

Port Adelaide Energy Pty Ltd

Snapper Point Power Station

Community Engagement Plan

July 2022





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1 Introduction

1.1 Purpose

The purpose of this Community Engagement Plan (CEP; the plan) is to support the operations phase of the Snapper Point Power Station project. It outlines the engagement activities, processes and protocols for managing stakeholder and community engagement. This plan has also been prepared as part of the compliance with the EPA License Conditions 2.2.1, 2.2.2, 2.3.1 and 2.3.2. The EPA Licence 51513 was issued on 22 November 2021. This plan also refers to the EPA South Australia's guideline for Community Engagement.

Port Adelaide Energy Pty Ltd (PAE) intends to consult with key stakeholders including briefing local Councils to incorporate feedback into this engagement plan. A copy of this plan will be made available and accessible on the project website.

1.2 Background

1.2.1 *The Snapper Point Power Station*

The Snapper Point Power Station (the Project) involves the de-commissioning, relocation and re-commissioning of five (5) trailer-mounted GE TM2500 Gen 8 aero-derivative turbine generators, and ancillary infrastructure, from an existing site at Elizabeth in Adelaide's northern suburbs, to a new site adjacent to the Pelican Point Power Station at Outer Harbor. The turbines were operated by APR Energy on behalf of the Government of South Australia (SA Government or the State) for emergency electricity generation, as part of South Australia's emergency power plant project.

PAE, an affiliate of Nexif Energy Australia Pty Ltd (Nexif Energy) has entered into an agreement with the SA Government to lease the turbines from the SA Government and operate them for commercial use for a period of 25 years. As part of the Project, the turbines will be converted from diesel to natural gas as the primary fuel, with diesel to be used as back-up fuel. It is proposed that the Project will connect into the nearby Pelican Point Power Station fuel gas yard (owned by Epic Energy) and Pelican Point Power Station switchyard (owned by ElectraNet).

It is noted that Development Approval for the Project was granted on 5 August 2020 (DA 040/V052/19), with an updated approval provided on 4 November 2020 that included a revision to Condition 10 (DA 040/V052/19 R1).

1.2.2 *Site location*

The Project site (the Site) is located adjacent to the Pelican Point Power Station at Outer Harbor, approximately 20 km north of Adelaide. The land is owned by Renewal SA and is leased by PAE for this Project. The Site is situated between the coastal waters of the Port River and the Pelican Point Power Station and is located within the City of Port Adelaide Enfield under the Industry Zone.



Figure 1.1 Site location

1.2.3 Project benefits and operation

The key benefit of the turbines is to support the energy security objectives of South Australia, providing fast response dispatchable energy generation during periods of high demand or when there is a shortage of energy supply to meet the energy needs of the community.

It is anticipated that the turbines will switch on and off when required or directed by the Australian Energy Market Operator. Due to the ‘flexible start’ nature of the facility, the facility will operate as required during periods of high demand (which can occur at any time).

This project is essential to providing energy security and avoiding state-wide blackouts similar to those that were experienced by the South Australian community in 2017.

2 Community engagement approach

2.1 Approach

This plan has been developed to ensure PAE can proactively engage and communicate with stakeholders including surrounding residents, industry, businesses, and other key stakeholders, regulators and authorities with an interest in the project during the operations phase of the project. The core principles of the approach to engagement are based on the International Association of Public Participation (IAP2) Core Values as well as the Better Together principles established by the South Australian Government. Observing these will ensure PAE undertakes best practice engagement. These principles align also with the EPA South Australia's Guideline for Community Engagement.

PAE Pty Ltd are committed to:

- Engaging early and where practical communicating proactively.
 - Establishing a trusted presence in the community that is built on being honest and transparent.
 - Be empathetic and listen to understand the community and stakeholders and what is most important to them.
 - Minimise and manage potential impacts to the community and stakeholders where possible.
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2.2 Community engagement objectives

The objectives of this CEP are to:

- Provide timely responses to all community complaints and enquiries.
- Provide methods for two-way communication between project team and community.
- Be a “good neighbour” to all nearby stakeholders, and provide timely, clear, concise responses.
- Ensure a ‘no surprises’ approach to community in regard to noise testing and activities associated with the commissioning and operations of the site.
- Communicate outcomes of the monitoring data or public reports in easy to understand language and explaining technical data simply.
- Develop and maintain positive one-on-one relationships with key stakeholders, surrounding residents and sensitive receptors.
- Understand and address insofar as possible community concerns and potential impacts.

