

25 March 2013

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Productivity Commission
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Dear Jonathan,

Thank you for the opportunity to provide a submission to the Productivity Commission's inquiry into *Major Project Development Assessment Processes*, in particular in response to the Commission's issues paper, dated 11 February 2013.

The Queensland Resources Council (QRC), is the peak representative organisation of the Queensland minerals and energy sector. QRC's membership encompasses minerals and energy exploration, production, and processing companies, and associated service companies. The QRC works on behalf of members to ensure Queensland's resources are developed profitably and competitively, in a socially and environmentally sustainable way.

As an industry association, QRC does not have direct, first-hand experience of complying with the approval process for major projects, so has sought to draw from the experiences of QRC members and to identify the systematic sources of delay, frustration and confusion. Many QRC members are also members of the Business Council of Australia (BCA), and so many of the themes in the BCA's discussion paper were drawn from experiences of QRC members working to secure approvals for major resource projects in Queensland.

The Commission's issues paper, on page three, notes that the economic rationale for major project approval processes "is the presence of externalities", and as such, major project development assessment and approvals (DAA) "play an important part in balancing competing public policy interests and delivering good outcomes for the community". This is entirely accurate, but misses an important distinction in that while major resource projects provide a basket of externalities, both positive and negative, these externalities are not evenly distributed. There is a concentration of negative externalities at the local level – issues with noise, dust, light and amenity – which need to be managed. By contrast, many of the positive externalities accrue at the regional, state and national level – employment, royalties, payroll tax, stamp duty, income tax etc.

It is essential that the Commission understand this geographical distribution of effects from major projects as it helps to explain why local Governments will often take an abiding interest in a major project on behalf of their community. It also explains why the Queensland Government is increasingly looking for new major projects to explicitly demonstrate a degree of local community support for the project.

This understanding of the externalities of major projects is necessary to understand the two major criticisms that are made of Queensland's major project assessment process.

The first criticism is that the assessment process, through the comprehensive environmental impact statement (EIS), has become so long, complex and detailed, that it is very difficult for a local community to engage in the assessment process. When EIS reports routinely run to 10,000-14,000 pages and the hard copies weigh upwards of 7-8 kilos, they are not documents that can be readily read and understood. As the EIS has become increasingly exhaustive in their coverage, the sheer volume of information has made them increasingly inaccessible to local stakeholders.

In areas where there are a number of major projects proceeding in close proximity, the volume of information compounds. This is the second major criticism of the assessment process, that the assessment tends to be on the basis of *ceteris paribus*, assuming that all else is equal. Critics of the assessment say that this means that they are ill-suited to assessing the cumulative impact of multiple projects in a small area – for example around Gladstone Harbour.

Regulators have tended to respond to these criticisms by requiring proponents to consider the cumulative impact of their project in addition to all the other major proposals. The difficulty with this approach is that to assess the impacts of other projects with any confidence requires access to detailed commercially sensitive information and in many cases competing projects are not disposed to cooperate with the provision of data.

QRC will be interested to see if the Commission's international benchmarking can cast some light on new approaches to these questions. In Queensland, major projects are already contributing to a pool of resources for local and state Government assessments and the (then) Queensland Water Commission's (May 2012) groundwater assessment provided a mechanism for companies to pool their confidential information in a manner which allowed the cumulative results to be modelled at a regional scale (see *Underground water Impact Report for the Surat Cumulative Management Area* at [link](#)).

The newly established Office of Best Practice Regulation (OBPR) as part of the Queensland Competition Authority identified in their interim report, [Measuring and Reducing the Burden of Regulation](#) (page 30, November 2012) that 'mining development requirements that raise costs and delay investment' (page 30) as one of 10 fast track reform priorities to be achieved within 12 months on the grounds that the existing regulations are:

- (a) unnecessarily burdensome,
- (b) have a high reach,
- (c) have a high potential for net benefits from reform (estimated net present value of \$2 billion or \$125 million per year), and
- (d) the need for reform is well understood.

The estimates prepared by the [Centre for International Economics](#) (CIE) on behalf of OBPR would presumably show an even larger net present value from reform if the reform encompassed *all* resource tenures.

In April 2010, the QRC Chief Executive delivered to the (then) Premier a comprehensive review of the Queensland tenure and project approach system. Titled *Supporting Resource Sector Growth*, the review reflects an honest 'warts and all' industry appraisal of the project approval system in Queensland. The industry review process found that the process of securing common forms of resource tenure had increased by up to 150 per cent in the five year period to April 2010 (page 3).

