



Kyneton Licence Amendment

Communications and Engagement Plan

Updated: 5 May 2022

Revision history

Revision Number	Prepared By	Description	Date
1	Coliban Water	Kyneton licence amendment	20 February 2022
2	Coliban Water	Kyneton licence amendment	15 March 2022

1. Introduction

The Kyneton Water Reclamation Plant (WRP) has seen a significant upgrade of infrastructure since 2019. Our operating licence with the Environmental Protection Authority (EPA) requirements amendments to reflect these changes.

We have begun a process with the EPA to amend our licence. We are now preparing documentation with an agreed submission date of 21 March 2022. This will mark the commencement of the statutory process through which EPA will consider how the Kyneton WRP is regulated into the future.

The EPA has advised us that the site will continue to be regulated against the current licence until the licence amendment application has been accepted and a decision on the amendment has been made by the EPA.

The EPA will oversee all community engagement. They have committed to this being a robust process to ensure all feedback from the Kyneton community is captured as part of their assessment. It is important they hear from as many voices as possible. We will mirror any of their communications via our communications channels to ensure this happens.

2. Purpose and background

The Kyneton Water Reclamation Plant (WRP) treats wastewater from approximately 3,800 connections in Kyneton, Malmsbury, Trentham and Tylden - approximately 7,500* people.

The wastewater is collected via 13 pump stations and a sewer network comprising 80 kilometres of gravity mains and 11 kilometres of rising mains. The sewer network also collects wastewater from the Kyneton industrial estate, including Hardwick's abattoir and the livestock exchange.

Wastewater from residential and commercial customers is treated by a Biological Nutrient Removal process and ultraviolet disinfection to produce tertiary treated water, a high quality, low nutrient water. Class B treated water is supplied to the Kyneton Racecourse, Kyneton Botanic Gardens, Kyneton Showgrounds, Barkly Square Recreation Reserve and Hardwick's land for irrigation.

Wastewater from our trade waste customers is treated in a series of lagoons, to produce Class C water, which is used onsite for irrigation. We are licensed by the EPA to release treated water to the Campaspe River at Wards Lane. The water must meet water quality parameters and be released at a maximum ratio of 20% treated water to 80% river flow. River flow is measured at a gauging station at Redesdale.

When there isn't a demand for irrigation water or when there aren't sufficient flows to release water to the Campaspe River our plant has historically struggled to store the treated water it produces.

*As at 15/03/2022

2.1 What does success look like

- That the community understand the EPA licence amendment and engage in the process.
- That the community are confident that we have the appropriate measures to effectively deal with any issues that arise from our operations.

- That the community believe we are open and transparent in our interactions, and that we have information easily accessible.
- That our decisions and recommendations are science or EPA guideline based.
- That we meet the deadlines outlined in the statutory process.
- That we receive a new licence we can comply with.

2.2 Negotiables

To ensure that the decision-making process is widely understood, it is important to be specific and open about the extent to which participants can influence the project. However, the negotiable and non-negotiable issues must be decided prior to discussions with the community and clearly explained at the start. It is important to determine where meaningful engagement can realistically occur and how to manage community expectations, as well as defining roles and responsibilities.

The statutory process and community engagement for the Kyneton licence amendment will be overseen by the EPA, Coliban Water will mirror all communications.

3. Objectives

The communication and engagement objectives outline what we aim to achieve through this component of the project. They are designed to support delivery of the overall project and to minimise risks associated with community concerns and negative perceptions.

The objectives are as follows:

- Ensure that all stakeholders with an interest in the licence amendment process have access to accurate and timely information.
- Continue to provide information to the broader community about the licence amendment process.
- Provide opportunity for the community to track our progress.
- Mirror the communications of the EPA about the engagement process.
- Provide water literacy information about our services generally through social media.
- Be aligned on messaging internally to provide a consistent narrative.
- Create a framework for spokespersons for the media.

4. Stakeholder identification

By segmenting project stakeholders, we can ensure that we are inclusive and appropriate in our communication and engagement approach. It enables us to tailor and time activities according to each group's interest in the project.

Stakeholders are categorised below.

Community are the people who live in Kyneton who are aware of the issues and the project and how it could impact on them, their town and the river.

Regulatory stakeholders and partners have a role in granting approvals for the project works or undertake complementary activities where collaboration is required. This includes government agencies and authorities, local government, non-government organisations, Indigenous and environmental groups.

Landowners are people who live adjoining our land or in the vicinity of where works will be undertaken and who may experience some disturbance during construction or loss of visual amenity.

Internal stakeholders include Coliban Water Board members, contact centre, staff, consultants and contractors.

