



VHM Limited

Goschen Rare Earths and Mineral Sands project

DRAFT COMMUNITY ENGAGEMENT PLAN FOR TRG REVIEW

-May 2023-

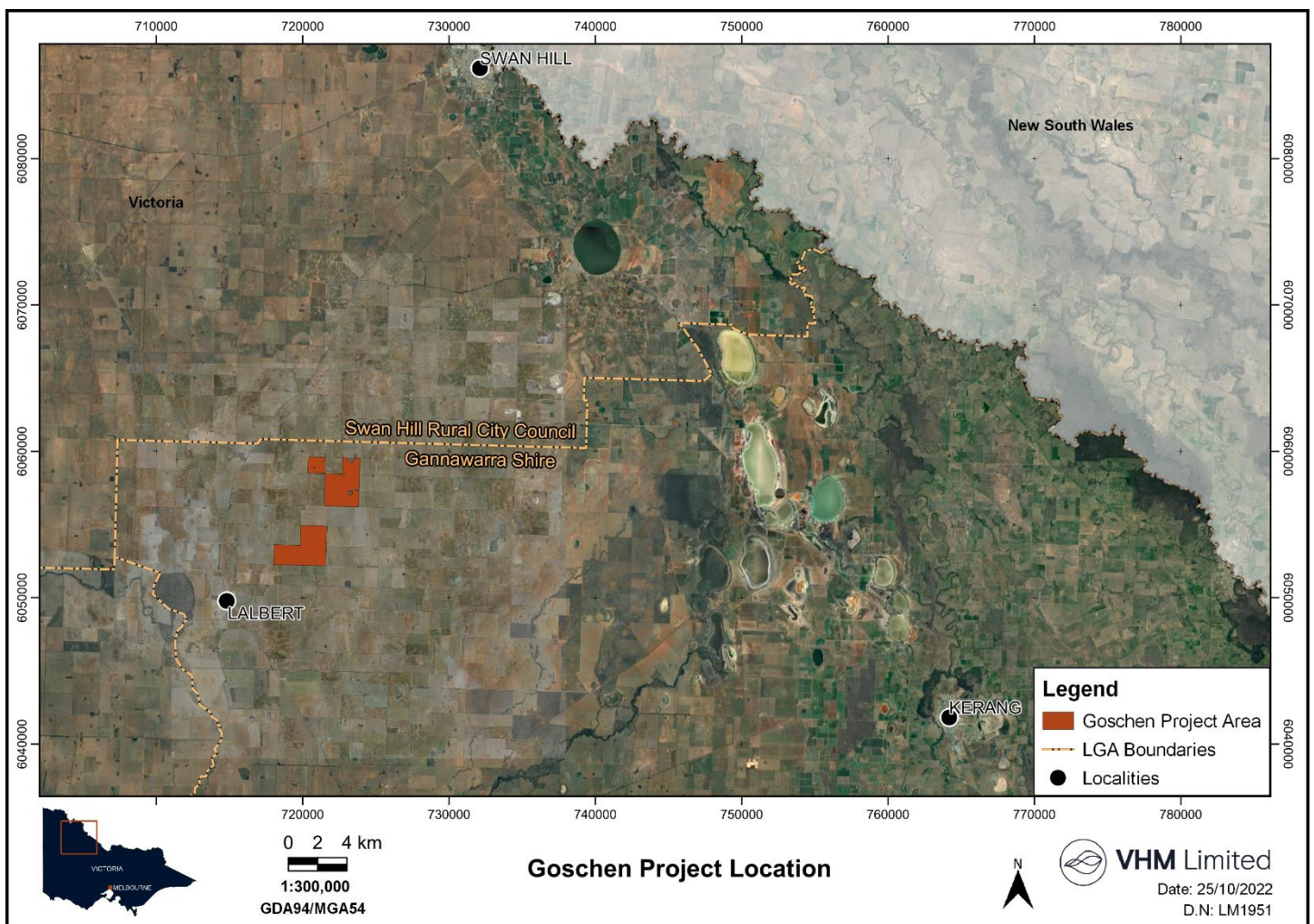


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1 Managing Director Statement

VHM Limited (VHM) acknowledges the environmental, cultural, social and economic values of the region surrounding the Goschen Project area and is committed to protecting and enhancing these values.

VHM is dedicated to effective engagement with the community to establish trust, and foster support to develop the Goschen project as a vital and sustainable new industry that will benefit the Loddon-Mallee region of Victoria.

VHM respects the rights of private and public landowners and is committed to engaging with landowners and the broader community in an open, honest and transparent manner. The company considers that listening is key to understanding community concerns and to building a strong and trusting relationship. We are committed to working collaboratively with all stakeholders to achieve mutually beneficial solutions and positive outcomes.

Embedded in VHM's values is our commitment to honour and acknowledge the traditional custodians of the land, the Wemba Wamba Barapa Barapa Working Group and to pay respect to their elders past, present and emerging. The company aims to work closely with traditional custodians to maintain cultural association with the land and to provide education, employment and economic opportunities associated with the Goschen project.

VHM strives to be:

- Open, honest, and willing to engage
- Proactive in sharing information and communicating openly
- Respectful of all community views and responding to concerns in a timely manner
- Recognised as a valuable contributor to the community
- Trusted as an integral member of the community.

