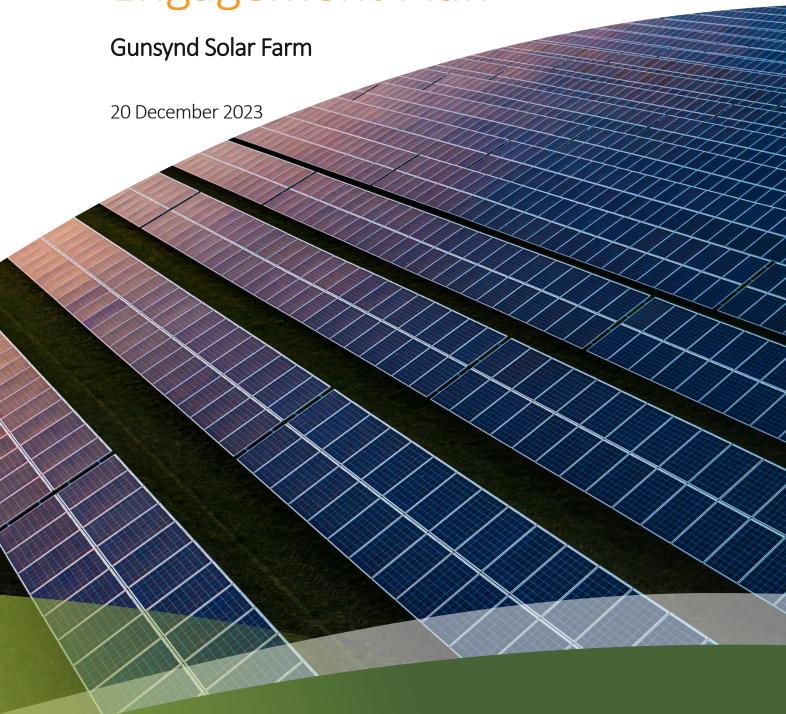






Community and Stakeholder Engagement Plan



Community and Stakeholder Engagement Plan Gunsynd Solar Farm

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Abbreviations

AC alternating current

ABS Australian Bureau of Statistics

ACHA Act Aboriginal Cultural Heritage Act 2003

Accent Environmental Pty Ltd

AEMO Australian Energy Market Operator

BoP balance of plant

CHMP Cultural Heritage Management Plan

Cth Commonwealth

CoC condition of consent

CSEP Community and Stakeholder Engagement Plan

DAF Department of Agriculture and Fisheries

DCCEEW Department of Climate Change, Energy, the Environment and Water

(Cth)

DES Department of Environment and Science

DN decision notice

DNRME Department of Natural Resources, Mines and Energy (now the

Department of Energy and Public Works [DEPW])

DRDMW Department of Regional Development, Manufacturing and Water

DSDILGP Department of State Development, Infrastructure, Local Government

and Planning

DSDSATSIP Department of Seniors, Disability Services and Aboriginal and Torres

Strait Islander Partnerships (now DTATSIPCA)

DTATSIPCA Department of Treaty, Aboriginal and Torres Strait Islander

Partnerships, Communities and the Arts

EPC engineering, procurement and construction

EP Act Environmental Protection Act 1994

Ergon Energy Ergon Energy (Network)

GRC Goondiwindi Regional Council

Gunsynd SF Gunsynd Solar Farm

HSE health, safety and environment

IAP2 International Association for Public Participation

km kilometre

LGA local government area

Metis Energy Ltd

MW megawatt

NEM National Electricity Market

NSW New South Wales

O&M operations and maintenance

PCL PCL Constructors Pacific Rim Pty Ltd

QAS Queensland Ambulance Service

QFES Queensland Fire and Emergency Services

Qld **Queensland**

QPS Queensland Police Service

Site EMP Site Environmental Management Plan
SARA State Assessment and Referral Agency

SES State Emergency Service

TMR Transport and Main Roads

WHSQ Workplace Health and Safety Queensland

1 Introduction

The Gunsynd Solar Farm (Gunsynd SF) project is a solar farm in southern Queensland that is being developed by Metis Energy Ltd (Metis Energy – the proponent). Metis Energy has engaged PCL Constructors Pacific Rim Pty Ltd (PCL) as the engineering, procurement and construction (EPC) contractor for the project.

1.1 Purpose and scope of this document

The purpose of this Community and Stakeholder Engagement Plan (CSEP) is to set out a framework for community and stakeholder engagement pertaining to the Gunsynd SF. This framework is based on the Equator Principles relating to stakeholder engagement (Equator Principles Association, 2020), which is to:

...demonstrate effective stakeholder engagement, as an ongoing process in a structured and culturally appropriate manner, with affected communities, workers and, where relevant, other stakeholders.

For projects with potentially significant adverse impacts on affected communities, the client will conduct an Informed Consultation and Participation process. All Projects affecting Indigenous Peoples will be subject to a process of Informed Consultation and Participation.

This CSEP is one of several subplans that support the Site Environmental Management Plan (Site EMP). The Site EMP is the key document outlining the requirements for environmental management during construction and operation. Figure 1.1 shows where this CSEP sits in relation to the Site EMP.

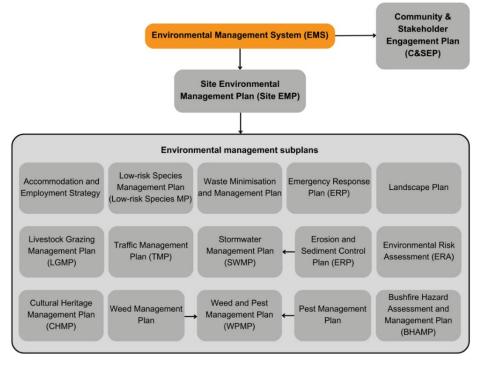


Figure 1.1 Site EMP and subplans diagram

The CSEP covers the construction and operation of the Gunsynd SF. While this CSEP covers community and other stakeholder engagement during normal construction and operation activities, it does not cover emergency incidents that may occur on site. This is addressed in the Emergency Response Plan (ERP) and Section 7 of the Site EMP.

1.2 Project overview

The project is a utility-scale solar renewable energy development, capable of generating up to 94 megawatts alternating current (MWAC). This electricity will be transmitted to the National Electricity Market (NEM) through the adjacent 132 kilovolt (kV) Bulli Creek – Waggamba electricity transmission line via an overhead connection with the on-site substation.

