

Subject: **Objection against the Mangoplah Battery Energy Storage System – SSD-77527735.**

Because of the **Complete lack of engagement and social licence with the landholder near the proposed Mangoplah BESS project, using a roadway on private property.**

I am writing to formally express my objection against the Mangoplah Battery Energy Storage System (BESS) project proposed by Samsung C & T Renewable Energy Australia (SREA) Pty. Ltd., to be located within the property on 4178 Holbrook Road, Mangoplah. Because of the **Complete lack of engagement and social licence with the landholder near the proposed Mangoplah BESS project, using a roadway on private property.**

The site is within close vicinity to the village of Mangoplah and is surrounded by agricultural and grazing land – to me it is not a place to build such a project.

“Landholder and community engagement is an important aspect of providing essential energy services to Australian communities”, with landholders considered as “critical partners and stakeholders in the delivery of major energy projects” (p. 1, The Energy Charter, n.d.). Additionally, The Energy Charter, goes onto state that “respectful engagement...needs to take place for the design, development, delivery, operation and/or maintenance of new...energy assets”, with its “primary purpose is to encourage better engagement and outcomes for landholders...You can use it to encourage us to do better and to hold us to account” (p.1, The Energy Charter, n.d.).

It is disappointing that Samsung C&T Renewable Energy Australia Pty. Limited do not have the same understanding as The Energy Charter, as there has been a complete lack of consultation, and discussion with the landholder in relation to a meeting with Cumulus Engineering, (Flood Risk Specialists), Samsung C&T Renewable Energy Australia Pty. Limited (Proponents) and Wagga Wagga City Council, regarding the use of a roadway/track on private property, namely “Access Route B (via an unnamed track to Paper Forest Road...”, despite in the Scoping Report Mangoplah BESS, 2024, stating that “this was however deemed unsuitable, as the unsealed road passes a number of non-associated receiver dwellings and private driveways”, but do however go onto say “use of this road will continue to be explored within the EIS stage in consultation with potential impacted receivers. To reduce overall impact to nearby non-associated receivers, the associated receivers private access road is being considered” (p.28).

This road was further discussed in the Bushfire Assessment Report, stating that “A secondary emergency route, subject to ongoing consultation is available from Paper Forest Road to the south of the Project site, providing safe access and egress during an emergency, all of which will comply with acceptable solutions set out in PBP (2019)” (p. 3, Ember Bushfire Consulting, 2025). Also, as stated in the Environmental Impact Statement, that “Access of Paper Forest Road is proposed to only be utilised in the event of emergency, as directed by the NSW SES. Outside of these conditions, there will not be any traffic to and from the Subject Lot along the emergency access route to the Project” (p.161, 2025). Once more, there has been no consultation with the landholder, regarding the use of this roadway.

In addition to the landholder, is the high risk of biosecurity issues with workers bringing in weeds and pests as they drive through the properties, there is also high risk to the livestock that graze along this roadway, with these workers leaving gates open, allowing the livestock to move onto Paper Forest Road, and then onto Holbrook Road. Moreover, there is the high risk of insurance issues not only from a worker, who is not authorised to be on the property having an

accident, to the cost incurred by the landholder's livestock on open roadways not confined within the property fencing.

In a Flood Impact Assessment by Cumulus Engineering, Flood Risk Specialists, it was noted that Samsung C&T Renewable Energy Australia (SREA) Pty. Limited discussed at a meeting together with Wagga Wagga City Council councillor's the use of this unsealed road. Moreover, there has been no consultation, no discussion and no written documentation with the landholder/neighbour to the proposed Mangoplah BESS project site, regarding the proposed use of this unsealed road.

As stated by the Australian Energy Infrastructure Commissioner, "Most large-scale renewable energy and transmission projects will have neighbours. Neighbours are residents or owners of properties in proximity of the proposed project, whether or not they are adjoining the host land" (p.45, Annual Report to the Parliament of Australia, 2022). Furthermore, the report states that "developers have not always understood the importance of consulting and working with neighbours in proximity to a project. A typical complaint received by our Office from project neighbours is that they were not consulted by the developer" (p.45, Annual Report to the Parliament of Australia, 2022).

