



Technical report O: Social Impact Assessment

Goschen Rare Earths and Mineral Sands Project

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Client: VHM Ltd

Prepared by

Public Place Melbourne P/L

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1.0 Introduction

This report assesses potential social impacts associated with the construction, operation and decommissioning of the Goschen Mineral Sands and Rare Earths Project (the Project).

1.1 Requirement for an EES

The Project was referred to the Minister for Planning to seek advice on the need for an Environment Effects Statement (EES) under the *Environment Effects Act 1978* (Vic) (EE Act). On 10 October 2018, the Minister for Planning decided that an EES was required on the basis that the Project has the potential for a range of significant environmental effects.

On 19 December 2018 under delegated authority from the Minister for the Environment, the Department of the Environment and Energy (now referred to as the Department of Climate Change, Energy the Environment and Water (DCCEEW)) made a decision that the Project is a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and would require assessment and a decision about whether approval should be given under the EPBC Act. DCCEEW also confirmed the Victorian Government's advice that the Project will be assessed under a bilateral agreement under the EE Act.

The EES allows stakeholders to understand the likely environmental impacts of the Project and how they are proposed to be managed. The Minister's assessment of the EES will also inform statutory decisions that need to be made on the Project. The EES was developed in consultation with the community and stakeholders.

2.0 Project description

2.1 Project overview

The Project is approximately 20-year rare earth and mineral sands mine and processing facility. VHM has been developing the Project in the context of a rapidly growing global demand for rare earths. One of the world's largest, highest-grade zircon, rutile and rare earth mineral deposits is in the Loddon Mallee region of Victoria in Australia. VHM intends to establish the Project to mine these deposits and process to produce and market a range of products to national and international consumers.

The mine footprint has been restricted to avoid intersection with groundwater and significant areas of remnant native vegetation. VHM will implement a staged development approach. Initially developing phase 1 consisting of a mining unit plant (MUP), wet concentrator plant (WCP), rare earth mineral concentrate (REMC) flotation plant and a hydrometallurgical plant (Hydromet) that will further refine the REMC that is produced at Goschen. The product suite for phase 1 consists of a zircon/titania heavy mineral concentrate (HMC) and mixed rare earth carbonate (MREC).

Phase 2 will commence approximately 2 years post-production and consist of an additional mineral separation plant (MSP) and, subject to prevailing market circumstances at that time, hot acid leach (HAL) and chrome removal circuit, that will produce additional products such as premium zircon, zircon concentrate, HiTi rutile, HiTi leucoxene, LoTi leucoxene, low chromium ilmenite.

The Project is located approximately 4 hours' drive (280 kilometres) northwest of Melbourne and 30 minutes (35 km) south of Swan Hill within Gannawarra Shire (Figure 2-1).

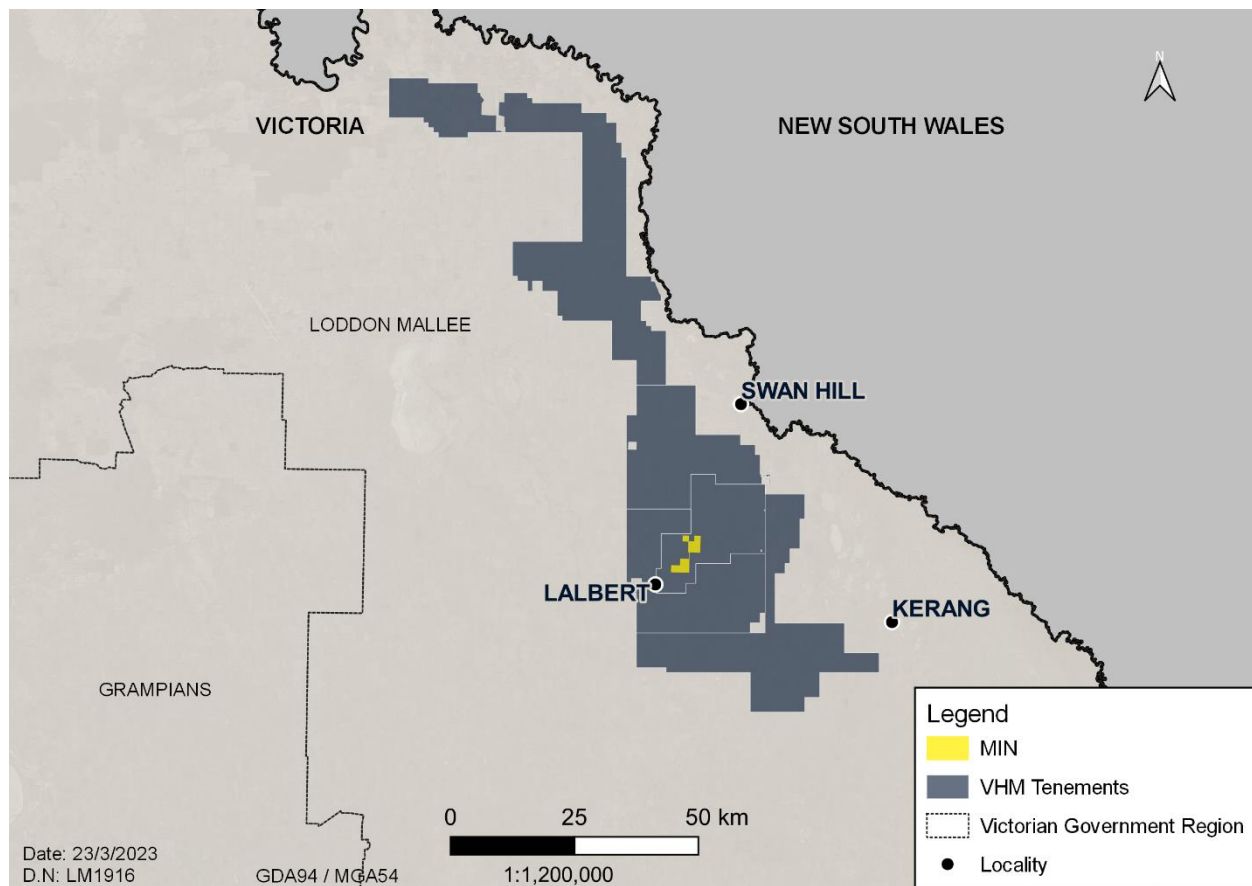


Figure 2-1: Goschen Project Location

2.2 Key project components

The Project site consists of a heavy mineral sand mining and processing operation that will produce several heavy mineral concentrates (HMC) and a range of critical rare earth minerals across two defined mining areas known as Area 1 and Area 3 (Figure 2-2 and Figure 2-3).