Graham Howard
Managing Director

2 Introduction

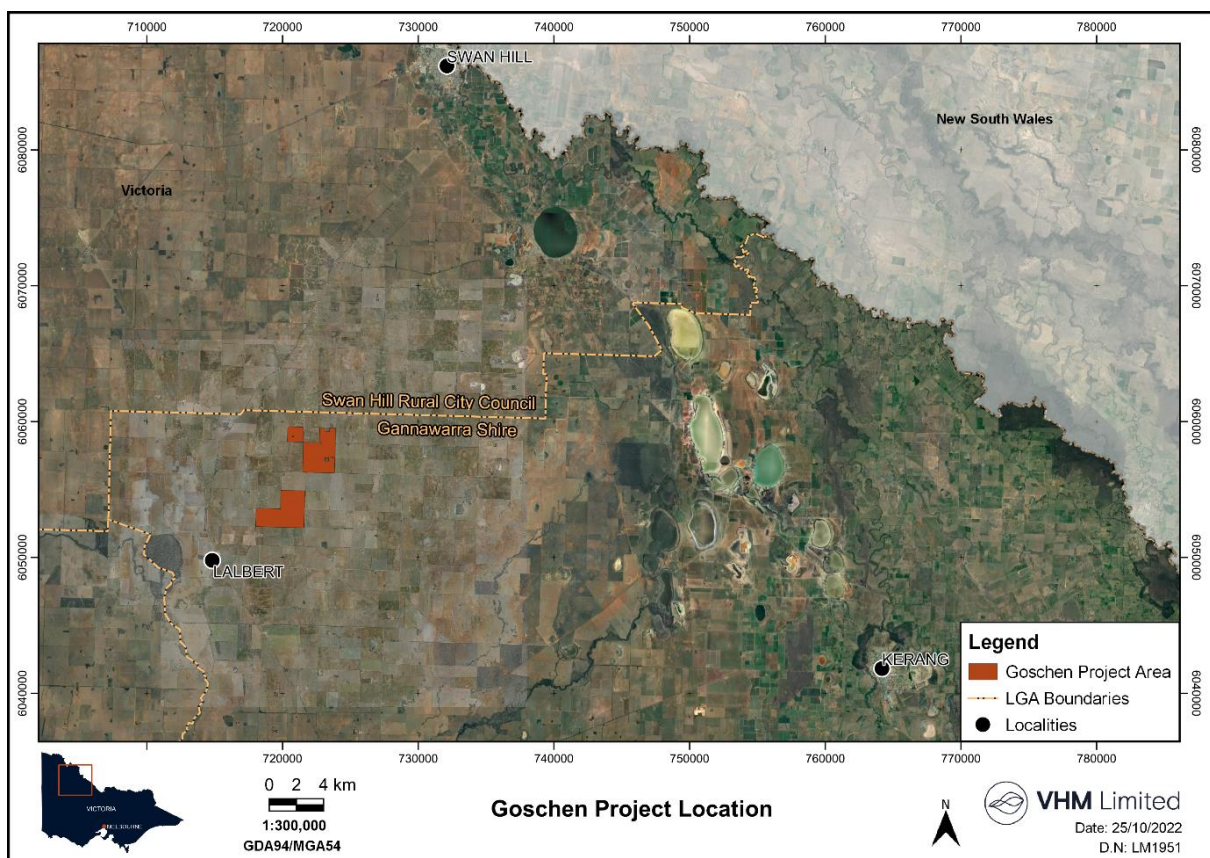
VHM Limited (**VHM**) is proposing to develop the Goschen Mineral Sands and Rare Earths Project (the **Project**) in the Loddon-Mallee Region of Victoria.

This Community Engagement Plan (**CEP**) outlines the consultation and communication strategy that will be undertaken to keep all stakeholders informed during the various phases of Project development. It uses information collected for the Stakeholder and Community Engagement Plan prepared for the EES that ensured communities in the region were provided regular and detailed updates focussed on the various environmental studies undertaken.

The CEP describes the methods VHM will use to engage stakeholders, outlines how individuals can obtain information and how people can raise concerns or provide feedback.

2.1 About the Project

The Goschen Project is approximately 4-hours drive (280 kilometres) northwest of Melbourne and 30 minutes (35 kilometres) south of Swan Hill.



Goschen Project Location – showing Swan Hill and Gannawarra Shire boundaries

The Project will involve the mining and processing of rare earth minerals and heavy mineral sands at a throughput of approximately five million tonnes per annum (Mtpa) to produce mixed heavy mineral concentrate (**HMC**), zircon concentrate, rutile product, leucoxene products, ilmenite product and rare earth mineral products, over a 20 to 25 year mine life. Mine products are proposed to be transported via road and rail for export overseas.

The project has a current Proved and Probable Ore Reserve of 198.7Mt. Mining will occur within two areas at a rate of 5 million tonnes per annum (Mtpa) +/- 10%. Area 1 (~ 722 hectares) will also be the location of the processing facility. Area 3 (~754 hectares) is expected to become operational once mining of ore within Area 1 has ceased.

VHM will develop on-site processing in phases:

- Phase 1 – mining unit plant (MUP), wet concentrator plant (WCP), feed preparation plant (FPP), and a rare earth mineral concentrate (REMC) flotation plant. The product suite for this phase consists of zircon, titania heavy mineral concentrate (HMC) and REMC products.
- Phase 1A – adding a hydrometallurgical plant (HMP) downstream of the REMC flotation plant. The HMP would commence operations approximately 18 months post first production. The product suite for this phase consists of mixed rare earth carbonate (MREC) products and zircon/titania HMC.
- Phase 2 – to commence either at the same time as Phase 1 or some 24 months post-production, depending on prevailing market circumstances – an additional mineral separation plant (MSP), hot acid leach (HAL) and chrome removal circuit. This additional plant allows for the production of premium zircon, zircon concentrate, high titanium (HiTi) rutile, HiTi leucoxene and low chromium ilmenite.

The Project also requires water which will be used for construction earthworks, processing, dust suppression and rehabilitation. Water is proposed to be sourced through Goulburn Murray Water (GMW) on the open water market from Kangaroo Lake. Four and half gegalitres per year (GL/y) will be needed for project start-up and reducing during operations. The water would be delivered from a new pump station adjacent to Kangaroo Lake and a 38-kilometre underground pipeline to be constructed beneath existing local roads.

Final rehabilitation of mined areas, and decommissioning of facilities after mining has ceased, is expected to take up to a further five years.

2.2 Purpose of the Community Engagement Plan

This CEP sets out VHM's planned community engagement for the Project in the Loddon-Mallee region of Victoria for all phases of its development and ultimately closure.

The CEP describes the purpose, objectives, methods and activities to meet community engagement requirements for the project and gives VHM a clear and effective framework to maximise community involvement and achieve the best possible stakeholder engagement outcomes.

It provides the basis for VHM to engage purposefully, openly and effectively with the community and all stakeholders for the life of the project.

Community engagement is based on an understanding and respect for a range of community values and needs, clear and open communication, and engagement activities that are purpose-designed and targeted to meet the expectations of different community interests.

During the construction phase, community engagement will relate to initial on-site activities including road access, infrastructure upgrades including the water supply pipeline to site from Kangaroo Lake, management of contractors and contract projects, and establishing frameworks for engagement during operations. The stakeholder and community reference group will be reconvened to enhance and encourage two-way communication between VHM and community.

During the operational phase, community engagement will involve reporting, consulting and disclosure of information, environmental monitoring and grievance and feedback processes, and also delivering community investment/support programs and projects.

Prior to and during the mine closure phase, community engagement will include communication and regular updates on closure procedures and final rehabilitation works.

The CEP has been developed in accordance with the Community Engagement Guidelines for Mining and Mineral Exploration in Victoria and incorporates concepts developed by the International Association for Public Participation (IAP2).

3 Site description

Mining Area 1 and mining Area 3 are generally used for broadacre farming consisting of dryland cropping and the production wheat, barley, pulses, legumes, sheep and lambs used as part of the farming system.

