

## Submission from Dr Sandra Eady, Uralla NSW 2358

UPC Renewables and EMM are to be commended on the comprehensive and well-presented EIS.

This submission supports the development but seeks to raise some issues for further consideration and makes suggestions on how risks of detrimental impact can be mitigated and benefits maximised for the community, especially during the construction phase.

As acknowledged in the EIS, Uralla Shire is a small regional community for which the scale of the development will have a large impact during construction. The community will need to make a number of adjustments to accommodate the increase in people, traffic, and demands on a range of services.

### Traffic

The EIS addresses road usage and maintenance of the physical infrastructure. The use of shuttle buses to major hubs for employees is an excellent idea. This will reduce traffic, manage the risk of driver fatigue, and make employment more accessible to those in Armidale and Tamworth.

In addition to this, it would be good to see the community safety risk of increased traffic specifically addressed, with mitigation strategies (road widening, give-way signage, reduced speed limits, advanced warning of traffic increases). Many of the access roads are through residential areas where children play, and families congregate on the nature strips. The rural sections of the roads are currently quiet country roads where heavy traffic is not usually encountered. For all drivers the smaller rail crossings pose a particular risk due to the intermittent nature of train use and the expectation that the one regular service will come by at a particular time.

### Visual Impact

Additional visual screening of arrays should be undertaken. Only one area of planned landscaping has been identified in the EIS, for a close neighbouring landholder, whereas a number of sensitive sites have been flagged e.g. visual impact of the southern array adjacent to Thunderbolts Way and Salisbury Court. Vegetation screening will also help mitigate the impact of dust on pastures and rural residences.

### Biodiversity Offsets

Of the three options for biodiversity offsets, it would be preferable to see offsets being created with in the project area or nearby. The advantages are that flora and fauna diversity is supported in (or close by) the impacted area, locals can see that cleared vegetation has been replaced, and the revegetation areas can be sited to provide additional screening and reduce visual impact of the arrays.

The EIS flags this offset option as the most “*onerous*” but provision of these types of plantings is the bread and butter of local Landcare groups, and considerable expertise exists within the region to design, undertake and maintain such plantings in a cost effective manner. There are a number of groups who could partner with UPC to generate offsets e.g. the Armidale Tree Group in conjunction with StringyBark Ecological (<http://stringybarkecological.com.au/>) who are revegetating the Saumarez Creek area.

Any trees removed from the project site should be made available for local firewood rather than being burnt in situ, as this will reduce the impact of firewood collection on other dead wood supplies/reserves. Z-NET Uralla has set up a number of sustainable firewood supply chains and could facilitate the use of cleared timber as firewood.

## Risk Assessment

The EIS risk assessment covers technological and materials risk but does not address other significant risks, within a risk assessment framework. These additional risks are predominantly safety risks associated with human behaviour. While the EIS recommends a construction workforce management plan (CWMP) be developed which set down a Code of Behaviour, the EIS contains no systematic risk assessment that identifies the likelihood, consequences, controls and mitigation approaches.

Some of these risks will pertain directly to the construction/operations of the project while others will relate to impacts in the local community. These risks should be explicitly identified and assessed in a similar manner to physical risks. Such risks would include use of alcohol/drugs by machinery operators, worker and driver fatigue, anti-social/illegal behaviour of employees in the camp and local community, and psychological distress (elevated for live-in workforce; see [https://www.mja.com.au/system/files/issues/208\\_09/10.5694mja17.00950.pdf](https://www.mja.com.au/system/files/issues/208_09/10.5694mja17.00950.pdf)).

Appendix N acknowledges that *“UPC should consider safety and workforce procedures on-site to mitigate”* some of these risks. However, based on my experience with project risk assessment for geographically remote projects and for mining operations, these risks should be **explicitly included in the project risk assessment**. I suggest UPC obtains input into the risk assessment from a suitably qualified Human Resources person.

## Interface with Local Community and Businesses

The EIS identifies that *“communities are also commonly seeking the opportunity to work through issues directly with the project proponent. In particular, communities are demanding accurate and timely information about the project, transparent engagement and ‘fit-for-purpose’ consultation methods.”*

A number of areas have been flagged in the EIS:

- *Opening up opportunities for local businesses to provide services to the project.* The majority of local businesses in Uralla have limited or no experience on how to approach or tender for project work with a large contractor. This creates the risk that they will be excluded simply from lack of awareness. If there is genuine desire for opportunities to be available then a “fit-for-purpose” approach needs to be established.
- *Need to assess the pressure on accommodation to make decisions about if/when camp accommodation is required.* Currently the EIS suggests the Community Reference Group or the like for this role.
- *Mechanism by which inappropriate community social behaviour of project personnel can be identified and addressed.* The EIS recommends a passive grievance mechanism based on website and phone number.
- *Identifying the need for indigenous support programs.* The EIS suggests additional support could be provided directly from UPC or from the CBSI in the case of disadvantage for indigenous residents, most likely associated with pressure on rental housing.

While the CBSI/CRG could contribute to the consultation process and support community initiatives, the CBSI/CRG should not be used as the primary vehicle for resolving these issues. Impacts that are directly related to project activity (i.e. pressure on rental homes for indigenous community members) should be resolved by UPC. Equally, it is likely that community volunteers on a CRG will not have access to the data required to judge when additional accommodation is required, and providing this type of feedback would be outside the scope of the group.

An additional social impact on the community not identified in the EIS is the 'boom and bust' impact that large resource projects can have on communities. Without sensible business planning, people will borrow to invest in real estate and open new businesses or expand businesses, naively believing the slowdown once the project is completed will not be as severe as it often is in reality.

The suggestion is made that a more proactive process be introduced for community/business engagement (alongside the passive grievance mechanism and the interface with CBSI/CRG as proposed in the EIS). This could be in the form of a more 'operational' (rather than 'consultative') Stakeholder Group that meets monthly, or bi-monthly, for regular project updates during the construction phase. The Stakeholder Group would include the likes of Uralla Shire Council, Chamber of Commerce, Community Services and Groups, Police, JobLink, Armidale TAFE, school career officers, SES/Fire Brigade (usually the first responder to any 000 emergency call), accommodation and recreation providers and local trade businesses.

The functioning of Stakeholder Group will add to the administrative overheads but if well managed could also yield a number of distinct advantages.

The goal of the Stakeholder Group would be to:

- assist UPC with key feedback on accommodation availability, community gripes, crime, etc
- help identify labour resources amongst new school leavers and TAFE graduates
- facilitate the ability of UPC and local businesses to link up to provide services
- guide the community and businesses on progress and level of activity for the project
- allow advance warning of when traffic will increase, routes that will be taken etc
- give emergency services and Police insights into the nature and scope of work and associated risks

I am happy for UPC to follow up with me on any of the above suggestions to provide further input.