5. Key messages

Key messages provide the basis of project communication material to ensure that clear and consistent information is provided through all mediums. Below are the general project key messages.

- In response to the operational shortcomings at the water reclamation plant, we fast tracked a \$17 million investment to upgrade the plant, with the Kyneton Solutions Project that is currently underway.
- The objective with these works is to improve treatment process and increase storage capacity so we only discharge high quality tertiary water to the Campaspe River.
- Phase 1 works were announced in October 2019 and were completed in March 2020 - on time and on budget.
- The works included a 270-megalitre storage facility at the Hardwick Meatworks farm site for the storage of irrigation water and a series of improved treatment processes.
- Phase 2 completed works included the construction of a Class C to Class B treatment plant for the trade waste treatment stream.
- The construction of two new lagoons including a 200-megalitre and a 30-megalitre lagoon have now been completed on the plant site to further improve our storage capacity at the plant.
- The final phase of the project is construction of a recycled water pipeline. This work will be completed in the summer of 2022/23.

These are key messages specific to the licence amendment process:

- The Kyneton Water Reclamation Plant (WRP) has undergone a \$17 million upgrade to its infrastructure since 2019.
- Our operating licence with the Environmental Protection Authority (EPA) requirements amendments to reflect these changes.
- We have begun a process with the EPA to amend our licence. We have submitted documentation within the agreed submission date of 21 March 2022.
- This will mark the commencement of the statutory process through which EPA will consider how the Kyneton WRP is regulated into the future.
- The EPA has advised that the site will continue to be regulated against the current licence until the licence amendment application has been accepted and a decision on the amendment has been made by the EPA.
- The EPA will oversee all community engagement. We will mirror any of their communications via social media to ensure this happens.
- They have committed to this being a robust process to ensure all feedback from the Kyneton community is captured as part of their assessment. It is important they hear from as many voices as possible.

6. Issues and risk management

Understanding the current context and identifying potential issues will assist in tailoring effective strategies. This enables us to prepare appropriate responses to mitigate negative outcomes from these issues. A number of specific issues have been identified relating to stakeholder groups and the projects stages.

These issues can be categorised into the following themes:

- Concerns about the licence amendment process.
- Concerns regarding breaches of our licence.
- That the licence amendment process will be a drawn-out process.

It is likely that other issues will be raised through the statutory process. It is important that we address these issues and concerns as they arise.

Subject	Issue	Mitigation strategy
Relationship with the EPA	<ul style="list-style-type: none"> We are currently serving a 2- year good behaviour bond which expires in March 2023. 	<p>Ongoing effective communication with EPA will minimise regulatory risk impacts and compliance issues.</p> <p>This amendment ensures compliance of our plant within an operating Licence, which is monitored and tracked by the EPA.</p>
Licence parameters	<ul style="list-style-type: none"> That the community are not comfortable with the parameters set out in the licence amendment. 	<ul style="list-style-type: none"> Ensure that we are transparent in our communications. Make any information we have available on Connect Coliban. Use science and data as our guide for decision making.
Licence breaches	<ul style="list-style-type: none"> That we will breach our licence. 	<ul style="list-style-type: none"> This is covered off by plant operations as we have risk mitigations in place to ensure compliance. However, any breaches of our licence, or spills etc, we should be open and transparent and post these on our social media platforms (which is our normal process).
Length of Licence Renewal Timeframe	<ul style="list-style-type: none"> Concerns that this may be a long-drawn-out process. 	<ul style="list-style-type: none"> Ensure Stakeholders are briefed on a regular basis. Provide timely updates, including messaging, where required.

7. Communication tools

There are a number of communication tools available to the project that will effectively reach all stakeholders and ensure that key messages can be communicated appropriately and consistently throughout the project.

Tool	Format / information provided
Media	
Editorial	<ul style="list-style-type: none"> Media releases as determined for key milestones.
Advertising	<ul style="list-style-type: none"> No advertising planned at this time.

Tool	Format / information provided
Website	<ul style="list-style-type: none"> ○ A project page exists on Connect Coliban, which will be updated with project works and frequently asked questions. ○ It will also mirror the EPA's engagement plans.
Visual aids	
Project based details	<ul style="list-style-type: none"> ○ Graphical depiction of sites and footprint (already available and completed).
Publications	
Frequently asked questions	<ul style="list-style-type: none"> ○ Responses to questions likely to arise throughout the process. ○ Make these available through Connect Coliban.
Waterway health data	<ul style="list-style-type: none"> ○ Already available on Connect Coliban.
Communication & Engagement	
Connect Coliban	<ul style="list-style-type: none"> ○ We will mirror any engagement from the EPA on Connect Coliban.
Point of contact	<ul style="list-style-type: none"> ○ All correspondence from the public should be directed to the Contact Centre. ○ The EPA will be the main point of contact during the engagement period for the licence amendment.
Questions log	<ul style="list-style-type: none"> ○ The KWRP team are keeping a log of any questions they think may arise in readiness for the engagement period. Maintain a list of frequently asked questions
Internal communication	
Targeted engagement	<ul style="list-style-type: none"> ○ Ensure Executive Leadership Team are regularly informed. ○ Provide tailored information to specific people (e.g. Contact Centre).
Presentations	<ul style="list-style-type: none"> ○ 'All staff' presentations where required.
Intranet	<ul style="list-style-type: none"> ○ Key messages and fact sheets made available on request.

