



Boral Berrima Cement
Tyre Chip Storage
Stakeholder Engagement & Consultation Plan
EXTERNAL VERSION



May 2023



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1.0 Background

- The Boral Berrima Cement Works is the flagship operation of Boral's integrated cement supply network. The site hosts the only operating kiln of scale in the state, which in turn provides more than 60 percent of cement products consumed by the NSW/ACT building and construction market.
- From the commencement of operations in 1929 through until 2013, the heat energy source used in the Cement Works' various kilns was primarily provided via coal mined at the Berrima (Medway) Colliery, eight kilometres to the west of the site.
- Various economic challenges forced the Colliery to revert to a 'care and maintenance' mode in 2013, with the site's permanent closure announced during July 2014. A program of works has been under implementation ever since to deliver a consequent Closure Plan.
- The discontinuation of supply from Medway meant the Cement Works transitioned to coal transported from mines in the Illawarra. While this has continued successfully to date, cost of production pressures associated with the 100 percent use of coal as fuel energy for the kiln have persisted.
- Several years ago, Boral Cement began exploring options to integrate solid waste-derived fuels (SWDF) into the kiln's energy mix. Successfully doing so would reduce the Cement Works' reliance upon coal given a portion would no longer be required as a result of using SWDFs.
- The use of SWDFs by Boral is not new. The Berrima site has an existing approval to use rubber tyre 'chips' as gained in the early 2000s, while Boral's former Waurm Ponds (Geelong) kiln also ran SWDFs until its closure in 2013. SWDFs are in standard use by cement kilns throughout Europe.
- The modification process was undertaken between 2014 and 2016 and sought not only to permit the use of SWDF and RDF as fuels, but also to have several air emission limits adjusted to align with the expected outputs resulting from their use.
- The NSW Department of Planning Industry and Environment (DPIE) granted approval for the modification at the beginning of October 2016. The obtaining of the approval was announced to the public at the Cement Works' regular community meeting of 10 November 2016.
- As per condition 1.4CA, following consultation with the EPA on 8 October 2021 and a letter of support on 22 October 2021, Boral notified the DPE on 21 December 2021 of the intention to undertake a six-month trial to receive and use up to 205 tonnes of AKF-5 tyre chips at the site. On 21 January 2022, the DPE responded and were satisfied with undertaking the trial and the proposed temporary storage of chipped tyres during the trial.
- The trial commenced on the 25 January 2022 when the first delivery of tyre chips was received from Molycop360 in Cootamundra (EPL 21294). A total of 102 tonnes of tyre chips were delivered and used at various feed rates of 1t/hr, 2t/hr and 4.5t/hr. The trial was considered to have a positive result, in that the kiln operation did not change due to the use of the AKF-5 tyre chips in the pre-calciner, the environmental performance of the operation did not change (air/water), the existing feeding conveyor CO75 could handle the AKF-5 tyre chips at the trial feed rates. In addition, no steel accumulation was observed in the slopped section of the riser in the calciner.
- In the last trial report on 29 July 2022, it was concluded the trial has met all the trial objectives in that the Kiln operation will not change due to the use of alternative fuels (tyre chips AKF-5) in pre calciner. Given the success of the trial, Boral sought a modification to the existing consent to permit the external storage of AKF-5 tyre chip fuel and the loading of the fuel via an external feeding system (hopper or unloading docking station) and the existing feeding conveyor CO75. Modification 15 was approved in early 2023.
- As part of the requirements of the modification approval, before works can begin a Construction Environmental Management Plan (CEMP) is to be submitted to the DPE for approval. **A component of the CEMP is a 'community consultation plan' which is fulfilled by this document.**
- Further to the approval of the CEMP by DPE, this community consultation plan has been reviewed in line with the ongoing requirements of the Operational Environment Management Plan.

2.0 Aims of Engagement and Consultation

The objectives of the Berrima Cement CBS Project are:

- To build the plant and equipment necessary to successfully integrate the use approved SWDFs as heat energy into the clinker production process;



- To remain in compliance with the Cement Works' modified planning consent throughout the construction, testing, commissioning and ongoing usage phases;
- To achieve the anticipated reduction in the costs of clinker production, assisting with the long-term viability of the Berrima operations.