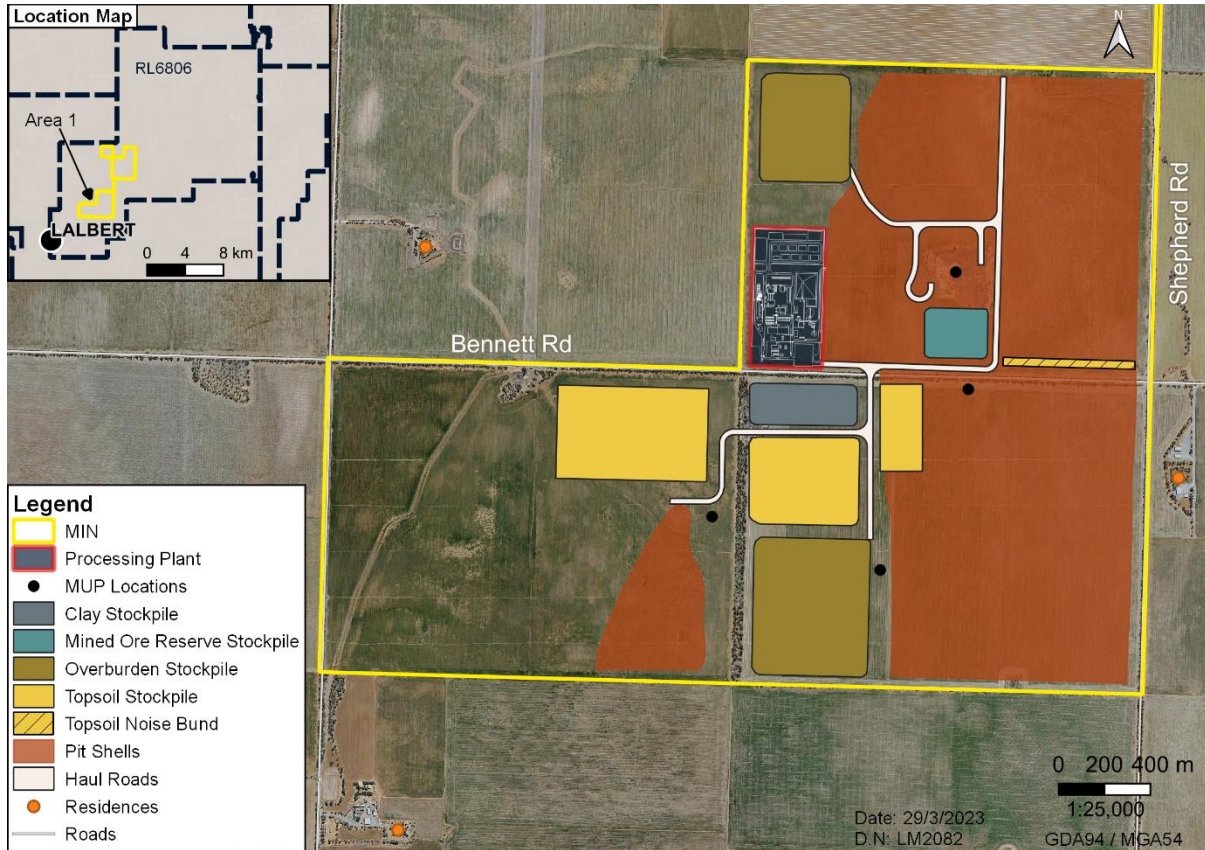


Figure 2-2: Area 1 Goschen Project

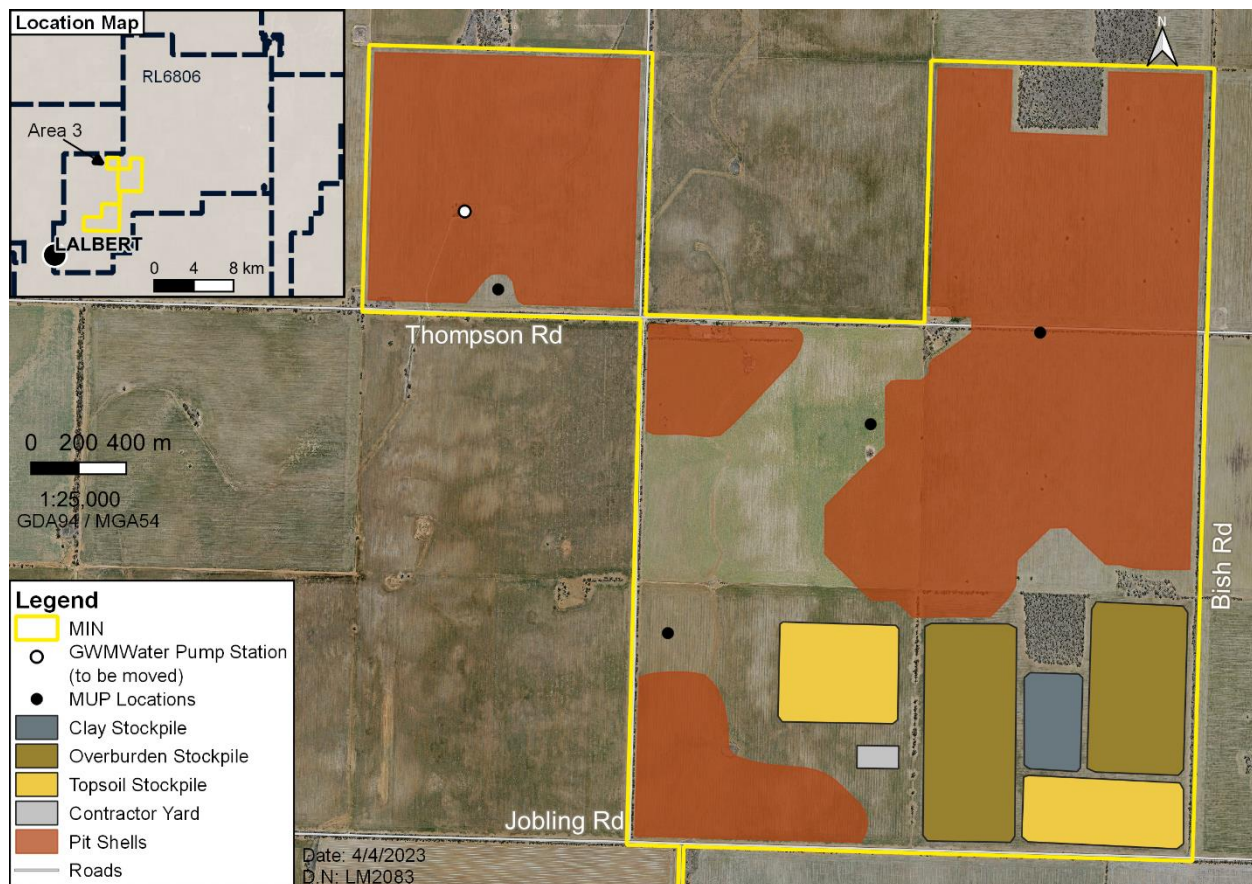


Figure 2-3: Area 3 Goschen Project

The key components that make up the project are described below.

Mining – Mining will take approximately 20 years at 5M tonnes of ore produced per year and will occur only above groundwater (no dewatering) across approximately 1,479 hectares of farmland using conventional open cut mining methods of excavation, load, and haul.

Processing – Heavy mineral sands and rare earths ore will be separated via an on-site WCP and MSP to generate a Rare Earth Mineral Concentrate (REMC). Refining of the REMC on-site is limited to hydrometallurgical extraction to produce a mixed rare earth carbonate. Tailings from the various mineral processes will be homogenised and placed back into the ore zone earlier mined.

Rehabilitation – The mined areas will be progressively backfilled in a staged manner, with tailings dewatered in-pit to allow overburden and topsoil placement in a profile that reinstates the background soil structure. This will result in the ability for a return to the current agricultural land uses within 3 years.

