

NEOEN



CULCAIRN SOLAR FARM

COMMUNITY COMMUNICATION STRATEGY & BENEFIT SHARING PLAN

Version	V3
Released	September 2023
Document Owner	Alexis Good



Document Control

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History	
Version:	V3
Nature of change:	Updated to reflect ongoing engagement
Author:	Alexis Good
Related Documents	
	CSF IAPP
	CSF Stakeholder Register (internal)
	Neoen Sustainability Framework

Acknowledgement of Country

Neoen would like to acknowledge the traditional custodians of the country on which we work, in particular the Wiradjuri people on whose land Culcairn Solar Farm is proposed. We pay respect to their connections to land, sea and the community. and we pay our respect to the Elders – past, present, and future.

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INTRODUCTION

Neoen is a specialist, independent power producer with a long-term vision to produce renewable, competitively-priced energy sustainably and on a large scale. Our total capacity in operation and under construction globally is currently over 5.6GW and we are targeting 10 GW by the end of 2025. Neoen is Australia's leading renewable energy producer with over 2.5 GW of wind, solar and battery storage projects in operation or under construction.

Neoen is the owner of the proposed Culcairn Solar Farm (CSF), a 350MWac solar energy facility to be developed on leased farming land near Culcairn, in New South Wales. It is on the Traditional country of the Wiradjuri people. First proposed in 2018, the Project received Development Approval in 2021. The Project is currently in the post-approval phase with construction anticipated to commence early 2024.

Neoen understands that the success of CSF is dependent to a large extent on the development of genuine, open and ongoing relationships with key stakeholders and the local community. We recognise the importance of ensuring a “no surprises” dynamic with the local community and are committed to developing and nurturing long-term relationships between our team and various project stakeholders.

This Community Communication Strategy (CCS) and Benefit Sharing Plan (BSP) outlines our community engagement approach and objectives for ensuring key stakeholders and communities are involved and consulted throughout each stage of the Project's lifecycle. This plan has recently been updated in preparation for the Project moving through the post-approval stage towards pre-construction, and to incorporate content outlines in a NSW Social Impact Assessment Report. To illustrate how relationships and engagement will flow on from this stage, indicative engagement plans for Operations and Decommissioning are also included.

Proposed engagement approaches are diverse and have been tailored to the expectations of stakeholders. Wherever possible, Neoen seeks to deliver engagement in alignment with the INVOLVE, COLLABORATE and EMPOWER levels of the [International Agency for Public Participation \(IAP2\) Spectrum](#) – to ensure stakeholder feedback, interests and concerns are adequately reflected in the final design and operational approach of the CSF asset.

Critical aspects of this CCS & BSP include:

- A community description and context which underpins engagement and planning
- Enquiries and complaints procedure
- Detailed stakeholder mapping incorporating the stakeholders and communities affected and/or interested in the project.

Governance

This plan aligns with Neoen's Community Engagement Toolkit by Project Stage (See Appendix A) and is intended as a living document, to be utilised by Project Managers, site-based teams and Neoen's dedicated Community Engagement Manager as the project progresses. This document will also be shared with nominated EPC and O&M contractors so that it can be incorporated into their stakeholder and site management plans to ensure CSF's engagement approach is consistent and coordinated.

Review

Periodical evaluation and reviews of this CCS & BSP will ensure the plan is routinely updated and informed to reflect changing circumstances, community feedback and ongoing improvements in Neoen's community engagement approach, so that our communication and engagement remain:

- Relevant to the project's evolving needs, issues and outcomes
- Responsive and tailored to the needs of key stakeholders and local community
- At the leading edge of industry and global best practice

1. COMMUNITY ENGAGEMENT APPROACH

1.1 Our approach

Neoen have a vertically integrated business model, meaning that we ‘develop to own’ our projects. This model is unusual in the industry, affording us a clear advantage over our competitors in respect to community engagement – our starting point is the clear understanding that we will be long term neighbours and participants in the local community for the lifetime of the project.

As a result, Neoen considers it to be vitally important that trusting relationships are developed between the people on the ground who know the project the best, and the stakeholders that are part of and connected to their region and local community. Due to the rural nature of the community, our overall approach to consultation for the CSF will be open, relaxed, flexible and responsive – an approach preferred by stakeholders engaged to date.

1.2 Our values

Neoen has a clear set of values that underpin and guide our work. How these values translate into our external approach to building relationships with communities is described in **Table 1**.



Integrity

We operate with integrity, whatever we do, whenever and wherever we do it. We work with partners who abide by the same rules.



Commitment

We uphold all our commitments, internal and external. We believe in hard work and take pleasure in seeing a good job well done.



Audacity

We believe we can become a world leader in renewable energy. We have the audacity to operate globally, imagining, designing and implementing competitive, effective energy solutions.



Esprit de corps

We are loyal to each other and form a close-knit team. We are proud of our company, our goals and our accomplishments.

Table 1: Principles and practice

Value & Principle	In practice
Integrity <i>Mutual Respect</i>	We provide a space for genuine dialogue where people can participate in respectful discussions.
Integrity <i>Transparency</i>	We demystify the development process for local stakeholders and clearly communicate which points, when and to what extent they are able to influence decisions. We are transparent about how and why decisions are made.
Integrity <i>Inclusiveness</i>	We reach out to involve key stakeholders and the local community so they can play a part in decisions that affect them. We provide a range of opportunities and avenues for ongoing and meaningful dialogue, allowing for detailed and timely discussions.

Commitment <i>Responsiveness</i>	We communicate well and are responsive to emerging issues, concerns and ideas. We provide timely information and ensure people have time to digest information, understand the project and make informed decisions.
Commitment <i>Mutual Benefit</i>	We seek shared outcomes of mutual benefit for the local host community over the long term.
Audacity <i>Innovation</i>	We deliver engagement beyond regulatory conditions and compliance We are open to and pursue bold and creative ideas and solutions tailored to and driven by the local context of the project.
Esprit de corps <i>Relationship building</i>	We build and nurture long term local relationships and make meaningful links with local leaders and organisations. We provide many avenues for interaction across the project lifecycle.
Esprit de corps <i>Celebration</i>	We value and celebrate community; our own and those of the communities we work with. We enjoy celebrating our successes together.

1.3 Themes

As a company that frequently engages with stakeholders, Neoen is well versed in best practice engagement practices and emerging trends. Table 2 below shows several of the key themes we utilise to shape our engagement approach.

Table 2: Engagement Themes

 Cultivating advocates from within the community	 Good understanding of the social context & work to meet stakeholder expectations	 Community involved in decisions around siting, project design & operations	 Community engagement that starts early, builds trust & provides opportunities for participation	 Focus on creating a legacy for community
 Building trust and long-term relationships	 Informed by best practice & exploring opportunities to go beyond	 Ensure genuine benefits flow to host community & co-development of benefit-sharing outcomes	 Meaningful effort to achieve local and social procurement through project lifecycle	

1.4 Objectives

1. Engagement follows a transparent and open approach throughout all stages of the development of CSF and ensures 'no surprises' for stakeholders and community.
2. First Nations community engagement and consultation will be incorporated to maximise long term benefits to the Wiradjuri people.
3. Engagement seeks to uncover and interrogate the expectations and preferences of stakeholders from an early stage to ensure these are then reflected in the Project's design and approach to operation.
4. Regular, consistent and considered consultation provides stakeholders and community with accurate, timely and factual information – encouraging positive perceptions and trust in CSF and in Neoen.
5. Community and stakeholder concerns are managed in a professional, respectful way, establishing and preserving the Project's Social Licence to Operate.
6. Where possible, identify opportunities to partner with community stakeholders in the co-design and delivery of equitable, lasting community benefits – including procurement, employment, training, benefit-sharing and support for key social groups.

2. PROJECT CONTEXT

2.1 Context Narrative

The Culcairn Solar Farm is a 350 MW solar farm & battery storage project designed to improve New South Wales's energy security, reduce consumer power prices and facilitate greater uptake of renewable energy.

The location of the project in New South Wales has been chosen to meet several criteria to design a project that achieves competitive pricing for the end consumer in a strong part of the network. Some of the criteria taken into account are the following:

- solar irradiance
- site topography
- limited vegetation
- proximity to a strong, reliable part of the transmission network
- availability to connect additional capacity on this part of the network.

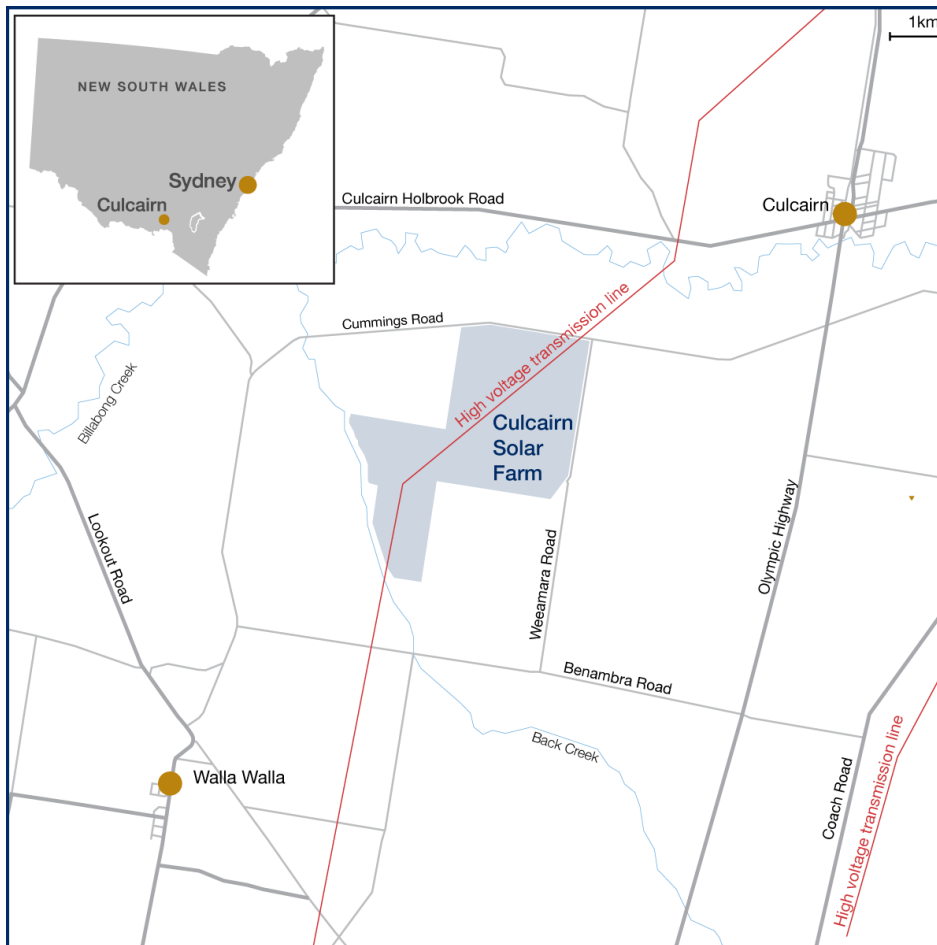
2.2 Community Overview

The broad community of CSF includes the towns of Culcairn (5 km to the northeast) and Walla Walla (8 km to the southwest). Culcairn is located between the major regional centres of Albury (50 km to the North, population 56,093) and Wagga Wagga (80 km to the South, population 67,609).