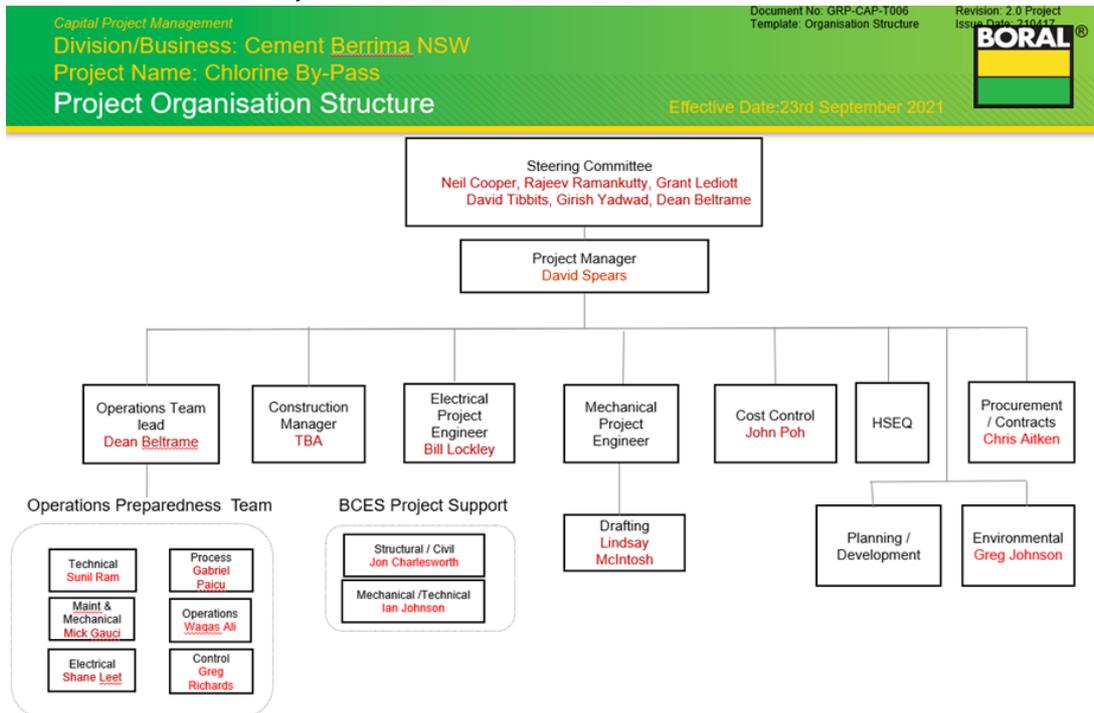
In supporting the objectives of the Project, the aims of this Engagement and Consultation Plan (E&C Plan) are therefore to:

- Build upon the positive outcomes of the earlier E&C Plan implemented during the planning modification period of this Project;
- Ensure the local community is aware of the construction schedule and provided with advance notice of any activities which have potential to influence them;
- To keep local stakeholders up-to-date with the testing of the new plant and equipment, and the results of same, in order to gather feedback which assists with completion of the Project and ongoing operations;
- To ensure the business and its contractors remain aware to potential matters of community complaint, and address any feedback in an appropriate and timely fashion;
- To make the Berrima site more accessible to the local community through promotion of both the Project and day-to-day business;
- To highlight the positive benefit the Project will provide to the local area and wider state in terms of environmental and social outcomes; and
- To meet the community engagement obligations of the CEMP, general modified planning consent, and NSW Environment Trust grant funding.

3.0 Project Team and Internal Resources

The Berrima Cement SWDF Implementation Project is an initiative of Boral Cement. The business is wholly responsible for providing budget and ancillary resources (eg administration support) as required by members of the Project Team, including Boral's Stakeholder Relations team.

Members of direct relevance to the delivery of this E&C Plan are detailed in the Table below:



4.0 The IAP2 Spectrum as part of this Plan

The International Association for Public Participation Spectrum (IAP2) is an internationally recognised tool which is used to guide the development and implementation of stakeholder engagement programs.

It consists of a number of public participation ‘goals’, with a ‘promise’ attached to each goal which outlines the level of interaction stakeholders can expect with the proponent of any project requiring stakeholder engagement.

IAP2 has been used by Boral for a number of years to determine the level at, and approach which, individual stakeholder groups should be engaged during projects and initiatives. The table below outlines each of the five levels included within the Spectrum.