The project area falls within the Murray and Western Plains surface water segment, which comprises river and stream reaches of lowlands (generally below 200 metres in altitude) including the Avoca basin.

Potential sensitive receptors identified within two (2) kilometres of the Project include:

- Five (5) dwellings
- Eleven (11) council roads
- Powerlines
- Telecommunications cables
- No registered waterways
- Nearest designated waterways in the near vicinity of the project are Lalbert Creek, Back creek and the Avoca River
- No registered bores

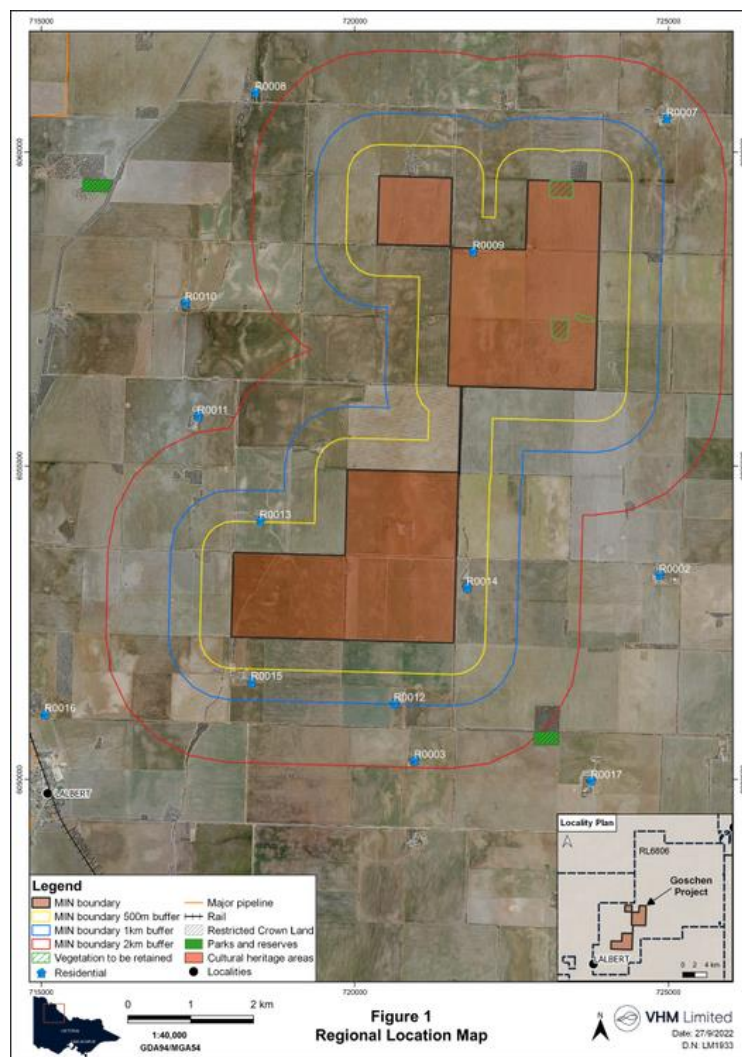


Figure 1 Regional Location Map

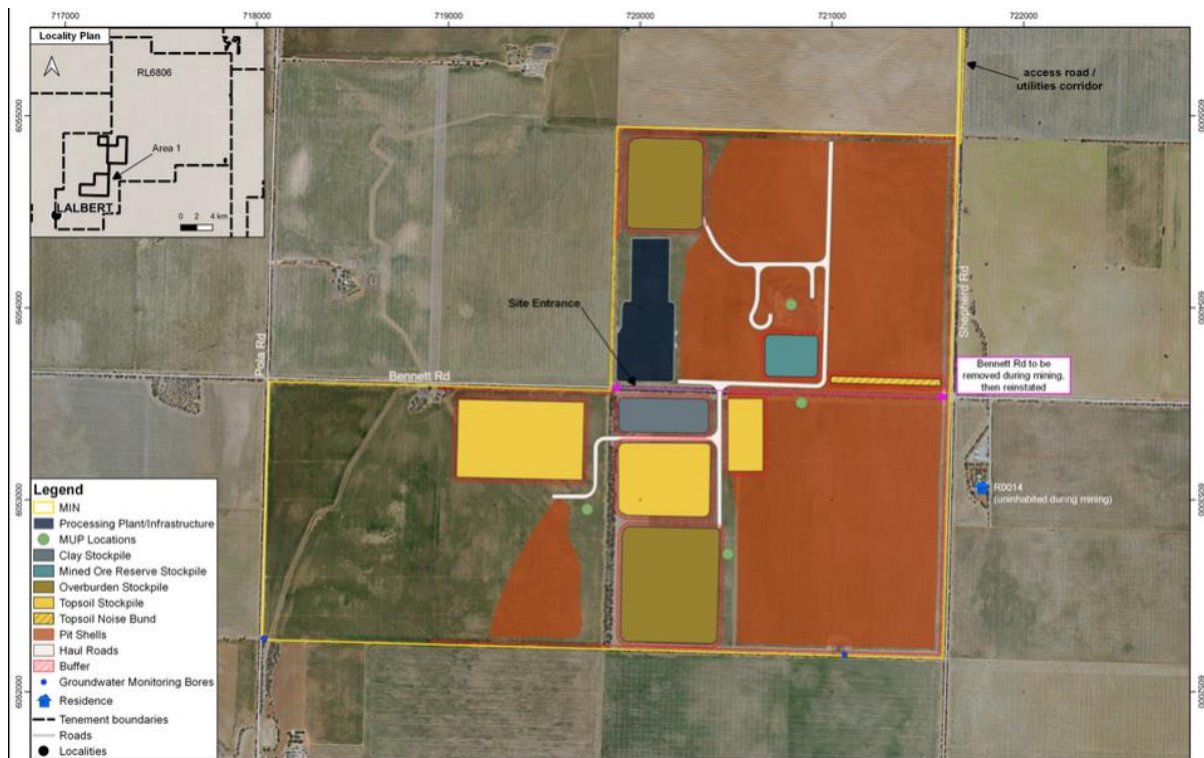


Figure 2 Area 1 General Layout

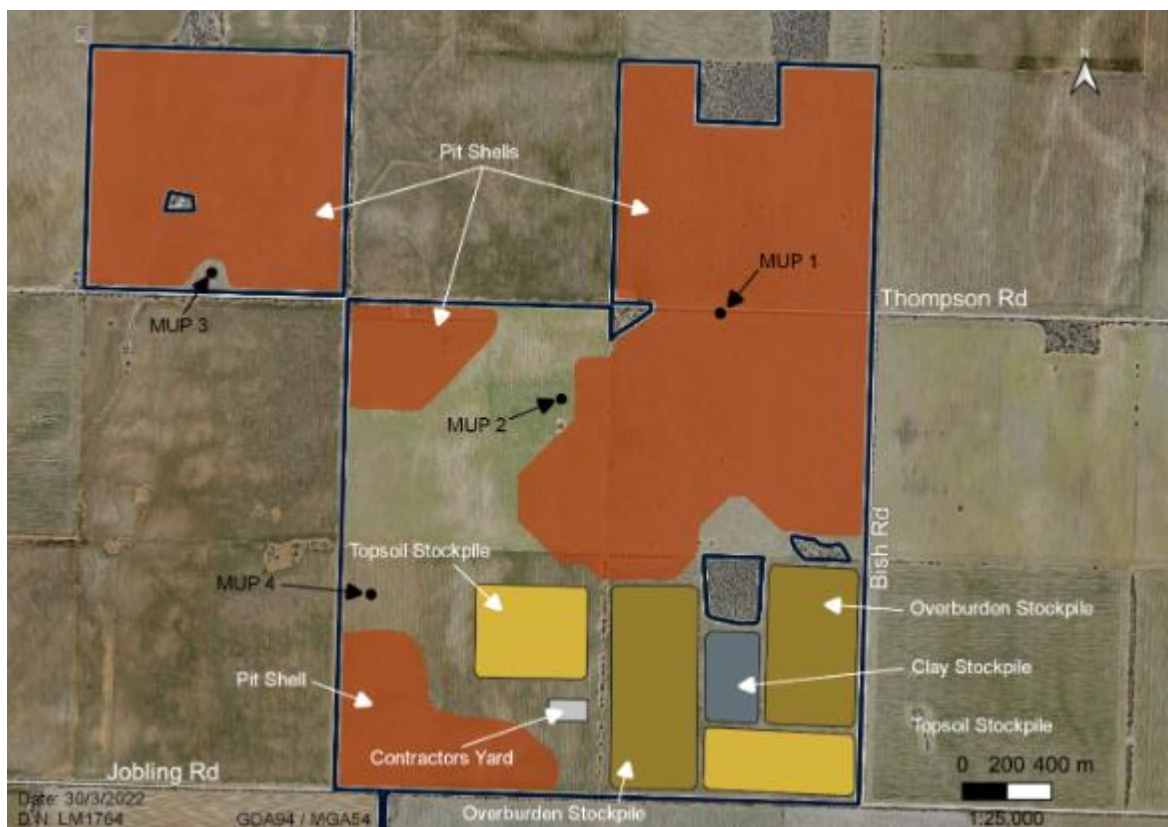


Figure 2 Area 3 General Layout

4 Background

VHM is an Australian owned and operated listed public company established in 2014 that is developing an integrated business comprising of heavy mineral sands projects located in Victoria, providing feedstock to downstream customers.

VHM initially held over 7,000 km² of near-contiguous tenements in Victoria, which provided the Company with access to significant historical exploration data. This data formed the basis of VHM's exploration program to generate its own data for estimating mineral resources and ore reserves within its tenements. The exploration undertaken to date has discovered one of the world's largest, highest-grade zircon, rutile and rare earth mineral deposits, located near Lalbert in the Murray Basin, Victoria.

VHM exploration commenced in 2015 within the various Exploration Licences. For the Project consultation with key stakeholders, landholders and community members commenced in 2018 as part of the EES. Engagement targeted all affected landholders and neighbours, local businesses, Gannawarra Shire Council, Swan Hill Rural City Council, Traditional Custodians, water and infrastructure authorities, community interest groups, and the local and broader community.

Throughout the EES engagement focused on communicating information on project scope, technical reports and environmental impact studies, and providing feedback through the formal public consultation processes.

5 Legislative framework

This CEP has been prepared in order to meet the legislative requirements set out in Section 40(3)(d) of the *Mineral Resources (Sustainable Development) Act 1990* (the **Act**), the Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019 and the 'Community Engagement Guidelines for Mining and Mineral Exploration' (2019).

The holder of an approved Mining Licence has a duty to consult with the community throughout the period of the work authority by sharing with the community information about any activities authorised by the work authority that may affect the community, and giving members of a community a reasonable opportunity to express their views about those activities (S39(a)).