Power – Electrical power needed for mining and processing will be produced on-site from dual fuel diesel/liquified natural gas (LNG) fired power generators, with a gradual evolution over the life of mine to renewables, hydrogen and/or battery as technologies and commercial viability increase. Heat energy for the on-site gas fired appliances shall be provided from an extension of the distribution network from the main LNG storage and regasification system.

Transport – Final products shall be containerised in 20ft sealed sea containers on site and exported via Melbourne Port using road and/or rail-based land logistics solutions. Ultima will provide intermodal rail solution, to reach the shipping export ports.

Water - Water will be required for construction earthworks, processing, dust suppression and rehabilitation. Up to 4.5 GL a year will be needed for the start-up of the Project. Water will be sourced from Goulburn Murray Water (GMW) from a new pumpstation at Kangaroo Lake via the open water market. A 38km underground pipeline is proposed beneath existing local road easements as shown in Figure 2-4 below. Although assessed as part of this EES, the alternative water supply route option is not proposed to be constructed.

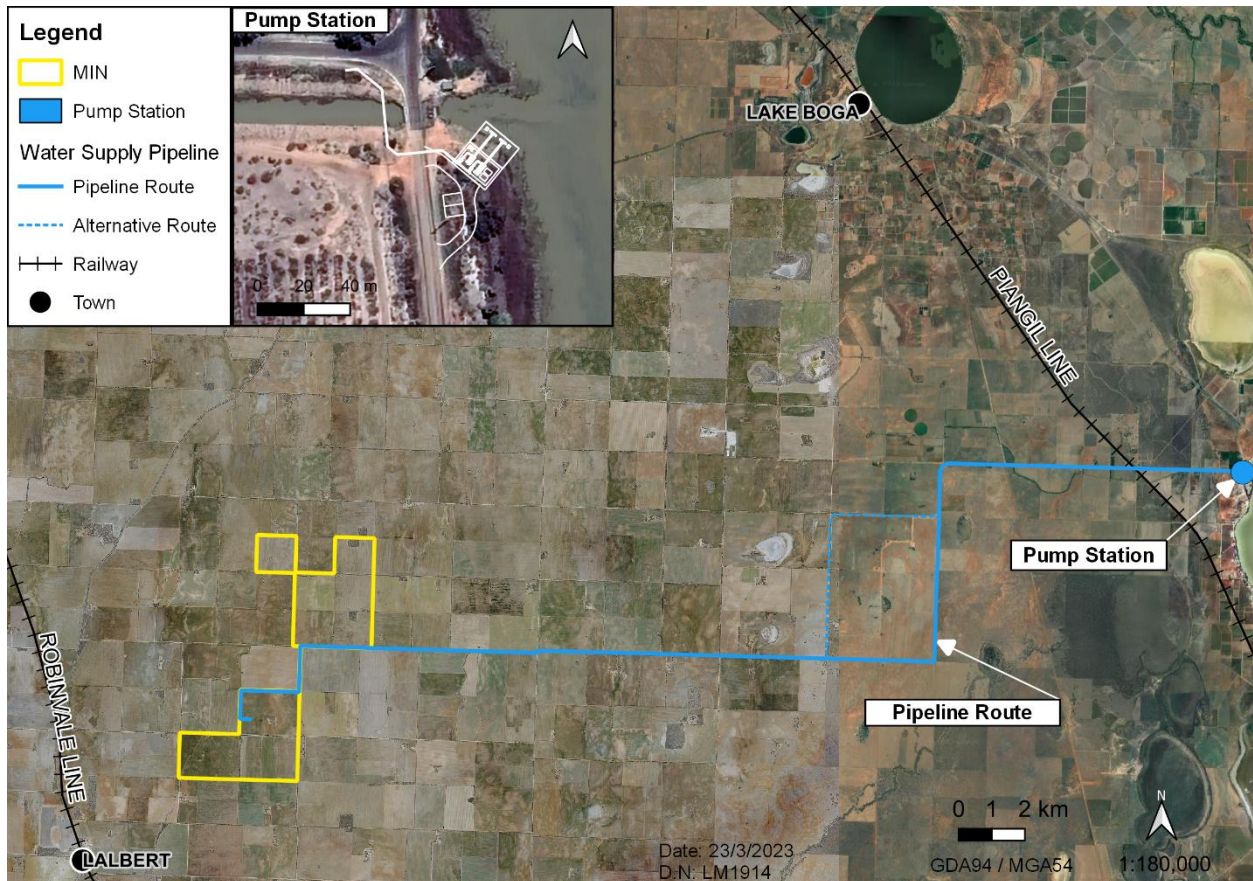


Figure 2-4: Proposed water supply pipeline route

2.3 Assessment framework

2.3.1 Study objective

The objective(s) of this study are to:

- Identify and assess social impacts associated with the Project.
- Where necessary and appropriate, recommend mitigation measures to manage identified impacts.

