

ATTACHMENT 3

SOCIAL IMPACT ASSESSMENT COMMENTS

Department's Review of the Social Impact Assessment (SIA) Scoping Report and Recommendations for the EIS SIA

Context and Approach

This review considers the SIA Scoping Report prepared for the Glendell Continued Operations Project (Umwelt, May 2018) prepared in accordance with the Department's new *Social impact assessment guideline for State significant mining, petroleum production and extractive industry development* (SIA guideline) The SIA Scoping Report is provided as Appendix A of the project's Preliminary Environmental Assessment.

This review evaluates the Scoping Report's consistency with the principles and methodology set out in the SIA guideline, against the following review questions in Appendix D:

- **Q1-2** which address the application of principles and team qualifications;
- **Q8-11** which outline requirements for defining and describing the area of social influence; and
- **Q12-14** which outline requirements for identification and description of social impacts and benefits.

This review is limited to desktop study only, and the Department has not independently sought the views of potentially affected people and groups. Generally, the Department is satisfied with the findings of the Scoping Report. The below comments are provided to assist with the preparation of the EIS for the Glendell Continuation Operations Project.

Review Comments

<i>Section of guideline</i>	<i>Comments</i>
Q1: SIA principles	<p>The Scoping Report states that it has been undertaken in accordance with the SIA guideline, although it does not specifically address how the principles have been applied in the Scoping Report or how they will be applied in the SIA for the EIS.</p> <p>The Scoping Report appears to be impartial in its tone and unbiased in its approach, following ethical standards. Consistent with its tone and approach, the analysis also appears to be rigorous and transparent, describing in some detail and in plain English its methods (Section 2). By adopting the scoping methodology outlined in the guideline and analysing the relative importance of a wide range of issues, the report appears to focus on the material social impacts identified to date based on community engagement feedback (Section 2.4). The scoping methodology also encourages a precautionary approach to the analysis.</p> <p>The discussion of community and stakeholder identification (Section 2.3) and engagement methods and findings demonstrates inclusivity through efforts made to ensure a diversity of views has been sought from residents, businesses and employees through a range of methods, including surveys, discussions and community feedback.</p> <p>It notes that new issues and information gained through community engagement will be examined and strategies adapted – demonstrating an adaptive approach.</p>

	<p>There is less discussion of distributive equity and a life-cycle focus. At the scoping stage it is understandably too early to demonstrate action-oriented outcomes and integrated reporting, or full compliance with a life-cycle approach and proportionate focus. These should be included in the SIA for the EIS. Use of integrated information could also extend to incorporation of findings from other studies of coal mines in the area to ensure previous research and cumulative impacts are fully understood and properly integrated in the EIS.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> ➤ <i>The SIA for the EIS should ensure that all principles in the guideline are addressed, particularly with reference to distributive equity, action-oriented outcomes, a life-cycle approach, a material and proportionate focus, and integrated assessment, including evidence and information from other projects in the area which could impact on the identified stakeholders.</i>
<p>Q2: Authorship requirements</p>	<p>The Scoping Report notes (Section 2.1) that it has been led and conducted by a qualified and experienced social team, but (apart from naming the reviewer) does not state explicitly who they are, their qualifications and experience, or their professional affiliations.</p> <p>This could leave readers who are unfamiliar with the consultancy firm to question the qualifications or skills of the team, and could affect the degree to which they can rely upon the research that underpins the assessment.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> ➤ <i>The SIA for the EIS should specify the names, qualifications, and experience of those involved in preparing the report.</i>
<p>Q8-11: Area of influence</p>	<p>The Scoping Report describes at length (Section 2.3) the efforts made to identify different social groups that may be affected by the project, and different ways they have been and will continue to be consulted and engaged with during the SIA. It is unclear if this includes ‘all the different social groups’ but it appears to cover the most relevant for the project. The report also states that it will include additional stakeholders in future consultations for the EIS phase.</p> <p>While protecting privacy, it would also be helpful to understand pathways of impacts, including a map or figure showing the geographical locations of stakeholders with reference to the project.</p> <p>Understanding where stakeholders have elected to not respond to requests for feedback would increase transparency and may highlight some issues with consultation fatigue or other factors influencing feedback.</p> <p>Rather than adopting the specific format of the guideline’s review questions 9 & 10 (built and natural features, current and expected social trends and social change processes etc), the Scoping Report includes considerable background information on the region and its history. This section appears to be very detailed and could have been more directly related to the project to narrow the scope. It sensibly takes a broad geographical scope to cover potential social impacts across the region, including economic linkages. It also notes that information in the area of influence will be updated in the SIA for the EIS (Section 3.1).</p> <p>The historical context and governance sections are certainly detailed - perhaps more so than necessary. There is less relevant information in</p>

