



Rushes Creek Poultry Production Farm Development Consent SSD 7704

Community Consultation Plan

Prepared for:

ProTen Tamworth Pty Limited

Prepared by:



July 2021



Rushes Creek Poultry Production Farm Development Consent SSD 7704

Community Consultation Plan

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TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	Background	1
1.2	Document Purpose and Objectives.....	1
2	PROTEN'S PROJECT TEAM	3
2.1	Site Contact Details	3
2.2	Roles and Responsibilities	4
2.3	Inductions and Training.....	5
2.4	Key Messages	5
3	IDENTIFIED STAKEHOLDERS.....	6
3.1	Local Community.....	6
3.2	Regulatory Authorities	7
3.3	Registered Aboriginal Parties	9
3.4	Other Interested Stakeholders.....	9
4	CONSULTATION IMPLEMENTATION	10
4.1	Stakeholder Key Areas of Interest.....	10
4.2	Communication Tools	12
5	COMPLAINTS MANAGEMENT STRATEGY	15
5.1	Performance Objective	15
5.2	Responsibility	15
5.3	Contact Details for Complaints	15
5.4	Handling Procedure.....	15
5.5	Preventative Action.....	17
5.6	Dispute Resolution	17
6	CCP REVIEW AND UPDATE.....	18
7	REFERENCES	19

TABLES

Table 1	Development Consent Condition B56	1
Table 2	ProTen Contacts - Construction Phase	3
Table 3	ProTen Contacts - Operational Phase.....	3
Table 4	Roles and Responsibilities	4
Table 5	Surrounding Residences and Recreational Facilities	6
Table 6	Stakeholder Key Areas of Interest.....	10
Table 7	Communication Tools.....	12

FIGURES

Figure 1	Surrounding Residences and Recreational Facilities	8
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APPENDICES

- Appendix A Regulatory Authorities Contact Details
- Appendix B Registered Aboriginal Parties Contact Details
- Appendix C Other Stakeholders Contact Details
- Appendix D Complaint Report Form

ABBREVIATIONS

Abbreviation	Definition
BCD	DPIE Biodiversity Conservation Division
CCP	Community Consultation Plan
Council	Tamworth Regional Council
DPI	Department of Primary Industries
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EME	EME Advisory
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environment Protection Authority
EPL	Environment Protection Licence
FRNSW	Fire and Rescue NSW
HNELH	Hunter New England Local Health
LGA	Local government area
MP	Member of Parliament
NRAR	Natural Resources Access Regulator
ProTen	ProTen Tamworth Pty Limited
RAPs	Registered Aboriginal Parties
RFS	NSW Rural Fire Service
RTS	Response to Submissions
SHEQ	Safety, Health, Environment, Quality
SLR	SLR Consulting Australia
SSD	State significant development
TfNSW	Transport for NSW
TRRRA	Tamworth Regional Residents and Ratepayers Associated Inc.

1 INTRODUCTION

1.1 Background

ProTen Tamworth Pty Limited (ProTen) obtained Development Consent SSD 7704 from the Department of Planning, Industry and Environment (DPIE) (as delegate for the Minister for Planning and Public Spaces) on 16 April 2020 to construct and operate an intensive poultry broiler production farm within a rural area known as Rushes Creek in the Tamworth Regional Local Government Area (LGA). In summary, the approved Rushes Creek Poultry Production Farm development (the “Development”) comprises a total of 54 poultry sheds housing a combined population of 3,051,000 broiler birds, along with various items of ancillary infrastructure.

The following should be referred to for a detailed description of the approved Development:

- *Environmental Impact Statement, Intensive Livestock Agriculture, Rushes Creek Poultry Production Farm, SSD 7704* (SLR Consulting Australia [SLR] 2018) (EIS), including all appendices;
- *Rushes Creek Poultry Production Farm, SSD 7704, Response to Submissions* (EME Advisory [EME] 2019a) (RTS), including all appendices; and
- *Rushes Creek Poultry Production Farm, SSD 7704, Supplementary Response to Submissions* (EME 2019b) (Supplementary RTS), including all appendices.

