, Schedule 5	
6. Management of Cumulative Impacts In conjunction with the owners of the nearby mines in the Leard Forest Mining Precinct, the Proponent shall use its best endeavours to minimise the cumulative impacts of the project on the surrounding area to the satisfaction of the Secretary.	Yes	Section 4 and Section 5 address the condition.	-	



Social Impact Management	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
NSC	,			
Section 3.2.4 states that majority of the BCM workforce are pe indicates only 13.2% of employees reside in the Narrabri Shire Gunnedah LGA			Closed	
The information provided in the 2020 Draft SIMP regarding the workforce opportunities for residing in the area/region as opportunities are availability impacts on other sectors, such as agricultural enterprise.	sed to FIFO/DIDC	is insufficient. Similarly, labour	Closed	
Section 2.2.2 states that BCM committed to implementing the of To date Council can find no records to confirm that this has occommitted to the construction of a minimum of 20 dwellings in that this has occurred. Therefore, Council requests BCM provious these commitments. Further, there is no information given as to unreasonably increasing the cost of housing in the area. Council along with the results from the monitoring since 2012. This inforcurrent SSD 09_0182.	Closed			
Council previously requested that the local spend totals (Table 2.7) be broken down as to where this money is spent and on what and noted in the 2020 Draft SIMP			Table 2.7 to be broken down as to where money was spent.	
Council also previously requested that consideration should also of roads used to access BCM and potential measures to mitigate the control of the control o	•	increase in rubbish along the verges	Closed	
Further, Council previously requested information be provided ahead of time	Closed			



Nathan Cooper Principal Hansen Bailey Pty Ltd Level 15, 215 Adelaide Street BRISBANE QLD 4000 NCooper@hansenbailey.com.au

04 August 2021

Dear Nathan

Re: Boggabri Coal Operations - Draft Social Impact Management Plan (SIMP) - Consultation

Thank you for the opportunity to provide feedback on the draft Boggabri Coal Operations Social Impact Management Plan (SIMP), which articulates a roadmap for the management and monitoring of potential social impacts and opportunities association associated with the ongoing operation of the Boggabri coal mine for the calendar period 2020-2022. In reviewing the document, Council acknowledges that the BCOP SIMP is detailed and aligns with the DPIE Social Impact Assessment Guideline for State Significant projects. As a result, feedback has been provided only on those areas deemed noteworthy.

Medical and Emergency Services

- The SIMP identifies that of the total 454 permanent BCOP employees that reside locally, the majority (186) reside in Gunnedah and of the 291 contracted employees, 80 also reside in Gunnedah. With access to health care a critical and ongoing and heavily documented challenge for the Gunnedah Shire, the statement on Page 34, that "feedback received indicated that the demand on local services has remained stable in recent years and that local providers are sufficiently staffed to cope with the number of patient visits they typically receive" is deemed to be significantly out of date and requires amendment.
- The SIMP does not appear to contain any references to current health profiles nor does it makes mention of issues around the lack of access to health professionals in Gunnedah. The SIMP would be strengthened by a reference to causal links to health care, schools and local housing and rental stock post construction arising from increases in population from new and expanded mining operations. Further references to existing wait lists and the limited capacity of local services to accept new patients, needs to be captured in the document as a presenting issue.

Housing

- Housing affordability and availability is a presenting issue in the Shire. With regard to the statement "The potential impact on mining with respect to the cost of living and access to affordable housing in the Gunnedah Shire are two areas of concern for ageing community members, lower income families and for some Aboriginal community members", Council disagrees with the SIMP with regard to the ability for the surrounding local centres to accommodate an increase in population, taking into consideration the current demand and possible impacts on housing in the future.
- While the scope of BCOP's housing commitment is articulated on page 15. Points 1 6 and demonstrates an understanding of the challenges in relation to housing affordability and availability within the Gunnedah Shire, Council would like to again reinforce the need for innovative strategies in relation to short to long term housing solutions, and once encourage active dialogue between BCOP, local realtors, developers and Council.
- Table 7.1 'Housing Affordability and availability' could be strengthened by a proposed measure that focusses on working with Council to investigate opportunities for alternative and innovative housing options to accommodate short to medium term mine contract workers. A strategy also identified within the scope of the soon to be released Gunnedah Shire Local Housing Strategy.