At the time of the 2021 Census, Culcairn had a population of 1,483 people, representing 13.3% of the Greater Hume Shire LGA. Walla Walla had a population of 811, representing about 7.3% of the LGA. Traditional grain farming and sheep farming account for a significant part of the local economies.

In Culcairn, about 5.4% of the population identifies as Aboriginal or Torres Strait Islander. The number of persons in Walla Walla who identify as Aboriginal or Torres Strait Islander is relatively small, representing 3.7% of the population.

Figure 1: Culcairn Solar Farm area



2.3 Greater Hume Shire region

Greater Hume Shire is the Local Government Authority for the project. It was formed in 2004 when three former shires (Culcairn, parts of Holbrook and Hume) were amalgamated. In 2021 there were 11,157 people living in the shire (ABS Census).

Greater Hume has nine Councillors, who are listed below:

- | | |
|--------------------------------|------------|
| - Tony Quinn, Mayor | East Ward |
| - Annette Schilg, Deputy Mayor | North Ward |
| - Ian Forrest | North Ward |
| - Matt Hicks | West Ward |
| - Ashley Lindner | West Ward |
| - Doug Meyer | North Ward |
| - Jenny O'Neill | South Ward |
| - Lea Parker | East Ward |
| - Heather Wilton | East Ward |

The Greater Hume Shire voted to formally object to the Jindera Solar Farm on 6 November 2019, to the Walla Walla Solar Farm on 20 November 2019, and the Culcairn Solar Farm on 20 February 2020.

The recognised Traditional Owners in the Greater Hume Shire are the Wiradjuri. 3.4% of the Greater Hume Shire LGA population identifies as Aboriginal and/or Torres Strait Islander people.

Culcairn is located in the Albury electorate of NSW. Albury electorate comprises the city of Albury and the surrounding rural councils. The electorate covers 19,686 square kms in southern NSW.

The previous MP is Greg Aplin of the Liberal Party, who was first elected in 2003 with a safe margin of 27%. He announced his retirement in 2018 and his successor Justin Clancy was elected in March 2019.

Culcairn is in the Federal electorate of Farrer, held by Liberal MP Sussan Ley, who won the seat in 2001. The seat is considered secure for non Labor parties, alternating between the Liberal Party and the National Party since 1949.

The Farrer electorate includes large-scale irrigation areas (around Deniliquin, Griffith and Wentworth) and produces dairy products, sheep and cattle, orchard and vine crops, apples and rice. Other major agricultural products include wool, cotton, wheat and cereals. Many industries are based on the processing of agricultural products, such as the newsprint mill at Albury and the largest rice mill in the southern hemisphere at Deniliquin. Other industries include mineral sand mining, tourism and agricultural service industries.

2.3.1 Cumulative impacts

The NSW Social Impact Assessment Guideline suggests that a social impact is a consequence experienced by people due to changes associated with a State significant resource project. This can include impacts on way of life, community, access to and use of infrastructure, services and facilities, culture, health and wellbeing, surroundings, personal and property rights, decision-making system and fears and aspirations.

Cumulative impacts are the successive, incremental, and combined impacts (both positive and negative) of activities on society, the economy and the environment and the Guideline suggests they can arise in three main ways:

- ‘Spatial’ impacts are those that occur over the same area. For example, trucks from multiple operations may produce a cumulative noise impact along a common haulage route.
- ‘Temporal’ impacts are those that vary over time. For example, the construction of multiple large projects over the same timeframe may produce a spike in temporary workers in an area, creating a short-term cumulative shortage of accommodation.
- ‘Linked’ impacts involve more complex interactions, such as where an impact triggers another or where a single activity has multiple impact

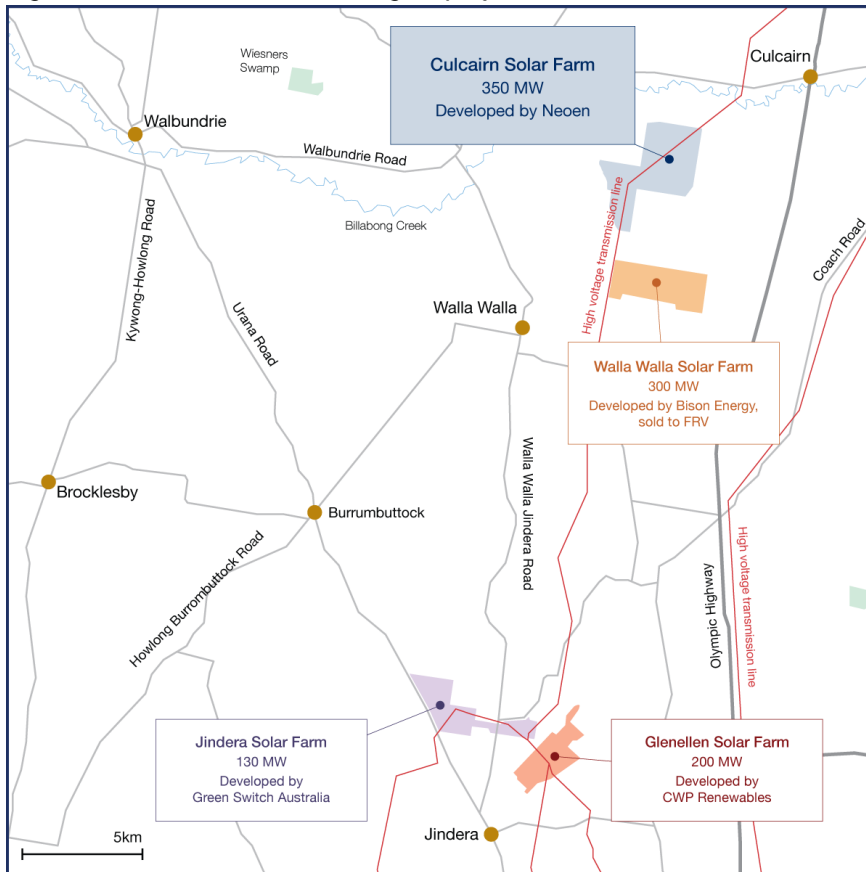
Social impacts can also be perceived, for example if a community or individual perceives changes as detrimental.

CSF will be one of four large scale renewable energy projects in the Greater Hume Shire and as a result, cumulative impacts are possible. Other projects located nearby include:

- Glenellen Solar Farm: a 200 MW solar farm developed by CWP Renewables, to the north of Jindera. The Public Exhibition of the EIS has closed and they are in the Response to Submissions phase.
- Jindera Solar Farm: a 130 MW solar farm developed by GreenSwitch Australia. Development approval was granted December 2020, and a modification is being prepared.
- Walla Walla Solar Farm: a 300 MW solar farm developed by Bison Energy, and recently purchased by FRV. Development approval was granted November 2020, with consolidated consent granted August 2022 after modification determination. Early works are currently underway.

The map below identifies the four projects currently proposed in the Greater Hume Shire. It was developed by Neoen in response to confusion in the community and amongst local stakeholders about which project was which. The high voltage transmission lines, which the solar farms intend to connect into, are shown in red.

Figure 2: Greater Hume Shire region projects



There are some key cumulative impacts that are likely in this project, including:

- Supply chain impacts and construction labour demand/ local workforce shortages from multiple construction projects in regional NSW (Snowy 2.0, Inland rail, Energy Connect, Humelink)
- Construction impacts from solar farm construction in the area, particularly if construction periods overlap with different projects – increasing traffic movement, safety concerns, construction noise etc.
- Accommodation impacts from high demand for housing workers across multiple projects, consequent impact on tourism accommodation
- Impacts on local business capacity where larger projects entice workers with larger budgets
- Impacts on way of life and temporary changes to community life e.g., changes to quiet rural amenity of host and neighbouring landholders’ properties, anxiety about future changes to rural landscape

Through considered project delivery, many of the anticipated cumulative impacts of concurrent solar farm development can be avoided, or minimised. Strategies may include:

- Opportunities for better coordination of training, skills and workforce development to reduce the labour supply risks, improve regional economic outcomes and job quality.
- Engagement with industry to provide opportunity for students to develop workforce skills
- Implementation of Accommodation strategy to address housing pressures
- Consultation with other solar farm developers to understand project phasing
- Mitigation strategies including early screening and
- Transport planning e.g. bus or car sharing to minimise vehicle movement, etc.
- Ongoing consultation throughout Construction and into operations to ensure those with genuine concerns are given opportunity to raise them, and solutions are offered where practical.

Neoen will work closely with regional partners to address cumulative impacts identified in the community. Further discussion of construction labour demand is addressed in the related IAPP.

Section 5 of the CCS outlines some of the strategies that Neoen will implement on CSF in response to specific concerns.

3. PROJECT STAKEHOLDERS

CSF Stakeholders are progressively included in the CSF Stakeholder Register, where a process of ranking and recording of interests and preferences provides clear guidance on the level of influence and interest each stakeholder is likely to have, informing how Neoen should engage. The stakeholder register continues to be broadened over time as engaged stakeholders provide further recommendations on who to engage and in direct response to social risks identified by the project team during project planning.