2.3.2 EES evaluation objectives and scoping requirements

The Scoping Requirements¹ for the Project, set out the specific environmental matters the project must address in order to satisfy the Victorian assessment and approval requirements.

By way of introduction, the Scoping Requirement set out the Ministers' requirements for the EES, specifying that the EES should *address both positive and adverse socio-economic effects, at local and regional scales, potentially generated by the project, including increased traffic movement and indirect effects of the project construction workforce on the capacity of local community infrastructure.*

The scoping requirements provide further guidance regarding the specific matters to be investigated in the EES, in the form of evaluation objectives. These objectives identify the desired outcomes to be achieved in managing the potential impacts of constructing and operating the project in accordance with the *Ministerial guidelines for assessment of environmental effects* under the EE Act.

The following evaluation objectives are relevant to the Social Impact Assessment:

To minimise potential adverse social and land use effects, including on agriculture and transport infrastructure

To protect the health and wellbeing of residents and local communities, and minimise effects on air quality, noise and the social amenity of the area, having regard to relevant limits, targets or standards.

Aspects of the scoping requirements relevant to the above evaluation objectives are shown in Table 2-1 as well as the location where these items have been addressed in this report.

¹ Scoping Requirements for Goschen Mineral Sands Project Environment Effect Statement. Department of Environment, Land, Water and Planning (DELWP), May 2019.

Table 2-1 Scoping requirements relevant to the Social Impact Assessment

Aspect	Scoping requirement	Section addressed
Key issues	The potential for reduced access to farm land, businesses, social networks and community facilities.	Sections 4-8
	Potential for benefits and adverse effects on socio-economics at local and regional scales.	
	Potential for the project to adversely impact the social cohesion, mental health and well-being of the communities in the vicinity of the project.	
	Potential for risks to public health and safety and diminished social wellbeing at all stages of the project due to a range of factors including but not limited to: exposure to dust, air pollution, noise, vibration, lighting, radiation, hazardous materials and transport hazards	
Priorities for characterising the existing environment	Characterise the existing and planned land use and the existing beneficial uses within and in the vicinity of the proposed project.	Section 4
	Describe the characteristics of the existing community in the vicinity of the project site, having regard to demographic, socio-economic and societal connection factors and with reference to relevant municipal or sub-regional benchmarks.	
	Describe community attitudes to the existing environment and the potential changes brought by mining and associated operations.	
Assessment of likely effects	Assess potential social and land use impacts arising from the project including access to accommodation and social services.	Sections 5-8
	Assess the potential effects on workforce development opportunities in the local and wider region as a result of the project.	
	Assess likely effects to the social cohesion, human health and well-being of the communities in the vicinity of the project.	
Design and Mitigation	Outline measures to minimise potential adverse effects on local communities and infrastructure	
Performance objectives and management	Describe monitoring programs to measure social, land use, economic and infrastructure outcomes for communities living within or in	

Aspect	Scoping requirement	Section addressed
	the vicinity of the project area including a framework for identifying and responding to any emerging issues	
	Describe monitoring programs for potential effects on amenity, environmental quality, health and social wellbeing including a framework for identifying and responding to any emerging issues.	

2.3.3 Legislation, policy, guidelines and standards

The legislation, policy, guidelines and standards relevant to this assessment are summarised in Table 2-2, below.

Table 2-2: Legislation, policy, guidelines and standards relevant to the assessment

Document title	Summary	Relevance to the project
Victorian government		
EE Act Ministerial Guidelines	Defines the environment broadly as including physical, biological, heritage, cultural, social, health, safety and economic aspects	Social impacts arising from the disruption of the use and enjoyment of community resources and/or alterations to the social profile of a community must be addressed as part of the EES.
Loddon Mallee Regional Strategic Plan (2015-18) - Regional Development Australia and Regional Development Victoria.	Identifies a vision and priorities for cooperation on regional development between all levels of government and other stakeholders	Plan seeks to harness the comparative advantages of the region to attract new investment and a diverse range of jobs
Local Government		
Gannawarra Council Plan	The Plan outlines a vision under which Gannawarra will grow through encouraging economic diversity, creating unique tourism destinations, and embracing our cultural and natural assets	Goal 2 of the Plan is to Grow Gannawarra through a diverse and broad economy. To achieve this goal, through the Plan the Shire will facilitate infrastructure, programs and policies that support economic development and productivity, whilst considering our natural environment
Gannawarra Economic Development Strategy 2019-2024	Plan seeks to encourage economic development which leverages the areas natural assets, including mining projects. Indicates that in order for growth to occur, existing communities will need to accept that there will be more competition for housing.	Plan explicitly references the Goschen Project as potential opportunity to create around 300 full time jobs over 25 years and that the Project <i>would certainly provide a positive lift to the local economy.</i>
Swan Hill Council Plan (2021-2025)	Sets out a vision for Swan Hill as a place of progression and possibility	Under the heading 'Prosperity', the Plan includes the strategic objective: <i>A thriving diverse economy</i> and indicates that Swan Hill will focus on creating jobs and wealth through adding value to existing strengths in all areas of our economy

3.0 Method

3.1 Introduction

The following sections outline the method for the social impact assessment, including the assessment framework employed and primary research tasks completed.

3.2 Social impact assessment

Social impact assessment (SIA) is a social research process to identify the potential social effects of planned interventions such as mining projects and to assess the likely impact of these effects for individuals and social groups. Fundamental to SIA practice is the distinction between effects and impacts as follows:

- Social effect: an objectively verifiable change to the social profile of a community or the resources it relies on.
- Social impacts: the experience (positive or negative) of a social effect by individuals or groups (the social receptors).

Social impacts are distinct from social effects as different individuals and groups experience change differently depending on their circumstances (Van Schooten *et al.*, 2003).

This SIA was compiled following the well-established procedural steps of SIA and makes use of data collected using a variety of research methods to establish existing conditions and assess potential effects and impacts. The report is structured to present the information in a number of parts as indicated:

- Scoping – Define the scope of the study and develop an SIA methodology (Sections 1 to 2).
- Profiling - Outline the existing social conditions and policy context. Identify the key social receptors and community resources (Sections 3 to 5).
- Prediction and Evaluation - Assess likely social changes/effects associated with the proposal and evaluate the impact of the predicted changes for relevant social receptors (Sections 6 to 8).
- Mitigation - Propose measures to mitigate identified impacts (Sections 6 to 8).