Employment

- The Project has the capacity to continue to be a significant economic driver for the region with the majority of permanent workers drawn from the Gunnedah LGA. While it is recognised that some roles requires specialized skills and qualifications, Council reinforces the preferred use of local workforces during both the construction and the operational phases of the mine wherever possible and feasible, and encourages the implementation of any strategies that yield a greater balance between village accommodation and town based accommodation to support local investment and social cohesion.
- Council acknowledges that BCOP has made a commitment to promote training programs and apprenticeships as well as promoting employment opportunities for indigenous persons within their organisation. Council requests that this development consent require ongoing commitment to these practices.
- Council acknowledges that BCOP has made a commitment to promote training programs and apprenticeships as well as promoting employment opportunities for indigenous persons within their organisation, with 7% of its current workforce identifying as Aboriginal. Given the Shires Indigenous population rests at 12.8% (higher than the NSW state average) it is suggested that the venture commit to achieving a target of at least 10% staff indigenous employment and that efforts be made to source trainees and apprentices from within the surrounding local communities. Council also reinforces the need for an ongoing commitment to source indigenous trainees and apprentices from within the surrounding local communities and to provide training pathways that lead to long term employment in the industry.
- Displacement of employment opportunities from within the agricultural, construction and manufacturing sectors is both a social and economic consideration. Gunnedah is currently experiencing a significant skills shortage, exacerbated by the migration of local skilled workers from trade roles to higher paying mine roles. It would be expected that the increased demand as a result of the expansion of operations however limited, could potentially drive up incomes and further displace local workforces, which in turn places further strain on local businesses to attract and retain workers. Local preference procurement policies are just one example of essential strategies that mines can implement to offset those impacts, and support local businesses, to stay afloat.

Statistics

- Population It is noted that the document relies heavily on 2016 Census statistics and for consistency purposes, this is understood. However more recent population data available on https://profile.id.com.au/gunnedah indicates that in 2020, the estimated resident population for the Shire is 12,690. The most accurate count of the total population is Estimated Resident Population, which factors in an estimate of those missed in the Census and those who were overseas on Census night. It is usually higher than either Census count, and is also updated annually after the Census, providing preliminary estimates for up to 5 years.
- Population Projections It is worth noting that the NSW DPIE 2019 Population Projections have been a strong source of contention particularly in the regional Shires and that Gunnedah Shire Council believes them to underrepresent the extent of growth and infrastructure projects underway or planned.
- Unemployment statistics Page 29 Economic indicators on Gunnedah Shire Council's economic profile have been updated recently and more recent quarterly statistics are available. E.g. March 2021 quarter statistics indicate the employment rate in the 2021 March quarter in the Gunnedah Shire was 5.2% (326) compared to 375 (4.8%) in the 2020 March quarter.

Economic Impact

The economic impact of mining in general to the Gunnedah LGA is documented at \$314.2million with over 729 of 1034 employees residing in the Gunnedah Shire equating to a direct spend of over \$140.9million and approximately 159 business directly supported (refer 5.14). A direct correlation to the economic value of the Boggabri operations for each of the Shires would however value-add to these statistics.

Community Issues and Concerns

It is acknowledged that the BCOP SIMP captures the feedback provided by Gunnedah Shire Council staff in December 2020 and in particular those focusing attention of local business and employment opportunities; continuity of employment, amenity concerns, housing, water management and usage and communication. Table 5.1 on Page 39 – 40 - Adequately and accurately reflects the key categories of predicted social impacts, significance and nature of impact. It is worth noting that that the stated negative impacts of the mining workforce on community cohesion, are not a presenting issue in the Gunnedah Shire.

Social Infrastructure Enhancements

It is noted that there is a significant number of the workforce located in the Gunnedah Shire both permanent and contract in nature. With a large proportion of the workforce domiciled in the Shire, strong consideration should be given to the development of a Voluntary Planning Agreement with Gunnedah Shire Council to ameliorate the impact.