The following table is a complete list of stakeholders and priority needs.

Table 3: Culcairn community stakeholders and needs

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
Host Landowners	Residents who are hosting solar infrastructure on their land.	Ongoing communication and discussions as project progresses. Contribution to the project’s progress, ability to provide local knowledge, advice and input. Involvement in development of Community Benefit Sharing Scheme.	One-on-one meetings Landowner updates & dinners Letterbox drops Invitations & involvement in community events
Near neighbours	Residents owning land adjacent to the project site have the potential to be affected by the visual impact of the solar, the noise and heavy vehicle traffic associated with the construction phase	To create and maintain a close connection with direct adjacent neighbours of Culcairn Solar Farm. To keep neighbours informed about the project from early in the project planning process and provide opportunities to raise issues and provide feedback. To ensure that neighbours share in the benefits of the project.	Benefit-sharing: One-on-one engagement Invitation to be provided a private photomontage Letterbox drop project updates Community Information Sessions Invitation to community events Adjacent landholders to be offered a Construction Disruption Payment to mitigate potential impacts associated with the construction phase.
Neighbourhood (Culcairn and Walla Walla)	The local community / people living within the Culcairn township adjacent to the project.	To keep neighbours informed about the project from early in the project planning phase. To provide opportunities to raise issues and provide feedback.	Letterbox drop project updates Community information sessions Invitation to community events
Council including Councillors, CEO Planning Team	We will work with the Greater Hume Shire Council to shape the Community Engagement Strategy and Benefit Sharing Program.	To ensure a positive and collaborative relationship with the LGA that can support the long-term goals of the community.	One-on-one engagement Project briefings & updates Community information sessions Regular meetings

		Evidence of compliance with DA conditions.	
State MP	Justin Clancy	To ensure the local member is kept updated about the project and its progress. To seek input and advice in relation to community priorities	Project briefing in person by Head of Development Invitation to community events
Federal MP	Sussan Ley	To ensure the local member is kept updated about the project and its progress. To seek input and advice in relation to community priorities.	Project update in person by Head of Development Invitation to community events
Traditional Owners – Indigenous community	Registered Traditional Owners and identified indigenous representatives from the local community.	To ensure Neoen is engaging with local Aboriginal groups beyond planning requirements, such as employment, training and opportunities to work on country.	Invitation to co-design Industry and Aboriginal Participation Plan Invitation to community events
RFS	Local volunteers representing the Country Fire Authority	To ensure project activities abide by safety and regulatory requirements.	Provide indicative design plans and updates on the project to prepare for any local fire and emergency safety requirements
Schools, TAFEs and Universities	Culcairn Public School Billabong High School St Joseph's Primary Walla Walla Public School St Paul's College Albury TAFE	To ensure organisations are updated on education and vocational opportunities associated with the project. To use the opportunity of a local renewable project to dovetail relevant & practical educational content into the syllabus.	Information and project updates provided and invitation to future networking engagement Opportunities for site visits for local schools.
Business groups / industry stakeholders	We will seek to engage and collaborate with local businesses and business networks around what opportunities may be available such as sourcing for the solar farm development.	To ensure Neoen is creating opportunities for local businesses to participate in the development of local renewable energy projects.	Pre-construction local business expression of interest Invitation to Local Employment & Supplier Networking session
Solar farm opponents	We will seek to identify those issues that are of concern to local solar farm opponents.	To be accessible, help to address concerns proactively, and to have a	Complaints process implemented and transparent.

		best practice complaints system in place.	
Advocacy groups	Sustainability Groups Community Energy Groups	Discussion on community energy and zero emissions targets. Potential for partnerships.	Update / presentation on project Invitations to community events
Community organisations	Culcairn & Walla Walla Development Committees	To understand the Project and be able to update their members. To participate in / benefit from Community Benefit Sharing Scheme.	Update/presentation on project Invitations to community events
Employment providers	For detailed plan see Industry and Aboriginal Participation Plan	To ensure Neoen is creating opportunities for local businesses to participate in the development of local renewable energy projects.	Pre-construction local business expression of interest Invitation to Local Employment & Supplier Networking session
Natural resource management groups	Landcare and other local groups that are involved in local conservation projects	To ensure local NRM knowledge and resourcing is available to the project. To distribute information to members	Update/presentation on project Invitations to community events
Media	Local and regional print, electronic and social media	To understand the Project and be able to update their readers / viewers.	Project

Neoen have also created and maintains a comprehensive stakeholder register document for internal use.

4. SUMMARY OF ENGAGEMENT TO DATE

4.1 Initial Engagement: Q3 2018 to Q2 2019

After identifying the site for the Culcairn Solar Farm in the first half of 2018, Neoen started engaging with the host landholders and the Greater Hume Shire.

Once the site was secured, consultation started with neighbours of the project site. Adjacent Landowners and those within 3 km of the project site were contacted with an invitation to meet for the first time in November 2018. Initial meetings were held on 8 and 9 November 2018 and 27 and 28 November 2018.

Landowners met were informed about the project and were given the following information:

- Presentation of the proponent.
- Presentation of the development process of a solar farm in NSW.
- Potential land considered for the development.
- Discussions on the concerns raised by the landowners.
- The contact email address of the project was shared.

A presentation leaflet on solar development and the proponent, a 2-page information leaflet on the project and a feedback form were provided to neighbours to allow for early feedback on the project.

During the meetings in November, landowners raised several questions and concerns. Among others, the main concerns raised were the following:

- Development of a solar farm on agricultural land.
- Local economic impact of a solar farm during its operations compared to normal agricultural operations of the land.
- Visual amenity and effect on adjacent property values.
- Heat effect of solar farms and impact on neighbouring farming operations.
- Health impacts of a solar farm.
- Bush fire risk management.
- Weed and vegetation management.

When possible at this stage of the development, the proponent has provided initial answers to those concerns.

In order to plan this first on-going early-stage consultation, neighbours were informed by phone or email and were offered the possibility to provide feedback through a face to face meeting or by phone when a face to face meeting couldn't be held directly.

Around the same time, Neoen engaged with the local branch of NSW Farmers and took part in a branch meeting on 28 November 2018 on Solar Farm Developments on Agricultural Land with TransGrid, the DPIE and NSW Farmers.

Additionally, a letter of information was sent in December 2018 to the Federal Member for the Farrer Electorate and to the Member of Parliament of NSW for the Albury electorate. APA (gas pipeline owner) was contacted by email in July 2018 and Council consulted in February, October and November 2018 and March 2019.

An additional opportunity to meet was given in April 2019 before Neoen held their community open-day in Culcairn, and an update of the project was provided by email or post mail to neighbours within 3 km of the project site informing them that the Scoping Report had been lodged to the Department of Planning and Environment of NSW.

On 16 May 2019, Neoen held a Community Drop-in Session at the Culcairn Bowling Club on Olympic Highway. This session was advertised in the Border Mail, and in the two local Newsletters of Walla Walla and Culcairn. The Neoen team was available to meet and answer questions from 2 to 8 pm. The main outline of the project was presented, with the information presented as posters (attached as Appendix 2) and made available as A4's for people to take-away. Over 100 people attended the session.

Contact numbers, project email address, and project website were shared with the community to allow for on-going information on the project. Feedback surveys were also available to fill in.

Many local community members attended the session with genuine questions about the project. A small but vocal opposition group attended and made it difficult for people to feel comfortable to ask questions. Several community members reported feeling intimidated by those loudly opposing the project and requested a follow up meeting to raise concerns and ask questions that were not answered.

Following this first phase of community engagement on the project, Neoen took the time to gather the feedback and adjust the design of its second phase of community engagement.

4.2 First Nations Engagement

Neoen engaged Wiradjuri man Mark Saddler to participate in and support the development of the Cultural Heritage Management Plan and assessment during the early stages of project development. Mark runs a Wagga Wagga based cultural education business and has continued to stay in touch and help the local landholders understand some of the Aboriginal cultural history of their area, also visiting the Walla Walla historical society to share information.

During 2020, Neoen supported the host landholders to meet Mark Saddler and to visit their property to help them relocate Aboriginal artefacts that were identified on their property. Another host landholder has also identified an important scarred tree on his property (known as a ring tree) and has taken steps to protect this important cultural history.

During the development of the CSF IAPP, organisations that represent First Nations people in the region were first identified. Early consultation with Albury and District Local Aboriginal Land Council (Albury LALC) and Riverina Murray Regional Alliance (RMRA) helped to understand local context and identify Aboriginal organisations and businesses. Meetings were subsequently held with Aboriginal businesses (via Supply Nation), education/training providers and employment agencies. Conversations with First Nations organisations and businesses identified key issues in the region as far as work readiness, the need to focus on pre-apprenticeship training, cultural safety and support, and further funding for Aboriginal businesses to offer these services.

First Nations consultation and networking is detailed further in the CSF IAPP.

4.3 Intensive Engagement: Q3 2019 to Q2 2020

The Community Drop-in Session in May 2019 attracted a small number of vocal objectors. Feedback from some community members indicated that they had been unable to engage in meaningful conversations and were unable to get adequate responses to their concerns due to the circumstances of the meeting. Reports were subsequently received of considerable concern and emotion, and that some community members felt intimidated by those with opposing views.

In response to this and intent on continuing to provide meaningful opportunities for public engagement and consultation, Neoen recruited two local community engagement specialists to provide strategic input and support for the next phase of community engagement.

The newly formed community engagement team (two Neoen staff along with two local specialists) developed a tailored, intensive approach that primarily focused on 'kitchen table' conversations. This low-key method avoided opportunities for public protest, enabling more personalised and respectful conversations to occur, and reducing the risks and perceived risks of voicing views in public.

The meetings were framed as confidential, based on listening and information sharing (rather than positional) and an opportunity for residents to voice their concerns and have input to the development of the proposed Community Benefit Fund. The information needs were met iteratively, for example the first conversations there was confusion about which projects was which and who the proponent was, and there

were rumours that all four projects belonged to the same company. In response, Neoen developed a regional map which showed the four projects were located, their size and different companies (see Figure 2).