"Industry submissions variously described the current system as: onerous, cumbersome, disjointed, riddled with significant and unexpected delays, requiring multiple authorities from multiple agencies, inconsistent, slow, and confused."

While a number of the review's recommendations have since been implemented, QRC commends the Review to the Inquiry because it focussed on the *outputs* of a good regulatory system as the ultimate measure of performance. In this case the time taken to secure tenure and project approval was explicitly bench marked. Prior to the Review, the clear trend had been for increasing delay in securing tenures and approvals and recommendations sought to reverse these trends.

Two parallel streams of reform work, which were informed by this industry review, have recently culminated in legislation being passed through the Queensland Parliament. The '*Greentape*' reforms to the *Environmental Protection Act 1994* and the '*Streamlining*' reforms to the various resource legislation both had their own impetus before the review; but were influenced and shaped by industry's recommendations. The two reform agendas, while relating to the legislative responsibilities of two different agencies, were developed as an interwoven platform of reforms. Both reforms agendas were also characterised by close consultation and engagement with industry and as such have enjoyed general industry support.

A key set of reforms, which are underway at the moment is the process of streamlining the Coordinator General's process for assessing projects of state significance under the *State Development and Public Works Organisation Act 1971*. As it is common for large resource projects to be assessed by the Coordinator General - these reforms are of key interest to QRC members.

The role of the Coordinator-General was established in Queensland back in 1938 to coordinate the provision of public infrastructure and encourage development and the creation of jobs in post-Depression times. The Coordinator-General administers the *State Development and Public Works Organisation Act 1971* (SDPWO Act), along with the relevant Minister. Under the SDPWO Act, the Coordinator-General has wide-ranging powers to plan, deliver and coordinate large-scale infrastructure projects, while ensuring their environmental impacts are properly managed.

Over the past eight decades, the Coordinator-General's role has evolved from being concentrated solely on public works to being principally focused on facilitating and regulating private-sector infrastructure projects. Many of these projects have stemmed from rising world demand for Queensland's natural resources, most notably coal and coal seam gas.

The mechanics of the Coordinator General's assessment - of recommending conditions that are attached to the project - is the same as for environmental impact statements (EIS) conducted under the *Environmental Protection Act 1994*.

An interesting issue for the Commission to consider is the way that these project conditions function as regulations, but without any of the protections or balances that accompany formal legislative or regulatory requirements. As an example, Queensland has a burgeoning industry in conducting social impact assessments (SIA) on issues as diverse as housing affordability, social amenity and childcare places in communities - even though there is no specific policy on these requirements. Rather what has occurred is that the accretion of conditions through time has meant that the regulatory reach of the environmental impact statement has been extended well beyond the stated policies of the Government.

When major projects are routinely having twelve hundred or more specific conditions imposed on them - which collectively require hundreds of subsidiary assessment processes, such as the preparation of a social impact management plan - the case could be made that regulations are being made by stealth. In many cases, these quasi-regulations are blurring the boundaries of the Government's responsibility to provide basic services for growing communities by seeking to shift these costs onto major projects.

The general approach of the first year of Queensland's new Coordinator General - of setting clear deadlines and simplifying complex processes to the central and germane issues - was reflected in the manner in which the Queensland Government recently renegotiated the bilateral agreement under the *Environmental Protection and Biodiversity Conservation Act* (EPBC Act) with the Australian Government.

The Commonwealth's growing assertiveness at inserting a second and subsequent layer of review on environmental grounds seems more motivated by a focus on political rather than environmental outcomes. QRC members remain concerned at the duplication and overlaps between the state and Commonwealth regulatory processes - particularly around the EPBC Act and suggests that this area is ripe for the Commission's review.

Queensland's new Coordinator General has focused on delivering two overarching themes of reform. The first is to focus on the task of getting activity commenced. QRC submits that the public interest is best served by having the time taken from application to operation to be as short as is consistent with a world-class rigorous environmental assessment.

The second is to eliminate 'surprises' during the assessment process by agreeing the assessment's scope, timetable and key deliverables upfront. This will prevent the iterations of nested assessments, which have been all too common in recent and ongoing environmental impact statement (EIS) processes. Central to this work is refining Queensland's generic terms of reference (ToR).

The generic ToR need to be developed on a risk management framework basis. That is, assessment and mitigation activities should be targeted to securing *outcomes* with respect to high likelihood or high impact outcomes from that project. Further, agreed deliverables must be focused on mitigation of identified project impacts rather than attempting to address additional environmental or social goals.