8. Evaluation

Evaluation of this communications and community engagement plan should take place during the project so that improvements can be made where necessary, and at its conclusion so that learning can be built into future projects. The evaluation questions are based on the plan's objectives.

Quantitative research method

Qualitative research method

Evaluation question	KPI	Measure
Have all stakeholders with an interest in the licence amendment had access to clear information?	Level of understanding amongst stakeholders is high.	Anecdotal feedback from stakeholders.
Have directly impacted people been informed about how the project affects them?	Level of understanding amongst direct impacted people.	Number of queries or complaints from direct impacted people.
		Anecdotal feedback from directly impacted people.
Has the community felt engaged during the EPA licence amendment process? (Noting this is led by the EPA, not us).	Feedback received.	Nature of calls and queries.
		Nature of media coverage.

Attachment A: Project stakeholders

The project's target audience has been segmented into overarching target groups and then specific stakeholders (although some may be relevant to more than one group). Also noted is each stakeholder's expected interest in the project, the potential impact of the project on them, and their level of influence on project implementation

Target group	Project stakeholder	Interest in project/ Impact of project on stakeholder	Influence on project
Community	<ul style="list-style-type: none"> ○ Kyneton community members ○ Nearby landowners 	<ul style="list-style-type: none"> ○ There will be varying levels of impact or interest. ○ They will be interested in the outcome of the EPA licence amendment, and how they can track our compliance. 	<p>High - particularly if concerns exist and are ongoing.</p> <p>High – particularly if concerns exist and are ongoing.</p>
Regulatory stakeholders and partners	<ul style="list-style-type: none"> ○ EPA ○ DELWP ○ Macedon Ranges Shire Council ○ Mount Alexander Shire Council ○ Hardwicks ○ Crofton park ○ NCCMA ○ GMW 	<ul style="list-style-type: none"> ○ Interested in the licence amendment. ○ Interested in seeing the licence issued to ensure ongoing compliance. ○ Interested in understanding the process for their constituents/community. 	<p>High – this has been a protracted issue where all stakeholders would like to see a resolution</p> <p>High – The SoO obliges Coliban to consult with the EPA.</p>
Internal	<ul style="list-style-type: none"> ○ Contact Centre ○ Coliban Water Board and staff 	<ul style="list-style-type: none"> ○ Interested in ensuring that the licence amendment process is finalised. ○ Impact is dependent upon their role within the project. 	<p>High – need to ensure that good information and clear consistent messages are available.</p> <p>Staff need to have capacity to answer questions directly and accurately.</p>
Media	Local media outlets	<ul style="list-style-type: none"> ○ Interested in providing information of interest to local community. ○ Interested in publishing community sentiment. 	High – the widespread delivery of key messages is reliant on media coverage.

Item	Objective	Dates
Media framework	To have clear, approved media statements at various milestone points of the licence amendment process.	Ongoing
Key messages	To provide consistent communication messages to staff and public.	Ongoing
EPA licence engagement - community	To mirror the communications of the EPA to ensure the Kyneton Community understand the statutory process for the amendment	Post 21 March 2022
Stakeholder notifications	Advise key stakeholders of the EPA licence amendment process.	Ongoing at various milestone points.
Internal Communications	Inform contact centre and all staff of key messages.	Ongoing
Social media campaign	Use social media channels for ongoing licence amendment updates (mirroring the EPA's messaging).	Ongoing