While many of these early conversations were with supporters of the project, over the ensuing weeks interviews were held with people holding a wider range of views or concerns. For many, it was their first opportunity to speak with someone who could answer some of the questions they had about the project.

This phase of the community consultation was conceptualised as involving three stakeholder groups;

- immediate neighbours
- the wider community
- business community

Between mid-August and October 2019, over 130 kitchen table discussions were conducted with residents of Walla Walla and Culcairn, and with some of the wider shire. The majority of these were held in private homes with family members; a smaller number were with neighbours, friends or in business settings. A small number were by phone where respondents could not schedule a meeting or felt their concerns could be captured by a brief conversation. All of those who had left their details on feedback forms at the Community Drop-in Session were contacted.

Most meetings were held in private homes as many community members were willing to contribute to the discussion and address their concerns but were unwilling to be seen discussing the project in public. There were mixed views about the solar farm in the community consultation, of those interviewed the majority indicated support for the solar farm, while almost all the immediate neighbours objected to the solar farm.

During this time, Neoen also presented to Councillors of the Greater Hume Council as well as the Culcairn Development Committee. Conversations were held with some members of the Walla Walla Development Committee independently, including the Chairperson, but efforts to present at a committee meeting were prevented by the difficult political environment in Walla Walla. Information was instead provided to all committee members via the Chairperson, with an invitation for further meetings if questions were raised.

4.4 Ongoing Engagement

In response to enquiries and to provide community members with the opportunity to see for themselves, a bus trip to visit Neoen's nearby Numurkah Solar Farm was held in September 2019, with invitations extended to all community members. Approximately 20 people participated in this tour, most identified as supporters of the project, but a few were opponents who wished to see an operational solar farm. The bus was hired from a Walla Walla bus company, with catering provided by a Culcairn coffee shop.

Neighbour face to face meetings were conducted at individuals request, meeting them at their homes or other locations on 30 and 31 January 2020. Face to face meetings were also held with the local community, industry groups and the Greater Hume Shire Council on these days, as well as on 19 February. An onsite fire management workshop was held at Numurkah Solar Farm in March 2020, as per council requirements, which included representatives from local groups such as the Culcairn Fire Station, NSW Rural Fire Service, Fire Rescue NSW, Greater Hume Shire Council.

With the introduction of travel restrictions, in person consultation had to move to online communication and meetings for the remainder of the year. Periodic updates were sent to various stakeholders, including project bulletins sent every other month to those interested in the community. Two online industry workshops were planned to provide information to local contractors and businesses about the business opportunities of the CSF. Both sessions were cancelled due to low registration numbers, with many local businesses not comfortable in an online style of engagement. The community was also welcomed to request (by phone or email) a meeting online with the Community Liaison Officer and/or the Neoen project manager, and during this time engagement was done by phone. Communication was also kept up online with the Greater Hume Shire Council, in which terms of the Voluntary Planning Agreement (VPA) were finalised and agreed upon.

Between lockdowns, the Community Liaison Officer regularly attended a local Culcairn café on a Tuesday morning where locals could attend for a project update or to ask any questions they had. This café functioned as a hub, with information posted on the walls to inform the local community of project status.

Upon determination in March 2021, letters were sent to the State and Federal MPs in May 2021 and electronic project bulletins were sent to the community, which have been sent with any significant project milestone, since then.

4.5 Recent Consultation

Post DA Approval, the focus of recent consultation has shifted towards industry and understanding how CSF can best support community and regional economic development. The outcomes of this consultation and networks created are detailed further in the CSF IAPP.

It became evident early on in this consultation that workforce shortages would be an issue in the region, considering the scale of projects in the development pipeline. Neoen also prefers to source labour from local regions, in order to bring the most benefit to the surrounding regional communities. Because of this, consultation was done with the idea of creating a network of organisations that CSF could work with to develop the workforce and capacity of the surrounding communities and broader region.

The community engagement team reached out and met with a range of organisations and regional development groups in order to discuss possible partnerships to support both the construction of CSF and regional economic development. Employment and training agencies were consulted, as well as Aboriginal organisations that help prepare and support individuals through the employment process. These Aboriginal organisations were also able to provide understanding as to the capacity of Aboriginal groups in the region, in order to set realistic Aboriginal participation goals.

Meetings with agencies and organisations began in August 2022, with in-person meetings held on 6 and 7 September 2022. Meetings continued online into October 2022. Neoen will continue to engage with the community and work with these organisations throughout the development and construction of Culcairn Solar Farm. Before construction, Neoen will also hold Local Employment & Networking Sessions to best communicate the opportunities for local contractors, suppliers, labourers, etc.

For more details, refer to the CSF IAPP.

In August 2023, a new Community Liaison Officer has been appointed, as CSF has been ramping up towards construction. They will work closely with the Neoen Project Manager to keep the community updated and be on-site to engage with the EPC, landholders, and neighbours.

4.6 Enquiries and Complaints

A Community Enquiries and Complaints Register was initiated in the post DA phase to record details of neighbour and stakeholder engagement and record any concerns or issues raised. No complaints have been made to date. An Employment Register has also been established to capture interest from local and state-based suppliers and personnel interested in working on the project. This register will be shared with the EPC contractor and is expected to be maintained collaboratively between Neoen and the EPC Contractor as a living register of local workers and suppliers interested in employment with CSF.

See Appendix B for the CSF Enquiries and Complaints Procedure.

5. RESPONSE TO COMMUNITY CONCERNS

This section is focused on summarising the concerns expressed by members of the community throughout the engagement and consultation process, and how the project design and plans have responded to these concerns.

5.1 Summary of Concerns & Responses

The following provides a summary of key themes raised during deliberative and ongoing engagement:

<p>Theme 1: Changes to the agricultural landscape</p>	<p>Loss of productive agricultural land, heat island effect</p> <p>While many respondents expressed a belief in the importance of renewable energy (many have solar installed on their home and/or farm), they registered an objection to the proposed project due to its location on what they described as productive agricultural land. This was particularly common amongst neighbours to the project and was the single concern expressed most often across all respondent groups.</p>
<p>Response to Theme 1</p>	
<ul style="list-style-type: none"> – It is possible for agriculture to continue under the solar panels, with sheep being grazed on all 5 of Neoen’s operating solar farms in NSW and VIC with early indications showing there is the potential for up to 80% carrying capacity under solar panels, increasing during drought conditions. – Neoen will provide opportunities for local landowners to use the land under solar panels for sheep grazing and will explore other opportunities for combined land use, as per advice from local agronomists, farmers, researchers and Landcare. – In response to this concern Neoen, commissioned an expert review into the benefits and opportunities of combining agriculture with solar or ‘agrisolar’ and is implementing changes to standard practice during design, development, construction and operation phases of its solar farms to plan for best practice in agrisolar. – The potential for agrisolar was captured in a short community information video, made in August 2019, about the experience of a local farmer at Dubbo Solar Farm which identified the co-benefits of combining grazing with solar in an accessible way. https://www.youtube.com/watch?v=uO3k9EdZjml. The video highlights an unexpected benefit during periods of drought where the productivity of the land was found to increase due to the dripping of dew and moisture along the edge of the solar panels resulting in strips of green growth. This video was widely shared on social media, with Greater Hume Shire Council members, at community meetings, at a recent Renewables & Agriculture Forum in Wagga Wagga, and with registered members of the community via email. – Neoen commissioned consultancy group DC McMahon Pty Ltd to undertake an independent soil test to test the indicative quality attributes of the soil and to also mitigate the risks associated with soil erosion during the construction and operation of the project. It was found that the fertility of the soil was generally low to moderate quality, with sandy and pale sub-surfaces found that generally do not retain fertilisers well. Allowing for multiple and diverse uses of the land via the development of the project and continued grazing opportunities will help supplement the low-moderate fertility. – Neoen’s response to the uppermost community concern about the loss of productive agricultural land has been considered and comprehensive. The intention has been to seek to understand and then to communicate the existing knowledge around the possibilities and opportunities for combining agriculture with solar and then to take an active role in leading the industry towards advancing our understanding of how to maximise combined land use productivity. – The Independent Panel of experts created for the Shepparton Solar Farm concluded in 2018 that any potential temperature increase within the solar array will be marginal, however, any solar array should be separated 30 metres from any neighbouring property boundary, which will be included in the Project design. 	

Theme 2:
Biodiversity Impacts

Impacts on landscape connectivity and habitat trees

This was one of the most common concerns raised across all groups. It was referenced by the majority of neighbours, particularly those that have spent considerable time revegetating their properties. More specific issues, such as impacts of construction on particular species, were raised by neighbours, and community members involved in Landcare or environmental-based community groups.

Response to Theme 2

- Neoen's design team is continuously optimising the site layout with consideration to the vegetation and land constraints. The northern most section of the project was dropped before DA submission due to its higher biodiversity impact. This exercise will continue into detailed design, seeking to minimise the disturbances to trees, species and biodiversity found on site.
- An ecologist was engaged by Neoen to determine the impact to biodiversity due to the proposed project development. Since some vegetation clearance must occur, Neoen is required to offset this impact and gain approval from the NSW Department of Environment, Energy and Science, in compliance with the Biodiversity Conservation Regulation 2017.
- Where hollow bearing trees must be removed from the site (old trees that are dead but provide hollows and important habitat for wildlife) Neoen intends to re-locate them to nearby swamp or riparian areas where they can be retained as habitat for wildlife, preferably in a vertical position.
- Connectivity is very limited throughout the existing development site, consisting of a highly cleared landscape. The main connectivity corridors for threatened species would occur along the vegetated Back Creek and Billabong Creek. These vegetated creek lines have been avoided by the development footprint.
- Retaining the vegetation along Back Creek in the development site will maintain connectivity across the landscape to facilitate movement in an east-west direction. This creek line also connects to the remnant roadside vegetation that would be retained. Due to the highly cleared and fragmented landscape within the development site the proposal is not likely to disrupt the movement of any threatened species.
- Vegetation screening is proposed to screen views of the proposal from nearby dwellings with a sufficiently wide buffer using a mixture of native vegetation and other specific mitigation measures to effectively screen the project from visual receivers, which will minimise the impacts to near neighbours.
- There will be a 30m buffer zone between the edge of the panels and the site boundary

Theme 3:
Community Risks

Fire risk, decline in property values, construction, weed management, decommissioning

Anxiety about the unknown risks was common across all groups interviewed. Neighbours and farmers were more likely to raise concerns about immediate risks to their farms, such as fire risk, livestock impacts and weed management. Community members were more likely to focus on the longer-term risks: what economic impacts will this project bring and who will clean up the solar farm infrastructure once it comes to the end of its operational life.