QRC suggests that the generic terms of reference (ToR) should have sign-off from the various agencies on what deliverables the agencies expect. Currently proponents waste a lot of time and effort because different agency districts or regions have different expectations of what should be in a ToR and the EIS.

Ideally the ToR and the corresponding EIS should answer what is required in legislation to get an appropriate licence, permit, authority, approval or similar that is applicable to the project in question. One of the reasons ToRs and EISs are so large is that some of the points needing to be responded to in a ToR are beyond the scope of the legislation being managed by an agency, but are included as agency comments. The ToR needs to request information that is within the management responsibility of the agency requesting the information, and be relevant to support an application.

Agencies need to understand that proponents will write one EIS, not a special section in the EIS in accordance with their agency's expectations. For example, a proponent should only need to write about air quality once in a single section of an EIS, not have an air quality chapter for roads to Main Roads guidelines, then another air quality chapter for rail using the rail provider's guidelines and finally another air quality chapter for the mine using the environmental protection policy (air).

The Commission's issues paper cites the example provided by the BCA (page 4) whereby a project had 1,500 conditions which had a further 8,000 sub-conditions attached to the project. To illustrate the extent to which conditions have become far more narrowly prescriptive over time, attachment one provides an example from two equivalent coal mines projects, one in 2005 and one in 2012. The conditions have essentially the same intent, but the later conditions are much more restrictive and directive in their language. Rather than describe the outcomes that are sought (or in some cases, to be avoided) they provide a lot of process detail about precisely how to manage these issues.

Until recently, Queensland's regime in relation to mitigation of social impacts involved mandated requirements for Social Impact Management Plans (SIMPs). Resources companies recognise their responsibility for identifying, assessing and mitigating direct social impacts within their control and responsibility. However, in Queensland, the SIMP practice become skewed towards supplementing government agency service delivery capacity at the expense of a focus on mitigation on significant identified impacts of major projects.

Further, through the submission mechanism, as part of the EIS process, government agencies had, until recently, been able to include what may be considered as 'ambit claims' in relation to responsibilities for 'impacts' which were, in fact, not the responsibility, nor within the influence, of the project proponent to address. As noted above, cycles of requests for information to be gathered, sometimes to disprove a hypothesis of an impact, generate substantial concern and cost for industry. These issues demonstrate a lack of coordination and clarity of role with respect to these, largely service delivery, agencies.

This assessment of a major project's social impacts is an area where QRC suggests that there has been considerable duplication, inefficiency and confusion in the collation of baseline data and forecasting for such assessments –

- **Duplication** – the need to source common data sets and reports many times by multiple project proponents and their consultants for major resource projects from Government sources, Departments, Regional Councils and common stakeholders.
- **Inefficiency** – leading to a focus on the time-consuming and expensive data collection phase rather than robust analysis of data and significant time and effort duplication for stakeholders.
- **Confusion** – use of different multipliers, forecasting tools and indicators for project impacts and ongoing monitoring by proponents relating to similar communities making it difficult to obtain a common baseline and cumulative trend for comparative and planning purposes.

QRC has recently proposed to the Queensland Government the development of a single Government quantitative and qualitative data repository which would significantly address this issue in addition to providing key centralised planning data for Government planning, budgeting and decision-making. QRC is pleased to report a positive response by the relevant Queensland Government agency.

Finally, QRC endorses the Queensland Government's recent reform agenda to move away from a prescriptive approach to a more streamlined and outcomes-based approach to environmental approvals. The importance of developing a more streamlined and less onerous social impact assessment process is key. Of particular relevance, is for social impact obligations should be wound back from wish-lists to cover genuine direct impacts. QRC's suggested principles for Social Impact Assessment of major projects are attached (Attachment 2).

QRC suggests that key features of a good major project approvals process would include:

- **Resources:** The chain of approvals for a major project is only as strong as the weakest link. QRC can see an urgent need for the Government to secure a pool of experienced project managers, ideally with experience in both industry and Government, whose role would be to case-manage, coordinate and drive the approvals process for major projects from a central point.
- **Timelines:** QRC would like to see all steps in the assessment process have a deadline agreed at the beginning of the process. Timelines for each step would improve transparency of the process while also providing greater certainty to both industry and Government departments of the lines of accountability.
- **Post approvals:** For a number of major projects, an exhaustive assessment process leads to an ability to have the decision to grant tenure challenged. Queensland has seen a spate of court objections to tenures being granted which seem more motivated by the opportunity to delay and frustrate major fossil fuel projects than they are with debating the merits of a project. In this context, QRC would support a move from the current merit-based review process towards a process-based appeal process.