Level	IAP2 Goal	Promise
Inform	Provide balanced and objective information to stakeholders and assist their understanding	Keep stakeholders informed
Consult	Obtain stakeholder feedback on analysis, alternatives and/or decisions	Acknowledge stakeholder concerns and provide feedback on how stakeholder input influenced the final decisions
Involve	Work directly with stakeholders throughout the process to measure concerns. Stakeholder aspirations are understood and considered.	Stakeholder concerns directly reflected in alternatives
Collaborate	Partner stakeholders in each aspect of the decision including alternatives and solutions	Incorporate stakeholder advice and recommendations in decisions
Empower	Final decision making in the hands of the public	Implement community decisions

5.0 Who are our Stakeholders?

Boral’s Berrima operations have been intrinsically linked to the local community ever since the establishment of the Cement Works during the 1920s. The adjacent township of New Berrima, immediately to the north of the site, was settled as an ancillary village for staff of the cement operations.

In recognition of this relationship, the Cement Works has maintained an active community engagement program through which regular opportunities for interaction with local residents and other stakeholders are facilitated. The program is broad reaching and includes a number of communications channels and a community contributions approach.

Thanks to the frequent participation of stakeholders in these opportunities, the Cement Works has formed firm relationships with numerous individuals and groups in almost all of the 13 categories used by Boral to classify its stakeholders.

The result for this Project is that virtually all stakeholders with the potential to have an interest are readily identified. As this E&C Plan has been written to follow the similar one developed in support of the initial planning modification process, the previous Plan’s Stakeholder Register will again be used.

5.1 Primary (critical) stakeholders

Boral regards all stakeholders as of equal importance when communicating about day-to-day initiatives or ‘special projects’. Stakeholder engagement and consultation plans are accordingly tailored to be inclusive of all parties, with emphasis on those groups most likely to be influenced or affected by any changes or new proposals.

Of these, the ‘primary’ stakeholders are summarised in the table below:

Primary Stakeholder	IAP 2 Engagement Level	Involvement / Key Issues
New Berrima residents and businesses	Inform / Consult	Potentially affected by any activity at the Cement Works

Primary Stakeholder	IAP 2 Engagement Level	Involvement / Key Issues
		<p>Sensitive receivers of any outputs generated by CBS construction and usage</p> <p>Were largely supportive during planning application process</p> <p>Effects of changed air emissions limits – concerns over perceived health risks</p> <p>Concerns related to construction activity – noise / dust / traffic</p> <p>Concerns about SWDFs – air emissions / odour / nature of materials being imported to site</p> <p>Long-term positive outcomes for local employment if cost of production decreases achieved.</p>
Wingecarribee Shire Council	Inform / Consult	<p>Representative body for local community</p> <p>Strict adherence to conditions of consent, especially concerning air quality</p> <p>Previous discussions about intaking wood waste from Council landfill site</p> <p>Support for retaining of long-term employment and ratepayer</p>
NSW Member for Goulburn (Wendy Tuckerman MP)	Inform	<p>Recent concern and opposition about EfW projects such as Jerrara Power, specifically those located near Goulburn.</p> <p>Generally supports Berrima Cement as it is located within established industrial routes and zones</p> <p>Access to monitoring data for residents is a key issue</p>
NSW Department of Planning and Environment	Collaborate	<p>Regulator for overall planning consent</p> <p>Compliance with all terms of the new consolidated and construction specific components of the planning consent</p>
Environment Protection Authority of NSW / NSW Environment Trust	Collaborate	<p>Regulator for Environment Protection Licence – part of consent conditions</p> <p>Environmental outputs, specifically air quality.</p> <p>Completion of obligations under terms of grant</p>
Contractors and Boral project employees	Collaborate	<p>Responsible for the physical implementation of the Project</p> <p>Compliance with the modified conditions of consent for the site – CEMP</p> <p>Appropriate conduct of activities on site in accordance with day-to-day site community engagement standards</p> <p>Ensuring local community receives appropriate notice for activities with potential to affect surrounding properties</p> <p>Timely and professional addressing of complaints/feedback received</p>

6.0 Issues for consideration

Ahead of the implementation of an E&C Plan, it is important to identify or reasonably predict the range of issues which could arise as a result of the associated Project.

This can be achieved as the result of structured research or surveying using tools such as Boral's Stakeholder Perception Benchmark, and through listing out known issues of relevance which have arisen through day-to-day contact and general community engagement activities at the site.