Thank you for the opportunity to provide feedback. If you have any comments in relation to the above please do not hesitate to contact me on 02 6740 2100.

Yours faithfully

Andrew Johns

DIRECTOR PLANNING AND ENVIRONMENTAL SERVICES

Contact: 02 6740 2100 Reference: 1582245

dh:bg



Appendix C Social Impact Significance Assessment Methodology

The assessment of social impacts has been undertaken in accordance with the NSW SIA Guideline to inform this section of the SIMP (DPE, 2017). In accordance with the SIA Guideline, the significance assessment has taken into account the impact characteristics as outlined in Table C.1 and the social impact categories discussed in the NSW SIA Guideline are presented in Table C.2.

Table C.1 Impact Characteristic for Assessing Significance

Characteristic	Definition			
Duration	When the impact will occur and over what period.			
Extent	 Geographic extent of the impact - e.g. broad or localised Number of people potentially affected by the impact. 			
Sensitivity	 Social value placed on the affected aspect of the social environment by different potentially affected people or groups. 			
	 Resilience of the potentially affected people or groups - i.e. their ability to adapt and respond. 			
Severity	 The intensity of the potential effect or consequence on the social environment or potentially affected people of group. 			
	 Whether the effect or consequence is acute or chronic. 			

Source: DPE, 2017a.

Table C.2 Social Impact Categories Considered

Social Impact Category	Description			
Way of life	 Access to housing, employment and recreation activities. 			
Community	 Composition, cohesion, character and sense of place. 			
Access to and use of infrastructure, services and facilities	 Physical infrastructure and service delivery e.g. health and wellbeing services, children's services, emergency services. 			
Culture	 Connections to land, places and buildings. 			
Health and wellbeing	Physical, mental and social wellbeing.			
Surroundings	 Public safety and security, accessiblity, and amenity. 			
Personal and property rights	Economic livelihood, personal disadvantange.			
Fears and Aspirations	Future landholder aspirations.			

Source: DPE, 2017a.

Table C.3 and Table C.4 describe the measures for impact probability and consequence respectively.



Table C.3 Probability of Occurrence

Rating	Description			
Almost Certain	 Very likely to occur or be an opportunity at either a specific stage of the project lifecycle or more broadly. 			
Likely	 Likely to occur or be an opportunity at either a specific stage of the project lifecycle or more broadly. 			
Possible	 Possible to occur or be an opportunity at either a specific stage of the project lifecycle or more broadly. 			
Unlikely	 Unlikely to occur or be an opportunity at either a specific stage of the project lifecycle or more broadly. 			
Rare	 Very unlikely to occur or be an opportunity at either a specific stage of the project lifecycle or more broadly. 			

Source: DPE, 2017a.

Table C.4 Consequence of the Potential Social Impact

Rating	Description			
Minimal	 Local, small-scale, easily reversible change on social characteristics or values of the communities of interest. 			
Minor	 Isolated issues or complaints that can be resolved via routine site procedures. 			
	 Short-term recoverable changes to social characteristics and values of the communities of interest. 			
	Minor social harm.			
Moderate	 Medium-term recoverable changes to social characteristics and values of the communities of interest. 			
Major	 Repeated incidents or community complaints that require significant adjustment to overall site level and business level procedures. 			
	 Long-term recoverable changes to social characteristics and values of the communities of interest. 			
Catastrophic	 Significant, widespread and enduring community issue or dissent. 			
	 Irreversible changes to social characteristics and values of the communities of interest. 			

Source: DPE, 2017a.



Table C.5 presents the risk ranking matrix that has been used to determine the significance of potential social impacts and opportunities.

Table C.5 Risk Rating Matrix

			Consequence Level				
			1	2	3	4	5
			Minimal	Minor	Moderate	Major	Catastrophic
Level	Α	Almost Certain	A1	A2	A3	A4	A5
	В	Likely	B1	B2	B3	B4	B5
рооц	С	Possible	C1	C2	C3	C4	C5
Likelihood	D	Unlikely	D1	D2	D3	D4	D5
-	E	Rare	E1	E2	E3	E4	E5
Social Risk Rating							
	Low		Moderate		High		Significant

Source: DPE, 2017a.