3 Key stakeholders

Table 3.1 identifies the Project’s external stakeholders, and their potential interests and issues:

Table 3.1 Key stakeholders Snapper Point Power Station

Stakeholder	Potential interests and issues
State Government	
Environmental Protection Authority (EPA)	<ul style="list-style-type: none"> — Regulation of noise impacts and monitoring program — Assesses PAE compliance with licence to operate — Assesses PAE compliance discharge of water, including to creeks and environmental areas
The Office of the Technical Regulator	<ul style="list-style-type: none"> — Project updates — Inform about noise testing and management
Regulators / Authorities	
Coast Protection Board	<ul style="list-style-type: none"> — Recommendations incorporated into the Flooding, Drainage and Erosion Assessment (for the prevention of coastal hazards).
Office of the Technical Regulator	<ul style="list-style-type: none"> — Changes or impact to initially proposed fast frequency response/inertia and network connections.
Adelaide Dolphin Sanctuary	<ul style="list-style-type: none"> — Managing potential impacts to the marine environment.
Local Government	
City of Port Adelaide Enfield	<ul style="list-style-type: none"> — Updates on noise testing and monitoring results. — Inform of all community engagement occurring (including project updates). — Project mailing list available for e-mail updates/notifications about the facility.
City of Salisbury	
Community	
Kaurna People	<ul style="list-style-type: none"> — Project updates. — Inform on land changes. — Community contact points are accessible and maintained to ensure two-communication with the project team. — Project mailing list available for e-mail updates/notifications about the facility.
Local Residents in North Haven	<ul style="list-style-type: none"> — Keep informed of updates with the Snapper Point Terminal gas turbines. — Where required, seek input regarding noise and other impacts. — Were possible, provide in-person consultation in regards to noise complaints. — Consult and inform of mitigation measures to reduce impacts where possible. — Maintain clear communication about health impacts and regulatory standards. — Community contact points are accessible and maintained to ensure two-communication with the project team. — Project mailing list available for e-mail updates/notifications about the facility.
Local Residents in St Kilda	

Stakeholder	Potential interests and issues
Business owners	<ul style="list-style-type: none"> — Keep informed of all updates associated with the Snapper Point Terminal gas turbines. — When required, seek input regarding noise and other impacts. — Maintain clear communication about health impacts and regulatory standards. — When required, inform of mitigation measures to reduce impacts where possible. — Community contact points are accessible and maintained to ensure two-communication with the project team. — Community contact points are accessible and maintained to ensure two-communication with the project team. — Project mailing list available for e-mail updates/notifications about the facility.
Community and environmental groups and associations (including but not limited to)	<ul style="list-style-type: none"> — Including key groups such as the Port Adelaide Resident’s Environment Protection Group, St Kilda Progress and Tourism Association, Port Adelaide Environment Forum, and Port Adelaide Environment Centre, Friends of the Adelaide International Bird Sanctuary, Adelaide Dolphin Sanctuary Action Group, Estuary Care Foundation SA. — Provide briefings and information directly to the groups as a way of communicating broadly with the community when required. — Inform of updates associated with the Snapper Point Terminal gas turbines. — When required, seek input regarding noise and other impacts. — Community contact points are accessible and maintained to ensure two-communication with the project team. — Project mailing list available for e-mail updates/notifications about the facility.
Industry	
Pelican Point Power Station (Engie Australia)	<ul style="list-style-type: none"> — Inform of all noise testing and monitoring that occurs at Snapper Point Terminal. — Inform of other environmental testing results.
Quarantine Power Station	<p>When required:</p> <ul style="list-style-type: none"> — Inform of all noise testing and monitoring that occurs at Snapper Point Terminal. — Inform of other environmental testing results.
Viterra Outer Harbor Grain Terminal	<ul style="list-style-type: none"> — Inform of any environmental testing and monitoring, and present results as required.
ASC Pty	<ul style="list-style-type: none"> — Community contact points are accessible and maintained to ensure two-communication with the project team.
Flinders Warehouse & Distribution	<ul style="list-style-type: none"> — Project mailing list available for e-mail updates/notifications about the facility.
Flinders Adelaide Container Terminal	
Port Adelaide Passenger Terminal	
Taylor Bros Marine	

Stakeholder	Potential interests and issues
Australian Civil and Mining Training Pty	
Semaphore Container Services	
Techport – System Centre	
Osborne Naval Shipyard	
Naval Shipbuilding College	
Babcock	
Royal South Australian Yacht Squadra	
Crusing Yacht Club of South Australia	
Hillebrand	
Pacific Marine Batteries	
PMR Deference Pty	
QUBE Logistics	
SA Power Networks	
The Coast Protection Board	
ElectraNet SA	

4 Key communication tools and engagement methods

Table 4.1 outlines key communication tools that will be used for engagement and consultation purposes throughout the project, essentially forming the Communication Strategy for the roll out of this engagement plan.

