



Kyneton Licence Amendment - Engagement Process

Communications and Engagement Plan

29 June 2022

Revision history

Revision Number	Prepared By	Description	Date
1	Coliban Water	Development of a specific plan focused on the engagement process to be undertaken over July/August 2022. In line with overarching Kyneton Licence Amendment Plan (Version 5 May 2022)	29 June 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 commenced the process with EPA to amend our Licence, with our Kyneton WRP Licence Amendment Application submitted to the EPA in March 2022 and accepted by the EPA on Wednesday 11 May 2022. This marked 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.

On 8 June 2022 the EPA advised Coliban Water will now need to undertake the required community engagement and the amendment assessment period is paused until these requirements have been met.

Coliban Water will undertake an engagement approach that is in line with what was planned by the EPA, involving:

- Online availability of the submitted Licence Amendment for public feedback, in week commencing Monday 11 July 2022. This will be available on our online engagement platform Connect Coliban (www.connect.coliban.com.au).
- Promotion of a community drop-in session during feedback period.
- Community drop-in session to be held in Kyneton in early August 2022.
- Public feedback period will close on Friday 19 August 2022. Feedback received (including at the drop-in session) will be provided to the EPA before the end of August 2022.

This will be a robust process to ensure ample opportunity is provided for feedback from the Kyneton community, and is captured and provided to the EPA as part of their assessment process. We believe the EPA need to be involved in the community drop-in session to ensure it is an effective session for participants, and be on-hand to support questioning on the Licence Amendment process.

2. Purpose and background

The Kyneton Water Reclamation Plant (WRP) treats wastewater from approximately 3,800 connections in Kyneton, Malmesbury, 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 per cent treated water to 80 per cent river flow.

River flow is currently 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.

In 2019 when we breached our operating licence at the plant there was strong community feedback, with key themes involving the plant to only produce and release low-nutrient, low-e-coli Class B water to the river in future, and to abandon the measurement of river flow at its current gauging station at Redesdale.

This feedback has been heard and actioned through the investment work undertaken in the Kyneton Solutions Project.

*As at 15/03/2022

2.1 What does success look like

- That the community understand the EPA Licence Amendment process and engage in the process.
- 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. Feedback from the community has been taken on board where appropriate.
- That we meet the deadlines outlined in the statutory process.
- That the community are confident that we have the appropriate measures to effectively deal with any issues that arise from our operations.
- That we receive a new Licence for the Kyneton Water Reclamation Plant that 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.

The Kyneton WRP Licence Amendment submitted to the EPA by Coliban Water is not negotiable as part of this process.

The Amendment has been prepared based on community feedback to date and scientific evidence. It has now been submitted to the EPA for assessment.

The feedback received as part of this engagement process and provided to the EPA will be considered by the EPA as part of their Licence Amendment Assessment process. The feedback received may have some influence in this consideration.

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:

- Deliver engagement actions that meet the agreed expectations of both Coliban Water and the EPA in order to continue the licence amendment process.
- Create an environment for the community drop-in session that is facilitated by an independent 3rd party engagement specialist to maximise the community’s confidence in the engagement’s transparency.
- Having both Coliban Water and EPA parties present will also help to demonstrate that the engagement is taken seriously and will help facilitate the provision of information and provide answers to questions in real time.
- 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 during this period.
- Continue to provide information on our progress with the Kyneton Solution Project works still continuing (Phase 3 underway).
- Ensure consistent messages and narrative throughout the process by aligning all internal stakeholders.

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.

On the IAP2 Public Participation Spectrum, this process is targeted at the **INFORM** and **CONSULT** level. We want stakeholders to be informed of the process and provide opportunity to submit feedback.