3.3 Scoping

The scope of the SIA was determined following:

- A review of the Scoping Requirements for the Project (see Table 3-1).
- Initial Workshop - Prior to commencement of the SIA, a workshop was undertaken with the proponent to determine the nature of the project and its potential physical affects, and to begin to identify the individuals and groups who may be impacted (the social receptors). Communication with the proponent regarding social receptors continued throughout the SIA process.
- Stakeholder and community engagement – prior to commencement and through the development of the SIA, the proponent has consulted with the relevant Councils and regulators, land-holders, residents of the district and community groups. Feedback collected via this activity was relayed to the SIA team.

The sources/activities listed above were used to identify potential change mechanisms of relevance to the SIA, the spatial range over which social effects may be experienced and in turn a geographic focus for the SIA (see

Table 3-1). The scoping phase also contributed to the identification of community resources and social receptors. Notwithstanding, the scope of the SIA remained open to review throughout the SIA process, to ensure that no relevant potential impacts were omitted.

Table 3-1: Scoping the SIA

Category	Social Effect	Receptors	Phase
Workforce and Social Profile	<ul style="list-style-type: none"> ▪ Influx of workers creates additional demand for community facilities and services in settlements within commuting range of the project 	<ul style="list-style-type: none"> ▪ Users of community facilities and services ▪ Housing market participants. 	Construction, Operation and Decommissioning
	<ul style="list-style-type: none"> ▪ Influx of workers influences the social profile of communities within commuting range of the project 	<ul style="list-style-type: none"> ▪ Residents of established communities 	
Displacement	<ul style="list-style-type: none"> ▪ Occupation of land disrupts current land use 	<ul style="list-style-type: none"> ▪ Owners and occupiers of directly affected land. ▪ Members of the broader rural community 	
Access and Amenity	<ul style="list-style-type: none"> ▪ Alterations to the amenity and character of rural areas in proximity to the MIN (within approximately 3.5 kilometres) and Water Pipe. 	<ul style="list-style-type: none"> ▪ Occupants of nearby dwellings ▪ Members of the broader rural community 	
	<ul style="list-style-type: none"> ▪ Alterations to the amenity and character of Kangaroo Lake 	<ul style="list-style-type: none"> ▪ Residents living adjacent the lake ▪ Recreational users 	
	<ul style="list-style-type: none"> ▪ Altered access and amenity due project induced traffic interferes with the enjoyment of valued community resources 	<ul style="list-style-type: none"> ▪ Residents of dwellings and settlements along the transport route. 	

3.4 Study area

As indicated by Table 3-1, the social effects of the Project would be concentrated in locations proximate to the proposed mine, water pipe and pumping station and transport route, and in towns where workers employed by the Project may reside.

These locations comprise the Study Area for the SIA and are the focus of the existing conditions section below. In some cases, community resources potentially affected by the Project are used by people who live beyond the Study Area and the impacts for affected individuals and social groups are also assessed as part of the SIA.

3.5 Data collection

Data to support the social impact assessment was compiled using a number of primary and secondary sources, including:

- A site visit to the Mining Area and surrounding settlements including Lalbert, Ultima, Swan Hill and Kerang.

-
- Australian Bureau of Statistics (ABS) data and other relevant secondary data sources (referenced as required throughout the report).
 - Technical assessments prepared for the EES including, namely:
 - Economic Impact Assessment of the Goschen Project (EIA) - Deloitte Access Economics, Oct 2022
 - Landscape and Visual Impact Assessment – Goschen Mineral Sands and Rare Earths Project (LVIA) – Moir, April 2023
 - Noise Assessment - Goschen Mineral Sands and Rare Earths Project (NIA) – SLR, May 2023
 - Air Quality Impact Assessment - Goschen Mineral Sands and Rare Earths Project (AQIA) – SLR, 2023.
 - Road Transport Impact Assessment (TIA) Goschen Mineral Sands and Rare Earths Project - AECOM, 2023
 - Technical report K Land Use Planning: Goschen Mineral Sands and Rare Earths Project (LUIA) - AECOM, 2023
 - Data provided by the proponent regarding the number and type of properties within the Mining Area and an interview with the proponent's Land Access Team which covered the reactions of directly land holders to the Project, challenges facing land holders, etc.
 - Data generated through open community forums conducted by VHM Limited during the preparation of the EES:
 - Kerang, 28 July 2022 and 28 September 2022
 - Lalbert, 27 July 2022 and 28 September 2022.
 - Quambatook, 27 September 2022.
 - Swan Hill, 28 July 2022 and 29 September 2022.
 - Ultima, 29 September 2022.
 - The author of this report attended three of the open community forums: Lalbert, Kerang and Swan Hill (July 2022).
 - Telephone discussions with representatives of local medical clinics to establish service capacity 5 clinics were contacted, see table 4-10).
 - Telephone discussions with representatives of Gannawarra Shire and Swan Hill Rural City Council (RC)

3.6 Impact assessment

The SIA describes and assesses the residual impacts of the Project (see Sections 5 to 8) following application of mitigation imbedded in the Project's design and mitigation measures developed via the SIA process. The 'SIA mitigation' was developed in conjunction with the proponent, in cases where the severity of identified impacts warranted further remedial action.

3.6.1 Assessing significance

The significance of identified social impacts has been assessed considering the magnitude of effects likely to generate impacts and the sensitivity of social receptors to these effects. Following Rowan (2009):

- Magnitude of social effects, taking account of: intensity of change (i.e., how large is the change relative to existing conditions); scale (number of people affected); and duration of the change.
- Sensitivity of affected social receptors to the predicted affects taking account of: the compatibility of predicted effects with use and enjoyment of a community resource; the value attributed to an affected community resource by the receptor(s); the adaptive capacity, or rather the ability of those affected to adjust in order to cope with a predicted effect.

Significance ratings presented herein represent professional judgements, made in light of the attributes of an impact, as opposed to objective measurements. The SIA literature identifies magnitude and sensitivity as factors relevant to a consideration of significance, and further outlines the concept that as magnitude and sensitivity increase, as does significance (see Table 3-2).