The Act further requires that a community engagement plan is prepared to document the commitments that a licensee has made to engage with the community (S.43(b)).

The Regulations stipulate the minimum requirements to be included in a community engagement plan that:

- (a) *identifies any community likely to be affected by mining activities authorised by the licence; and*
- (b) *includes proposals for:*
 - I. providing information to the community; and*
 - II. receiving and considering feedback from the community in relation to mining activities authorised by the licence; and*

- (c) *includes a proposal for responding to complaints and other communications from members of the community in relation to mining activities authorised by the licence; and*
- (d) *includes a proposal for identifying community attitudes and expectations in relation to mining activities authorised by the licence; and*
- (e) *includes a proposal for analysing feedback, taking into account community concerns or expectations; and*
- (f) *includes a proposal for registering, documenting and responding to complaints and other communications from members of the community in relation to mining activities authorised by the licence.*

The CEP also includes proposals detailing an effective complaint and communication handling process.

6 Aims, Objectives, Principles and Implementation

6.1 Aims

The aims of this CEP are to:

- Outline the commitment, approach and methods of engagement adopted by VHM for the Goschen Rare Earths and Mineral Sands Project.
- Provide a comprehensive robust and flexible framework for delivery of best practice in community engagement for the project.

6.2 Objectives

The objectives of this plan are to:

- Design and deliver effective stakeholder engagement for the Goschen Project to ensure participation of affected communities and interested parties and that their values, priorities and concerns are acknowledged and addressed.
- Engage stakeholders in an open, honest and timely manner.
- Be transparent in the provision of factual and consistent information.
- Monitor and manage expectations for the community's involvement in aspects of the project.
- Seek a social licence to operate through respect for stakeholder views and by building trust in VHM through its actions.

VHM recognises that to build trust and credibility with its stakeholders, it must:

- Seek to understand community values and respect them.
- Actively seek stakeholder and community views and listen respectfully to concerns.
- Provide clear and timely information to the community so that they can make informed decisions about the project.
- Ensure all stakeholders have access to information and opportunities to participate in the stakeholder engagement process.
- Inform stakeholders of opportunities to influence aspects of the project.
- Demonstrate how community views have been considered in the decision- making process.
- Maintain adequate documentation of engagement and regulatory compliance.