Stakeholder group	Description	Interest in project/ Impact of project on stakeholder	Influence on project	Engagement outcome
Community	General members of the Kyneton community	There will be varying levels of impact or interest.	High – particularly if concerns exist and are ongoing. Need to fully understand process and what EPA will do with the feedback provided.	Inform & Consult

Stakeholder group	Description	Interest in project/ Impact of project on stakeholder	Influence on project	Engagement outcome
Landowners	Landowners downstream of the WRP or along pipeline route for Phase 3.	High level of interest in amendment details.	High – particularly if concerns exist and are ongoing. Need to fully understand process and what EPA will do with the feedback provided.	Inform/Consult
Regulatory stakeholders and partners	EPA	The licence amendment process is overseen by the EPA.	Very High	Inform - Involve.
Regulatory stakeholders and partners	DELWP Macedon Ranges Shire Council Mount Alexander Shire Council Hardwicks Crofton Park NCCMA GMW	Interested in the licence amendment. Interested in seeing the licence issued to ensure ongoing compliance. Interested in understanding the process for their constituents/community.	High – this has been a protracted issue where all stakeholders would like to see a resolution.	Inform/Consult
Internal	Contact Centre Coliban Water Board and staff	Interested in ensuring that the licence amendment process is robust and finalised, in order to continue with assessment process. Impact is dependent upon their role within the project.	High – need to ensure that good information and clear consistent messages are available. Staff need to have capacity to answer questions directly and accurately.	Inform
Media	Local media outlets	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.	Inform

5. Key messages

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

Messages have been grouped to key topics, listed below.

Kyneton Solutions Project

- 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.

- These works will improve treatment process and increase storage capacity so we only release high quality tertiary treated water to the Campaspe River during normal operations.
- 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. These works are now underway with work expected to be completed in the summer of 2022/23.

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) requires amendments to reflect these changes.
- We have begun a process with the EPA to amend our Licence. Our Licence Amendment was submitted to the EPA in March and accepted by the EPA on 11 May 2022.
- This marked 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 Kyneton WRP Licence Amendment is now available for public feedback (post 11 July 2022) until the 19 August 2022. Visit connect.coliban.com.au
- A community drop-in session will be held in Kyneton in early August, allowing community members to find out more regarding the licence amendment process and what is currently being assessed by the EPA with regards to the Kyneton Water Reclamation Plant operations.
- The feedback received during this time will be provided to the EPA and considered as part of their licence assessment process.
- The Amendment submitted takes into consideration community feedback to date, and is based on evidence-based review of the available data.
- We believe the Amendment will deliver a Licence for the Kyneton WRP that meets regulatory, operational and environmental requirements, as is protective of beneficial uses of the Campaspe River downstream of the release point.
- Despite the change to the dilution ratio, the overall volume of water released to the Campaspe River under normal operations will decrease.
- We are committed to a robust process to ensure all feedback from the Kyneton community is captured as part of the engagement process.

Licence Amendment Submission

- A major outcome of the Kyneton Solution Project is the water reclamation plant will no longer need to undertake blended water releases to the Campaspe River. The only water that will be released to the river, under normal operating conditions, will have been treated onsite by the Biological Nutrient Removal (BNR) process.
- This commitment is reflected in our Licence Amendment and dependent on the completion of the Kyneton Solutions Project.
- The BNR process produces a high-quality treated water (tertiary treated) that is considered equivalent in quality to Class B recycled water, which can be put to a range of beneficial uses such as irrigation.
- The improvement in the quality of the water when released will result in:
 - at least a 50% reduction in the annual load of total nitrogen going to the river
 - at least a 95% reduction in the annual load of total phosphorus going to the river
 - an improvement in pathogen management through the installation of an upgraded UV disinfection system.
- The quality of water that will be released to the river is now exactly the same as the Class B water that is used to irrigate the Kyneton Racecourse, Kyneton Botanic Gardens and various sporting ovals across the Kyneton township.
- The improvement in the quality of water released is complemented by the Kyneton Environmental Offsets Project. This is a long-term investment to improve the river health of the Campaspe River.
- Delivered in partnership with the North Central Catchment Management Authority, 14.3 kilometres of environmental improvement works have been completed along Post Office Creek and the Campaspe River in Kyneton. These works are being supported by a 5-year independent river monitoring program.
- The environmental offsets for both total nitrogen and total phosphorus are modelled as being greater than 100% of any nitrogen and phosphorus released to the river.
- A change in the dilution ratio for the release of treated water to the river will shift the ratio from up to 20% for passing river flow to up to 66.7% of passing river flow.
- This shift is based on a comprehensive assessment of the available data. We believe this dilution ratio will be protective of the beneficial uses of the river.
- The gauging station, where river flow is measured, will no longer be taken at Redesdale but at the gauging station on the Campaspe River in Kyneton. This is 1 kilometre upstream of the release point at Wards Lane.