The significance ratings provided in the SIA reflect the overall level of disruption caused by different aspects of the Project. However, the way that different individuals experience change varies and the ratings do not imply that the experience of all affected individuals would be equivalent. In this context, the ratings are provided to give the reader a sense of the relative importance of impacts and draw attention to those which require mitigation.

3.7 Limitations, uncertainties and assumptions

The SIA relies on estimates of the nature and magnitude of physical changes to the environment that would arise as a consequence of the Project as outlined in other technical reports produced as part of the EES process (as listed in Section 3.5). The reliability of the SIA is contingent on the reliability of these studies.

As discussed in Section 3.6.1, significance ratings presented in the SIA represent professional judgements, made in light of the attributes of an impact, as opposed to objective measurements.

Table 3-2: Assessing the significance of social impacts: The Table below outlines the rating scale (black) and illustrates the concept that an increase in magnitude and/or sensitivity is associated with increasing significance (greyed area). Ratings are formulated taking account of the factors which influence severity, but are not a computational output of the scales.

Rating	Recommendation		Factors Relevant to a Significance Assessment					
	Importance	Mitigation (if negative)	Sensitivity			Magnitude of Change		
			Compatibility	Importance	Adaptive Capacity	Intensity	Duration	Extent
Severe	Impact cannot be justified/is essential	Significant investment in mitigation and/or project redesign is required	<i>Change is highly disruptive/ necessary.</i>	<i>Resource is essential</i>	<i>Receptors have little to no capacity to cope with/without changes.</i>	<i>Very large change relative to baseline conditions.</i>	<i>Greater than 10 years</i>	<i>Affects many people across a wider area.</i>
Major	Impact is significant in the context of the net benefit assessment	Additional mitigation measures would be highly beneficial	<i>Change is disruptive/ beneficial.</i>	<i>Resource is very important</i>	<i>Receptors have limited capacity to cope with/without changes.</i>	<i>Large change relative to baseline conditions.</i>	<i>3-10 years</i>	<i>Affects many people across a wider district (such as an LGA).</i>
Moderate	Impact is significant but can be tolerated/forgone	Additional mitigation measures should be considered in particular circumstances	<i>Change causes considerable disruption/ benefit.</i>	<i>Resource is of considerable importance</i>	<i>Receptors have some capacity to cope with/without changes</i>	<i>Considerable change relative to baseline conditions.</i>	<i>1 to 3 years</i>	<i>Affects many within a local community.</i>
Minor	Impact is of minor importance	Impact can be tolerated, but mitigation encouraged.	<i>Change is somewhat disruptive/desirable</i>	<i>Resource is of minor importance</i>	<i>Receptors have capacity to cope with/without changes.</i>	<i>Noticeable change relative to baseline conditions.</i>	<i>3 months to 1 year</i>	<i>Affects discrete sections of a local community</i>
Negligible	Impact is not material	N/A	<i>Change has minimal implications for use and enjoyment of the affected resource.</i>	<i>Resource is not valued</i>	<i>Receptors are unaffected.</i>	<i>Little to no change relative to baseline conditions.</i>	<i>Less than 3 months</i>	<i>Affects a small number of individuals.</i>

Adapted from Rowan (2009)

4.0 Existing Environment and Sensitivities

4.1 Introduction

This section outlines social conditions in locations where effects of the Project would be perceptible. Due to the nature of the Project, effects of different types would be directly perceptible in an area covering parts of Gannawarra Shire the Rural City of Swan Hill, and to a lesser extent the shires of Buloke and Loddon. The focus of this section is:

- Rural Areas in proximity to the proposed Mining Area (Area 1 and Area 3).
- Locations in proximity to the proposed product transport route to Ultima and water pipeline from Kangaroo Lake to Mining Area.
- Settlements with a practical commuting distance of the proposed mine, where the Project's workforce may reside.

4.2 Population and Settlement

4.2.1 Overview

The Project is located approximately 35 kilometres south west of Swan Hill within the Murray River – Swan SA3 Area² (see Figure 4-1).

The largest settlements in proximity to the project are the regional centres of Swan Hill and Kerang, which are located approximately 30km north-east and 40 kilometres east of the Project respectively. As at 2021, the population of Swan Hill was 11,225 while Kerang's population was 3,882 (see Table 4-1). Swan Hill and Kerang are significant employment centres within their respective LGAs, with approximately 60% and 35% of LGA residents working within the regional centres. In, addition, a large share of rental accommodation in the Rural City of Swan Hill and Gannawarra Shire is located in Swan Hill and Kerang (62% and 48% respectively), along with a number of regional scale community facilities and services, including the Swan Hill Hospital (Swan Hill District Health), Swan Hill TAFE (Sun TAFE), Swan Hill Leisure Centre; and Kerang Hospital (Kerang District Health).

Modest population growth is projected for Swan Hill to 2036 (0.4% per annum). In contrast, incremental population decline is projected across the Murray River – Swan SA3 Area, including in locations such as Kerang, due to factors such as an increasing scale of production in the agricultural sector, the outmigration of young people from the region to access education and/or employment opportunities (see Section 4.2.4) and natural attrition due to ageing.

Also in proximity to the Project are a number smaller settlements, the nearest of which are Lalbert (population 80), 4 kilometres to the south west and Ultima (population 118, approximately 20 kilometres to the north west east). Lalbert and Ultima are situated on the Robinvale Railway Line, and for much of their history have been grain transport hubs. However, changes to the scale of agricultural production in the region and associated reductions in population density, have significantly affected the viability of facilities and services located in Lalbert, Ultima, and other small settlements throughout the region. To illustrate, the passenger service on the Robinvale Rail Line ceased in 1978 and since 2010, the Lalbert grain silo, hotel, primary school and many of the town's shops have closed.

² A geographical unit used by the ABS to report Census Data. SA3 areas cover 'regions' and are comprised of SA2 areas (medium sized areas), which are in turn comprised SA1 Areas, all of which form part of the 'Australian Statistical Geography Standard'.