Once identified, predicting the risk of each issue upon the overall project and the potential mitigations which can be put in place becomes key to the effectiveness of the E&C Plan. Risk and likelihood ratings are configured through use of Boral's Risk Assessment Matrix.

For the SWDF Implementation Project, a number of potential issues have been identified. These have been predicted based upon topics raised during the planning modification process, and observations picked up through day-to-day site stakeholder engagement activities during the past two years.

These matters, their relative level of risk, and the proposed 'control' mechanisms remain confidential to Boral, however a broad summary of the topics considered includes:

- Potential for the scheduled construction activities to generate effects which influence surrounding properties and residents;
- Due notification of intent to undertake works which may have an effect on surrounding properties and residents;
- Revisitation of issues which were addressed during the planning modification assessment phase, such as the consequences of the amended air emission limits;
- Regional perception of the import of waste into the local area;
- The Project's testing and commissioning phase;
- The potential for the Project not to deliver the expected economic and/or environmental outcomes; and
- Non-compliance with any aspect of the site's or Project's planning consents and other approvals.

7.0 How will we engage our Stakeholders (channels)?

The following channels will be used to ensure the broadest reach of stakeholders can be informed and included:

- **Letters** – formal to key stakeholders, initially to update about the transition of the Project from approval to implementation, then to notify ahead of key stages.
- **Phone briefings and emails** – for timely notification and as a precursor to the sending of formal information.
- **One-on-one briefings** – as required to explain the detail of the Project implementation.
- **Site visits/inspections** – will be offered to key stakeholders as an extension of one-on-one briefings or formal presentations, with the aim of allowing them to visualise potential effects of the Project.
- **Formal presentations** – for larger structured groups such as Council.
- **Community meetings** – The Cement Works operates a Community Liaison Group (CLG) as a requirement of the site's planning approval. The CLG, which re-formed in June 2019 to replace a series of regular open community meetings held between 2011-18, meets bi-annually as a primary communication channel between the site and local residents. As described in the planning approval, the CLG consists of community representatives, an appointed representative of Wingecarribee Shire Council, and Boral personnel. To ensure the wider community remains 'connected' to the Cement Works, we also organise Whole of Community (WoC) Meetings if any significant changes are planned at the Cement Works, or if there has been a major issue or topic needing broad communication.
- These sessions also act as a 'report back' on the previous year's activities.
- **Site Open Day/experience** – consideration will be given to hosting a 'controlled' site inspection at a strategic point during the construction phase. This will be arranged to tie into the site's normal stakeholder engagement program of activities, for example the regular community meetings (above).
- **Information/fact sheets** – the 'dot point' fast facts used as part of the collateral produced for the approval phase of this Project will be updated to reflect the implementation phase.
- **Community newsletters** – the site's *Community Update* newsletter will be continued to raise awareness of the Project implementation with local residents, as well as opportunities to provide feedback.
- **Editorial / advertorial** – opportunities will be proactively sought to promote the implementation of the Project as a demonstration of Boral's 'best practice' and industry expertise. Opportunities for photos will form a part of this process. Messaging will centre on the social, environmental and economic benefits of the Project.
- **Website** – The existing Berrima Cement website, <https://www.boral.com.au/locations/boral-cement-works-berrima>, will be used to convey detailed information in support of the Project. Other communications collateral will reference the website accordingly.

8.0 When will we engage our Stakeholders (timeframes)?

The following project benchmarks will be used to notify associated stakeholders:

- **Pre-construction activities** – preparation works such as detailed survey marking, arrangements for construction power and other services and erection of construction fencing and setup areas
Work on this phase is already underway and is expected to continue up until the physical start of construction works at the Tyre Chip Storage site.
- **Phase 2: Commencement of Construction Work** –the first phase of construction will focus on the preparation of groundworks. The majority of the components of the Storage area is fabricated offsite and delivered for installation at Berrima by specialised contractors. The location of the construction works means it will remain almost totally out of external view.
Engagement at this stage will therefore allow Boral to demonstrate the near-completion of one of the major components of the Project. Further details of the construction phases of the project are detailed in Section 3.1.1 of the CEMP.
- **Phase 3: Pre-testing / commissioning** – to ensure continuation of the level of support for the Project notionally received through the planning approval phase, it will be critically important to ensure stakeholders are given notice of the first use of tyre chips.
The importance arises because if the testing is successful and no noticeable effects occur beyond stakeholders' normal experience of the site, any lingering doubts about the use of SWDFs and their external effects can be virtually eliminated.
- **Phase 4: Completion of project / start-up of regular operations** – as the ongoing use of the tyre chips is incorporated into the operations an update will be provided at Community Liaison Group meetings.