1.2 Document Purpose and Objectives

This Community Consultation Plan (CCP) establishes the approach and management of community and stakeholder consultation and engagement throughout the construction and operational phases of the Development. It will assist in fulfilling condition B55 of Development Consent SSD 7704, which states:

The Applicant must consult with the community regularly throughout the development, including consultation with the nearby sensitive receivers identified in Appendix 2 [of the Development Consent], relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.

The CCP has been prepared in accordance with the requirements of condition B56, as listed in **Table 1**.

Table 1 Development Consent Condition B56

Consent Condition		CCP Section
B56	Community Consultation Plan <i>The Applicant must prepare a Community Consultation Plan for the development, to the satisfaction of the Planning Secretary. The Plan must:</i>	
(a)	<i>be approved by the Planning Secretary prior to the commencement of site preparation works;</i>	
(b)	<i>be implemented for the life of the development, or as otherwise agreed by the Planning Secretary;</i>	
(c)	<i>assign a central contact person to keep the nearby sensitive receivers regularly informed throughout the development;</i>	Sections 2.1 and 2.2
(d)	<i>detail the mechanisms for regularly consulting with:</i> <i>(i) the local community;</i> <i>(ii) nearby sensitive receivers identified in Appendix 2;</i> <i>(iii) relevant regulatory authorities;</i> <i>(iv) Registered Aboriginal Parties; and</i> <i>(v) other interested stakeholders,</i> <i>throughout the development, such as holding regular meetings to inform the community of the progress of the development and report on environmental monitoring results;</i>	Section 4

Consent Condition		CCP Section
(e)	<i>include contact details for key community groups, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders; and</i>	Section 4.1 and Appendices A, B and C
(f)	<i>include a complaints procedure for recording, responding to and managing complaints, including:</i> <i>(i) email, toll-free telephone number and postal address for receiving complaints;</i> <i>(ii) advertising the contact details for complaints prior to and during operation, via the local newspaper and through on-site signage;</i> <i>(iii) a complaints register to record the date, time and nature of the complaint, details of the complainant and any actions taken to address the complaint; and</i> <i>(iv) procedures to resolve any disputes that may arise during the course of the development.</i>	Section 5

The key objectives of the CCP are:

- Provide a coordinated approach to community and stakeholder consultation and engagement;
- Provide timely and accurate information about the Development, including both construction and operational activities;
- Ensure the responsibilities for community and stakeholder consultation and engagement are nominated;
- Promote good relationships between ProTen and the surrounding local community and additional stakeholders;
- Minimise development-related complaints through consultation and awareness; and
- Ensure any development-related complaints are promptly and effectively received, handled and addressed.

The CCP will be implemented for the duration of the Development (unless otherwise agreed by the Planning Secretary).

2 PROTEN'S PROJECT TEAM

2.1 Site Contact Details

Tables 2 and 3 list the key site contacts during the construction and operational phases of the Development, respectively.

Table 2 ProTen Contacts - Construction Phase

Role	Name	Contact Details
ProTen Regional Operations Manager - nominated "central contact person"	Graeme Attwell	Ph: 0447 048 321 Email: graemea@proten.com.au
Construction Site Supervisor	Stephen McGoldrick	Ph: 0414 535 161 Email: sjmcgoldrick@agribiz.global
ProTen National Construction Manager (NCM)	Dern Pease	Ph: 0438 070 927 Email: dernp@proten.com.au
ProTen Safety, Health, Environment & Quality (SHEQ) Advisor	Kathryn Singh	Ph: 02 6962 1770 / 0434 550789 Email: kates@proten.com.au
ProTen Safety, Health, Environment & Quality (SHEQ) Officer - Tamworth	Richard Bullock	Ph: 0407 659 997 Email: richardb@proten.com.au
ProTen Risk Manager	Jim Rimmer	Ph: 02 6962 1770 / 0438 750974 Email: jrimmer@proten.com.au
ProTen environmental hotline (toll-free)	-	Ph: 1800 776 994
ProTen Development webpage	-	www.proten.com.au