Item	Date	Who was involved	Discussion points	Key outcomes/concerns
Community meeting	December 2021	<p>Members of the public.</p> <p>Coliban Water staff (Damian Wells, Dale Husted, Emily Byrne).</p> <p>This session was facilitated by Mosaic Lab.</p>	<p>The agenda for the online meeting was as follows:</p> <ul style="list-style-type: none"> • Welcome and overview • Looking back. • Overview of what has been heard and identify key themes. • Current and future state (update on where review process is) • Overview of next steps. 	<p>There were a number of questions asked and answered during the community meeting. For the questions that were not answered, we committed to answering in writing within the week.</p> <p>Post event, all participants received an email outlining:</p> <ul style="list-style-type: none"> ○ All of the questions asked and answered on the night. ○ Answers to the questions that were not answered on the night due to time constraints. ○ The agreed date between Coliban Water and the EPA regarding the licence amendment application submission. ○ A commitment that Coliban Water would mirror any communications regarding community engagement about the licence amendment application.
Kyneton community updates	<p>September 2020</p> <p>February 2021</p> <p>November 2021</p>	<p>Kyneton community members who have opted into receiving community updates.</p> <p>They receive these via email or post, depending on their chosen method of delivery.</p>	<p>Project phase updates</p> <p>Recycled water EOI's</p> <p>Plant operations</p> <p>Water balance information</p> <p>Funding announcements</p> <p>Waterway health data – where to access</p>	<p>EOI's for the Kyneton Water Recycled Pipeline project were received.</p> <p>Community registered for the community meeting, where they were able to ask questions about the past, present and future state of the plant.</p>



Item	Date	Who was involved	Discussion points	Key outcomes/concerns
			Promotion of the Kyneton Community Meeting Promotion of the Urban Water Strategy community consultation Information about Connect Coliban	
Landowner meeting	13 June 2019	Coliban Water staff Kyneton landowners EPA Macedon Ranges Shire Council NCCMA	Actions undertaking to improve the operations at the Kyneton Water Reclamation Plant.	Questions relating to the water quality, general operational capacity, the upgrades to the plant, release details, information about the fine imposed by EPA.
Kyneton Show	2019	Coliban Water staff and general community	General survey questions: <ul style="list-style-type: none"> • How is your drinking water supply? • How are your sewer services? • Do you find Coliban Water easy to deal with? • Do Coliban Water provide value for money compared to other utilities? • How would you rate the trust you have in Coliban Water? • What should be the main focus of Coliban Water in Kyneton in 2020? • General comments. 	Based on the survey, respondents focus included our plans regarding sustainability, growth in the town, catchment health, waterway health and uses for wastewater.
Direct media correspondence	September 2021	Midland Express	Specific questions from media outlet Midland Express regarding the Kyneton Recycled	Statement from Coliban Water regarding direct questions from the community regarding the Kyneton Water Recycled Irrigation Scheme was



Item	Date	Who was involved	Discussion points	Key outcomes/concerns
			Water Irrigation Scheme.	<p>provided as requested to Midland Express.</p> <p>The questions raised were:</p> <ol style="list-style-type: none"> 1. Whether Coliban has secured any irrigation customers yet? 2. How much would Coliban estimate these customers would need to invest to make it viable on their properties? 3. How many customers does Coliban need for this program (and how many acres)? 4. Why have the new lagoons filled up so quickly?
Connect Coliban	Launched in April 2021	<p>General public information page.</p> <p>Prior to April 2021, this information was available on the Coliban Water website.</p>	<p>Waterway Health Data</p> <p>Project phases</p> <p>Kyneton Recycled Water Irrigation Scheme</p> <p>Fact Sheets</p> <p>Community updates</p> <p>Educational videos</p>	<p>The release of our Waterway Health Data was a direct request from a number of landowners in the Kyneton region.</p> <p>This request was fulfilled by making the data public on the Connect Coliban project page. We promoted the release of this data through our Kyneton Solutions Update, and via direct phone calls to those who requested it.</p>
Media releases	October 2019 - ongoing	All media releases were distributed to media outlets in the region, and made available on our website and Connect	<p>3 September 2021 Kyneton operational update</p> <p>18 June 2021 Storage capacity at Kyneton plant doubles</p>	<p>All media releases were provided to media outlets for release.</p> <p>The Midland Express which is the Kyneton</p>



Item	Date	Who was involved	Discussion points	Key outcomes/concerns
		Coliban.	<p>(joint media release with Local Member, Maryanne Thomas)</p> <p>3 March 2021 Kyneton Water Reclamation Plant</p> <p>16 October 2020 La Nina impacting operations at Kyneton Water Reclamation Plant</p> <p>1 September 2020 Phase 2 works on track at Kyneton Water Reclamation Plant</p> <p>13 March 2020 Phase 1 works on track at Kyneton Water Reclamation Plant</p> <p>18 October 2019 Kyneton Water Reclamation Plant update</p> <p>10 October 2019 Works underway to improve Kyneton catchment health</p> <p>1 October 2019 Coliban Water announces plans to improve Kyneton plant performance</p>	<p>newspaper was provided with these stories, and on occasion made the decision to print them.</p>