Table 4.1 Communication tools

Strategy	Description
Dedicated project phone line and email address	Project phone line and email (community contact points) to be staffed during business hours Monday to Friday to ensure residents, businesses, Councils, and community groups have easy access to the project team.
Project website Reporting of noise monitoring and air monitoring on website.	Specific project webpage as a part of the overall Nexif Energy website. To be updated regularly with project information and notifications. Will also display community contact points.
Project Mailing List	A mailing (or distribution) list for interested stakeholders to register for, through which project updates will be distributed.
Stakeholder database / CRM	A tool used by the internal team to record and maintain project stakeholder contact details, and communications, including feedback, complaints, and general enquiries.
Notifications	These may be via phone call, hard copy letterbox drop, SMS, or e-mail and will provide notice and updates about changes to testing, updates on results and ad-hoc notifications when required.
Resident visits/meetings with members of project team	Organise visits and meetings when required to potentially impacted stakeholders with relevant members of the project team (i.e. face-to-face updates, to obtain/further information or feedback, and follow up for sensitive receptor stakeholders etc). If necessary, communicate outcomes of monitoring data and potential mitigation.
Stakeholder meetings and briefings	Meetings with key stakeholders as required to ensure key stakeholders remain updated for the project. This may include but is not limited to the City of Port Adelaide, Enfield, City of Salisbury, Coast Protection Board, The EPA, the Office of the Technical Regulator, St Kilda & Surround Progress and Tourism Association.
Fact Sheets or FAQs	Develop fact sheets or Frequently Asked Questions (FAQs) about the power plant operations, noise monitoring obligations and other issues that may be of interest to the community and make these available on the project website and (when necessary) as updates to the Project Mailing List.

5 Managing feedback

PAE is committed to managing any feedback and complaints that may be received from the general public, businesses, key stakeholders, local residents or interest groups in regards to the operation of the turbine generators.

Complaint handling will ensure ‘good practice,’ which will require relevant staff to exercise reasonableness, impartiality, fairness and ethics in the decision-making process by officially acting in the public interest. The complaints management system describes how PAE and its contractors will manage ongoing complaints. It has been developed to be consistent with the current Australian Standards for complaints handling (AS-4269). This includes:

- receiving complaints and enquiries
- responding to complaints and enquiries
- recording complaints
- advising complainants of the requirement to collect personal information
- reporting.

This complaints management system will be reviewed regularly by PAE with the EPA. The review will provide information on how well the system is working in meeting expectations of all stakeholders and in managing timelines for response.

5.1 Receiving complaints

Tools have been established for receiving complaints in the community. At minimum the Project’s community contact points (phone number and e-mail address) will be published on the website and on all communication collateral that is distributed to members of the community.

Complainants will be advised that formal complaints, whether in-person, email, in writing or phone are required to be added to the project’s Stakeholder Complaints and Enquiry Register.

All contractors will receive training (within their site induction, or toolbox meetings) on the complaints management (and community feedback) process. They will direct all public enquiries to the project’s contact points to be managed by the Community Engagement Manager. This will ensure complaints (and feedback) will be received by relevant members of the project team who will coordinate a response for resolution and/or closure, and feedback to the complainant.

5.1.1 *Unreasonable or habitual complaints*

Unreasonable complaints are defined as beyond the limits of what is acceptable. The Commonwealth Ombudsman defines unreasonable complaint conduct as behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to the complaint. It could be challenging behaviour that is confronting and unpleasant, providing false information, demands that are not practical and contact that is repeated and unnecessary.

PAE does not anticipate that there will be a significant number of unreasonable complaints and will make every effort to listen to, work with complainants, and resolve reasonable complaints.

Should a complaint be deemed unreasonable, PAE will attempt to gather further information from the complainant and follow up if possible. If the complaint remains unreasonable after further information is sort, PAE will provide an explanation to the complainant about the nature of the complaint, closing the complaint out.

5.2 Response timeframes guidelines

5.2.1 *General enquiries*

An acknowledgement to the receipt of general enquiries will occur within 24 hours or the next business day (if received out of hours). All written correspondence will be responded to within 7 working days.

5.2.2 *Complaints*

- 1 All complaints will be investigated, and the source of the complaint determined immediately, acknowledgement of the receipt of the complaint will occur via a phone call to the complainant (when received by phone) in business hours and within 24 hours of receipt. An initial response will be provided during this phone call, unless the complainant agrees otherwise.
- 2 An initial written response to e-mail complaints will be provided within 24 hours (or during the next business day if received out-of-hours) and a resolution aimed to be provided within seven business days (if practical), if the complaint cannot be resolved in the initial contact.
- 3 The complainant will be kept informed and updated of the progress until the complaint is either resolved or closed.
- 4 All complaints will be recorded in the Stakeholder database/CRM within 24 hours where they can be tracked for resolution/closure, and reported on.