Response to Theme 3

- Neoen will have its own insurance policy in place to provide coverage in the unlikely event that solar farm equipment is damaged by fire.

- A Bush Fire Management Plan will include procedures to deal with a fire on site, and normally requires water to be kept on site for that specific purpose. In line with requirements from RFS, surrounding the panels will be 10 m of cleared vegetation to prevent the spread of fire around the panel arrays.
- Neoen have found that property values have not declined in areas of proximity to their existing renewable energy projects, such as Coleambally where anecdotal evidence suggests prices have risen. This has been confirmed at Culcairn where property adjacent to the proposed solar farm has recently been sold at above market rates.
- Independent studies into the potential impact of renewable energy project developments on property prices have been conducted by the NSW Valuer-General (2009) and Urbis (2016) which conclude that there is insufficient evidence to suggest that renewable energy projects can be linked to adverse impacts on property prices.
- Neoen will consult and communicate with neighbours about how construction will impact on the land and identify areas of concern with neighbours.
- During the project development, Neoen as land manager will comply with the general biosecurity duties under the Biosecurity Act through management of on-site weeds and pests.
- Prior to commencement of each phase, a Weed Management Procedure would be developed as part of the Biodiversity Management Plan for the proposal to prevent and minimise the spread of weeds.
- Neoen is a committed project custodian and will establish circular procurement initiatives with its supply partners to ensure that best practices in recycling and waste management are followed throughout the life of the project. This is particularly the case for solar PV and battery modules, done in partnership with the original manufacturers and where possible, local recycling agencies.
- Recyclable materials are expected to constitute a large proportion of the waste generated, including timber pallets used to transport the solar panel modules. Components such as batteries and solar panels will be recycled (typically by the manufacturer) when they reach the end of their operational life.

Theme 4:
Economic impacts and opportunities

Local opportunities for sheep grazing and impacts on local businesses

Neighbours and community members that object to the project expressed a high level of cynicism and expressed concerns about local economic opportunities that will flow from the solar farm, perceiving that the benefits would occur solely during the construction period. Council members and staff were also concerned that the overall economic impact on the shire would be negative. Business respondents were more aware of the wider opportunities offered by the solar farm, including the potential for developing new skills and expertise, while concerned that their capacity may preclude them from some opportunities. There was a view expressed widely that the local community would miss out on many of the economic opportunities and that the workforce would be employed from outside the region.

Response to Theme 4

- Neoen will provide opportunities for local landowners to use the land under solar panels for sheep grazing and communicate with neighbours regarding other opportunities for combined land use (as per advice from local agronomists, farmers, researchers and Landcare).
- In response to concerns raised by neighbours and the Greater Hume Shire Council that there would be an overall negative economic impact on the region, Neoen commissioned an expert Economic Impact Assessment for the project, which highlighted that significant participation

opportunities for businesses and workers located within the region will be available in a direct and auxiliary (accommodation, retail) perspective.

- No net job losses are expected, with the project replacing existing agricultural employment associated with the subject land (for both direct and indirect jobs). In addition, opportunities to continue sheep grazing will be available across the site.
- In response to this concern, Neoen developed and shared a community information video in September 2019 about the local economic and community benefits that Numurkah Solar Farm brought to the surrounding Shepparton area to demonstrate how another nearby project brought benefits and did not create disturbances within the economy or community.
<https://www.youtube.com/watch?v=Odxl0ZLvavE>.
- The ABC's 7.30 report on Numurkah in October 2019 also demonstrated how Neoen's approach is designed to maximise the opportunities, benefits and outcomes for local businesses.
<https://www.youtube.com/watch?v=zrKZK5j5b2k>
- Neoen have developed a job and supplier registry to be able to communicate opportunities at each stage of the process.
- Neoen are developing an Industry and Aboriginal Participation Plan to maximise the local business opportunities on the project to ensure adequate lead-in time for local businesses to be able to build their capacities, and prepare the workforce for the opportunities.
- Neoen will continue to meet with local businesses, industry bodies, regional economic development networks to share information and prepare for the construction period.

6. COMMUNITY BENEFIT SHARING

To ensure both short and long-term benefits flow through to the community as a result of the establishment and operation of Culcairn Solar Farm, we establish a Community Benefit Sharing Program (CBSP).

The CBSP is designed to deliver benefits to key stakeholders in the community in a way that aims to meet their needs and aspirations. Specifically, our objectives are to:

- deliver significant and meaningful improvements to the community surrounding Culcairn Solar Farm;
- ensure a wide range of different stakeholder groups benefit from Culcairn Solar Farm;
- empower the community to shape the design and implementation of the different initiatives;
- build support for renewable energy in the Greater Hume Shire.

The majority of initiatives will be delivered during the construction and operations phase. In alignment with Neoen's organisational vision, it is important that the benefit be a true benefit and be tailored to meet each distinct communities' need.

6.1 Scope of the CBSP

Initiatives and programs under the CBSP are broad, showing how community benefits have been considered as part of the many different streams of work being delivered as part of the Project. For transparency, some exclusions are necessary.

This CBSP does not include:

- required activities under our permit conditions such as for visual screening
- host landowner payments
- the value of local jobs and investment.

However, it is worth noting that these activities will all deliver significant value to the community.

The dollar value for the Culcairn Solar Farm Community Benefit Sharing Program is \$150,000 per annum for the lifetime of the project, a total estimated figure of \$4.8 million.

Another indirect community benefit-sharing component is Neoen will enter into a Voluntary Planning Agreement with the Greater Hume Shire. The sum is \$150,000 annually (CPI indexed) for the lifetime of the project. This proposal has been agreed upon with Council, who have indicated they would allocate it towards improving roads.

Neoen have a number of mechanisms to enable benefits to be shared in a meaningful and equitable way. Community input has been sought into these options (and other local ideas canvassed) through an interactive poster at the community information session, via the community feedback survey and through kitchen table discussions.

The final program will be a mix of 2 benefit-sharing mechanisms from the following list:

- Community Benefit Fund (including First Nations initiatives)
- Neighbour construction disruption payments

6.2 Program outline

Neoen considered it imperative that CSF Social Benefits were tailored to local circumstances, culture and need. Additionally, given Neoen's intent to be a long-term business owner in the area the benefits will ideally bring lasting benefit to the local area.

Formal and informal methods were used to collect community and stakeholder views on specific benefit sharing approaches they considered to be appropriate, proportional and effective. These methods include:

- Landholder interviews
- Stakeholder meetings
- Community drop-in sessions and surveys

- Feedback forms
- Informal engagement through phone calls

Table 4 provides a summary of the responses received.

Table 4: Community input into benefit sharing options

Option	Support	Comments
 <p>Community Benefit Fund</p>	<p>Majority support – most people interviewed supported this idea.</p> <p>Some opponents see this as a form of ‘buying-out’.</p>	<p>Nearly 100% expressed concern that if this fund was managed by Greater Hume Shire the funds would be distributed across the Shire, rather than to Culcairn and Walla Walla.</p> <p>The delivery model is considered critical. Preferred delivery model for delivery (95%) is through the Culcairn and Walla Walla Development Committees, which both have a high level of community trust.</p> <p>In Culcairn, the positive impact on Henty from the Bendigo Bank is referenced a lot in conversation. The potential impact of a community benefit fund is often likened to this model.</p> <p>A long list of potential organisations that could seek funding include footy and netball clubs, gardening club, bowls club, art projects etc. Also, a lot of interest in accessing funding to enhance public buildings and create public space projects e.g. Town hall equipment for events, attracting businesses to town, tourism information precinct.</p> <p>A formal application process is seen as fair.</p> <p>A common question was asked about how this would support the farmers/neighbours that will bear the impact of the project.</p>
 <p>Lower energy bills through solar and/or storage subsidies</p>	<p>Medium support</p>	<p>Many people already have solar and are not interested in further subsidies, although many see good sense in offering subsidies for solar, rather than discounted electricity bills.</p>
 <p>Lower energy bills through retail offer</p>	<p>High level of support initially, but not if it means there is no Community Benefit Fund.</p>	<p>Most people are initially very supportive of discounted electricity bills, but common questions are:</p> <p>How much discount would be offered to each household?</p> <p>Will all properties receive the same discount?</p> <p>How would this impact on a community fund of \$150k per annum?</p>

		<p>How would this incentivise energy efficiency?</p> <p>Does this include local businesses?</p> <p>Would we have to change retailer to access this discount?</p> <p>Once people discuss the issues, the majority express the view that community benefit is a higher priority than household discounts (as it provides a genuine community legacy). There was still support for a discount but not at the cost to community.</p>
 <p>Other - Support of local art & tourism</p>	Medium support	<p>Broad support for these initiatives, more so with town residents.</p> <p>Seen as one part of the community benefit fund.</p> <p>Concerns raised, primarily by farmers, that the money could easily disappear into town assets that the farming community only minimally benefit from.</p>
 <p>Other - Agribusiness grant fund</p>	High support	<p>One idea from a young farmer in Walla Walla is that Neon consider establishing an annual grants program specifically to support agriculture in the area. He suggested this could be framed as a start-up grant for agribusiness ventures (e.g. \$10k) to help famers diversify their income and/or implement sustainable practices.</p> <p>Other people consulted have agreed this was a great idea for rural and farming communities of Culcairn and Walla Walla.</p>

After community consultation, the lower energy bills through solar and/or storage subsidies and lower energy bills through retail offer initiatives will not be looked into further by Neoen. Since many people in the community already have rooftop solar, they would not be interested in further subsidies but would see discounted electricity bills as a more attractive initiative. After discussion on lower energy bills, though, the question around administration involved in carrying out the initiative and possible loss of community benefit funds were a concern. The majority then expressed the view that community benefit is a higher priority than household discounts as it supports the long-term legacy of the community.