Thank you again for the opportunity to comment on the issues paper.

Yours sincerely

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Chief Executive
Queensland Resources Council

Attachments:

1. Comparing conditions, 2005 versus the current vintage
2. Industry principles for Social Impact Assessment

Attachment one:

EIS conditions – now and then

Clermont Coal Mine – June 2005	Caval Ridge Mine (CRM) - November 2011
<p>Schedule G - Community</p> <p>Complaint Response (G1-1) All complaints received must be recorded including details of complainant, reasons for the complaint, investigations undertaken, conclusions formed and actions taken. This information must be made available for inspection by the administering authority on request.</p> <p>(page 46)</p>	<p>9. Consultation, review, complaints and non-conformance</p> <p>(c) Complaints — as an extension of the consultation process, there must be a formal process for receiving and dealing quickly and effectively with complaints about CRM construction and operation issues. This process must be established before the commencement of construction works and should adopt a consultative and negotiated basis rather than an adversarial basis. The complaints procedure must be easy to use, with information about its implementation provided on the CRM webpage and through the visitors’ information service. As a minimum, the complaints process must include the following elements:</p> <ul style="list-style-type: none"> (i) established in accordance with the <i>ICMM good practice guideline (Handling and Resolving Local Level Concerns and Grievances, October, 2009)</i> and the <i>MCA Enduring Value Guidance for Implementation (July, 2005)</i> (ii) a protocol establishing the responsibility for receiving and addressing complaints, and the means of notifying the community of this protocol (e.g. publication of a complaints telephone service, webpage advice, and address for notices and other correspondence) prior to commencement of construction (iii) establishment of a toll-free telephone line with a live operator (not a message service) that is open 7.00am-7.00pm 7 days a week during the construction phase of the CRM and 8.00am - 4.00pm Monday to Friday during the operation phase of the CRM. The aim of the hotline is to enable any member of the general public to reach a person who can arrange appropriate

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	<p>response/corrective action to complaints within 48 business hours</p> <ul style="list-style-type: none"> <li data-bbox="1205 384 2049 507">(iv) identification of the complainant, the identity of the person who received the complaint, the manner in which the complaint was made, the time and date on which the complaint was made, and the matter to which the complaint relates <li data-bbox="1205 539 2049 847">(v) a process wherein, upon receipt of a complaint, an investigation commences forthwith into the cause of the complaint and where necessary mitigation is required, take any actions reasonably required to address the complaint. At least a verbal response on the action(s) to be taken is provided to the complainant within 48 business hours (unless the complainant agrees otherwise) and a detailed written response within ten business days of the receipt of the complaint. Information on all complaints received and response times shall be made available to the environmental management representative weekly <li data-bbox="1205 879 2049 938">(vi) a database for tracking complaints, issues, the subject of complaints, responses and corrective actions taken <li data-bbox="1205 940 2049 1150">(vii) a means of reporting each complaint, such as a complaints register, must include identification of the entity responsible for addressing the complaint, the time and date on which the complaint was addressed and closed out, a brief summary of any action taken to address the complaint, and a notation as to the satisfaction or dissatisfaction of the complainant with the outcome <li data-bbox="1205 1182 2049 1278">(viii) quarterly reporting of a summary of complaints as part of an overall performance and compliance report posted on the CRM webpage. <p>(pages 159-160)</p>

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<p>Monitoring</p> <p>(A3-1) Record, compile and keep for a minimum of five years all monitoring results required by this environmental authority and make available for inspection all or any of these records upon request by the administering authority.</p> <p>(A3-2) Where monitoring is a requirement of this environmental authority, ensure that a competent person(s) conducts all monitoring.</p> <p>(page 37)</p>	<p>4. Audit reports</p> <p>(a) Compliance with the Coordinator-General’s imposed (Schedule 1) conditions of this report must be audited by an appropriately qualified and experienced third party auditor or auditors relevant to the matters being audited, nominated by the proponent and accepted by the Coordinator-General within six months of commencement of construction of the CRM, then annually until the second year of operation of the CRM, and then biennially thereafter until six years of operation of the CRM has occurred.</p> <p>(b) The proponent must submit the third party audit report(s) to the Coordinator-General within 60 days of the end of the relevant period.</p> <p>(c) The audit report must identify the conditions that were activated during the period, and a compliance/non-compliance table. A description of the evidence to support the compliance table must be provided. The audit report must also contain recommendations on any noncompliance or other matter to improve compliance. The third party auditor must certify the findings of the audit report.</p> <p>(d) The financial cost of the third party audit is borne by the proponent.</p> <p>(e) The proponent must immediately act upon any recommendations arising from the audit report and:</p> <ul style="list-style-type: none"> (i) investigate any non-compliance issues identified, and (ii) as soon as practicable, implement measures or take necessary action to ensure compliance with this authority. <p>(f) Subject to (a), and not more than one month following the submission</p>