6.3 Engagement principles

VHM is committed to establishing and maintaining meaningful and positive engagement with all relevant stakeholders on a consistent and continuous basis through the project and the EES process. It has adopted the following key principles:

Open and transparent

- Ensure consultation activities enable open and transparent communication between VHM and all stakeholders through the timely distribution of project information that is clear, accurate and relevant.

Collaborative and inclusive

- Ensure that stakeholders are sufficiently informed about the project, understand their rights as stakeholders during the EES process, and the aspects of the project which they can influence.
- Enable stakeholders to have input into those aspects of the project that could affect them.

Acting with integrity

- Ensure that consultation and engagement is conducted in a manner that fosters mutual respect and trust.
- Meet statutory requirements and expectations of regulatory authorities in relation to the EES process.
- Clearly outline the process of consultation during the EES process and the complaints process to ensure consistency with the regulatory requirements.

6.4 Implementation of the plan

The aims and objectives of this community engagement plan will be implemented by:

- Identifying different stakeholder groups and designing consultation to meet their needs and expectations.
- Clarifying roles and responsibilities for community and stakeholder engagement to ensure consistency of approach and that stakeholders have accessible points of contact.
- Establishing systems and processes to support stakeholder engagement activities.
- Making sufficient investment in stakeholder engagement to ensure comprehensive and inclusive engagement.
- Providing opportunities for involving and communicating with stakeholders, ensuring open, transparent, timely and informed engagement occurs.
- Providing a process by which project planning can consider matters raised by stakeholders at the earliest possible stage.
- Reducing the potential for stakeholder dissatisfaction due to misunderstandings about the project or the engagement process.

7 Stakeholder and issues analysis

7.1 Stakeholder identification

A detailed list of stakeholder groupings has been identified.

Stakeholders have been listed comprehensively to include community, business, government and non-government interests. The stakeholders listed include all parties who represent a direct or indirect interest as an individual or as part of the broader community.

For the purpose of a stakeholder classification only, primary stakeholders are defined as those who have the potential to experience direct impacts from the project. Secondary stakeholders are defined as those with an interest/influence in the project.

Stakeholders have been allocated across four levels to differentiate between high and low levels of interest/influence as shown below in Table 7.1.

Impacts or perceived impacts of the project on these stakeholders have been considered in the classification. This may change subject to the nature of the activity/issue and is used only as a guide to different levels of impact among stakeholders.

Table 7.1: Stakeholder classification

Level 1	Level 2	Level 3	Level 4
Primary stakeholders (high impact) who experience high levels of interest/influence	Secondary stakeholders (low impact) with high levels of interest/influence	Primary stakeholders (high impact) who experience low levels of interest/influence	Secondary stakeholders (low impact) with low levels of interest/influence

Table 7.2 below lists the key stakeholder issues identified through engagement with key stakeholders, feedback at community and stakeholder meetings, briefings and drop-in sessions, and one-on-one conversations during the EES process.

Table 7.2: Key stakeholder issues

Stakeholder	Issues/concerns
<p>Landowners</p> <ul style="list-style-type: none"> • Mine footprint • Nearby/neighbouring 	<ul style="list-style-type: none"> • Ability to mine safely • Impact on farming operations – access to neighbouring properties, dust deposition on crops • Land values, compensation, land acquisition • Increased heavy vehicle traffic, road maintenance • Visual amenity, dust (including radiation), noise impacts, 24/7 operations • Impact on water resources - volume and quality of surface water • Impact of tailings on groundwater • Effectiveness of rehabilitation • Biosecurity – weed control • Community cohesion, social fabric • Mental health impacts throughout planning and operations
<p>Traditional custodians – Wemba Wamba Barapa Barapa Working Group (WWBBWG)</p>	<ul style="list-style-type: none"> • Cultural heritage • Employment and training opportunities • Direct and indirect disturbance to conservation significant flora and fauna populations • Appropriate methods of engagement
<p>Local Members of Parliament MLCs Northern Victoria MLA Murray Plains MLA Mildura Member for Mallee</p>	<ul style="list-style-type: none"> • Community views, social fabric • Employment and training opportunities • Increase in traffic resulting in road damage and safety risk • Power diversification to renewables
<p>Agencies and statutory authorities</p>	<ul style="list-style-type: none"> • Direct and indirect disturbance to conservation-significant flora and fauna populations • Potential impacts to availability or quality of surface water or groundwater • Potential impacts to aboriginal cultural heritage • Potential public health risks - radiation from storage or transport of mineral product • Potential for air emissions to affect public amenity or health • Potential detriment to future land value and utilisation due to poor rehabilitation • Increased fire risk impacting environment and community
<p>Utility and asset owners</p> <ul style="list-style-type: none"> • Goulburn Murray Water • Lower Murray Water • Grampians Wimmera Mallee Water 	<ul style="list-style-type: none"> • Potential impacts to availability or quality of surface water or groundwater • Potential impacts of utility supply • Resourcing for upgrade to utility infrastructure and services • Increased traffic resulting in road damage or increased safety risk

Stakeholder	Issues/concerns
<ul style="list-style-type: none"> • Vic Roads • Power utilities • Telecommunications providers 	<ul style="list-style-type: none"> • Pipeline infrastructure – installation and legacy use
<p>Local government</p> <ul style="list-style-type: none"> • Gannawarra Shire Council • Swan Hill Rural City Council 	<ul style="list-style-type: none"> • Road use, damage, maintenance, safety risk • Potential decline in property values and land use due to poor rehabilitation • Mining impacts to landscape, visual amenity, character of region • Potential impacts to availability or quality of surface water or groundwater • Local employment, training and skills development • Workforce accommodation availability • Cost of housing and potential to drive away locals due to increasing accommodation costs • Community cohesion, social fabric • Consultation between both Councils • Power diversification to renewables • Pipeline infrastructure – installation and legacy use
<p>Emergency service providers</p> <ul style="list-style-type: none"> • Victoria Police • CFA • SES • Ambulance Victoria 	<ul style="list-style-type: none"> • Increase to local population impacting local service provision • Road access and maintenance, safety risk • Increased fire risk impacting environment and community • Community cohesion, social fabric
<p>Local businesses, contractors and industry groups</p> <ul style="list-style-type: none"> • Kerang Traders • Swan Hill Incorporated 	<ul style="list-style-type: none"> • Competition for local labour – trades and other skills being depleted from local businesses to work in mining • Income differences – attraction of mining wages versus local business wages • Accommodation availability for increased local workforce • Accommodation costs increasing with increased demand, driving locals out due to affordability • Upskilling level of service provision to meet standards required by mining industry • Local business and services not being afforded opportunities to support mining operations
<p>Industry groups/ representative bodies</p> <ul style="list-style-type: none"> • Victorian Farmers Federation (VFF) • Minerals Council of Australia (MCA) 	<ul style="list-style-type: none"> • Sourcing and accommodating labour in the region • Employment, training and skills development opportunities • Community cohesion and social fabric
<p>Local communities</p>	<ul style="list-style-type: none"> • Housing availability for increased workforce