The project site is approximately 15 kilometres (km) north of the Goondiwindi township in southern Queensland, on the border between Queensland and New South Wales. The local context of the project site is shown in Figure 1.2. The project site is situated on land identified as Lot 51 on MH115 'Glenoe', Jacksons Road, Goondiwindi. The site layout is shown in Figure 1.3.

The statutory cultural heritage party for the project site is the Bigambul People, represented by the Bigambul Native Title Aboriginal Corporation.

1.2.1 Sensitive receptors

The nearest sensitive receptor from the project site is approximately 2 km north of the project site. A total of 31 sensitive receptors are located within 5 km of the project site. Figure 1.4 shows the sensitive receivers within 5 km of the project site.

1.2.2 Construction

GRC-led road upgrade works to Scudamores and Jacksons Roads to support the Gunsynd SF project will commence in October 2023. Main site construction is expected to commence in January 2024. The construction period will be 26 months, with practical completion expected in October 2025. Construction will be undertaken by PCL, with substation, civil, electrical and mechanical Balance of Plant (BoP) contractors. Ergon Energy (Network) (Ergon Energy) will provide the grid connection for the Gunsynd SF.

Key construction works include:

- external Goondiwindi Regional Council (GRC)-led upgrade works to Scudamores and Jacksons Roads, as well as the Department of Transport and Main Roads (TMR)managed intersection of Scudamores Road and Cunningham Highway
- establishing the site compound (access roads, fencing, laydown areas and O&M buildings)
- constructing the substation, switchyard and control building
- erecting solar panels, trackers and associated infrastructure
- testing and commissioning the solar farm infrastructure
- rehabilitating the site prior to completion, ahead of commercial operations.

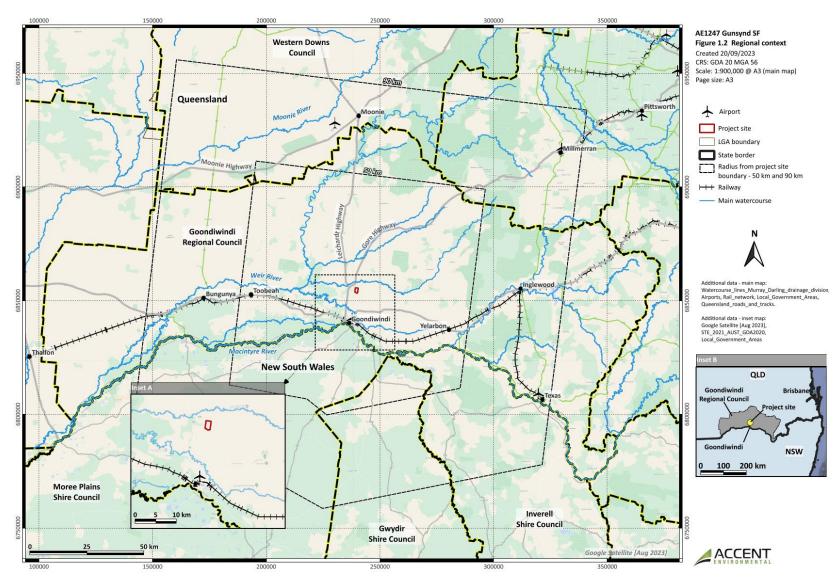


Figure 1.2 Local context

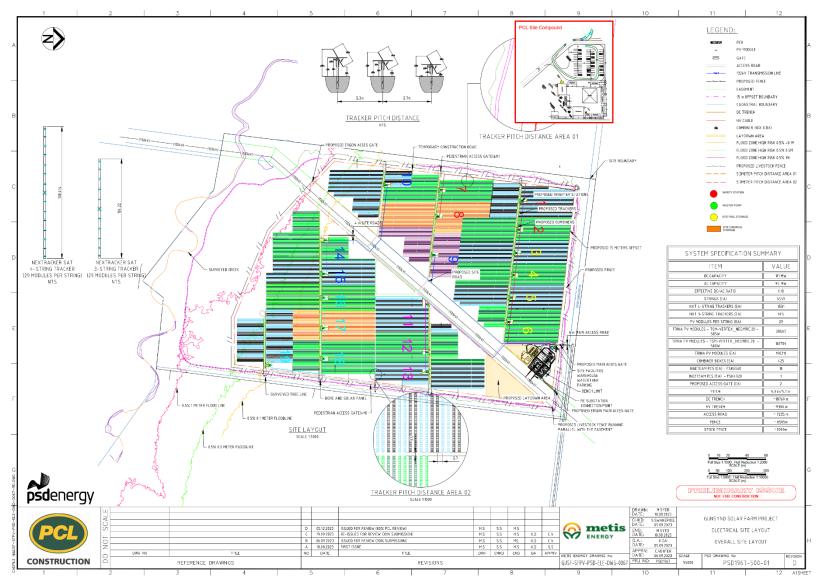


Figure 1.3 Gunsynd SF - Site layout

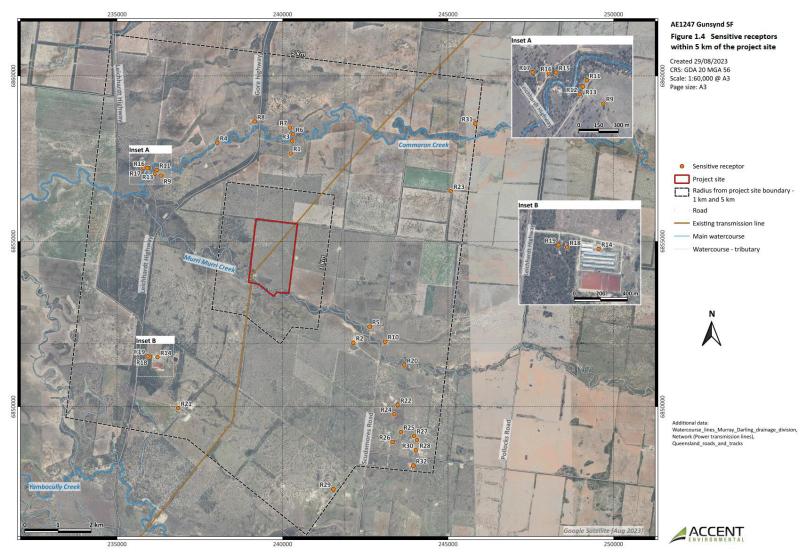


Figure 1.4 Sensitive receptors within 5 km of the project site

1.2.3 Operation

When the Gunsynd SF commences operation, PCL will appoint an operations and maintenance (O&M) contractor to undertake routine, scheduled and/or unscheduled maintenance tasks for the Gunsynd SF. These tasks include:

- cleaning the solar panels
- preventative maintenance of site infrastructure (such as fencing, solar panels, substations and cabling)
- land management activities (such as vegetation, weed and pest management)
- security monitoring.