Table 3 ProTen Contacts - Operational Phase

Role	Name	Contact Details
ProTen Regional Operations Manager - nominated "central contact person"	Graeme Attwell	Ph: 0447 048 321 Email: graemea@proten.com.au
ProTen Safety, Health, Environment & Quality (SHEQ) Advisor	Kathryn Singh	Ph: 02 6962 1770 / 0434 550789 Email: kates@proten.com.au
ProTen Safety, Health, Environment & Quality (SHEQ) Officer - Tamworth	Richard Bullock	Ph: 0407 659 997 Email: richardb@proten.com.au
ProTen Risk Manager	Jim Rimmer	Ph: 02 6962 1770 / 0438 750974 Email: jrimmer@proten.com.au
ProTen environmental hotline (toll-free)	-	Ph: 1800 776 994
ProTen Development webpage	-	www.proten.com.au
Farm 1 Manager	Jase St Leon	Ph: 0403 602 010 Email: jaestl@proten.com.au
Farm 1 Assistant Manager	TBC	TBC
Farm 2 Manager	TBC	TBC

Role	Name	Contact Details
Farm 2 Assistant Manager	TBC	TBC
Farm 3 Manager	TBC	TBC
Farm 3 Assistant Manager	TBC	TBC
Farm 4 Manager	TBC	TBC
Farm 4 Assistant Manager	TBC	TBC

2.2 Roles and Responsibilities

The key personnel responsible for community and stakeholder consultation and engagement are listed in **Table 4** along with their respective key responsibilities.

Table 4 Roles and Responsibilities

Development Role	Key Responsibilities
ProTen Regional Operations Manager (ROM) - nominated “central contact person”	<ul style="list-style-type: none"> Overall responsibility for community and stakeholder consultation and engagement in compliance with the development consent and this CCP. Oversee the implementation of this CCP and provide adequate resources to enable its implementation. Be the central contact person to keep the surrounding community regularly informed throughout the construction and operational phases of the Development. Coordinate community information sessions, community newsletters, etc. Record, notify, investigate and respond to any enquiries and/or complaints and, where necessary, develop and implement corrective actions. Ensure the site inductions/training for employees and contractors includes the requirements under this CCP. Approve/reject minor amendments to this CCP (see Section 6).
ProTen SHEQ Advisor / Officer	<ul style="list-style-type: none"> Assist the Regional Operations Manager (as required) with community and stakeholder consultation and engagement in compliance with the development consent and this CCP. Assist the Regional Operations Manager (as required) to record, notify, investigate and respond to any enquiries and/or complaints. Help facilitate appropriate site inductions/training for employees and contractors, including their specific requirements under this CCP.
All employees and contractors	<ul style="list-style-type: none"> Ensure familiarity, implementation and compliance with this CCP. Support ProTen’s commitment to fostering good relationships with the surrounding community and additional stakeholders. Work in a manner that minimises the potential for adverse impact on the surrounding community; Report all complaints and environmental incidents to ProTen Regional Operations Manager without delay; and Report any inappropriate construction, operational and/or environmental management practices to ProTen’s Regional Operations Manager without delay.

2.3 Inductions and Training

The Construction Site Supervisor will ensure that all employees and contractors involved in the construction and/or operation of the Development are suitable inducted and trained prior to commencing any work on site. Training in relation to community and stakeholder consultation and implementation of this CCP will take place initially through the site induction and then on an on-going basis through “toolbox talks” (or similar).

The topics to be covered during the induction and toolbox talks in relation to community and stakeholder consultation include:

- Appropriate behaviour when interacting with the local community and other stakeholders;
- The key messages when communication with the local community and other stakeholders, as listed in **Section 2.4**;
- Referring community contact to ProTen’s Regional Operations Manager; and
- Appropriate response and management of complaints received from the public, regulatory authorities and/or other stakeholders in accordance with the Complaints Management Strategy in **Section 5**.

2.4 Key Messages

The following key messages will be the focus of communications with the community and other stakeholders:

- ProTen is a leading poultry broiler farm developer and operator and is 100% Australian-owned.
- ProTen is committed to open communications and fostering good relationships with the surrounding community and other stakeholders.
- ProTen is committed to current industry best practice environmental management and bird welfare.
- ProTen has committed to a suite of development design features and best practice environmental management and mitigation measures to be implemented during the construction and operational phases to avoid/minimise the potential for adverse impacts on the surrounding environment and community.
- The development consent and environmental protection licence impose strict requirements for environmental management and mitigation measures during the construction and operational phases to avoid/minimise the potential for adverse impacts on the surrounding environment and community.
- The Development will be a catalyst for significant and sustained economic activity within the local and regional economies through employment during both the construction and operational phases, significant expenditure on products and services, and additional flow-on benefits.

