

## COMMENT ON UMWELT PTY LTD SOCIAL IMPACT ASSESSMENT

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In my opinion this report is not satisfactory as a Social Impact Assessment. It lacks clear description or analysis of the specific social impacts of the project on the defined community. Instead, opinions and issues are drawn from secondary sources and the conclusions and recommendations for mitigation are made on the basis of familiar and predictable generic issues that are defined more from the perspective of policy-makers and industry. The report contains very few pages about the social circumstances of the affected communities and the ways that sandmining may change these to the detriment of families, community groups or businesses.

### **Methodology - secondary sources only**

This report gives a demographic summary of people in the location, based on ABS statistics, government and company reports, then defines three sources of information:

- media reporting of issues about sandmining in the area
- feedback from a doorknock and letterbox drop conducted by the sandmining company of residents 'proximal' to the proposed quarry.
- notes from observation at a meeting called by the Williamtown and Surrounds Action Group Community Meeting, Williamtown Community Hall, 2 March 2015.

### **Media reporting**

Examples from media reporting of issues related to sandmining are presented in a table (Table 4.2, p 22) without further analysis. The assumption seems to be that this tells its own story about community concerns. At best, this media coverage provides background on how journalists define the major issues. Only a naïve reading would present it as a direct voice from the community. The examples discuss issues and opinions but not the project's likely effect on day-to-day life.

### **Doorknock and letterbox drop**

Details about the residential areas covered, the questions asked, the selection of people to be interviewed and the recording of information are usually reported in research but are not provided here. This activity was conducted by the proponent not Umwelt. The two pages of information provided to community members in letterboxes are not legible in the report. Since there are no results from this stage about the community itself, feedback from company members who did an initial letterbox drop and talked to some residents does not provide a sufficient basis for drawing conclusions about impacts.

### **Community meeting**

The third stage involved attendance at a meeting called by the Williamtown and Surrounds Action Group Community Meeting, Williamtown Community Hall, 2 March 2015. Results obtained from this stage seem to be lists of issues noted during the

meeting. These are presented in quotations on page 28 of the report but without the more important contextual information about how the issue related to the person speaking and their concerns about its impact on their lives. This should have been the consistent focus of fieldwork for a social impact assessment.

A meeting called and run by a local activist group is not fully representative of community concerns, nor productive for the kind of insights needed. Especially with politicians present, it is impossible for the researchers to raise questions, follow up with further queries and record a range of views systematically. It also raises an ethical question of whether the consultants identified themselves to the organisers and stated the purpose of their attendance. Participant observation without disclosure is unethical research practice. It also severely limits note-taking.

### **Treatment of issues instead of impacts**

Taken together, these three methods do not provide the empirical base that is necessary for a Social Impact Assessment. This is very evident when the reader looks for an analysis of results about social impacts and finds only a brief five pages that are reported on the basis of the fieldwork (pages 25 to 29). There is a lack of specific information about the current social circumstances of this community and their own views of ways that day-to-day life will be changed as a result of the sandmining.

Instead, the focus is on listing 'issues' as if this is all that is required. The issues are defined from an industry or policy perspective and do not seem to reflect conditions and questions important to Williamstown residents and visitors. For example, the media reports of resident concerns such as truck movements, dust and noise and threats to the koala population by landclearing could have been included in the interview questions, to understand why they were important in their lives. Local people could also suggest the initiatives that might work to minimise disruption.

### **No mitigation for specific impacts by the company**

The focus on issues instead of social impacts makes it possible to add extensive generic discussion, material from their other reports and lists of possible mitigation initiatives, even where they may not be relevant. This makes for a long report but does not address the impacts particular to Williamstown. This lack of information is especially glaring when the preferred mitigation advocated is all on the side of community members themselves. They are to keep detailed diaries of events and use a company phone number or email to report them. If the Social Impact Assessment had provided an empirical base about the social changes and detrimental impacts on this community, we would have expected the company to address these when the project was designed or built.

### **Two-way communication the basis for success**

We do know that one of the current concerns of the community is the lack of information provided by the company (p 34) and this report has not added to it. The lack of actual engagement for the Social Impact Assessment does not provide a basis for assuming the company would listen and respond to community members at any future time. Two-way communication with individuals and communities in the area has not yet been developed but it will be the strength of these

relationships that will be an important factor in the longer-term success of the enterprise.

## **Conclusion**

In my opinion, the Social Impact Statement does not use accepted standards and methods and does not focus on this community and what might be the social impacts of this project in that place. The conclusions drawn from this report and suggestions for mitigation should be rejected and an expert Social Impact Statement should be conducted.

## **Technical notes**

The report uses some technical research terms that seem to give credence to it being done by professional researchers. However, the terms are misused in ways that show this is not the 'Robust specialist assessment' (Community Participation Fig 3.1 page 14) it claims to be.

'Triangulation' is a term that refers to a research design that uses multiple methods together, to gain different types of evidence. The analysis needs to bring these together to interrogate the conclusions from multiple perspectives. In my opinion, this project does not read as though it has been designed from the outset to use different methods in combination. It seems, instead, a post hoc analysis of sources and opportunities available at the time.

'Semi-structured interviews' are designed with a progression of major questions on a specific topic, together with more open-ended questions that enable deeper exploration of answers as they arise. There is no evidence given in the report that questions were structured or used consistently with residents. An interview schedule and description of the way information was recorded and analysed must be included in such an interview report. If conducted this way, the interviews would have made a major contribution to the Social Impact Assessment.