Section 3 of the Site EMP provides more detail pertaining to construction and operation activities.

1.2.4 Community profile

A total of 10,310 people live within the Goondiwindi Regional LGA. Key demographic statistics are outlined below, based on 2021 census data (Australian Bureau of Statistics 2021):

- 49.9% female
- 50.1% male
- median age 40
- 803 people identify as Aboriginal and/or Torres Strait Islander
- 1,613 people (or 15.6% of the population) were born overseas
- 178 people speak a language other than English at home
- 573 people need help in their day-to-day lives due to a disability
- 1,416 (13.7% of the population) are aged 70 and over
- the largest age groups are 5–9-year-olds and 60-64 year-olds (729 people in each)
- 4,554 people are employed 65% full time and 29% part time
- 3.5% of the labour force is unemployed.

1.3 Project objectives

Metis Energy has established several overarching objectives for the Gunsynd SF project. These objectives include:

- protecting the agricultural productivity of the project site and surrounding land while maximising agricultural co-existence opportunities within the project site (sheep grazing)
- preventing harm to sensitive flora, fauna and livestock on the project site and surrounding land through good design, best practice and compliance with legislation
- avoiding and minimising adverse social and environmental impacts on the local community and environment

- forming mutually beneficial relationships with host communities, First Nations and other stakeholders through community engagement and benefit sharing (employment, training, social procurement and investment)
- setting a target of zero injuries during construction and operation of the project
- contributing to Australia's transition to a clean energy future.

The CSEP seeks to support the achievement of these project objectives.

1.4 Principles

The Queensland Solar Farm Guidelines (2018) describe five features of best practice community consultation. These five features have been integrated into the actions and monitoring measures described in this CSEP. These features are:

- Genuineness: Demonstrated commitment to the community engagement process, issues are identified, understood and managed via two-way communication, and communications demonstrate how stakeholder and community feedback has been considered.
- Timeliness: Engagement starts early and is undertaken at appropriate stages of the project lifecycle.
- Relevance: Engagement activities and tools reflect the specific and diverse needs of stakeholders and the community, and the communication approach responds to emerging issues or impacts.
- Transparency: The expectations of the stakeholders and community are managed effectively through a transparent approach to defining the negotiables and nonnegotiables in any decision-making processes.
- Inclusivity: Communication and engagement targets all stakeholder groups and demographics. Technical jargon is avoided, and information is presented clearly and concisely allowing stakeholders and the community to provide informed feedback.

1.5 Objectives of this plan

Based on the project objectives and principles outlined in Sections 1.3 and 1.4, respectively, the objectives of this CSEP are to:

- outline the means for community and other stakeholders to submit enquiries and feedback to PCL and Metis and a process to address grievances
- enable community and other stakeholder issues to be effectively managed, monitored and reviewed over the life of the development
- identify, prioritise and address the issues and concerns raised by the community and other stakeholders.

2 Statutory requirements and commitments

A Decision Notice (DN) 19/04W permitting the development of the Gunsynd SF was issued on 18 April 2019. This DN permitted the development of the Gunsynd SF subject to the conditions of consent (CoCs) prescribed in Attachment 1 of the DN.

A total of two CoCs in the Gunsynd SF DN, and two commitments in the Planning Report pertain to community and stakeholder engagement. Several environmental and cultural heritage policies also emphasise the need to engage with stakeholders on specific issues.

2.1 Conditions of consent

Attachment 1 – Assessment Manager's Conditions of the DN, did not specify any specific conditions pertaining to community engagement. However, CoCs 12 and 13 require that the proponent contact Goondiwindi Regional Council (GRC)'s Engineering Department and the Queensland Department of Transport and Main Roads (TMR), respectively, to confirm appropriate standards for civil works and road upgrades prior to the development of the Gunsynd SF.

2.2 State policies

Environmental, workplace and cultural heritage policies that include community and other stakeholder engagement considerations also include the cultural heritage duty of care, principles of pest management and the duty to notify of environmental harm. These policies apply to the construction and operation of the Gunsynd SF.

One of the eight principles of pest management defined by the Department of Agriculture and Fisheries (DAF) include the formation of consultation and partnership arrangements between land managers, local communities, industry groups, state government agencies and local governments to achieve a collaborative and coordinated approach to management.

Land users also have a duty to notify under the *Environmental Protection Act 1994 (Qld)* (EP Act) when serious or material environmental harm has occurred on land not owned by the proponent. As this constitutes an incident, the duty to notify is summarised in Section 5.3.4 of this CSEP and detailed in Section 7 of the Site EMP.

Under section 38 of the *Work Health and Safety Act 2011 (Qld)*, Workplace Health and Safety Queensland (WHSQ) must be notified immediately of a notifiable incident, such as a serious injury, illness, dangerous incident or death of a person at a workplace. As this also constitutes an incident, management measures are summarised in Section 5.3.4 of this CSEP and detailed in Section 7 of the Site EMP.

2.3 Commitments

2.3.1 Planning Report

Section 6.10 of the Planning Report 'Environmental Management' (Echo Consultants 2019) contains the following commitments relating to community and stakeholder engagement during construction and operation:

'Consult with local community affected regarding potential noise issues and notify adjacent landholders of timing and sequence of construction activities.'

'...A Traffic Management Plan will be developed in accordance with consultation with Council, TMR and internal standards, processes and procedures.'

2.3.2 Cultural Heritage Management Plan

The Cultural Heritage Management Plan (CHMP) (AHS and BNTAC 2023) sets out notification requirements to ensure BNTAC has the opportunity to monitor and protect Aboriginal cultural heritage on the project site. Management measures described in the CHMP include:

- providing timely updates to BNTAC of construction works to be conducted
- providing cultural heritage training to project personnel
- outlining a framework for dispute resolution
- describing procedures for unexpected Aboriginal cultural heritage finds on the project site.

2.3.3 O&M Specification

Section 6.3 of the Gunsynd SF Operations and Maintenance Specification (O&M Specification) (SMEC 2022) describes communications and reporting requirements for project personnel. Requirements include:

- weekly, monthly, semi-annual and annual reports
- monthly meetings between Metis Energy and PCL.

3 Previous engagement

3.1 Stakeholder engagement

Skylab, as the proponent of the Gunsynd SF prior to its purchase by Metis Energy, conducted a series of pre-lodgement stakeholder engagement activities with Echo Consultants as part of the Gunsynd SF development application process. Stakeholder engagement activities took place between 2018 and 2019 and are described in the Planning Report (Echo Consultants 2019). A summary of engagement activities during this period is described in Table 3.1.