this section about how the history of the existing mine/complex, and mining in the area more generally has affected the lives in surrounding communities, and about social trends, social change and change processes in the locality and surrounding areas. Some of this information could be pulled together from the Community Capitals section, and supplemented by information from a range of other sources, including Council reports, social histories, media analysis and community engagement and feedback.

Including baseline information about the role of the mine/complex in social change and influence could assist with demonstrating impartiality. Should there be no information to imply social impacts have occurred, this should be noted to provide evidence of investigative rigour.

The Community Capitals approach (Section 3.4) aims to include key social data variables in the description of the locality. Views expressed by stakeholders during early discussions are incorporated through quotes from community engagement. This is commended as it adds an authentic 'local voice'. The analysis also attempts to include a range of perspectives reflecting variations within the localities.

It would have also been useful to include information on community values gained from other studies and reports, such as through Council community planning reports and local media to support an understanding of important and valued features of the area and perspectives on change.

Page 19 states that the study area includes communities in closet proximity to the project, but the Capitals analysis in Table 3.2 only includes LGA and NSW level data. Analysis of more granular data may provide a better understanding of these local demographic and social issues which can sometimes be obscured when reporting on the larger towns of Singleton and Muswellbrook.

Table 3.2 also raises some questions about choice of indicators:

- Why use the Social Health Atlas (2011-12 data), when NSW Health Statistics are considerable more recent (2016)?
- Are there other relevant sources of data on the health impacts of mining that should be included?
- On what basis have these indicators been selected? i.e. how do we know these are the most relevant health (or other social) indicators?

Reporting on indicator values from the Social Health Atlas without further analysis overlooks some critical aspects of value ranges. For several indicators (rates of respiratory disease, psychological distress, rates of at-home care, for example), the values fall into the highest (i.e. worst outcome) quintile and in some cases are amongst the worst in NSW. This is not evident from the indicator values and leads to potentially misleading statements (p. 22) such as the rates of respiratory disease are only slightly higher in Singleton than in comparison areas – when they are in fact in the highest quintile. Allied health care instances at home for Singleton (p. 23) are amongst the highest in NSW. Hospital admissions are also relatively high against NSW averages.

Community issues identified through local media analysis appear to focus mainly on Glencore media releases. There may be further opportunities to explore community values and key issues important to residents from media other than mine-oriented coverage. As noted above, there may be other studies and reports that could be useful in setting out the community history and social impacts being experienced to date.

Overall, the Scoping Report appears to have reviewed relevant data sources, but the SIA for the EIS should also draw on reports and studies from previous/similar mining proposals.