The EIS and RTS should be referred to for a detailed description of the Development, predicted environmental, social and economic impacts, and the suite of environmental management and mitigation commitments.

3 IDENTIFIED STAKEHOLDERS

The stakeholders identified for consultation and engagement throughout the Development include:

- The local community, including surrounding residents and recreational facilities;
- Relevant local and State regulatory authorities;
- Registered Aboriginal Parties (RAPs); and
- Other interested stakeholders.

3.1 Local Community

As listed in **Table 5** and identified on **Figure 1**, the local community comprises a low density of privately-owned residences associated with the surrounding farming enterprises and various recreational facilities.

Table 5 Surrounding Residences and Recreational Facilities

Receptor	Location
Existing Surrounding Residences	
R1	Residence, Rushes Creek Road
R2	Residence, Rushes Creek Road
R3	Residence, Rushes Creek Road
R4	Residence, Rushes Creek Road
R5	Residence, Rushes Creek Road
R6	Residence, Rushes Creek Road
R7	Residence, Moys Lane
R8	Residence, Moys Lane
R9	Residence, Corella Road
R10	Residence, Corella Road
R11	Residence, Rushes Creek Road
R12	Residence, Rushes Creek Road
R13	Residence and small piggery, Rushes Creek Road
R14	Residence, Rushes Creek Road
R15	Residence, Ski Gardens Road
R18	Residence, Ski Gardens Road
R19	Residence, Moys Lane
R21	Residence, Rushes Creek Road
R22	Residence, Moys Lane
R23	Residence, Moys Lane
R24	Residence, Rushes Creek Road
R25	Residence, Rushes Creek Road
R26	Residence, Perrings Road
R27	Residence, Perrings Road
R28	Residence, Rushes Creek Road

Receptor	Location
R29	Residence, Boundary Road
R30	Residence, Boundary Road
R31	Residence, Glenbrook Road
R33	Residence, National Fitness Road
R34	Residence, Rushes Creek Road
R36	Residence, Glenbrook Road
Potential Future Surrounding Residences	
R16	Potential future residence, Rushes Creek Road
R35	Potential future residence, Bidford Access
Existing Surrounding Recreational Facilities	
R17	Manilla Fishing Club, Ski Gardens Road
R20	Manilla Ski Gardens Caravan Park, Ski Gardens Road
R32	Lake Keepit Sport and Recreation Centre, National Fitness Road
R37	Lake Keepit Soaring Club, Keepit Dam Road
R38	Reflections Lake Keepit Holiday Park, Keepit Dam Road

ProTen maintains a register of postal and/or letterbox drop contact details for these community stakeholders.

3.2 Regulatory Authorities

The regulatory authorities that have an interest in the construction phase and/or operational phase of the Development are:

- DPIE - Industry Assessment team, Compliance team and Biodiversity Conservation Division (BCD);
- Environment Protection Authority (EPA)
- Transport for NSW (TfNSW);
- Heritage NSW;
- Natural Resources Access Regulator (NRAR);
- WaterNSW;
- Department of Primary Industries (DPI);
- NSW Health / Hunter New England Local Health (HNELH);
- NSW Rural Fire Service (RFS);
- Fire and Rescues NSW (FRNSW);
- Tamworth Regional Council (Council);
- Gunnedah Shire Council; and
- SafeWork NSW.

Contact details for each of these authorities are provided in **Appendix A**.

Figure 1 Surrounding Residences and Recreational Facilities

3.3 Registered Aboriginal Parties

The following 11 RAPs were identified in the approved *Aboriginal Cultural Heritage Management Plan* (OzArk Environment and Heritage 2021) for the Development:

- Tamworth Local Aboriginal Land Council;
- T&G Culture Consultants;
- Richard Slater;
- DFTV Enterprises;
- Gomery Cultural Consultant;
- Brian Draper;
- White Cockatoo Aboriginal Corporation;
- Gomeroi People NC2011/006, C/- NTSCORP;
- Natasha Rodgers;
- AT Gomilaroi Cultural Consultancy; and
- Veronica Talbott.