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	<p>of the audit report, the proponent must provide written advice to the Coordinator-General addressing the:</p> <ul style="list-style-type: none"> (i) actions taken by the proponent promptly and routinely to ensure compliance with the Coordinator-General's imposed conditions, and (ii) actions taken to routinely prevent a recurrence of any non-compliance issues. <p>(page 154)</p>
<p>Housing & Accommodation</p> <ul style="list-style-type: none"> • The proposed site construction village, with a capacity to accommodate at least 500 people should be kept operational until after the Blair Athol mine ceases production and bulk rehabilitation earthworks are complete, to alleviate pressure on the existing housing market during the transitional phase of the Project. • The Proponent should cater for all employees who choose to reside outside the Clermont district by providing accommodation in the proposed single person village in the Clermont township. • Development of the township village should occur early during the construction phase and be operational no later than the end of 2007 to alleviate pressure on the existing accommodation market from demand induced by the Project. • The Proponent should monitor the demand for accommodation and implement options to ensure that demand for workforce accommodation is met and impacts on the Clermont housing market are minimised. 	<p>18. Accommodation</p> <p>Worker accommodation</p> <ul style="list-style-type: none"> (a) From the commencement of operation of the CRM, and then at yearly intervals for the following 20 years, the proponent must report to the Coordinator-General in the SIMP the accommodation arrangements for the CRM operational workforce, including the average number of workers residing in accommodation villages at the commencement of operation of the CRM and for each 12-month period thereafter. (b) The proponent must not accommodate more than approximately 70% of its total CRM operational workforce in operational accommodation village(s) or other fly-in-fly-out (FIFO), bus-in-bus-out (BIBO), drive-in-drive-out (DIDO) arrangements. (c) The proponent must provide new dwellings in the Isaac Region local government area to accommodate at least approximately 30% of the CRM operational personnel and their accompanying immediate family members. (d) The number of new dwellings required under (c) may be reduced for

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<ul style="list-style-type: none"> • The Proponent should provide to Belyando Shire Council, within 3 months of Project approval, a layout for a 100-lot housing subdivision, as a contingency to manage excessive demand for new housing beyond that predicted in the EIS, with the trigger for development of such a housing estate based current and projected housing demands for employees exceeding the availability of existing serviced lots. • If the proposed development of the township village results in the displacement of remote-area students using the current hostel, that the Proponent should provide alternative accommodation to a standard that is suitable for a student hostel, in agreement with, and at no additional cost to, the Belyando Shire Council. <p>(page 53)</p>	<p>each CRM operational worker that has existing permanent accommodation within the Isaac Region local government area if that accommodation is owned by the proponent or the CRM worker, (and this should be documented in the SIMP).</p> <p>(e) Notwithstanding the proponent’s obligations under (b)-(d), the proponent must also provide sufficient accommodation village units at each stage of the CRM development to accommodate at least 60 per cent of the CRM operational workforce.</p> <p>BBCG project housing impacts study</p> <p>(f) The proponent must engage the Office of Economic and Statistical Research (OESR) to undertake the “BBCG Project Housing Impacts Study” (including the CRM and Daunia Mine) which will provide an analysis of the impacts of each component of the BBCG project on the housing market in Moranbah or surrounding areas. This study must provide:</p> <ul style="list-style-type: none"> (i) detailed demographic analysis including: <ul style="list-style-type: none"> A resident population estimates and age-sex population projections B dwelling and household projections C place of work / place of residence analysis D customised statistical local area and locality-level profiles utilising unpublished data from the 2006 Census, as well as OESR’s housing sales and rents databases E housing and accommodation – housing tenure, dwelling stock, sales volumes and prices