	<p><u>Recommendations</u></p> <p><i>The SIA for the EIS should:</i></p> <ul style="list-style-type: none"> ➤ <i>Include community values identified in other reports such as Council planning studies and media reports;</i> ➤ <i>Incorporate more up to date health statistics and ensure statements and conclusions accurately reflect variations in values and between areas.</i> ➤ <i>Incorporate evidence from other relevant studies of mining impacts in the region.</i>
<p>Q12-14: Identifying social impacts</p>	<p>The Scoping Report does a relatively good job of identifying the range of positive and negative social impacts of the proposal. The focus on potential impacts on Ravensworth Homestead is particularly detailed. Evidence for the identification of these issues appears to derive primarily from the community engagement outcomes. Missing from the report at this stage is information about Aboriginal cultural heritage impacts and health implications of ongoing mining. This information should be cross-referenced in the SIA for the EIS.</p> <p>The Report aims to categorise the impacts in terms of the social impact categories on p. 5 of the guideline. Graphs showing relative levels of concern provide a comparative basis for determining the significance and materiality of identified impacts using qualitative and quantitative evidence.</p> <p>Table 4.1 attempts to reconcile identified impacts with social impact categories. This is a complex task that requires careful consideration, as individual impacts can fall into multiple categories. A deeper analysis of social impacts may show further overlaps – e.g. it is expected that dust and air quality issues would affect ‘way of life’, aspects of ‘community’, and ‘fears and aspirations’, as well as the identified categories of ‘health and wellbeing’ and ‘surroundings’. Dust and air quality should also link to ‘health impacts’. Noise can affect ‘way of life’, ‘health and wellbeing’ and ‘personal and property rights’. These interrelationships need to be fully outlined and considered in the SIA for the EIS.</p> <p>There is also little discussion at this stage of differing views across stakeholder groups or categories. For example, which are the key impact concerns from stakeholders living nearest the mine/complex, and which impacts are the greatest concerns for those living elsewhere? Analysis of noise, for example, should reflect proximity and location of stakeholders in relation to the mine/complex. This disaggregation should be undertaken in the SIA for the EIS.</p> <p>For the EIS, it will also be critical to understand project impacts in greater detail than the issues shown in Figure 4.1. Efforts should be made to investigate and explain in further detail how the stated impacts directly and indirectly affect:</p> <ul style="list-style-type: none"> • the lives of community stakeholders (e.g. their way of life, values, fears and aspirations etc); • the meaning or significance of identified issues; and • variation in views, needs, or potential impacts across different stakeholder categories, particularly those who are vulnerable or likely to be adversely impacted by the project, and across time frames and generations. <p>Re-analysing feedback in Figures 4.2 and 4.3 and expressing findings in terms of social impact categories rather than technical mine-related</p>

	<p>issues would assist in integrating and understanding current and predicted social impacts.</p> <p>Some inconsistencies are also noted between the issues of greatest significance in Figures 4.2 and 4.3 and those discussed in greater detail in Sections 4.2 and 4.3. Land Management appears to be of lesser concern than Health and Wellbeing impacts, yet the latter are not discussed and analysed. These adverse impacts and high-level community concerns need to be addressed directly in the SIA for the EIS.</p> <p>In the analysis of issues, the SIA for the EIS should also include evidence to substantiate or question the identified issues and perceptions. Comments about feared depreciation (or increases) in property values should be supported by data. Statements from community members about experiences in dealing with Glendell staff should be analysed to determine why some issues or stakeholders appear to receive different responses or treatment to others, and whether there are opportunities to improve performance through mitigation measures, if this project is approved. Health data and evidence should be analysed and included in the SIA for the EIS.</p> <p>Statements about the possible future relocation of Ravensworth Homestead imply that this option is likely to proceed. Other options do not appear to have been given equal consideration.</p> <p>Cumulative social impacts should be considered in more detail in the SIA for the EIS. Again, incorporating some of the information from other studies and feedback describing how impacts overlap or compound to affect daily life, activities and values (from the point of view of affected residents, employees and business stakeholders) would provide a deeper understanding of their experiences.</p> <p><u>Recommendations</u></p> <p><i>The SIA for the EIS should:</i></p> <ul style="list-style-type: none"> ➤ <i>Disaggregate and analyse social impacts and benefits by social impact category and according to key stakeholder groups and significance for affected stakeholders.</i> ➤ <i>Use evidence from a range of sources, including from other relevant studies of mining impacts in the region, to substantiate or challenge issues and concerns.</i> ➤ <i>Demonstrate that alternative scenarios for Ravensworth Homestead have been considered and analysed.</i> ➤ <i>Include information on any cultural heritage impacts and health impacts given the poor health indicator scores identified in the Capitals Analysis (Table 3.2).</i> ➤ <i>Consider cumulative impacts from multiple projects or occurring in single locations and across time-frames to understand the full extent of expected impacts.</i>
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