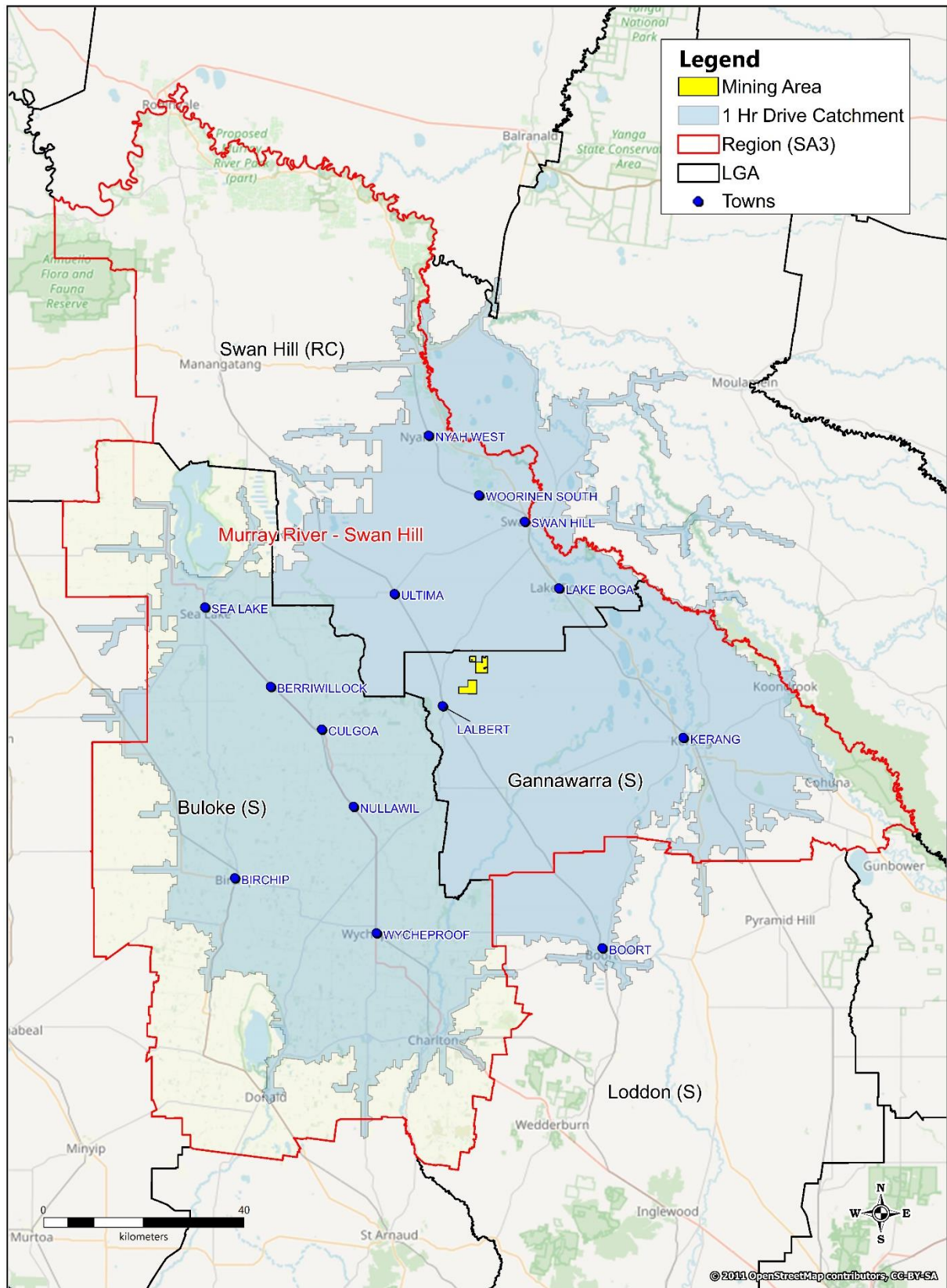


Figure 4-1: The Goschen Project, Location Map

Ultima, like Lalbert, has faced challenges in terms of retaining population in the context of the changing scale of agricultural production. However, unlike Lalbert, the Ultima primary school continues to operate, and in 2019 the Ultima Intermodal Terminal commenced operation, bringing employment to the township. In addition, the Ultima Progress Association has been active in attempting to attract new residents to the township. For example, in 2003 the Association made 12 blocks of land available for sale for \$1 on the condition that buyers began building within 12 months, with eleven of the blocks selling. Swan Hill Rural City Council officers noted that Ultima is somewhat unique among smaller townships in the region, in that in recent times it has successfully attracted new residents from outside the district including from Melbourne.

Table 4-1: Population Trends

	2011	2021	2036	Ave Ann Growth % (2021 to 2036)
Goschen area (SA1)	174	223		
Lalbert	81	80		
Lalbert & surrounds (SA1)	225	216		
Ultima	124	118		
Ultima & surrounds (SA1)	333	320		
Lake Boga	718	764		
Sea Lake	612	559		
Berriwillock	122	125		
Culgoa	106	71		
Nullawil	58	66		
Birchip	662	673		
Wycheproof	626	564		
Woorinen South	310	300		
Nyah West	491	532		
Kerang (SA2)	3,872	3,882	3,727	-0.3%
Swan Hill (SA2)	10,431	11,225	11,926	0.4%
Swan Hill Region (SA2)	6,550	6,477	5,417	-1.2%
Murray River – Swan (SA3)	37,202	37,242	35,460	-0.3

Source: Census 2021 & 2011; VIF 2019

Other smaller settlements located within commuting distance of the Project include Lake Boga (population 764), which is located 20 kilometres to the north east, and Sea Lake, Berriwillock, Culgoa and Wycheproof, which are located to the west, along the Calder Highway. To the north west of Swan Hill and also within commuting distance of the Project are Woorinen South and Nyah West.

The immediate environs of the Project is a farming area, which supports production of wheat barley, oats, canola and legumes and is sparsely populated.