Samsung C&T Renewable Energy Australia (SREA) Pty. Limited, state in the Scoping Report Mangoplah BESS, that "the engagement strategy aimed to achieve the following objectives:

1. Produce clear information on the Project, potential impacts (positive and negative) and benefits for the environment, community, and region by delivering high-quality communication channels across all targeted channels.
2. Endeavour to contribute towards positive impact in the region with shared local and broader regional social, economic and environmental benefits considered.
3. Develop a sense of local ownership in the Project by identifying local advocates.
4. Work together with the community in a collaborative way by identifying issues and likely mitigations throughout Project phases.
5. Support an uplift in the regional economy and level of local prosperity via a regional economic assessment.
6. Demonstrate sharing of Project benefits.
7. Support and engage local capabilities, engaging several local suppliers, including Aboriginal owned suppliers.
8. Maintain a positive corporate image for the Applicant and the renewable energy industry with the development of social licence and management of social and reputational risks..." (p.35).

Furthermore, The Australian Energy Regulator, state that "effective engagement is necessary to build the social licence" (p.9, Direction Paper, 2023), they go onto say that "social licence or social licence to operate, is a broad concept covering factors related to the level of community acceptance of, or opposition to, potential change or an organisation's operation" (p.2, Direction Paper, 2023). The community of Mangoplah and the surrounding landholders feel that there has been a complete lack of social licence, as social licence is described as an informal, implicit agreement based on trust, transparency, and responsible, ethical behaviour, this concept of 'engagement and social licence'.

This trust and ethical behaviour has been the complete opposite with the Mangoplah community and the surrounding landholders, this is evident with Samsung C&T Renewable Energy Australia (SREA) Pty. Limited, not informing the landholder of the proposed use of the unnamed, unsealed roadway to the proposed Mangoplah BESS project site that this roadway has been mentioned to be regarded as Access Route B, to the proposed Mangoplah BESS project site, despite the fact that this roadway is on private land, and is described under the

NSW Department of Primary Industries, Lands as a 'Road Closed', which according to the NSW Government Gazette..."Notification of closing of road - In pursuance of the provisions of the Roads Act, 1993, the road hereunder described is closed and the lands comprised therein cease to be public road and the rights of passage and access that previously existed in relation to the road is extinguished. Upon closing, title to the land, comprising the former public road, vests in the body specified in the Schedule hereunder."

The Australian Energy Regulator goes onto say that "Effective engagement is necessary to build the social licence"... "that facilitates collaboration and dialogue between landholders, communities" (p.9, Direction Paper, 2023) and developers. The community of Mangoplah and the surrounding landholders feel that Samsung C&T Renewable Energy Australia (SREA) Pty. Limited should understand what factors are mostly concerning to the community of Mangoplah and the surrounding landholders, as according to The Australian Energy Regulator, "building a social licence is therefore an important part of doing business in the energy sector" (p.9, Direction Paper, 2023).

Furthermore, in a Newsletter sent to the Mangoplah community and surrounding landholders in July, 2025, Samsung C&T Renewable Energy Australia (SREA) Pty. Limited stated that "We recognise that community expectations are changing. There is a growing demand for open communication, meaningful involvement in decision-making, and clear, timely benefits that reflect both the scale of a Project and its local impacts. The Proponent is committed to meeting these expectations by:

- Providing clear, accurate, and easy-to understand information
- Offering genuine opportunities for input throughout the process
- Reporting back on how community feedback has been considered and reflected in the Project. This approach reflects our commitment to engaging respectfully with the community and ensuring the Project is developed in a way that considers local interests and concerns".

Moreover, social licence is not present if a community withholds support and opposes an industry or a development, this statement is of major concern to the community of Mangoplah and surrounding landholders as they feel that there has been a distinct lack of information and consultation regarding how this proposed Mangoplah BESS project will benefit the environment, community socially and economically, if anything it will impact the community in reverse.

It deeply concerns and affects me that a rural community like Mangoplah is being treated with the disrespect and disregard of not being informed, consulted and a clear lack of ethical behaviour, there has been a distinct lack of social licence with the community of Mangoplah and the surrounding landholders, as this change in the land use from farming to industrial I feel will negatively impact upon Mangoplah's rural setting and lifestyle. I take it upon you to consider the cost to the Mangoplah community and the surrounding landholders and how this project will affect them in the future, as many of the local community members have been in the district for generations and do not want the proposed Mangoplah project to be constructed in such an inappropriate and ill-chosen location.