Contact details for each of these RAPS are provided in **Appendix B**.

3.4 Other Interested Stakeholders

The following other stakeholders have been identified as potentially having an interest in the Development:

- Tamworth Regional Residents and Ratepayers Associated Inc. (TRRRA);
- Animal Liberation;
- Reticulated service providers – Essential Energy, Telstra, NBN Co; and
- Local members of Parliament (MPs).

Contact details for each of these stakeholders are provided in **Appendix C**.

4 CONSULTATION IMPLEMENTATION

4.1 Stakeholder Key Areas of Interest

ProTen recognises the diverse interests and information needs of the community and additional stakeholders listed above in **Sections 3.1 to 3.4**. **Table 6** lists the identified stakeholders, key areas of interest and the key communication tools available to inform and engage with these stakeholders.

Table 6 Stakeholder Key Areas of Interest

Stakeholder	Key Areas of Interests	Key Communication Tools
Local community	<ul style="list-style-type: none"> • Regulatory compliance • All environmental and social aspects, including: <ul style="list-style-type: none"> - Odour - Dust - Traffic - Noise - Water resources - Waste management - Biosecurity, disease and mass mortality - Visual amenity - Weeds and pests - Biodiversity - Heritage (Aboriginal and non-Aboriginal) - Hazards and risk 	<ul style="list-style-type: none"> • Development webpage • Community information sessions • Community newsletters • Site signage • Emails/phone calls • ProTen environmental hotline • Complaints management strategy • Compliance reports • Independent audits
DPIE - Industry Assessment and Compliance teams	<ul style="list-style-type: none"> • Regulatory compliance • All environmental and social aspects 	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Briefings/meetings • Commencement notifications • Compliance reports • Independent audits • Management plan revisions • Incident notifications • Non-compliance notifications
EPA	<ul style="list-style-type: none"> • Regulatory compliance • Odour • Dust • Noise • Water resources • Waste management • Biosecurity, disease and mass mortality • Hazards and risk • Contamination 	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Briefings/meetings • EPL Annual Returns • Independent audits • Management plan revisions • Odour monitoring reports • Incident notifications
TfNSW	Traffic and transport (predominately highway-related)	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Management plan revisions
Heritage NSW	Heritage – Aboriginal and non-Aboriginal	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Unexpected finds protocol • Management plan revisions

Stakeholder	Key Areas of Interests	Key Communication Tools
DPIE BCD	Biodiversity	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls
NRAR WaterNSW	<ul style="list-style-type: none"> • Water licensing compliance • Water resources 	<ul style="list-style-type: none"> • Development webpage • Water metering • Emails/phone calls • Management plan revisions • Groundwater monitoring reports
DPI	Biosecurity, disease and mass mortality	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Management plan revisions
NSW Health / HNELH	<ul style="list-style-type: none"> • Odour • Dust • Potable/drinking water • Biosecurity, disease and mass mortality 	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Incident notifications
RFS FRNSW	Fire hazards and risk	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Management plan revisions • Incident notifications
Tamworth Council Gunnedah Council	<ul style="list-style-type: none"> • Regulatory compliance • All environmental and social aspects 	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Briefings/meetings • Management plan revisions • Incident notifications
Safework NSW	Workplace health and safety	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Incident notifications
RAPs	Aboriginal heritage	<ul style="list-style-type: none"> • Development webpage • Unexpected finds protocol • Management plan revisions
TRRRA	Water resources	<ul style="list-style-type: none"> • Development webpage • Community newsletters • Emails/phone calls
Animal Liberation	Bird health and welfare	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls
Reticulated service providers	Electricity and telecommunications servicing	<ul style="list-style-type: none"> • Development webpage • Dial Before You Dig • Emails/phone calls
MPs	<ul style="list-style-type: none"> • Impacts on local constituents • Tamworth poultry industry 	<ul style="list-style-type: none"> • Development webpage • Emails/phone calls • Briefings/meetings

4.2 Communication Tools

Table 7 provides an overview of the various communication tools available to inform and engage with the community and other stakeholders, including the target audience and frequency/timing.