Table 3.1 Summary of stakeholder engagement during planning and approvals

Activities	Stakeholder	Summary
Pre-lodgement meeting 1 23 August 2018	GRC	 General information pertaining to the development application process was discussed. GRC did not raise any concerns or issues associated with the application.
Pre-lodgement meeting 2 28 November 2018	GRC	 The proposed access to the site from Jacksons Road via Scudamores Road and Cunningham Highway was discussed. GRC confirmed the currently unconstructed section of Jacksons Road should meet the standard of the existing formed Jacksons Road, and that the existing culverts and crossings along the proposed access route are expected to carry the anticipated loads during construction deliveries. GRC confirmed that the proposed Surface Water and Drainage Assessment Report would be sufficient for the application.
Pre-lodgement advice 1 August – November 2018	State Assessment and Referral Agency (SARA)	 The advice indicated there may be a potential referral due to possible waterway barrier works. However, the current design ensures adequate buffers and avoidance of any sensitive triggers including Murri Murri Creek.
Pre-lodgement advice 2 Late 2018 – early 2019	Ergon Energy	 Confirmation that completed referral cannot be lodged with Ergon Energy until the Development Application has been made and a Confirmation Notice from GRC been received by SkyLab
May 2023	Bigambul Native Title Aboriginal Corporation (BNTAC)	 As part of early works, BNTAC representatives have been monitoring the site with Australian Heritage Specialists (AHS). Aboriginal cultural heritage artifacts have been identified on the project site, and management measures have been prescribed to mitigate impacts to these artifacts. BNTAC is also being engaged as part of developing a Cultural Heritage Management Plan for the Gunsynd SF.

3.2 Issues

Based on information from engagement activities and the site risk assessment outlined in the Environmental Assessment Report (Redleaf Environmental 2023), issues identified on the project site of specific concern to stakeholders are summarised in Table 3.2.

Other typical issues associated with the construction and operation of a solar farm such as the Gunsynd SF project are outlined in Table 3.3. These issues have been adapted from the document Community Engagement and Benefit Sharing in Renewable Energy Development - A Guide for Renewable Energy Developers (Lane and Hicks 2017).

Table 3.2 Issues identified during stakeholder engagement

Issues	Concerns raised	Responses or mitigations			
	Stakeholder engagement (Echo Consultants 2019)				
Waterway impact	The potential for planning referral due to possible waterway barrier works.	The design proposed by SkyLab ensures adequate buffers and avoidance of any sensitive triggers including Murri Murri Creek.			
Traffic and transport	The potential for the unconstructed section of Jacksons Road to carry the anticipated loads during construction deliveries.	GRC confirmed the currently unconstructed section of Jacksons Road should meet the standard of the existing formed Jacksons Road, and that the existing culverts and crossings along the proposed access route were expected to carry the anticipated loads during construction deliveries.			
Environmental R	eport (Redleaf Environmental 20	23)			
Native vegetation	The Project may require the removal of some vegetation on site. This may involve the removal of habitat features including termite mounts, nests, and trees with significant hollows.	Where possible, avoid damage to or removal of large habitat trees. A fauna spotter catcher is strongly recommended to be present to supervise tree clearing and topsoil stripping. Low or High-risk Species Management Program (SMP) may be required if active breeding places are tampered with.			
Weeds on site	A number of restricted species were present on site, often in high densities (Restricted Matter Biosecurity Act).	Pest species should be managed during construction with a high standard of weed hygiene for machinery.			

Table 3.3 Typical issues associated with solar farm projects

Issues			
Construction issues	Operation issues		
 Visual amenity (including fencing and lighting) Flow of benefits to the community Impacts on sites of significance to local Aboriginal groups Concerns associated with influx of workers during the construction period Traffic impacts Sediment and erosion control Dust concerns Perception of how the project will impact local energy prices 	 Technology failure Health and safety issues Lighting of the site Community expectations about local job creation Lack of local knowledge and expertise to solve maintenance or operational issues Pest animal and weed management 		

- Noise issues
- Fire hazard concerns
- Glare from reflective surfaces
- Land use and productivity of land
- Site water management and runoff quality
- Footprint and density of the project
- Impacts on site flora and fauna (short and long term)
- Decommissioning and post-project use of site

4 Stakeholder identification

Stakeholders refer to any person or group of persons who have or feel they have an interest or can affect or be affected by an issue or decision. Stakeholder groups have been identified based on their common key interests in the Gunsynd SF project. The identification of stakeholder groups helps engagement practitioners tailor engagement activities to suit each group's requirements and expectations of community and stakeholder engagement.

A total of five stakeholder groups have been identified as part of the CSEP, as follows:

- government (local, State and Commonwealth regulators, as well as elected representatives)
- services (e.g. health services, emergency services, accommodation providers, power utilities, water utilities)
- Aboriginal and Torres Strait Islander groups (Bigambul people)
- community (e.g. community groups, media, education and business, the broader community)
- near neighbours (neighbouring businesses, associated (host farms) and nonassociated (non-host farms) within approximately 2 km of the project site)
- project stakeholders (e.g. Metis Energy, Ergon Energy, PCL).

Stakeholders will also have varying levels of interest in the project and its outcomes. Each stakeholder group's interest level in the Gunsynd SF project has also been assessed based on experience with other solar farm developments. A ranking of high, neutral or low has been assigned to each stakeholder group.

Table 4 summarises the anticipated key interests and interest levels of these stakeholder groups. Appendix A of this CSEP contains a complete list of stakeholders by group. The stakeholder list in Appendix A also indicates where in the project lifecycle they would be relevant (construction or operation).

Table 4.1 Stakeholder groups

Stakeholder groups	Interest level	Key interests	
Government	High	Compliance with Commonwealth, state and local legislation and policies.	
		 Ensuring environmental impacts to sensitive ecological communities, flora, fauna and waterways are avoided, minimised or offset. 	
		 Enhancing community benefits and minimising impacts during construction and operation. 	
		 Ensuring public safety, as well as the safety of construction and operations personnel. 	
		 Ensuring engagement with key stakeholders, such as Aboriginal and Torres Strait Islander groups. 	