Stakeholder	Issues/concerns
<ul style="list-style-type: none"> • Lalbert • Ultima • Quambatook • Kerang • Swan Hill • Lake Boga • Mystic Park • Lake Charm 	<ul style="list-style-type: none"> • Cost of living increases across the region and pricing out long-term lower income locals • Employment and training - availability of jobs for local people and opportunities to upskill • Strain on existing services to keep up with increased local population • Increased traffic on roads and road maintenance • Potential impacts to historical heritage of the region
<p>Special interest groups Landcare Groups (Murray Mallee, Lalbert, Kerang, Lake Charm) Sustainable Living in the Mallee (SLIM) Birchip Cropping Group Wildlife Victoria</p>	<ul style="list-style-type: none"> • Direct and indirect disturbance to conservation significant flora and fauna populations • Increase in traffic, road maintenance and safety • Potential for effects to public amenity or health as a result of air emissions • Public health risks as a result of radiation from storage or transport of mineral product • Impact on farming, land use and land values • Effectiveness of rehabilitation • Employment, training and upskilling local workforce
<p>Community groups and sporting clubs Lions Clubs Rotary Clubs Probus Clubs CWA SH Business and Professional Women Football-Netball Leagues Cricket Associations Little Athletics Quambatook Tractor Pull Committee Lake Charm Power Boat Club</p>	<ul style="list-style-type: none"> • Community cohesion and lifestyle • Employment and training opportunities • Availability of accommodation for increasing workforce numbers • Social investment in local community
<p>Media – electronic and print</p> <ul style="list-style-type: none"> • ABC Radio Mildura/Swan Hill • MixxFM Swan Hill • Gannawarra Times • Swan Hill Guardian 	<ul style="list-style-type: none"> • Appropriate community consultation • VHM support for local community • Access to accurate and timely information

Stakeholder	Issues/concerns
<ul style="list-style-type: none"> • TV news • Social media 	

8 Communicating and engaging

Engagement methods and communication materials will vary depending on:

- The engagement preferences of the community or stakeholder group
- The stage of the project
- The purpose and level of engagement as defined by the IAP2 spectrum (inform, consult, involve, collaborate, or empower)

8.1 Level of engagement activity

The level of planned engagement activity is based on the classification of stakeholders and their interest in the project. The most appropriate engagement level will vary for different stakeholders at different stages of the project.

Table 8.1: Engagement activity and approach

Stakeholder group	Stakeholder type	Level of engagement (IAP2 spectrum)					Engagement approach
		Inform	Consult	Involve	Collaborate	Empower	
Landowners	Primary	X	X	X	X	X	Actively involve at all times. Inform and consult on all on-land activities. Collaborate and empower where practicable
Traditional custodians	Primary	X	X	X			Inform, consult and involve in cultural heritage assessment and management issues
Local MPs	Secondary	X	X				Inform at regular intervals. Consult on local sensitivities and issues
State government ministers	Secondary	X					Inform at key milestones
Agencies and statutory authorities	Primary	X	X	X			Involve in all key issues relating to planning, development, approvals, operations and closure
Local government	Primary	X	X	X	X		Inform and consult in planning and development stage. Collaborate on all key issues relating to ancillary approvals, operations and community outcomes
Emergency service providers	Secondary	X	X				Inform at key steps. Consult on safety and emergency arrangements
Local businesses, services, contractors	Primary	X	X	X	X		Consult on business impacts. Involve and collaborate in local procurement and supplier processes

Stakeholder group	Stakeholder type	Level of engagement (IAP2 spectrum)					Engagement approach
		Inform	Consult	Involve	Collaborate	Empower	
Local communities	Primary	X	X	X			Inform at all times. Consult and involve in project development and at key stages of approvals process and community impact assessments
Special interest groups	Secondary	X	X	X			Inform at key steps. Consult and involve on issues identification, assessment, rehabilitation, monitoring and reporting processes
Community groups and sporting clubs	Secondary	X	X	X			Inform, consult and involve during key steps of planning and approvals process
Media	Secondary	X					Maintain clear and consistent information through media communications

8.2 Engagement activity

Community and stakeholder engagement will continue for the life of the project and where necessary, beyond. The suite of methods used to communicate and engage are detailed below in Table 8.2.

Table 8.2: Engagement methods

Activity	Description
Key stakeholder briefings	Key stakeholder groups directly are offered regular updates on the project. They include elected local, State and Federal representatives, government agencies and authorities, and representative industry and community groups. The briefings enable detailed discussion of project status and issues, seek feedback on the project, answer questions and, where appropriate, seek views on broader stakeholder engagement strategies.
Personal meetings	Personal one-on-one meetings maintain close communication with key stakeholders. These meetings provide informal opportunities to explain the project and for stakeholders to express their views directly and openly to VHM. This method is used in liaising with directly affected landholders and is an important way to engage with directly affected individuals and stakeholder group representatives.
Direct communications	Written correspondence (letters, emails, enquiries via website), verbal correspondence (telephone calls, face-to-face meetings and informal discussions that require actions/follow-up) with stakeholders.
Community information meetings	Community information meetings provide a single forum when important information is required to be delivered to the wider community, often from experts, enabling the community to hear and ask questions with a shared audience.
'Open house' community	'Open house' community information and feedback sessions are effective in providing project information to many stakeholders in an efficient and