Further, Neoen has recently developed a ‘Sustainability Framework’ to advance responsible and sustainable commercial, environmental and social practices across its global enterprises. Specifically, this Framework encourages and supports initiatives to develop local economies by promoting renewable energy, facilitating access to electricity and supporting local economic development projects. This Framework will also be referenced in development of the CSF social benefit approach.

6.3 Program Initiatives

Near Neighbour Construction Disruption Payment

As the stakeholder group most likely to be impacted by the proposed CSF project, a Construction Disruption Payment was established to provide a significant financial benefit to nearby neighbours. These funds will be provided to neighbours adjacent to the Project. Funds will be acquitted prior to construction and not be linked to an impact occurring.

An indicative budget of \$250,00 will be provided to near neighbours. Acceptance of funding will be unconditional and will not limit neighbours from registering complaints. Neighbours adjacent to the Project or on the traffic route will receive a one-off construction disruption payment of \$15,000 at the start of construction. Those along the traffic route as well as adjacent to the Project site will be eligible for the same amount, \$15,000.

Community Benefit Fund

Neoen is proposing an annual Community Benefit Fund for CSF for the purpose of delivering tailored community benefits to Culcairn and the immediate local region.

Neoen will commit \$150,000 per year for the life of the solar farm to the Community Benefit Fund to be administered and distributed by an entity to be decided. During the development of the Culcairn Solar Farm, two local development committees were consulted extensively about the CBF.

1. Culcairn Development Committee
2. Walla Walla Development Committee

With responsibility for local initiatives across the two key communities of Culcairn and Walla Walla, both committees are keen to be involved in shaping the structure and delivery of funds through the Community Benefit Fund. Their input has informed Neoen's approach to CBF development, understanding that local communities want to see funding used strategically, rather than distributed through a community grants model. Members of both development committees have expressed an interest in being represented on a CBF advisory committee to provide advice and input to how funds are distributed in their community.

While the final terms and the administration will be co-developed with the community, funded projects for other Community Benefit Funds usually align with at least one of our community growth focus areas. It is intended that there will also be an agribusiness component in the fund.

In addition to the \$150,000 per year Community Benefit Fund, an additional one off \$50,000 has been set aside to commission an artwork.

First Nations Benefit Sharing

Through the development of the CSF Industry and Aboriginal Participation Plan (IAPP), relationships have been established with First Nations organisations to facilitate the achievement of First Nations participation targets and explore how Culcairn Solar Farm may support First Nations initiatives in the region. These include Albury & District Local Aboriginal Land Council (LALC) and the Riverina Murray Regional Alliance (RMRA).

There are a growing number of Aboriginal businesses operating across the region and many are keen to see a collaborative approach to ensure training, education and employment opportunities are provided through the construction and operations of the CSF.

Within the CBF, there is the potential to allocate a portion of the funds to First Nations community initiatives.

Contribution to Greater Hume Shire

The less direct component of the Community Benefit Sharing Plan is a significant proposed contribution to the wider Greater Hume Shire by means of a Voluntary Planning Agreement (VPA), which Council have indicated they would allocate to building and maintaining roads.

Neoen have proposed a total VPA of \$5 million (based on a 2% inflation rate) which it proposes to contribute at a rate of \$150,000 per annum (CPI index linked) over 26 years once construction commences.

Above & Beyond Environmental / Biodiversity Initiative

For every project, Neoen partners with a local or regional environmental group and invests in an Above & Beyond environmental or biodiversity initiative specific to the project region.

For the Culcairn Solar Farm environmental community, early discussions included initiatives such as regeneration along areas of the Billabong Creek. The partnership and details of the initiative will continue to be developed, and indicative one-off \$25,000 has been set aside for the project.

Support for local jobseekers & businesses

Neoen have developed a related Industry and Aboriginal Participation Plan (IAPP) to maximise the jobseeker and business opportunities on the CSF project.

The CSF IAPP combines aspects of a Local Industry Development plan, Social Procurement Plan, and Aboriginal Participation Plan. This will see Neoen and its EPC contractor utilise their spending power to cultivate and deliver genuine social benefits within the community. Initiatives will specifically focus on the development and uplift of the following socio groups:

- First Nations communities
- Underrepresented groups
- Learning individuals and workers
- Apprentices, pre-apprentices, trainees and cadets

Given the project's environmental credentials, the Project will also apply a close focus to environmentally sustainable outcomes that can stem from social procurement and socially responsible business practices. All of these aspects are discussed further in the CSF IAPP.

Additionally, Neoen has developed promotional videos to provide 'shared wisdom' from suppliers to its other solar farms. These videos have been distributed locally, giving local community and suppliers valuable intelligence on what to expect when tendering, working and living nearby to a Neoen Solar Farm.

6.5 Implementation

Ongoing delivery of the CBSP will have oversight from the Head of Engagement and Project Manager. As a priority, community stakeholders will continue to be involved in the design and implementation of suitable social benefit program approaches so that genuine value is provided to the host community throughout construction and operations.

Ongoing engagement will seek to confirm community degree of satisfaction with the CCS & BSP and the value of Neoen's contributions within the region.

7. COMMUNITY ENGAGEMENT PLAN

The following plan outlines recommended measures for delivering ongoing, consistent engagement for each remaining stage of the CSF Project.

Measures have been designed in consideration of the expectations of all stakeholders engaged to date and aim to specifically mitigate social impacts and ongoing stakeholder concerns.

Table 5: Pre-construction phase engagement timeframe

PRE-CONSTRUCTION					
Activity	Description / Format / Tools / Resources	Target Stakeholders	Purpose	Timeframe	Responsibility
Stakeholder mapping	Revisit Project Stakeholder list and update. Confirm relationships and level of influence / interest measures are current.	Project Team	Inform	COMPLETE	Community Liaison Officer Project Manager
Traditional Owners	Engage further with Traditional Owners for purposes of sharing details of detailed planning outcomes on cultural heritage. Investigate options for delivery of works via RAP employment arms (e.g. landscaping, civils, etc.).	Traditional Owners	Collaborate	Ongoing	Community Liaison Officer
Re-initiation briefings	Re-engage with key stakeholders to confirm expectations and concerns – update in register. Utilise these meetings to consult on shared benefit preferences and provide update on project approach and timing.	Council MPs	Involve	Ongoing	Community Liaison Officer Project Manager
Landholder engagement	Re-engage with host landholders to address any emerging issues or concerns, update on timelines and seek input to community engagement	Landholders	Involve	Ongoing	Community Liaison Officer Project Manager
Agrisolar	Consultation with host landholders for agrisolar including fencing and other requirements	Landholders	Collaborate	Ongoing	Project Manager

Neighbour consultation	Engage with near neighbours specifically in lead up to construction and utilise these meetings for the purpose of establishing neighbour payments	Adjacent neighbours	Involve	Ongoing	Community Liaison Officer Project Manager
Neighbour meetings	Meeting/s for Culcairn neighbours to provide updates on project in lead up to construction	Neighbours	Involve	Ongoing	Community Liaison Officer Project Manager
E-newsletter	Produce further editions of e-newsletter to provide update on Project timing and approach. Invite feedback and offer further opportunities to engage	Adjacent neighbours Culcairn community Key stakeholders	Involve	Ongoing	Community Liaison Officer
E-database	Include promotion of website function for subscription to email updates and stakeholder comms as required.	All	Inform	Ongoing	Community Liaison Officer
Website	Update project website to include recent information on planning and pre-construction works, include relevant planning documents as required.	All	Inform	Ongoing	Project Manager
Project Fact sheet	Update Project Fact Sheet, provide during stakeholder and neighbour meetings or as required.	All	Inform	Ongoing	Project Manager
Local business community information session	Host and run an information session for local businesses to find out about supply packages and provide support to tailor tenders. Potentially coordinate in conjunction with Council.	Local businesses (suppliers)	Collaborate	Refer to IAPP	Project Manager Community Liaison Officer
Media	Set up media monitoring to track coverage of project construction and development.	All	Inform	Ongoing	Project Manager
Stakeholder Register	Maintain Stakeholder Register.	Project Team	Inform	Ongoing	Community Liaison Officer

					Project Manager
Enquiries and Complaints Register	Maintain Enquiries and Complaints register. Include current Enquiries and Complaints Procedure on project website. Monitor 1800 Project number.	Project Team	Inform	Ongoing	Project Manager
Local Investment Impact	Assessment of direct/indirect economic investment and employment metrics for ongoing use in communicating the positive impact of the project	Project Team	Inform	Ongoing	Project Manager
Agency engagement	Facilitate required meetings with local agencies for purposes of compiling remaining technical studies and reports prior to construction.	Regulatory Authorities EPA	Involve	Ongoing	Project Manager
EPC Input	Host pre-tender workshops for potential EPCs to understand Neoen social procurement requirements. Prepare a 'Community Context' fact sheet for EPC contractor and subcontractor to ensure they are informed of local community, context and key issues.	EPC	Inform	Ongoing	Project Manager
Social procurement	Initiate engagement with key stakeholders to identify opportunities the project can offer to NSW First Nations communities and underrepresented groups.	Community groups, local businesses and networks	Collaborate	Refer to IAPP	Community Liaison Officer
Special interest groups	Continue to engage with relevant groups to provide updates and identify any opportunities for collaboration.	Community energy groups Landcare	Involve	Ongoing	Community Liaison Officer

		Community organisations Advocacy groups			
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Table 6: Construction phase engagement timeframe

CONSTRUCTION					
Activity	Description / Format / Tools/Resources	Target Stakeholders	Purpose	Timeframe	Responsibility
Start of construction media	Issue proactive media release to mark start of construction. Highlight local benefits and local employment targets, approach and outcomes.	Media	Inform	Q4 2023	Community Liaison Officer Project Manager
Start of construction event	Host event for Landholders to mark start of construction. Introduce Project Manager and EPC and invite feedback on planned approach to monitor for new issues/concerns.	Neighbours	Involve	Q1 2024	Project Manager
Key stakeholder meetings	Further meetings with key stakeholders to introduce Construction Manager and EPC where necessary. Invite feedback on planned approach to monitor for new issues/concerns.	Council MPs Regulatory Authorities Local community groups	Involve	Q2 2024	Community Liaison Officer Project Manager EPC
Site signage	Provide informative site signage in addition to minimum compliance signage. This will include contact details for the community.	All	Inform	Q2 2024	Project Manager EPC
Community Benefit Fund	Establish Community Benefit Fund Advisory Committee via local advertising and newsletter coverage and host first meeting. Provide and agree on Terms of Reference.	Council Neighbours Culcairn Community General community	Empower	Q3-Q4 2025	Project Manager