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	<ul style="list-style-type: none"> <li data-bbox="1189 296 2011 352">(ii) housing demand and housing need by low and moderate income key workers <li data-bbox="1189 389 2033 568">(iii) a description and analysis of BMA's current full suite of accommodation arrangements for all of its entire personnel (both direct employees and contractors engaged in all BMA business activities, including non-BBCG project activities) in the Whitsunday Hinterland and Mackay (WHAM) planning region, including existing and proposed FIFO/DIDO/BIBO arrangements <li data-bbox="1189 604 2011 660">(iv) the likely impact of the BBCG project components on the housing market and on housing demand <li data-bbox="1189 697 1928 753">(v) a description of the currently available options through the proponent for the provision of accommodation <li data-bbox="1189 790 2033 904">(vi) a framework which enables the proponent to develop a more detailed strategy for accommodating workers as well as for developing mitigation strategies in relation to housing impacts on non-resource key workers of each of the CRM project components. <li data-bbox="1133 941 2029 1029">(g) The Terms of Reference for the study in (f) must be developed in consultation with the Moranbah BCN and approved by the Coordinator-General. <li data-bbox="1133 1066 1984 1121">(h) The report for the study in (f) must be presented to the Coordinator-General before the EA for the CRM is granted. <li data-bbox="1133 1158 2029 1278">(i) If the Coordinator-General determines that the final study report in (h) does not meet the Terms of Reference approved under (g), then the report must be subsequently amended and presented to the Coordinator-General for approval before the EA for the CRM is granted. <li data-bbox="1133 1315 2002 1337">(j) The results of the study in (f) must be made publicly available and be

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	<p>considered in future revisions of the CRM SIMP, with intellectual property rights of the data collected:</p> <ul style="list-style-type: none"> (i) shared between BMA and OESR for data supplied by BMA; and (ii) retained by OESR for all other data. <p>(page 168-169)</p>
<p>Source: http://www.dsdip.qld.gov.au/resources/project/clermont-coal-mine/mp-cg-clermont-coal-report-jun-05.pdf</p>	<p>Source: http://www.dsdip.qld.gov.au/resources/project/caval-ridge-mine/addendum-cg-report-caval-ridge.pdf http://www.dsdip.qld.gov.au/resources/project/caval-ridge-mine/cg-report-caval-ridge.pdf</p>

Principles for Social Impact Assessment:

Overall SIA process – philosophy and definitions

- SIA should be about identifying, assessing and proposing mitigation measures for social impacts within the control/responsibility of the proponent
- The SIA should enable the development of clearly prioritised, risk based mitigation measures, addressing the high risk impacts identified in the SIA.
- Social impacts are impacts to social entities, primarily people. Impacts to groups of people (communities, organisations, service providers etc) should also be considered
- When mitigating social impacts, impacts should be first avoided, where not possible then reduced, then managed, then offset (hierarchy of impact management).
- Proponent *community investment* should be considered only after exhaustion of the above mitigation measures.

What should a good SIA contain?

- A definition of the impacted community
- A socio-economic profile of the impacted community/ies
- An explanation of methods used to gather information including a description of how the community was engaged during the development of the SIA
- Identification of potential social impacts and prediction of the significance of any impacts and duration or extent of each impact
- Proposed mitigation and enhancement measures in response to key impacts

What should mitigation measures look like?

- Mitigation measures which clearly align with the identified impacts which are within the proponents control and sphere of responsibility, and demonstrate a hierarchy of controls
- With respect to the hierarchy of controls, the development of proposed mitigation measures should involve the identification and evaluation of measures to firstly avoid, then minimise or control negative effects, and to secure potential community opportunities.
- Only when mitigation measures to avoid or minimise impacts are not possible or insufficient, some form of appropriate compensation may be required
- A program for monitoring, review and disclosure of social impact mitigation measures

What is reasonable to condition proponents to do?

- It is reasonable to condition a proponent to *engage with the community* (inform, consult, collaborate etc).
- It is reasonable to condition the proponent to have a community *grievance mechanism*.
- It is reasonable to condition a proponent to manage *social impacts that are within their control and sphere of responsibility*

What is it not reasonable to condition proponents to do?

- Deliver initiatives adopted voluntarily by the proponent.
- Fund or deliver core government responsibilities, for example, with respect to health, education, emergency services, as referred to in the attached social infrastructure policy. These must be acknowledged in setting conditions
- Provide an overarching framework for assessment and addressing of cumulative impacts (proponents to work with government to develop).
- Medium to long term planning for social infrastructure