Stakeholder groups	Interest level	Key interests		
		Frequency of project updates, communications protocol between government agencies and proponent.		
Services (health services, emergency services, power and water utilities)	High for health services during construction, low during operation High for utilities and emergency services during construction and operation	 Construction impacts on the capacity of health services in the region. Providing feedback on the safety of the project, including emergency procedures (bushfires, flooding, other emergencies on site). Upkeep arrangements for the electricity transmission line and connection on the project site. Frequency of project updates, communications protocol between government agencies and utilities/emergency services. 		
Aboriginal and Torres Strait Islander groups	High	 Compliance with CHMP, including providing cultural heritage training, site surveys, breaches of the CHMP. Handling of unanticipated Aboriginal cultural heritage finds. Opportunities for local procurement and employment. 		
Community	High during construction Neutral to low during operation	 Opportunities for local procurement and employment. Community benefits arising from the project. Engagement opportunities, or opportunities to provide feedback/complaints. Community impacts associated with construction (capacity of local services, road safety/congestion). 		
Near neighbours	High	 Details about the development of the project (proponent, design, construction timeline). Direct and indirect impact to surrounding landholders and land uses (dust, flooding, fire hazards, glare and visual amenity). Engagement opportunities, or opportunities to provide feedback/complaints. Impacts to road safety during construction. Emergency procedures during construction and operation. Frequency of project updates, communications protocol between project proponent and neighbours. 		
Project stakeholders (e.g. proponent, EPC contractor)	High	 Feedback from other stakeholders during construction and operation. Perception of the project within the community. Company reputation. 		

5 Communication and engagement strategy

5.1 Engagement objectives

The objectives of engagement for the Gunsynd SF will be to:

- provide the community and other stakeholders with timely information about the development and operation of the Gunsynd SF, including expected project activities, timeframes and impacts
- respond to community enquiries and feedback, and address any grievances
- build community trust for the project by validating and acting on feedback, complaints and suggestions received
- build local knowledge about the Gunsynd SF project, and its local and regional benefits.

5.1.1 Public participation spectrum

Engagement with stakeholders and the community will be guided by the International Association for Public Participation's (IAP2) Core Values for Public Participation (2015) and the five features of best practice community consultation described in the Queensland Solar Farm Guideline (DNRME 2018). These features are described in Section 1.4.

An important part of this process is to understand the interests and concerns of potentially affected people and their role in relation to the decision-making processes. These factors will help determine the appropriate level of community participation and required range of engagement tools to address their concerns and built trust on them.

During project construction and operation, engagement with the community and other stakeholders will align with the Inform and Consult elements of the IAP2 public participation spectrum (2018) – as indicated by the gold-coloured cells in Figure 5.1.

Inform	Consult	Involve	Collaborate	Empower
Public participat	ion goal			
Provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions. Promise to the p	Obtain public feedback on analysis, alternatives and/or decisions.	Work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	Partner with the public to get advice and inputs on each aspect of the decisions made	Public have power in final decision-making and their decisions are to be implemented
We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision	We will work with you to ensure that your concerns and aspirations are directly reflected in alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Figure 5.1 Community Engagement Framework (based on IAP2 (2018))

5.2 Engagement risks

The Gunsynd SF Environment Risk Assessment document (Accent Environmental 2023) outlined several project risks relating to the development and operation of the project. In addition to the project risks identified, some additional risks may arise from the engagement process. These risks can result in project delays, operational disruption, and increased costs. The likelihood of risks are ranked according to categories of likelihood defined in

Table 5.1, and engagement risks are outlined in Table 5.2.

Table 5.1 Categories of likelihood

Category	Definition
Rare	May occur only in exceptional circumstances. This risk event is known to not have occurred elsewhere (likelihood < 5%).
Unlikely	Could occur at some time. This risk event is not expected to occur but could occur at some time (likelihood 5% to 30%).
Possible	Might occur at some time. This risk event could occur at any time during planned works (likelihood > 30% to 70%).
Likely	Will probably occur in most circumstances. This risk event will likely occur several times during the planned works (likelihood > 70% to 90%).
Almost certain	Expected to occur in most circumstances. This risk event will likely occur frequently during the planned works (likelihood > 90%).

Table 5.2 Engagement risks and mitigations

Risk	Consequence	Likelihood	Mitigation
Misinformation about the project (or renewables in general)	 Skewed perceptions or bias against the project/proponent leading to community outrage Loss of community trust Poor uptake of community engagement activities 	Possible	 Have readily available project resources (such as fact sheets) explaining the project scope, need and outcomes Communicate the scope of the engagement (focusing on construction and operation of the Gunsynd SF) Design engagement
Information provided about the project is hard to understand, jargon-filled or too lengthy	 Limits community and other stakeholders to meaningfully engage with the project 	Possible	 Avoid jargon and unnecessary technical terms, and use plain language with the community

Risk	Consequence	Likelihood	Mitigation
Competing engagement activities in the region	Poor uptake of community engagement activities	Unlikely	Where practical, time communication and engagement activities so they do not overlap with any engagement activities from neighbouring projects or GRC
Engagement fatigue, loss of trust in developer-led engagement processes	Poor uptake of community engagement activities	Possible	 Build upon previous community engagement findings (if any) Define the engagement scope clearly and explain how community and stakeholder engagement will influence the project Identify and use existing trusted community groups and relationships to encourage participation Updates should define actions the proponent has committed to when dealing with community complaints and feedback
Lack of updates about project progress or addressing community feedback	 Perceptions of poor transparency about the project Loss of community trust 	Rare	 Deliver regular updates about the Gunsynd SF development during construction and operation Updates should define actions the proponent has

Risk	Consequence	Likelihood	Mitigation
			committed to when dealing with community feedback
Community engagement does not account for local conditions (such as natural disasters)	Poor uptake of community engagement activities	Possible	During extenuating circumstances affecting the local community, pause community
Conflicting interests among stakeholders and community, or 'loud voices' dominating community engagement	 Loss of community trust and ownership of the project Poor uptake of community engagement activities 	Possible	Provide multiple avenues for stakeholder and community engagement to allow a variety of opportunities to engage with the project

5.3 Engagement plan

PCL will engage and consult with the community, relevant council departments, utility providers, government agencies and the Bigambul Traditional Owners during the duration of the works in line with the relevant statutory requirements outlined in Chapter 2.

5.3.1 Engagement stages and key messages

Communication and engagement activities will take place across the construction and operation of the Gunsynd SF project site. Engagement stages alongside proposed key messages and timings are defined in Table 5.3.