Building capacity for local employment	Continue discussions, face to face introductions with key employment and economic representatives to establish best means of supporting local hire objectives with EPC.	Local suppliers Local workers	Inform	Refer to IAPP	Project Manager Community Liaison Officer
Social procurement	Continue engagement with key stakeholders to engage organisations that work directly to offer opportunities to Aboriginal Individuals and underrepresented groups.	Traditional Owners/ Aboriginal Businesses Local NFP Employment agencies Schools	Collaborate	Refer to IAPP	Community Liaison Officer
Community e-newsletter	Continue production of community e-newsletter and provide updates on construction as required. Deliver to neighbours within 3 km and email to key stakeholders and community database.	Neighbours Key stakeholders	Inform	Ongoing	Project Manager
Transport route engagement	Consider additional stakeholders impacted by transport route, site deliveries and commence targeted engagement in advance of transport occurring.	Transport route residents Australia Post local service	Involve	TBC	Project Manager
Neighbours	Continue close engagement with neighbours to inform of project progress, timings and monitor for issues as they arise. Implement use of construction amenity fund as required to mitigate impacts.	Neighbours	Collaborate	Ongoing	Community Liaison Officer
Agrisolar	Continue to consult with host landholders on agrisolar design requirements, including site design, fencing etc. Incorporate on-site meetings to assess progress and identify any operational issues.	Landholders	Collaborate	TBC	Project Manager

Emergency Services	Continue to engage with RFS and other emergency services to ensure project supports local emergency response.	Emergency services	Inform	TBC	Project Manager
Ongoing media and community outreach	Continue to provide factual, informative media stories to local paper for the purposes of updating community/stakeholders on project achievements and deliverables against social benefit and local procurement plans.	Media Culcairn community Greater Hume Shire LGA	Inform	Ongoing	Community Liaison Officer
Enquiries and Complaints Register	Maintain Enquiries and Complaints register and respond in line with procedure. Monitor 1800 Project number and website enquiries. Periodically report feedback from this process to Construction team to adjust approach / engagement plans if required.	Project Team	Inform	Ongoing	Project Manager
Resident drop-in session	Consider hosting onsite or nearby resident drop-in session for community members to meet with the Construction team and participate in an informal update / discussion on ongoing works onsite.	Neighbours Culcairn community	Involve	TBC	Project Manager
Key stakeholder tours	Provide an in-person experience of solar farm construction by providing key stakeholder site tours, hosted by Neoen and EPC. Utilise initiative as opportunity for media if appropriate.	Council MPs Chamber of Commerce Community groups	Involve	TBC	Project Manager
Community engagement monitoring and review	Periodically monitor / assess quality, timeliness and reach of engagement initiatives. Confirm engagement plan is meeting proposed objectives.	Project Team	Inform	Ongoing	Community Liaison Officer

Table 7: Operations phase engagement timeframe

OPERATIONS					
Activity	Description / Format / Tools/Resources	Target Stakeholders	Purpose	Timeframe	Responsibility
Start of operations media/event	Consider running start of commercial operations event and media announcement. Invite key stakeholders, neighbours as opportunity to share the outcomes delivered by the Project to date.	Media Neighbours Council MPs Special interest groups Project Team	Inform	COD	Community Liaison Officer Project Manager
Project Fact Sheet	Redevelop Project Fact Sheet to suit operations and use for distribution in hard copy during school visits, tours and the website.	All	Inform	COD	Project Manager
E-newsletter	Final edition of the e-newsletter to detail approach to asset management and to support transition into operations.	Neighbours Culcairn community	Inform	COD	Project Manager
Neighbour relations	Maintain relations with immediate neighbours via direct communications, involvement in wider community activities and provision of an annual onsite event. Utilise neighbour communications for early identification of issues and risks (i.e. noise).	Neighbours	Involve	Ongoing	Project Manager
Enquiries and Complaints Register	Ongoing implementation of formal Enquiries and Complaints Procedure to ensure ongoing best-practice management of community contacts. Maintain 1800 Project number.	All	Involve	Ongoing	Project Manager
Incident Response Procedure	Specific communications and engagement input to incident management to ensure community and stakeholder perspective included (i.e. media	All	Inform	Ongoing	Project Manager

	management, neighbour notifications).				
Community outreach	Provision of site tours, speaking engagements, and/or the Learning Hub to relevant groups including MPs, Councils, Business Authorities and Schools.	Culcairn community Greater Hume Shire LGA	Involve	Ongoing	Project Manager
Community Benefit Fund	Implement annual community grants commitment each year, to run for the life of the asset. Implementation includes planning, activation (advertising and stakeholder comms), media, and liaison with social benefit partners in collaboration with the Grants Committee.	Neighbours Council Culcairn community Greater Hume Shire LGA	Empower	Ongoing	Project Manager
Council and Emergency Services meeting	Maintain periodical meetings with the Council Mayor and General Manager (Council, quarterly). Maintain annual site meetings with CFA prior to bushfire season.	Emergency Services Council	Collaborate	Ongoing	Project Manager
Website	Maintain the existing CSF website and update with relevant operations, news and community news as required. Maintain as primary source of detailed project information.	All	Inform	Ongoing	Project Manager
Industry advocacy	Proactively identify opportunities to promote CSF Operations to broader energy industry (i.e. conferences, memberships).	Energy industry	Involve / collaborate	Ongoing	Project Manager

Table 8: Decommissioning phase engagement

DECOMMISSIONING

As part of the responsible management of all assets, Neoen develops a Decommissioning and Rehabilitation Plan in the Project's later years. The DA requires this within 3 years of the commencement of operation. Engagement with neighbours and key stakeholders remains a key activity prior to and through this phase.

An engagement plan will be developed alongside the CSF Decommissioning Plan and will include the following essentials:

- Continuation of the Enquiries and Complaints Procedure, 1800 number and website
- Collaboration with Council and key community groups to forward-plan for any impacts to the socio/economic status of the region
- Informative communications on the approach to decommissioning, timing, impacts and mitigation of environmental concerns
- A structured approach to ensure the site can return to full grazing / agricultural land use, in close cooperation with landholders
- Support for onsite personnel to transition to other employment in the area
- Support for community groups and grant recipients to sustain partnership programs and initiatives.

8. REPORTING & EVALUATION

Neoen is committed to continually improving its approach to engaging with the community and how it works to shape mutually beneficial plans and initiatives.

Evaluation is not a stand-alone or isolated process. Evaluation is an integral and on-going component of every communication and engagement activity. Evaluation is also a vital element for forward planning and can provide a strategic basis for decisions about issues, including the allocation of resources.

Evaluation and monitoring will be used to guide the ongoing delivery of community engagement and the overall development of CSF.

8.1 Objectives of monitoring and evaluation

The key objectives of monitoring and evaluation are to:

1. Measure anecdotal levels of community and stakeholder support for CSF and the project team with the view to improving this over time and / or changing the engagement approach if key issues emerge.
2. Verify that stakeholders and community members are provided with regular and diverse opportunities to be involved (or empowered) in planning, delivery and assessment of community benefits and outcomes.
3. Monitor the number of complaints made in relation to the CSF project and Project Team efficacy in responding to these in an efficient, timely manner.
4. Evaluate the measurable benefits of any community benefits or formal community engagement initiatives.

The following table provides details of monitoring and evaluation methods that will be utilised by the CSF Project Team.

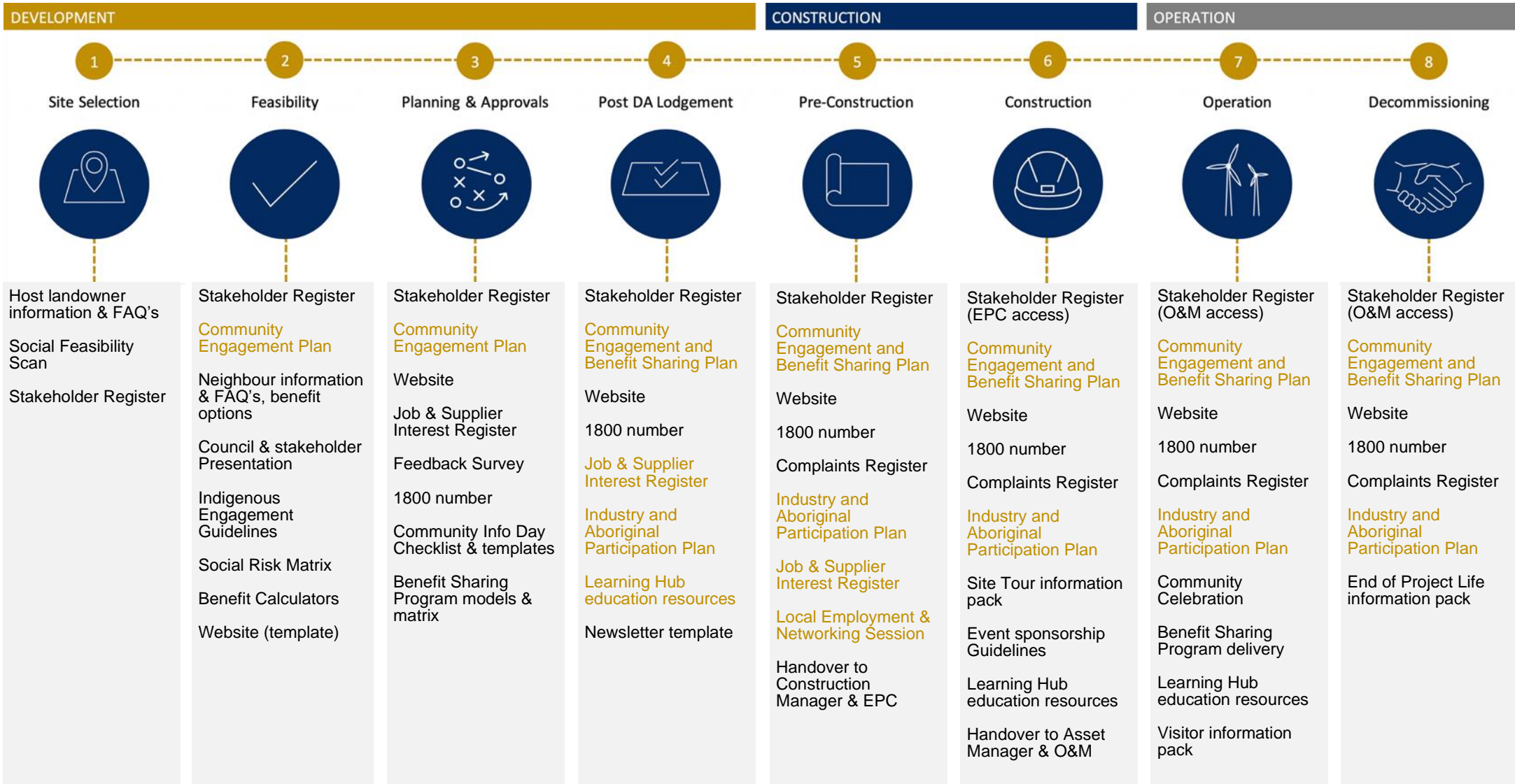
Table 9: Monitoring & evaluation methods