Activity	Description
information sessions	accessible manner. These forums are particularly relevant during the approvals process. The sessions are relatively informal, with stakeholders invited to drop in and discuss the project, ask questions of VHM personnel and technical specialists. The sessions are held in local public venues and include display information about the project. The purpose of these sessions is to allow community members and stakeholders to easily access information, discuss specific issues in detail, and have their input documented for response.
Technical information sessions	At various times during the approvals and EES process, technical information sessions will be held for interested stakeholders to be briefed on technical studies and assessments. Attendees can hear from technical experts about the purpose and methodology of technical investigations, key findings and proposed actions. Technical experts can answer questions and take on board local knowledge and views relevant to the investigation.
Webinars	Webinars may be used on occasions when it may not be possible to undertake face-to-face communications and there is a need to communicate with the broader community in a timely manner, such as in the flood events of 2022 when entire communities were isolated and roads were cut off or in the event of potential future COVID restrictions.
Information sheets	Information sheets contain factual information about the project and are produced for general community consumption. These rely heavily on the use of photographs and diagrams to represent project components visually. These are emailed as required and also available on the project website.
Project Update newsletters	From time to time VHM will produce and distribute a project newsletter to provide general updates on the project, company information, and items of interest to the broader community and stakeholders. This newsletter is provided in hard copy at local community hubs such as village post offices, emailed to a community email distribution list, and also accessible on the project website.
Letterbox drops	Letterbox drops have enabled VHM to target local communities to inform of upcoming engagement events and distribute Project Update newsletters. This method can reach those community members who may not have email or website access or who may not be aware of newspaper advertising to inform of engagement events or other general project information.
Email distribution	The email distribution list enables VHM to provide timely updates and information to community and stakeholders, particularly to notify of upcoming activities, milestones, approval and public consultation activities, and opportunities to provide comment.
Web site	The VHM website provides project information, contacts and feedback opportunities and this content will be migrated to a dedicated website for community engagement purposes. It provides an overview of the project, answers to frequently asked questions, project updates, contact details and information on opportunities for community feedback. The website has a routinely monitored feedback form/email enquiry service to enable comment on aspects of the project.
Frequently asked questions (FAQs)	FAQ sheets provide brief responses to address anticipated questions from stakeholders. These cover all aspects of the company, rare earths and mineral sands, and the project. FAQs have been informed by stakeholder issues and raised during initial engagement activities.
Annual reports	VHM will provide project updates in their annual reports to provide information on VHM as a company, progress of the drilling programs and environmental and social performance. These will be available on the VHM website and distributed to selected stakeholders.
Surveys	Surveys will be conducted recurrently to gauge community and stakeholder attitudes and perceptions of the project and to identify areas of concern that require action. On-line surveys provide an efficient and

Activity	Description
	accessible way to gauge opinion and seek feedback on community priorities.
Site tours	Site tours for key stakeholders can provide a valuable insight into the project area, physical features and potential impacts. Site tours will be organised at appropriate times during the assessment process and may include reference groups, referral agencies and emergency service providers.
Media releases and advertising	Media releases provide the opportunity for information to be circulated widely in the community at key points during project life and are particularly effective in alerting the community to significant decisions and milestones. Advertising is effective to promote consultation opportunities or where community participation is encouraged and sought.
Community investment program	Collaboration between VHM and community groups and community initiative drivers. These may include event or club sponsorship, philanthropic donations, in-kind support, or strategic partnership arrangements to meet shared goals.

8.3 Stakeholder and Community Reference Group (SCRG)

VHM will reconvene a SCRG and this engagement activity will provide two-way communication opportunity to openly share information and as a means for VHM to receive feedback from stakeholders and community about project activities.

The Terms of Reference for the SCRG can be found in Attachment 1.

9 Stakeholder engagement plan

The Stakeholder Engagement Plan sets out a summary of the key issues for each stakeholder group, identifies the level of engagement, communications approach and method of engagement for each group. This is a high level outline as the detailed management measures to be communicated for each issue will be drawn from the EES statement and relevant management plans which are too detailed for inclusion in this summary.

Table 9.1: Stakeholder engagement plan

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
Landowners	Noise	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting SCRG Land access agreement	As required
	Dust	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting SCRG Land access agreement	As required
	Visual amenity	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	SCRG Letterbox drop	As required
	Increased traffic and road maintenance	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting SCRG Letterbox drop	As required
	Road closures – access to neighbouring farmland	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting, SCRG Letterbox drop	As required
	Surface water	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	SCRG Site tour	As required
	Groundwater	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	SCRG	As required
	Rehabilitation	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting SCRG Site tour FAQs	As required
	Biosecurity	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	SCRG FAQs	As required
	Land values	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	SCRG	As required

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
	Community cohesion, mental health	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting SCRG Project Update newsletter Community information session Feedback survey	Quarterly
Traditional custodians	Cultural heritage	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting Project Update newsletter	As required
	Employment and training opportunities	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting Project Update newsletter Community information session Feedback survey	As required
	Flora and fauna conservation	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	As required
	Conservation of waterways (Kangaroo Lake)	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	As required
Local MPs	Social impact – community cohesion	Inform	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Project Update newsletter	As required
	Employment and training opportunities	Inform	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Community information session Project update newsletter	As required
	Power diversification to renewables	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing	As required

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
Agencies and statutory authorities	Flora and fauna conservation	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	Quarterly
	Surface and groundwater management	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	Quarterly
	Public health – radiation from product storage or transport	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	Quarterly
	Air emissions affecting public amenity	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	Quarterly
	Rehabilitation	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Site tour	As required
	Fire risk	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	As required
Utility and asset owners	Utility supply	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	As required
	Upgrade to infrastructure and services	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	As required
	Increased traffic and road maintenance	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Site tour	Quarterly
Local government	Road maintenance and safety	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting Site tour	As required

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
	Rehabilitation impacts to land use and value	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	As required
	Mining impact to landscape, amenity, regional character	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting SCRG	As required
	Availability of workforce accommodation	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting Key stakeholder briefing Project Update newsletter	Quarterly
	Cost of local accommodation	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting Feedback survey	Bi-annually
	Employment and training	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting Project Update newsletter	Quarterly
	Community cohesion	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	SCRG Project Update newsletter Feedback survey	Bi-annually
	Collaboration between local councils	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	Annually
	Future growth of renewable energy infrastructure	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	Annually
	Water pipeline infrastructure	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	As required

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
Emergency service providers	Population increase impacting service provision	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	Bi-annually
	Road access and safety	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting Site tour	Bi-annually
	Fire risk	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Face to face meeting	Annual
Local businesses, services, contractors	Competition for local labour – income differences	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing (business community) Community information session Project Update newsletter Feedback survey	Bi-annually
	Depleting local workforce and skills to mining	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing (business community) SCRG Community information session Project Update newsletter Feedback survey	Bi-annually
	Workforce accommodation	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing (business community) Community information session Feedback survey	Bi-annually
	Increasing accommodation	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Feedback survey	Annually

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
	costs due to workforce demand				
	Upskilling local businesses to meet mining standards	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing (business community) Feedback survey	Bi-annually
	Not preferencing local service provision	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing (business community) Project Update newsletter Feedback survey	Bi-annually
Industry groups, representative bodies	Depleting local labour force to mining	Inform	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session SCRG Project Update newsletters	Annually
	Training and upskilling for local businesses and workforce	Inform	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Project Update newsletters Community information session Feedback survey	Annually
	Workforce accommodation requirements	Inform	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Key stakeholder briefing Feedback survey	Annually
Local communities	Housing availability for mining workforce	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session Project Update newsletter	Bi-annually