9.0 What will we tell our Stakeholders (key messaging)?

Using the aims and objectives of this E&C Plan (Section 2) as guidance, all communications collateral will be developed from a foundation of supporting 'key' messages. While these remain confidential to Boral, the general themes which the messaging incorporates include:

- An overview of the Tyre Chips Program, including the schedule of construction and the activities contained within it, as well as the structures to be established;
- Details about day-to-day operations, including hours of works, Boral's commitment to reduce any risk of external effects from the Project upon neighbours, and how stakeholders can provide feedback, seek more information or register complaints;
- Details about the testing and commissioning phase of the Project, and the information sought and to be shared with the community about same; and
- Messaging from the original E&C Plan implemented during the planning modification phase concerning the rationale for using SWDFs, what SWDFs are, and the benefits of using SWDFs at the site.

10.0 Stakeholder enquiries and complaints process

Enquiries and complaints regarding the Project will be managed in alignment with the site's normal processes for addressing same. Management and resolution of all complaints is the **responsibility of the Berrima site and Cement business**.

Enquiries and complaints may be received via the following channels:

- Directly to the site, site personnel (regular or Project) or contractors;
- Directly to Stakeholder Relations Manager;
- Via members of the Community Liaison Group;
- Via contact with Boral's NSW or Corporate offices;
- Via other Boral personnel; or
- Through Boral's 'feedback' email address (feedback@boral.com.au) or website (www.boral.com.au/feedback)

Enquiries or complaints received by site personnel should be responded to by the appropriate Project Team member unless involvement of the Stakeholder Relations Manager appears necessary.



If the enquiry is deemed a complaint, it will be registered in the site incident register SEQUENCE and managed per associated protocols. The Stakeholder Relations Manager will be notified of all enquiries and complaints received and will be advised of the resolution.

If an enquiry or complaint is received by a contractor, it should be forwarded to the Project Team for resolution.

Any enquiries or complaints received by the Stakeholder Relations Manager via any channel will be responded to and managed in a timely and professional manner by the business in consultation with the Manager. Such management will adhere to the following timelines where possible:

Nature of enquiry / complaint	Response timeframe
Complaint relating to presently occurring works / operations	Acknowledge and action within one day of receipt, ideally on the same working day . If issue raised is complex to resolve, advice to be provided on same day as complaint made, with regular updates provided until resolution.
General enquiry via any channel	Acknowledge within one day of receipt. Response provided within five working days
Written correspondence	Response provided within 10 working days

11.0 Monitoring, Adjusting and Measuring Success

In order to verify that this E&C Plan is reaching the required range of stakeholders, and that the main messaging is being understood, continual monitoring of stakeholder reaction will be undertaken.

The main avenues for monitoring will be:

- Reactions of, and subsequent feedback and questions from, members of the New Berrima community, Wingecarribee Shire Council and other regular participants in the Cement Works' community meetings;
- Commentary received from, and queries passed on by, the State Member for Goulburn's office;
- Input from the DPE and EPA based on community feedback received by them;
- Media attention and resulting editorial; and
- Feedback offered directly to Boral via the provided channels.

Pending stakeholder feedback, adjustments to the Plan may be required to account for issues including:

- Insufficient reach across all stakeholder groups;
- Identification of new stakeholder groups not previously known to the business;
- Non-suitability of preferred channels to stakeholder needs; and
- The need to re-introduce messaging and communications collateral which was used during the approval phase as a way of re-explaining SWDFs or the Project concept.

The ultimate success of this E&C Plan will be defined by the achievement of the overall objectives for the Project as listed in Section 2.0. However, criteria which will be assessed when evaluating success include:

- Direct engagement with Boral about the Project and ongoing SWDF use by a wider group of stakeholders beyond those who normally interact with the Cement Works through the regular community meetings;
- Efficient management of any issues identified by stakeholders and their appropriate addressing in the formal documentation;
- Neutral to favourable local media coverage; and
- Formal and anecdotal positive feedback on the information sharing and engagement processes deployed in support of the Project by both stakeholders and assessing authorities.

12.0 Anticipated cost implications of this Plan

This section of this E&C Plan remains commercial-in-confidence to Boral.