

18 April 2016

Dear Sirs,

**Community Consultative Committee Guidelines – State Significant Projects (Draft CCC Guidelines)**

Goldwind Australia (GWA) welcomes the opportunity to provide comments on the Draft CCC Guidelines (the Guidelines). Community Consultative Committees (CCCs) serve as an important tool in communication with local communities on renewable energy projects. In general, the Guidelines appear to represent a measured approach and are generally supported by GWA. Further detailed comments are outlined below.

GWA welcomes the level of flexibility provided in the establishment of CCCs. Different projects may have different engagement requirements and while CCCs can be effective we agree they may not be the most appropriate engagement tool in every circumstance. We support that the purpose of a CCC is not to be a decision-making body, rather performs an advisory role only.

The role and mechanisms proposed for selecting the independent chair (including independent manner, use of confidential information and reviewing appointments) is supported, however the Guidelines could be improved by providing clarification around the methodology for nominating the position. Credibility in the appointment is vital for the smooth operation of the CCC and a level of transparency should be maintained in the selection process. For example, the Guidelines should outline the method to be used by the Company for recruiting two nominations (perhaps through local advertising), as well as the process should the Department appoint an alternative person as Independent Chair.

GWA supports the overall smaller size of the CCCs, which enable more productive meetings to be held, and the greater guidance given to conduct required by committee members and the proposed Code of Conduct. Also welcome is the selection criteria for community representatives, however clarification on the edibility of host landowners as CCC members would be beneficial. Further detail would be beneficial around involvement and eligibility of environmental representatives as community representatives. For example, organisations which are opposed to specific developments rather than broader environmental concerns, may not be appropriate as environmental representatives.

GWA has some concerns that aspects of the Guidelines appear to give CCCs additional responsibility for identifying issues or providing comment on draft Plans. In particular:

- *“To identify key issues for the assessment of projects and comment on any assessment documentation”*. The identification of key assessment topics for State Significant Developments is currently through the established Environmental Assessment Requirements process with the Department of Planning and Environment (DPE). GWA are concerned that requirements for environmental assessment may become broadened beyond reasonable and necessary requirements.
- *“Review draft management plans and provide suggestions for improvement.”* The scope for Management Plans is normally provided by the Project Approval, the content technical, and the length substantial. Providing draft documentation to CCCs ahead of them being provided to the DPE places an undue burden on CCCs to review extensive draft documentation and is likely to result in a longer process.
- *“Undertake regular inspections of the project’s operations” and “regular inspections of the project...undertaken in conjunction with committee meetings”*. GWA welcomes specific site visits by interested parties and groups, within reasonable timeframes and frequency. Given CCCs meet every three months during project construction, GWA feels inspections of the project every three months by the CCC would be unnecessary and onerous in terms of resources and health and safety requirements.
- *“Annual review reports, monitoring reports and so on are to be distributed to Committee members at the same time as submitted to agencies”*. As above, it would be preferable to supply final reports etc. to CCCs following approval by DPE.
- *“Consult with the Committee prior to seeking approval for a modification to its conditions of consent...”* GWA appreciates the importance of ensuring CCCs are fully informed of significant changes to a project, however there may be circumstances where not all modifications will be able to be raised with the CCC ahead of lodgement. The Guidelines should be modified to consider these circumstances.

Please don't hesitate to contact GWA should you wish to discuss any of the above points further.

Yours sincerely,



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