Table 7 Communication Tools

Tool	Description	Primary Audience	Frequency / Timing
Development webpage	Dedicated webpage on ProTen's website (www.proten.com.au) where the information specified under consent condition C18 will be made publicly available, along with the community newsletters.	All stakeholders	On-going
Community information sessions	Information sessions to inform the local community about planned construction/operational works, key dates, staging and hours, and provide contact details for feedback, queries and/or complaints. These sessions will be held in a location readily accessible to the local community, such as one of the nearby recreational facilities, and will be attended by relevant ProTen personnel.	Local community	Two sessions: <ul style="list-style-type: none"> • Minimum 3 weeks prior to commencing the first stage of construction; and • Minimum 3 weeks prior to commencing the first stage of operation.
Community newsletters	Development updates in the form of newsletters to keep the local community informed and up-to-date with construction/operational progress, key dates, staging and hours, and provide contact details for feedback, queries and/or complaints. Community newsletter will be distributed by mail and/or letterbox drop, and will also be uploaded on the Development webpage.	<ul style="list-style-type: none"> • Local community • TRRRA • MPs 	As required, but at a minimum: <ul style="list-style-type: none"> • Minimum 2 weeks prior to commencing each construction stage; and • Minimum 2 weeks prior to commencing each operational stage.
Site signage	Clearly visible signs adjacent to the construction/operational site accesses off Rushes Creek Road providing relevant site information and contact details.	Local community	<ul style="list-style-type: none"> • Prior to commencing the first stage of construction and maintained until all construction works are complete. • Prior to commencing the first stage of operation and maintained throughout the life of the Development.
Emails/phones	Consult and engage stakeholders as needed in relation to construction/operational works, management plans, non-compliances, incidents, complaints, monitoring, reporting, etc.	All stakeholders	As required
ProTen environmental hotline 1800 776 994	A toll-free number (listed on ProTen's website) where stakeholders can provide feedback and submit queries and/or complaints for follow-up.	Local community	On-going

Tool	Description	Primary Audience	Frequency / Timing
Complaints management strategy	System to ensure that all complaints regarding the construction or operation of the Development are promptly and effectively received, handled and addressed. See Section 5 .	Local community	Upon receipt of a complaint
Commencement notifications	Notify the date of commencement of each of stage of construction and operation in accordance with consent conditions A9 and A10.	DPIE	A minimum of 1 month prior to commencing each stage of construction and operation
Compliance reports	Monitor and report on the compliance status of the Development in accordance with consent conditions C11 to C13 and the NSW Government's <i>Compliance Reporting, Post Approval Requirements (2020a)</i> . Reports will be submitted to DPIE and uploaded on the Development webpage.	<ul style="list-style-type: none"> • DPIE • All stakeholders 	<ul style="list-style-type: none"> • Pre-operation compliance report - single report - minimum 6 weeks prior to commencing operation. • Operation compliance reports - annually - at intervals no greater than 52 weeks from commencing operation.
Briefings/meetings	Consult and engage with regulatory authorities as needed in relation to construction/operational works, management plans, non-compliances, incidents, complaints, monitoring, reporting, etc.	Regulatory authorities	As required
Independent audits	Obtain an independent and objective assessment of the environmental performance and compliance status of the Development in accordance with consent conditions C14 to C16 and the NSW Government's <i>Independent Audit, Post Approval Requirements (2020b)</i> . Audits reports will be submitted to DPIE and uploaded on the Development webpage.	<ul style="list-style-type: none"> • DPIE • All stakeholders 	<ul style="list-style-type: none"> • Initial audit - within 26 weeks of commencing operation. • On-going audits - at intervals no greater than 3 years or as otherwise agreed by the Planning Secretary.
EPL Annual Returns	Report on the compliance status of the Development against the EPL conditions and provide a summary of monitoring and complaints data. Returns will be submitted to the EPA and uploaded to the EPA's public register.	<ul style="list-style-type: none"> • EPA • All stakeholders 	Annually, within 60 days after the end of the 12 month EPL reporting period
Management plan revisions	Engage and seek feedback in relation to management plan reviews/revisions.	<ul style="list-style-type: none"> • Regulatory authorities • RAPs 	As required
Odour monitoring reports	Report on the performance of the poultry sheds in relation to odour emissions in accordance with the <i>Air Quality Management Plan</i> under consent conditions B4 to B7	EPA	<ul style="list-style-type: none"> • Monitoring - minimum once per cycle for a minimum of 2 years during (a) 1 Feb to 30 May; and (b) 1 Sep to 30 Nov. • Results - submitted to the EPA within 2 weeks of each monitoring event.