Table 5.3 Engagement stages, key messages and engagement tools

Stage	Pre-construction	Construction	Operation
Timing	September 2023 – December 2023	January 2024 – November 2025	November 2025 onwards
Proposed key messages	 Construction is about to start, and there will be minor construction impacts. 	There will be specific impacts to surrounding roads and/or landholdings at specific times.	Construction and commissioning of the project is complete and the Gunsynd SF is
	 We will keep you updated as construction 	 There may be temporary noise issues we will seek to 	operational We are still keen to hear your feedback

Stage	Pre-construction	Construction	Operation
	progresses and inform you in advance of any impacts. Here are ways to get in touch for any project enquiries or complaints.	minimise these and inform you ahead of time Get in touch with us for any enquiries and complaints about the project.	and address any enquiries and complaints
Communication and engagement tools (see Section 5.3.2)	 Letters to stakeholders Phone calls/emails One-on-one meetings 	 Fact sheets Newsletter Impact notifications Phone calls/emails One-on-one meetings Community pop-ups Formal report 	 Impact notifications Site visits, field trips or open days Formal report
	 Community and stak Project website Email address Community informat Online form Grievance mechanism 	ion line	

5.3.2 Communication and engagement tools

Table 5.4 outlines the communication and engagement tools will be used to facilitate engagement for the project.

Table 5.4 Communication and engagement tools

Tools	Description	Stakeholders	Responsibility
Community and stakeholder liaison	A community and stakeholder liaison manager will coordinate interactions with community and stakeholders throughout construction and operation.	All	Metis Energy
Project website	The Gunsynd SF project website (https://www.gunsyndsolarfarm.com.au/) will be established for construction and operation activities, containing: project details (project proponent and contractors, summary of the project,	Community Near neighbours	Metis Energy
	location, layout plans, construction timeline))		

Tools	Description	Stakeholders	Responsibility
	 expected environmental and social benefits and impacts, as well as mitigation and management measures a copy of the CSEP, and information about how a complaint, enquiry or grievance can be made to the project proponent statutory and project documents (DN and CoCs, Site EMP and subplans, environmental audits) project updates (blog page) project contact details gunsyndsolar@metisenergy.com, , community information line, project office) online form to leave feedback and complaints/grievances (see Online Form engagement tool). The website will be kept up to date with as construction progresses. 		
Formal report	Formal reports will be provided to Metis Energy during the operation of the Gunsynd SF. Depending on requirements, formal reports are summarised below: upcoming construction and operational works performance of the Gunsynd SF project health, safety and environment issues grievances and complaints critical issues and risks The format of the report is to be agreed between Metis Energy and PCL.	Metis Energy	PCL
Email address	A project email address (gunsyndsolar@metisenergy.com) will be established throughout the construction and operation of the project to receive any complaints and suggestions from community and other stakeholders. This email address will also be used to provide project updates to stakeholders and the community. The email address will be promoted on the project website and letters/newsletters/notifications to the community.	All	Metis Energy
Community information line	A community information line (0457 813 997) will be established throughout the construction	Community	Metis Energy

Tools	Description	Stakeholders	Responsibility
	and operation of the project to receive any complaints and suggestions from the community and other stakeholders. The community information line will be promoted on the project website and letters/newsletters/notifications to the community.	Near neighbours	
Project mailing address	A physical project mailing address (PO Box 1463, Goondiwindi, Qld) will be set up during construction provides the opportunity for members of the community to meet with project team and access to factsheets and project information. The project office also provides a physical address for written complaints to be posted or hand delivered.	Community Near neighbours	PCL
Letters to stakeholders	Letters to stakeholders will be distributed prior to construction to introduce the project, summarise potential construction impacts and outline engagement opportunities (community information line, email, project mailing address, website, or the option of engaging in a one-on-one meeting or phone call). Letters to other major projects allow for potential cumulative impacts to be identified and managed.	Near neighbours Community Government	Metis Energy
Newsletters	Newsletters to the community will provide information on project progress, upcoming major construction work and actions taken to address community feedback.	Near neighbours Community	Metis Energy
Impact notifications	Where works may disrupt the amenity of near neighbours or the broader community, an impact notification must be provided at least two weeks prior to works commencing. Impact notifications will be developed and made available on the project website and sent out as letters to stakeholders. Impact notifications will also be published in media outlets (see Appendix A). Impact notifications will outline the: nature of the impact duration of the impact.	Near neighbours Community (where there is wider impact to community) Aboriginal and Torres Strait Islander groups	Metis Energy

Tools	Description	Stakeholders	Responsibility
	As required by Clause 11.1 of the CHMP, a Works Program Notice must be provided to BNTAC at least 20 business days prior to the commencement of ground disturbance works, site survey or other circumstances agreed to by PCL, Metis Energy and BNTAC. Impact notifications to BNTAC must include:		
	 a topographical map depicting areas where works will be conducted a description of project activities, including ground disturbance activities. 		
Fact sheets	Fact sheets about the project will be created to explain aspects of the Gunsynd SF, including the: Iocation, size, scale and need for the project construction timelines expected community and environmental impacts, mitigations and benefits statutory approvals process.	All	Metis Energy
Phone calls and emails	Phone calls and emails to notify near neighbours, services and government about critical activities and the potential impacts. Phone calls can also be offered to any stakeholder to discuss specific feedback, concerns or complaints.	Near neighbours Services Government Community	PCL and Metis Energy
One-on-one meetings	Meetings will be undertaken by PCL to discuss project activities, timelines and the potential impacts. One-on-one meetings may also be offered to community members to discuss complex feedback or concerns.	Near neighbours Services Government	PCL and Metis Energy
Site visits, field trips or open days	Site visits, field trips and open days can be used during operation to socialise the project with stakeholders. For community members, this can be an educative experience about renewables, while services and government stakeholders can observe the site for statutory compliance and discuss operational aspects of the site.	Community Services (utilities, emergency services) Government	PCL and Metis Energy
Community popups	Pop-ups at community events can be used to distribute project collateral (newsletters, fact sheets, impact notifications) and create a space for community members to drop-in and ask question/provide comments about the project.	Community	PCL and Metis Energy
Online and paper form	An online form and a paper backup form will be available for the community to provide feedback, complaints and grievances about the	All	Metis Energy for online form

Tools	Description	Stakeholders	Responsibility
	project. A suggestions and feedback box will be placed at the O&M building to receive paper forms. The project mailing address can also receive written feedback, suggestions, complaints and grievances. The online form will be published on the project website.		PCL for paper forms

5.3.3 Complaints, enquiries and grievances management

Complaints and grievances will be managed according to the Equator Principles (Equator Principles Association 2020). PCL and Metis Energy will ensure that the community and worker grievance mechanism is in place prior to the start of construction and that this is disseminated to all workers and local community.