OBJECTIVE	HOW MEASURED?	METRIC/S	WHO
Measure anecdotal levels of support. Adjust engagement approach in response to issues if monitoring shows these to be emerging.	Progressively evaluate delivery of Community Engagement Strategy to plan.	>80% of community engagement strategy initiatives delivered to plan.	Community Liaison Officer
	Collate total number of local media articles and evaluate percentage of positive coverage.	>60% positive media appearing in local/state media.	Community Liaison Officer
	Provide forms at events, briefings and via web.	>60% positive feedback forms.	Community Liaison Officer
Verify that stakeholders and community members are provided with regular and diverse opportunities to be involved (or empowered) in planning,	Track involvement / frequency of key stakeholders in specified engagement activities.	Number of key stakeholders (High Interest, High Impact) considered involved ¹ in CSF engagement initiatives	Community Liaison Officer

¹ Involved – as per IAP2 Spectrum definition of level of engagement.

OBJECTIVE	HOW MEASURED?	METRIC/S	WHO
delivery and assessment of community benefits and outcomes.	Monitoring unique use of website forms.	Number of unique uses of website forms.	Community Liaison Officer
	Measurement of specific feedback relating to perceptions of involvement (feedback forms, face to face interaction, etc).	Stakeholders self-report increased level of involvement in CSF outcomes, or generally as an outcome of engagement.	Community Liaison Officer
Monitor the number of complaints made, specifically the number of complaints that are escalated to third parties, and Project Team efficacy in responding to these in an efficient, timely manner.	Track register of enquiries and complaints received.	<ul style="list-style-type: none"> – <5 unique complaints made to CSF per quarter. – <2 unique complaints escalated to third parties per 6 months. – >90% complaints and enquiries satisfactorily resolved within agreed timeframe. 	Project Manager
Evaluate the measurable benefits of any community benefits or formal community engagement initiatives	Unique number of quality initiatives delivered either as partnerships or via Grant funding.	Number and dollar value of initiatives delivered to local community that deliver improved outcomes.	Community Liaison Officer
	Measurable benefits or outcomes delivered as a direct result of the CSF Community Fund.	Target outcomes delivered as a result of community funding (e.g. new scholarships offered, training places provided, environmental gains realised, etc.)	CBF Advisory Committee
	Evidence Community partnerships or investments lead to long term 'legacy' improvements for host community.	Number of initiatives that provide longer-term outcomes (e.g. establish new infrastructure, provide long-term skills development, set up new social enterprises etc.)	Community Liaison Officer

APPENDIX A: COMMUNITY ENGAGEMENT TOOLK



APPENDIX B: ENQUIRIES & COMPLAINTS

The following process has been developed in accordance with the Australian / New Zealand Standard Guidelines for complaint management in organisations and in consideration of recommendations from publications by the Australian Energy Infrastructure Commissioner:

The process for managing complaints and concerns raised by community members involves several key steps including receiving, registering, investigating, responding to and addressing complaints stakeholders.

Table 10: Complaint lodging contact details

Project website	culcairnsolarfarm.com.au
Telephone number (toll-free)	1800 966 122
E-mail	contact@culcairnsolarfarm.com.au
Mail	GPO Box 1950 Canberra, ACT 2601

The contact details in the above table will be published on the project’s public website, alongside an outline of the complaints and investigation process. This information will also be made available in community consultations that occur in the lead up to construction commencement, and at any community consultation that is held during the construction period.

Step 1: Receive and register a complaint

Contact is received from community members and may be received through the following methods: verbally either in person or via telephone or in written form via electronic mail and/or via the website.

It may be an inquiry, a concern or a complaint. If it is an inquiry or a concern we will respond directly to this and simply record this interaction in the stakeholder register.

If it is a complaint then the following procedure is followed:

Upon the receipt of a complaint, a set of standardised information will be collected, recorded and filed to ensure an efficient and standardised process.

The following information will be collected from community members:

- The complainant’s name and address;
- A unique reference number is to be communicated to the complainant;
- Any applicable turbine or monitoring mast reference number; and
- The complainant’s concerns including date, time, prevailing conditions and description of the complaint.

This information must then be recorded in the relevant project’s Complaints Register.

Step 2: Acknowledging complaints

A non-urgent complaint will be acknowledged by the responsible Project Manager within 3 business days of the complaint being submitted. If it’s an urgent complaint then a response will be provided within 24 hours. This acknowledgement will be made via phone or email with any written correspondence dated and kept on file.

The acknowledgement will include:

- A summary of the complaint, with a reference number provided;
- The opportunity to clarify issues or a request for further information if required;
- The proposed investigation approach; and
- An estimated timeframe in which the stakeholder can expect to receive a response.

Where a complaint can be easily resolved or is better categorised as a request by a stakeholder for additional information, it may be appropriate for the Project Manager to immediately respond to the stakeholder.

Step 3: Investigating complaints

The Project Manager is responsible for ensuring all complaints are investigated and that all reasonable attempts to seek a resolution are made. The investigation may be delegated to an appropriate Neoen staff member. Accurate records of the investigation must be maintained including records of meetings, discussions and activities.

The investigation may involve:

- Site visits, particularly in the instance of reported property damage;
- Consultation with Neoen staff or contractors, including senior management when required;
- Acquiring monitoring data and evidence (e.g. for noise or dust complaints); and
- Contacting external stakeholders.

Step 4: Responding to stakeholder/complainant

Following the investigation, the results, including details of the findings and proposed resolution, will be clearly explained to the complainant. In most circumstances, it will be at this stage that the complainant will determine if the resolution is satisfactory.

Step 5: Closing the complaint

If the process has been concluded appropriately then the Project Manager will close the complaint and make a file-note to this effect in the Complaints Register. Formal written correspondence must also be issued to the complainant confirming that the complaint has been closed.

If the complainant is not satisfied with the investigation and resolution then the complainant has a right of review. This will be undertaken by the Project Manager to ensure that the complaint process has been properly followed.

If a complainant is not satisfied with Neoen’s investigation and proposed resolution, the complainant will be advised by Neoen that they have the right to contact a number of other bodies such as Greater Hume Shire or the National Wind Farm Commissioner or seek legal advice. Neoen will provide complainants with the relevant contact details, as seen in Table 11 below.

Table 11: Alternative complaint contacts

Alternative Contact	Email / number
Greater Hume Shire Council	mail@greaterhume.nsw.gov.au
Australian Energy Infrastructure Commissioner	aeic@aeic.gov.au
LegalAid NSW (Riverina Murray - Albury)	02 6020 7200

Step 6: Recording and registering the complaint

Upon the closing of a complaint, the following information will be updated in the Complaints Register with the additional following details:

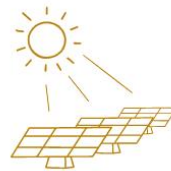
- The process of investigation that was undertaken to resolve the complaint;
- What the proposed resolution was;
- Whether this was accepted and how it was implemented;
- Whether or not the complaint has been resolved to the satisfaction of the complainant; and
- The reason why the complaint was closed.

APPENDIX C: PROJECT WEBSITE



OVERVIEW

The Culcairn Solar Farm is a 350MW renewable electricity project comprising solar arrays and battery storage near the town of Culcairn, New South Wales.



SOLAR

Solar farms are quiet, with the same solar panels you would place on your roof – supplied by premium brands.



BATTERY

Battery storage allows us to store the wind and solar energy and provide it to the grid whenever it's needed.

APPENDIX D: CONDITIONS OF CONSENT MATRIX

This CCS & BSP has been prepared to fulfill the requirements of Schedule 2, Condition 13 of the development consent for the Culcairn Solar Farm. A compliance matrix for this CCS and Schedule 2, Condition 13 is presented below. This CCS & BSP will be implemented through the construction and operation phases of the project.

Schedule	Condition	Relevant section of this CCS
2	13. Prior to commencing construction, the Applicant must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Applicant, and the community (including adjoining affected landowners) during construction. This strategy must:	
	a) Identify landowners for potentially impacted residences including but not limited to R09, R17, R19, R24 and R33;	Section 3 Section 4.1
	b) Ensure that the landowners identified in (a) are consulted during construction;	Section Error! Reference source not found.
	c) Set out procedures and mechanisms for the regular distribution of information to wider community;	Section 7
	d) Establish a public liaison officer(s) to engage with the local community; and	Section 4.5
	e) Set out procedures and mechanisms: <ul style="list-style-type: none"> • Through which the community can discuss or provide feedback to the Applicant • Through which the Applicant will respond to enquiries or feedback from the community; and • To resolve any issues and mediate any disputes that may arise in relation to the construction of the development. 	Appendix B
	The Applicant must implement the Community Communication Strategy for the duration of Construction.	