Tool	Description	Primary Audience	Frequency / Timing
Groundwater monitoring reports	Report on the performance of the Development in relation to any groundwater impacts in accordance with the <i>Water Management Plan</i> under consent condition B22.	<ul style="list-style-type: none"> • NRAR • WaterNSW 	TBC
Incident notifications	Notification and subsequent reporting of any incident that has caused or threatens to cause material harm to the environment in accordance with consent condition C9 and the <i>Protection of the Environment Operations Act 1997</i> .	<ul style="list-style-type: none"> • DPIE • EPA • NSW Health • SafeWork NSW • FRNSW 	<ul style="list-style-type: none"> • Initial notification – immediately after becoming aware of the incident. • Written notification – within 7 days of becoming aware of the incident. • Incident report – within 30 days of the incident occurring or as otherwise agreed to by the Planning Secretary.
Non-compliance notifications	Notification of any non-compliance with the development consent	DPIE	Within 7 days of becoming aware of the non-compliance
Dial Before you Dig	Obtaining information from electricity and telecommunications asset owners to ensure planned land disturbance activities do not impact/disturb network infrastructure.	Service providers	As required prior to land disturbance activities

5 COMPLAINTS MANAGEMENT STRATEGY

5.1 Performance Objective

To ensure that all complaints throughout the construction and operational phases of the Development are promptly and effectively received, handled and addressed.

5.2 Responsibility

ProTen's Regional Operations Manager is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of a complaint.

All employees and contractors who take receipt of a complaint, either verbal or written, are to immediately notify ProTen's Regional Operations Management.

ProTen Regional Operations Manager - nominated "central contact person"	Graeme Attwell	Ph: 0447 048 321 Email: graemea@proten.com.au
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5.3 Contact Details for Complaints

Complaints in relation to the Development activities may be received via a number of ways, including:

- In writing - via PO Box 1746, North Sydney NSW 2059;
- Phone - via ProTen's toll-free environmental hotline 1800 776 994;
- Email - via headoffice@proten.com.au; or
- Through a regulatory authority (for example - EPA, Council).

The contact details for complaints will be advertised to the general public in the following ways:

Site Signage

Clearly visible signs will be erected adjacent to the construction/operational site accesses off Rushes Creek Road prior to commencing construction and operation. The signs will advise relevant site information and contact details for feedback, enquiries and complaints. These signs will remain throughout the construction and operational phases.

Local Newspaper

An advert will be published in the local newspaper prior to commencing construction and again prior to commencing operation to advise contact details for feedback, enquiries and complaints.

5.4 Handling Procedure

Upon becoming aware of a complaint, ProTen's Regional Operations Manager is to undertake the following:

Receive

In the normal course of events, the first contact for complaints will usually be made in person or by telephone. While this should instigate investigative action, a formal written complaint should be requested.

Where the initial contact reaches an employee or contractor who is not a representative of ProTen's management team, the call should be directed to ProTen's Regional Operations Manager. If unavailable, the complainant's details should be taken with a view to returning the contact once the Regional Operations Manager is available and in a position to discuss the matter.

The complainant's name, address and contact details, along with the nature of the complaint, must be requested. If the complainant refuses to supply the requested information, a note should be made on the form and complainant advised of same.

Assistance

Where assistance is required handling the situation, ProTen's SHEQ Advisor and/or Risk Manager should be contacted.

ProTen Safety, Health, Environment & Quality (SHEQ) Advisor	Kathryn Singh	Ph: 02 6962 1770 / 0434 550789 Email: kates@proten.com.au
ProTen Risk Manager	Jim Rimmer	Ph: 02 6962 1770 / 0438 750974 Email: jrimmer@proten.com.au

Where the complaint is reported via a regulatory authority (for example - EPA, Council), ProTen's CEO should be notified immediately.