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
				FAQs Feedback survey	
	Local cost of living increases due to accommodation shortages	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Project Update newsletter Community information session Feedback survey	Bi-annually
	Training, education and upskilling opportunities	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Project Update newsletter Community information session Feedback survey	Bi-annually
	Maintaining local historical heritage	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Project Update newsletter Community information session Feedback survey	Bi-annually
	Increased traffic and road maintenance	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session Feedback survey	Bi-annually
	Community cohesion, social fabric	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session SCRG Project Update newsletter Website Feedback survey	Annually
Special interest groups	Flora and fauna conservation	Collaborate	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session Project Update newsletters	Bi-annually

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
				Feedback survey	
	Public health - air emissions and radiation impacts	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Website Community information session Project Update newsletter	As required
	Impact on farming – land use, land values, rehabilitation	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session SCRG Project Update newsletter Feedback survey	Annually
	Employment and training for aboriginal and local workforce	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session Project Update newsletter Feedback survey	Bi-annually
Community groups and sporting clubs	Community cohesion, lifestyle	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Project update newsletter Feedback survey	Bi-annually
	Social investment in local community	Involve	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session Project Update newsletter Website Feedback survey	Bi-annually
Media	VHM support for local community	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session Project Update newsletter Website	Bi-annually

Stakeholder	Issue/concern	Level of engagement (IAP2)	Controls to be communicated to impacted stakeholders	Suggested method of engagement	Suggested timing (weekly, monthly, as required)
				Feedback survey	
	Access to accurate information	Consult	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session	Bi-annually
	Appropriate community consultation	Inform	TO BE CONFIRMED ONCE EES PROCESS IS COMPLETE	Community information session	Bi-annually

10 Complaints management process

VHM will implement a complaints management process which will include:

- Provision of a visible and user-friendly system for providing feedback via direct face-to-face contact with a VHM or Project representative, email to Community email address, letter received via Australia Post or a direct telephone call to Community mobile number.
- Information on how and where to raise a complaint or grievance and/or provide feedback will be:
 - published on the Goschen project website; and
 - discussed during community engagement activities
 - published in Project Update newsletters.
- Keeping a detailed complaints/grievance and community feedback register.
- Clear accountabilities and procedures for VHM personnel to investigate and respond to community complaints/grievances and feedback.
- Commitment to respond promptly, fairly and confidentially to feedback received. VHM will aim to respond within a 48-hour time frame.
- An internal monitoring and audit system to ensure effectiveness of the complaint/grievance and feedback management process, and to identify recurrent themes and appropriate management responses.

The process for handling complaints and grievances will include:

- Prompt acknowledgement of the complaint/grievance, provide an indicative time for resolution and commitment to when next contact will be made
- Assessing the complaint/grievance, giving it a priority, and ensuring relevant manager decides details of investigation (who will investigate, does it need to be escalated etc)
- Planning the complaint/grievance investigation – what needs to be investigated, the steps involved, providing an estimate of time it may take to resolve, what the complainant's expectations are, any special considerations (eg anonymity), etc
- Investigating the complaint/grievance – facts, transparency (following clear process steps)
- Responding to complainant to advise:
 - how the investigation was undertaken
 - clear findings of the investigation and/or decision reached
- Following up with complainant to:
 - see if any residual concerns remain
 - seek feedback of how complaint/grievance was handled and resolved.

Attachment 1 contains a chart detailing the process for managing community complaints and a complaints registration form.

11 Evaluation

The aims of this plan are to:

- Outline the commitment, approach and methods of engagement adopted by VHM for the Goschen Rare Earths and Mineral Sands Project.
- Provide comprehensive robust and flexible framework for delivery of best practice in community engagement for the project.

Evaluation of the engagement processes will be undertaken based on:

- Regular informal feedback from stakeholders.
- Feedback forms distributed at engagement activities.
- Formal surveys at key points to gauge community awareness, participation and stakeholder satisfaction with the engagement processes.

VHM will monitor progress against the engagement schedule and report regularly via the SCRG and annually on indicators of engagement outputs and participation satisfaction measures.

VHM will review the community engagement plan annually to assess and ensure objectives continue to be met and the plan continues to be delivered to an optimal level.

12 Contact us

Head office:

VHM Limited
Level 11
330 Collins Street
MELBOURNE VIC 3000

Regional office:

38-40 Tate Drive
KERANG VIC 3579

Postal address:
PO Box 56
KERANG VIC 3579

Community enquiries:

Telephone: 0429 462 924
Email: community@vhmltd.com.au

Attachment 1

Part 1 - Complaints/grievance registration form

Date of receipt of complaint/grievance					Site conditions			
VHM representative who received and registered the complaint/grievance								
How was the complaint/grievance made	Face to face/meeting	Telephone		Email		Site visit		
	SMS message	Via letter/ Australia Post		Community engagement session		Other (please state)		
	Media coverage	Community survey feedback		Door knock				
Overall tone of contact	1 = very negative/aggressive, 5 = very positive	1	2	3	4	5		
Is this complaint/grievance a new matter or does it relate to a previous issue	New issue raised			Related to former issue raised				
	Yes	No		Yes		No		
Name of person/group who lodged complaint/grievance				Does this person/group want to remain anonymous? (this option must explicitly be offered)				
				Yes		No		
Contact details of person/group who lodged complaint/grievance or issue raised	Address				Telephone			
Nature of the complaint/grievance or issue raised	Air quality/dust	Noise/vibration		Light pollution		Power outage		
	Traffic/roads	Visual amenity		Health/safety		Erosion/ sediment control		
	Flora/fauna	Heritage – indigenous/non-indigenous		Property access		Compensation		
	Water management	Waste management		Employment/ training		Property damage		
	Impact on local services	Other (please provide detail)						
Date + time + location of the action (or lack of action) that led to the complaint/grievance	Date		Time	Location				
Has the complainant notified anybody else	Yes	No	If yes, who was notified?					

about this matter, and who did they notify?			
Is the complainant willing to make their name and nature and resolution of the complaint/grievance/issue public?	Yes	No	Under what circumstances?
			In what timeframe?
Commitments made by the VHM receiving officer	Return a call		
	Date by which VHM will respond		
	Raise matter with relevant team/ department manager		
	Other		
VHM accountable manager to whom the complaint/grievance has been referred for action			
Proposed action <i>(should include follow-up, further developments and communication, and include estimated timeline)</i>			
Action taken			
VHM officer responsible for taking action			Date action was taken
Has the issue been resolved?	Yes	No	Date of resolution
Note: <i>If the complaint is escalated to a dispute or grievance, substantial detailed and context-specific records must be kept. The outcome must be recorded and the register entry closed out when the complaint, dispute or grievance is resolved.</i>			