Coliban Water Environment and Sustainability Policy Statement

- In November 2021, the Board of Coliban Water endorsed an updated Environment and Sustainability Policy Statement which sets a new direction with respect to both environmental stewardship and environmental performance.
- The desired outcomes of the Policy Statement are reflected in the Licence Amendment Application with Coliban Water's commitment that the amended release licence for the plant will be protective of, and likely approve, river health and protective of downstream beneficial uses.

6. 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	Engagement level
Media		
Editorial	<ul style="list-style-type: none"> ○ Media release - Licence amendment feedback period open/online at connect Coliban ○ Media release/alert – community information session date reminder ○ Media release/alert – feedback period close 	<ul style="list-style-type: none"> ○ Inform ○ Inform ○ Inform
Advertising	<ul style="list-style-type: none"> ○ Public notice in local paper for community information session 	<ul style="list-style-type: none"> ○ Inform
Website	<ul style="list-style-type: none"> ○ A project page exists on Connect Coliban, which will be updated with this engagement piece and frequently asked questions. ○ Licence amendment added to Connect Coliban to facilitate the public feedback period 	<ul style="list-style-type: none"> ○ Inform ○ Inform/Consult
Social Media	<ul style="list-style-type: none"> ○ Posts to support the process will be created and shared on Coliban Water platforms during the feedback period. 	<ul style="list-style-type: none"> ○ Inform
Visual aids		
Project based details	<ul style="list-style-type: none"> ○ Graphical depiction of sites and footprint (already available and completed). ○ Further aids may be needed to help facilitate the drop-in session (to be determined) 	<ul style="list-style-type: none"> ○ Inform ○ Inform
Publications		
Frequently asked questions	<ul style="list-style-type: none"> ○ Responses to questions likely to arise regarding the amendment process and the amendment itself. ○ Make these available through Connect Coliban. 	<ul style="list-style-type: none"> ○ Inform ○ Inform
Waterway health data	<ul style="list-style-type: none"> ○ Already available on Connect Coliban. 	<ul style="list-style-type: none"> ○ Inform
Communication & Engagement		
Connect Coliban	<ul style="list-style-type: none"> ○ The Licence Amendment will be available on the platform for comment. ○ Information regarding this engagement process will also be available on the platform. 	<ul style="list-style-type: none"> ○ Inform/Consult ○ Inform

Tool	Format / information provided	Engagement level
Point of contact	<ul style="list-style-type: none"> ○ All correspondence from the public should be directed to the Contact Centre and to Connect Coliban platform. ○ Coliban Water will be the main point of contact for the engagement process on the licence amendment. 	<ul style="list-style-type: none"> ○ Inform ○ Inform
Questions/feedback log	<ul style="list-style-type: none"> ○ The Corporate Communications team will keep a log of feedback received during this period. 	<ul style="list-style-type: none"> ○ Inform
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). 	<ul style="list-style-type: none"> ○ Inform ○ Inform
Presentations	<ul style="list-style-type: none"> ○ 'All staff' presentations where required. 	<ul style="list-style-type: none"> ○ Inform
Intranet	<ul style="list-style-type: none"> ○ Ensure information promoted on intranet, directing to Connect Coliban 	<ul style="list-style-type: none"> ○ Inform

7. 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 and details in the submission made.
- Concerns regarding breaches of our licence.
- The Licence Amendment process has been drawn-out process and deviates to what was previously committed, with EPA conducting the engagement and Coliban Water mirroring all communications.
- Our Community Draft for Pricing Submission 2023 will be out for consultation during July. Investment in our region is outlined at a high level for the next 5 years and may not clarify detailed investment in the Kyneton WRP site that some landowners may seek to see.