Investigate

A field investigation should be initiated in an attempt to establish the legitimacy of the complaint and the cause of the problem. ProTen's site management should be consulted to identify any abnormality or incident that may have resulted in the complaint. Details may include heavy vehicle traffic, equipment and machinery activities during the construction phase, and bird ages and stocking densities, fan operations, internal shed conditions and heavy vehicle traffic during the operational phase.

If the complaint is due to an environmental incident, the Environmental Incident Management Strategy contained in the *Construction Environmental Management Plan* or the *Operational Environmental Management Plan* should be followed. If the incident has caused or threatens to cause material harm to the environment, the DPIE or other relevant regulatory authorities must be immediately notified and reports prepared in accordance with condition C9 of the development consent. See "incident notifications" in **Table 7** above.

If the complaint is in relation to odour or dust, meteorological conditions at and around the time of the complaint, particularly wind direction and speed, must be obtained from the on-site meteorological station.

Remedial Action

Once the legitimacy and cause of the complaint has been established, every possible effort must be made to undertake appropriate remedial action(s) to fix the cause of the complaint and mitigate any further impact.

Inform

The investigative work and remedial action should be reported back to the complainant and, if necessary, the relevant regulatory authorities.

Complaints Register

It is imperative that an honest assessment of the situation is carried out and documented. Every complaint received is to be recorded on ProTen's standard *Complaint Report Form* contained in **Appendix D** and a copy of the complete form is to be maintained in the Development's *Complaints Register* for a minimum of 4 years.

5.5 Preventative Action

Once the complaint has been suitably handled, appropriate preventative measures should be identified and implemented to negate the possibility of re-occurrence.

5.6 Dispute Resolution

If the complaints management strategy has been followed and a particular issue cannot be resolved, the complaint will be referred to ProTen's CEO for further review and the Planning Secretary will be notified. The escalated review process will include an assessment of the details of the complaint received, any findings of the investigation undertaken in response to the complaint, and any further matters raised by the complainant. It may also include ProTen's CEO seeking the advice of relevant regulatory authorities and/or specialist consultants.

If required, a third-party independent mediator may be engaged to help resolve the dispute.

6 CCP REVIEW AND UPDATE

ProTen will evaluate the performance and effectiveness of the communication tools in this CCP on a regular basis. Key elements of the evaluation will include reviewing whether the objectives of the CCP have been achieved as evidenced by:

- The availability, quality and distribution of information about the Development to the local community and stakeholders;
- The nature and number of enquires and complaints and the subsequent level of responsiveness and appropriateness of action taken by ProTen;
- The relationships between ProTen and the surrounding local community; and
- Feedback received on the value of information provided about the Development, attendance at the community information sessions, and responsiveness of ProTen to feedback, enquires and complaints.

This CCP will be reviewed and, if necessary, updated if the performance evaluation demonstrates that the objectives are not being adequately met and/or at the request of DPIE.

As listed in **Table 4**, ProTen's Regional Operations Manager has the authority to approve minor amendments to the CPP. For the purpose of this CPP a "minor" amendment is defined as:

- An amendment involving a minor error or misdescription;
- An amendment that maintains compliance with the EIS, RTS, Supplementary RTS and Development Consent SSD 7704;
- An amendment that is necessary to maintain consistency and/or compliance with changing legislative requirements (for example, an amendment to an Act);
- An amendment to the ProTen contact details listed in **Tables 2 and 3** when roles change;
- An amendment to the ProTen roles and responsibilities listed in **Table 4** that does not involve deleting any responsibilities; and
- An amendment to the stakeholder contact details in **Appendices A to C** when roles change.

All employees and contractors will be informed of any updates to the CCP during a toolbox talk.

7 REFERENCES

EME Advisory (2019a) *Rushes Creek Poultry Production Farm, SSD 7704, Response to Submissions*

EME Advisory (2019b) *Rushes Creek Poultry Production Farm, SSD 7704, Supplementary Response to Submissions*

NSW Government (2020a) *Compliance Reporting, Post Approval Requirements*

NSW Government (2020b) *Independent Audit, Post Approval Requirements*

SLR Consulting Australia (2018) *Environmental Impact Statement, Intensive Livestock Agriculture, Rushes Creek Poultry Production Farm, SSD 7704*