All complaints and grievances will be directed to these formal contact touchpoints outlined in Table 5.5.

Table 5.5 Contact touchpoints

Method	Contact detail	Responsibility
Online form	gunsyndsolarfarm.com.au	Metis Energy site administrator
Email address	gunsyndsolar@metisenergy.com	Metis Energy site administrator
Phone call	0457 813 997	Metis Energy site administrator
Mailing address	Gunsynd SF PO Box 1463, Goondiwindi, Qld	PCL lead project or site manager

Metis Energy and PCL will maintain their own Complaints, Grievances and Enquiries Register relevant to their responsibilities and activities.

When a complaint or grievance is received, the details of the complaint or grievance are entered into the Complaints, Grievances and Enquiries Register. The following details must be entered into the register as soon as practicable after the complaint is received:

- the date and time, where relevant, of the complaint or grievance
- how the complaint or grievance was made (telephone, mail, email or in person)
- who received the complaint or grievance
- any personal details of the complainant that were provided, or if no details were provided, a note to that effect

the nature of the complaint or grievance.

Complaints or grievances received by Metis *that are relevant to PCL's responsibilities and activities* will be entered into the Metis register and forwarded to PCL within 24 hours of being received. PCL will then enter the complaint into their own register. PCL will be responsible for acting on the complaint unless otherwise agreed with Metis in writing.

All complaints or grievances received directly by PCL will be entered into the PCL register and forwarded to Metis within 24 hours of being received. Metis will then enter the complaint into their own register. PCL will be also responsible for acting on these complaints unless otherwise agreed with Metis in writing.

When PCL receives a complaint or grievance for which it has responsibility, the PCL Lead project manager or site manager will undertake further investigation and define mitigating actions.

A response must be provided by PCL to the person who made the complaint or grievance within 48 hours after PCL has become aware of the complaint/grievance. The register must also be updated with information about:

- any actions taken in relation to a complaint or grievance, including timeframes for implementing the action
- if no action was taken in relation to the complaint or grievance, the reason(s) why no action was taken
- the status of the complaint or grievance (i.e. open/closed)
- any follow up correspondence with the person who made the complaint or grievance
- measures to avoid reoccurrence of issues highlighted in a complaint or grievance (if any).

PCL will report back routinely (at least monthly) to Metis to confirm that complaints and grievances have been adequately addressed. Complaints and grievances will be included in internal monthly reporting and meetings (see Section 6).

If a complaint or grievance relates to an incident, such as an incident of material or serious environmental harm, a biosecurity incident involving weeds, pests or diseases, workplace incidents or a chance-find of Aboriginal cultural or European heritage, refer to Section 5.3.4.

If the complaint or grievance constitutes a breach of the CHMP or a dispute within the scope of the CHMP, the measures defined in Sections 15 and 17 of the CHMP respectively must be followed.

When Metis or PCL receive an *enquiry* (as distinct from a complaint/grievance), the details of the enquiry will be recorded in the Complaints, Grievances and Enquiries Register. The company receiving the enquiry will be responsible for responding to it (e.g. by providing the requested information), unless otherwise agreed between the companies in writing.

5.3.4 Incident management

Any project-related incidents, or complaints/feedback from the community or stakeholders that constitute an incident will be managed and notified to regulators in accordance with the incident management procedures outlined in Section 7 of the Site EMP. Incidents include:

- environmental incidents involving material or serious environmental harm
- biosecurity incident involving pests, weeds or diseases
- chance-finds involving Aboriginal cultural or European heritage

Complaints, feedback or enquiries regarding any incident must be referred to PCL management personnel as soon as practicable. Metis Energy management personnel must be informed of any notifiable incidents within 24 hours and prior to notifying regulatory authorities.

Environmental harm

Sections 320B and 320C of the EP Act requires persons carrying out an activity (such as employees and other persons on site) to inform an owner, occupier or employer about an environmental incident of material or serious environmental harm. The DES must be informed of environmental incidents in writing within 24 hours (see Section 7 of the Site EMP).

Material environmental harm is defined as harm that:

- causes actual or potential loss or damage to property of an amount equal to or more than the threshold amount (\$10,740 from 1 July 2023 to 30 June 2024, or as updated) (DES 2023)
- results in costs of more than the threshold amount (\$10,740 from 1 July 2023 to 30 June 2024, or as updated) (DES 2023) to prevent or minimise the harm, or to rehabilitate or restore the environment.

In addition to the definitions of material environmental harm, serious environmental harm is defined as:

- irreversible, of a high impact or widespread
- caused to an area of high conservation value or significant significance (such as the Great Barrier Reef)
- causing actual or potential loss or damage to property of an amount equal to or more than the threshold amount (\$107,400 from 1 July 2023 to 30 June 2024, or as updated) (DES 2023)
- results in costs of more than the threshold amount to prevent or minimise the harm, or to rehabilitate or restore the environment (\$107,400 from 1 July 2023 to 30 June 2024, or as updated) (DES 2023).

General Biosecurity Obligation (GBO)

The *Biosecurity Act 2014 (Qld)* requires that sightings of Schedule 1 prohibited matter or Category 1 or 2 restricted matter be reported to Biosecurity Queensland within 24 hours, using the procedure outlined in Section 7 of the Site EMP.

Cultural heritage duty of care

Any chance-finds involving Aboriginal cultural heritage artefacts must be managed according to the management measures of the CHMP. This includes informing the cultural heritage party (Bigambul people), as well as DTATSIPCA. If human remains are discovered, this must be reported to the police as soon as possible.

Chance finds of European heritage must be reported to DES as soon as possible, according to the measures outlined in Section 7 of the Site EMP.

Notifiable incidents in the workplace

Any complaint or feedback regarding a notifiable incident (resulting in serious injury, illness, death or a dangerous incident) must be reported to WHSQ immediately, either by telephone or in writing. This must be done according to the measures outlined in Section 7 of the Site EMP.

5.4 Roles and responsibilities

In addition to the roles and responsibilities outlined in Section 4 of the Site EMP, engagement-related roles and responsibilities are outlined in this section.

5.4.1 Metis Energy

The role of Metis Energy would be to implement the community and stakeholder engagement strategy as outlined in the CSEP. In addition to the responsibilities outlined in Section 5.3.2, general responsibilities for Metis Energy include:

- proactively engaging with the community and other key stakeholder groups in relation to the project through the Community and Stakeholder Liaison
- maintaining and updating engagement tools with the latest information about the project, and distributing engagement tools to stakeholders
- providing a response to complaints within 48 hours of the complaint being made
- notifying any relevant Metis Energy and PCL management personnel about complaints, enquiries and feedback received
- setting up and updating registers needed to track enquiries, feedback and complaints (see Section 6)
- notifying regulators and other relevant stakeholders in the event of an:
 - environmental incident of serious or material environmental harm (see Section 7 of the Site EMP)
 - non-compliance with the DN conditions or state regulation
 - Aboriginal or European heritage cultural chance find.