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</p>

Subject	Issue	Mitigation strategy
		<ul style="list-style-type: none"> an operating Licence, which is monitored and tracked by the EPA.
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. Information will be available on Connect Coliban platform. Use science and data as our guide for decision making. Some changes in Licence parameters can be linked back to community feedback regarding the quality of water to be released to the river in future. We have listened and actioned through the Kyneton Solutions Project.
Gauging station	<ul style="list-style-type: none"> That the community were not happy with the location of current gauging station being used (Redesdale) 	<ul style="list-style-type: none"> We will no longer be using Redesdale as our gauging station. River flow will be measured at Kyneton. We have listened and actioned through the Kyneton Solutions Project.
Dilution ratio	<ul style="list-style-type: none"> Current licence allows treated water release at 20% dilution. Licence amendment is seeking dilution of 66.7%. 	<ul style="list-style-type: none"> The change is supported by the improvements made in the quality of water that will now be released to the river, in addition to the river health works completed and the Environmental Risk Assessment undertaken. Beneficial uses of the Campaspe River are protected with this increase to the dilution ratio.
Licence breaches	<ul style="list-style-type: none"> That we will breach our Licence in future. 	<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).
Water balance at WRP site	<ul style="list-style-type: none"> Concern water balance/approach taken in the Kyneton Solutions Project is not a long-term solution 	<ul style="list-style-type: none"> Transparency as to how the water balance is calculated and managed with the completion of all phases of the Kyneton Solutions Project.

Subject	Issue	Mitigation strategy
		<ul style="list-style-type: none"> ○ Information on additional works/investigations being/to be undertaken regarding infiltration and inflow in the Kyneton wastewater network.
<p>Delay in Licence Amendment process and change in approach.</p>	<ul style="list-style-type: none"> ○ Concerns that this process has been delayed and deviated from what was committed to in the community. ○ Community unclear what is negotiable/value of their feedback during the process 	<ul style="list-style-type: none"> ○ Ensure stakeholders are briefed on a regular basis. ○ Ensure ample opportunity to be involved in the feedback process. ○ Be clear that the Licence Amendment submitted is not negotiable as part of this process. ○ Be clear on what will be done with feedback. EPA to be clear with how this feedback plays a role in the assessment process underway. ○ Transparency in process with an independent facilitator engaged to deliver the community information session. ○ Provide timely updates, including messaging, where required.
<p>Commitment to environmental protection</p>	<ul style="list-style-type: none"> ○ Concern for ongoing environmental impacts/protection of the Campaspe River 	<ul style="list-style-type: none"> ○ Be clear on the commitments that have been completed and that have been made regarding the Kyneton Solutions Project and positive environmental outcomes. ○ Be clear on additional projects happening in the Campaspe River catchment that we are supporting/delivering and the benefits that they will deliver to the Campaspe River. ○ Transparency on implementation of our Environment and Sustainability Policy.

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 regarding the engagement process and feedback period.	Level of understanding amongst stakeholders is high.	Anecdotal feedback from stakeholders.
Have directly impacted people been informed about the Licence Amendment and subsequent engagement process?	Level of understanding amongst direct impacted people.	Number of queries or complaints from direct impacted people. Feedback received on Connect Coliban Platform. Anecdotal feedback from directly impacted people.
Has the community felt engaged during the EPA licence amendment process?	Feedback received.	Nature of calls and queries. Nature of media coverage.