5.3 Stakeholder database/CRM

A stakeholder database or CRM will be used to track contact with community and project stakeholders. This will record stakeholder information and communication and contact records. It will assist with the collation of up-to-date stakeholder contact details, distribution or project mailing lists, reporting on current issues and concerns, and complaint resolution.

6 Issues management

6.1 Noise management

PAE will comply with the noise criteria that is required by the EPA under the *Environment Protection (Noise) Policy 2007 (Noise Policy)* for operational noise from the Site.

In South Australia, environmental noise management is legislated under the South Australian *Environment Protection Act 1993*.

Section 25(3) of the *Environment Protection Act 1993* provides the following General Environmental Duty:

“A person must not undertake an activity that pollutes, or might pollute, the environment unless the person takes all reasonable and practicable measures to prevent or minimise any resulting environmental harm.”

Compliance with the *Environment Protection Act 1993*, and subsequently the General Environmental Duty, is administered by the South Australian Environment Protection Authority (SA EPA). For industrial sources of noise such as gas turbine power plants, compliance is assessed in accordance with the *Environmental Protection (Noise) Policy (2007)*.

6.1.1 Noise management plan

PAE has developed a Noise Management Plan that has been approved by the EPA. This plan outlines the details of the process for noise monitoring program, noise management, complaints process and noise mitigation measures. A copy of the Noise Management Plan can be found on the website nexifenergy.com/project/snapper-point.

7 Roles and responsibility

The execution of this Community Engagement Plan will be supported by an integrated approach between PAE and contractors, to ensure the best outcome for the extended community.

7.1 Port Adelaide Energy Pty Ltd responsibilities

The overarching role of PAE are to:

- Oversee all interactions with the key stakeholders including regular meetings with the EPA, local Councils and other key stakeholders
 - Take responsibility for the reputation management of PAE and Snapper Point Power Station.
 - Provide strategic input where required to issues and mitigation management where stakeholder concerns are at risk of being escalated to the media, the Minister or legal organisations.
 - Review and approve all communications materials prepared by the consultant prior to being publicly disseminated, including letters to residents regarding works.
 - Review and approve all communications materials prepared by the consultant prior to being issued to the EPA by PAE.
 - Manage activities involved in promotion of the project, including all interactions with the media.
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7.2 Operator contractor responsibilities

The overarching role of operator contractors at Snapper Point Power Station are to:

- Take responsibility for the management of Snapper Point Power Station
 - Work alongside PAE and Stakeholder Engagement contractor to ensure complaints are proactively handled.
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7.3 Stakeholder engagement contractor responsibilities (WSP)

The overarching role of the stakeholder engagement contractor is to:

- Work to ensure the positive reputation of the PAE.
- Seek to manage where practicable the expectations of stakeholders who are impacted by identifying and implementing mitigation strategies and measures as required.
- Work alongside PAE and other contractors to proactively resolve complaints and maintain a positive project reputation.
- Provide regular, proactive and timely feedback and information to PAE and the EPA as required
- Review previous consultation processes and outcomes and provide relevant up to date information that can build on previous work;
- Be familiar with timing, potential sensitive stakeholders, key stakeholders, and key staff, and communicate emerging and reoccurring issues with the project team;
- Adopt a practical approach to address community or key stakeholder concerns. In working closely with key project team members, ensure that all reasonable precautions have been taken to maintain a consistent and efficient 'public face' to the community and stakeholders and to maintain clear communication
- Establish and maintain community contact points for receiving enquires and complaints
- Maintain documentation via a stakeholder/CRM database of all communications with project stakeholders, and ensure all issues, responses and actions are recorded appropriately.

8 Reporting

8.1 Reporting

In addition to regular communication between PAE Pty Ltd and the EPA, a regular reporting system will be established. This report will be provided to the EPA, outlining consultations, complaints and enquiries that have occurred and their outcomes. Port Adelaide Pty Ltd will prepare the report. The parameters for reporting will be developed in discussion with the EPA and contractors, and will be delivered to an agreed schedule which meets their project reporting requirements.

8.2 Review

This Community Engagement Plan will remain fluid – it will be reviewed and updated if there are any changes to the Project that impact on the community or other stakeholders and require a change to way they are communicated with or engaged.

9 Contact details

For project information, enquires and complaints, please contact the Community Engagement Team:

Email: snapperpoint@wsp.com

Community Engagement Team Mobile: 0473 162 838 (Monday to Friday during business hours)

Website: <http://www.nexifenergy.com/project/snapper-point/>

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