5.4.2 PCL

PCL's role would be to support Metis Energy in implementing the CSEP. As the EPC contractor, PCL's responsibilities include:

- involving Metis Energy's Community and Stakeholder Liaison with any community engagement activities
- keeping Metis Energy up to date with the outcomes of any stakeholder engagement activities (such as one-on-one meetings, phone calls or site visits)
- providing Metis Energy with technical information to respond to community enquiries, feedback or complaints
- relaying any community feedback, complaints, greivances and enquiries received by
 Metis Energy to relevant project personnel as appropriate
- management of the complaints and grievances register, enquiries register, community and stakeholder engagement register
- ensuring BoP and substation subcontractors adhere to requirements for stakeholder engagement and immediately reporting any community or regulator interactions to the PCL Health, Safety and Environmental Manager
- updating community engagement registers with information about community and stakeholder engagement activities (see Section 6)
- notifying Metis Energy of any:
 - environmental incident of serious or material environmental harm (see Section 7 of the Site EMP)
 - non-compliance with the DN conditions or state regulation
 - Aboriginal or European heritage cultural chance find.

6 Monitoring and evaluation

The CSEP will be monitored for its effectiveness through the engagement objectives set out in Section 5.1.

6.1 Monitoring and evaluation criteria

Monitoring and evaluation criteria for this CSEP are set out in Table 6.1.

Table 6.1 Monitoring and evaluation metrics

Objective	Monitoring metric
Provide the community and other stakeholders with timely information about the development and operation of the Gunsynd SF, including expected project activities, timeframes and impacts	 Number of community members and stakeholders who received letters to stakeholders and newsletters. Number of near neighbours and other stakeholders who have been provided letters to stakeholders, impact notifications and newsletters. Number of near neighbours and other affected stakeholders who have received impact notifications at least two weeks prior to amenity-affecting works commencing.
Respond to community enquiries and feedback, and address any grievances	 Number and nature of complaints, feedback and grievances received. Number of complaints, feedback and grievances responded to within 48 hours.
Build community trust for the project by validating and acting on feedback, complaints and suggestions received	 Whether relevant project stakeholders (such as Metis Energy) or regulators have been notified of complaints, feedback and grievances. Whether actions have been taken to resolve complaints, feedback and grievances. Number of repeat complaints or grievances on the same issue.
Build local knowledge about the Gunsynd SF project, and its local and regional benefits.	 Number of engagements (phone calls, meetings, site visits, field trips or open days, community pop-ups) undertaken as part of the Gunsynd SF project. Positive/neutral/negative sentiments of community about the Gunsynd SF project.

6.2 Records management and reporting

Records management will be outlined in the Site EMP. Records that will need to be kept for this CSEP include a:

complaints, enquiries and grievances register

- community and stakeholder engagement register
- stakeholder database.

Enquiries, feedback, complaints and grievances received must be reported within the monthly Construction Progress or Operations Reports. The report must contain a:

- count of how many enquiries, feedback, complaints and grievances received
- summary of the nature of enquiries, feedback, complaints and grievances (including any WHS incidents and environmental compliance issues).

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Appendix A: Stakeholder list

Туре	Organisations	Phase
Government		
Local	Goondiwindi Regional Council Council staff Councillors and mayor	Construction Operation
State	 Department of State Development, Infrastructure, Local Government and Planning (DSDILGP) Department of Transport and Main Roads (TMR) Department of Agriculture and Fisheries (DAF) Member for Southern Downs (currently Mr James Lister) Department of Environment and Science 	Construction
	 (DES) Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts (DTATSIPCA) Workplace Health and Safety Queensland (WHSQ) Department of Regional Development, Manufacturing and Water (DRDMW) 	Operation
Commonwealth	 Department of Climate Change, Energy, the Environment and Water (DCCEEW) Australian Energy Market Operator (AEMO) 	Construction
Services		
Emergency services	 Queensland Police Service (QPS) Queensland Ambulance Service (QAS) State Emergency Service (SES) Queensland Fire and Emergency Services (QFES) 	Construction Operation
Utilities	Ergon Energy	Construction Operation
Local services	 Health services Darling Downs Health, Queensland Health Goondiwindi Hospital Goondiwindi Medical Centre Carbal Medical Services (Aboriginal and Torres Strait Islander medical service) 	Construction

Туре	Organisations	Phase
	Care Goondiwindi	
	Local accommodation providers	
	Real estate agents	
	Short-stay accommodation	
	Hotels and motels	
Aboriginal and Torres Strait Is	slanders	
Aboriginal and Torres Strait Islander groups	Bigambul Registered Native Title Aboriginal Corporation	Construction Operation
Community		
Community groups	 Southern Queensland Landscapes Cluster fencing groups Goondiwindi Lions Club Goondiwindi Scouts Goondiwindi Girl Guides Sports clubs 	Construction Operation
Education and businesses	 Goondiwindi Chamber of Commerce Goondiwindi Business Hub Goondiwindi Women's Co-Working Circle (Facebook group) Goondiwindi SILO TAFE NSW Boggabilla Macintyre Ag Alliance Local business owners Local employers Local suppliers Goondiwindi State Primary School Goondiwindi State High School St Mary's Primary School Border Rivers Christian College 	Construction
Media	 Goondiwindi Argus Goondiwindi Region (Facebook page) Goondiwindi Community Notice Board (Facebook group) Goondiwindi Notice Board (Facebook group) Goondiwindi Plus More (Facebook group) School newsletters 	Construction

Туре	Organisations	Phase
Other	Broader community	Construction
Near neighbours		
Major projects	Macintyre Wind FarmGoondiwindi Hydrogen	Construction
Landholders and residents	 Near neighbours, including associated (host farms) and non-associated (non-host farms) within 2 km of the project site Neighbouring businesses 	Construction Operation
Project stakeholders		
	 Metis Energy PCL Ergon Energy (Network) Project financiers/investors 	Construction Operation
	 Balance of Plant (BoP) Civil Contractor BoP Mechanical Contractor BoP Electrical Contractor Substation subcontractors Specialist subcontractors Specialist consultants Transport and logistics companies 	Construction