4.2.2 Demographic Profile

Table 4-2 presents demographic data for the farming area near the Project, Swan Hill and Kerang. Detailed demographic data are not published for the smaller settlements located in the vicinity of the Project, with the populations of these areas being subsumed in larger ABS reporting areas. The following observations can be made with respect to the data:

- The farming district near the Project is populated by a well-established, relatively affluent and stable farming community which is ageing in place. The median age of this community (47 years) is notably higher than observed for Swan Hill and Regional Victoria, but similar to the other comparison areas. Median household income in the farming area is relatively high and employment in agriculture is very common. Group households, younger singles and couples and single parents comprise only a small proportion of households in the farming area, which is largely populated by families with children and empty nesters.
- The demographic profile ABS SA1 areas which contain Ultima and Lalbert is similar to that of the farming area, with some minor differences (more elderly residents, lower incomes, more single persons, less employment in agriculture, etc.) being attributable to the presence of the urban settlements of Ultima and Lalbert within these areas.
- In contrast, Swan Hill is home to a large and relatively diverse population, with a profile that mirrors Regional Victoria as whole. Swan Hill's population includes people across the age spectrum, living in a range of household types (i.e., group households, lone person and single parents as well as couple families with children). In addition, a relatively large proportion of Swan Hill residents rent their dwelling and/or live in apartments or townhouses compared the surrounding farming district. Median household income for Swan Hill approximates that observed for Regional Victoria, as does the proportion of households on higher (>\$3,000 per week) and lower (<\$600 per week) incomes. The Swan Hill community has a much higher rate of turnover compared with the farming area near the Project, with only 59.0% of households indicating they lived at the same address as 5 years ago, compared with 90% for the farming area.
- The population of Kerang is older and less affluent than Swan Hill. However, like Swan Hill, Kerang accommodates a more diverse population than the surrounding farming district, including lone person and groups households, renters, and people from non-English speaking backgrounds.
- Many people living the farming area and in the townships of Ultima and Lalbert, and to a lesser extent Swan Hill and Kerang, were employed in agriculture at the time of the 2016 Census. However, relatively few people were working in mining (less than 1%).

Table 4-2: Selected demographic indicators

		Farming Area ³	Ultima, Lalbert & Surrounds	Swan Hill	Kerang	Murray River-Swan Region	Regional Victoria
AGE	0 to 4	5.0%	6.6%	7.0%	5.0%	5.6%	5.8%
	5 to 11	11.2%	8.7%	8.4%	7.8%	8.6%	8.7%
	12 to 17	5.3%	7.6%	7.3%	6.4%	7.2%	7.3%
	18 to 24	11.7%	6.6%	8.8%	6.7%	7.3%	8.0%
	25 to 34	7.9%	7.5%	13.0%	9.1%	10.3%	10.9%
	35 to 49	17.8%	18.1%	17.5%	15.2%	16.7%	18.1%
	50 to 69	33.7%	31.3%	23.0%	27.6%	28.2%	27.3%
	70+	7.4%	13.7%	15.1%	22.0%	16.2%	13.8%
	Median Age	47	48	39	49	45	43
HOUSEHOLDS	Household Size	2.8	2.4	2.3	2.2	2.3	2.4
	Lone Person	15.8%	28.2%	31.3%	36.6%	30.8%	29.0%
	Group	0.0%	2.5%	3.9%	2.4%	3.0%	3.1%
	Family	84.2%	69.3%	64.7%	61.1%	66.2%	68.0%
FAMILIES	Couple no children	46.2%	30.6%	24.4%	27.1%	28.7%	29.2%
	Couple with children	31.4%	29.6%	23.3%	20.8%	23.9%	26.9%
	One parent family	0.0%	3.5%	5.8%	3.8%	4.4%	11.0%
	Other family	0.0%	0.0%	1.1%	0.7%	0.9%	0.9%
EMPLOYMENT AND TRAINING	Unemployment Rate	6.7%	2.0%	4.8%	6.3%	4.8%	6.0%
	In Labour Force	63.9%	63.5%	55.4%	49.5%	0.6%	56.1%
	Completed Year 12	36.2%	34.0%	40.0%	30.3%	34.8%	43.4%
	Bach Degree or Higher	3.6%	7.5%	10.7%	8.3%	8.8%	14.5%
	Ag, Forestry or Fishing	31.5%	52.7%	6.8%	8.8%	21.3%	8.0%
	Mining	0.0%	0.0%	0.4%	1.0%	0.5%	0.8%
WEEKLY INCOME	Median H.H Income	\$1,268	\$936	\$1,098	\$886	\$983	\$1,124
	H.H >\$3,000	25.0%	31.1%	18.5%	16.8%	18.5%	20.1%
	H.H <\$650	17.3%	29.1%	27.2%	33.2%	29.5%	25.7%
DWELLINGS	Separate house	100.0%	100.0%	83.8%	94.8%	92.1%	89.5%
	Townhouse	0.0%	0.0%	6.5%	0.0%	2.3%	6.8%
	Flat/unit/apartment	0.0%	0.0%	9.1%	3.6%	4.2%	2.8%
	Occupied	0.0%	0.0%	0.7%	1.5%	1.4%	0.9%
TENURE	Fully owned	42.1%	60.1%	34.4%	47.8%	45.1%	39.0%
	Being purchased	40.4%	24.0%	30.3%	26.4%	28.6%	34.3%
	Rented	17.5%	14.2%	34.6%	24.7%	25.4%	25.9%
	Public/Social Housing	0.0%	0.0%	6.6%	4.0%	4.2%	3.7%
ETHNICITY	Born Overseas	0.0%	2.8%	11.6%	6.1%	10.0%	12.0%
	Speaks other language	0.0%	0.6%	10.2%	2.7%	8%	13.1%
	Poor or no English	0.0%	0.0%	2.5%	0.4%	2.0%	1.1%
	Indigenous	2.7%	0.0%	3.4%	3.0%	2.9%	1.6%
CARS	Access to Private Vehicle	100.0%	98.3%	92.0%	92.5%	91.0%	94.4%
SAME ADDRESS	As 5 Years Ago	89.1%	79.1%	59.0%	68.1%	57.2%	61.4%

Source ABS Census 2016

³ SA1 2140506 has been used to estimate the demographic profile of farming areas located near Ultima, Lalbert, Swan Hill and Lake Boga. This SA1 area is the only ABS reporting area in the vicinity of the Project which does not have an urban center located within it.

4.2.3 Labour Force Size and Profile

To the extent possible, the Project's aim is to recruit its workforce from the local area. Given the physical nature of mining work and the use of longer shifts in the mining sector, a one-hour drive represents a practical limit on the Project's commuter catchment.

Table 4-3 shows the size and profile of the labour force of the Murray River – Swan (SA3) area. The majority of this area's population live within commuting distance of the Project, although settlements such as Robinvale are located beyond the 1 hour commuting threshold. As the Table shows, the region's labour force comprised 16,242 people at the time of the 2016 Census.

The type of employment that would be offered during construction and operation of the project has historically been taken up primarily by younger males, aged 15 to 54 who have mining experience and/or experience in civil or domestic construction, trades, etc. Notwithstanding, the Project would offer positions which may be attractive to males, females and older workers.

Relatively few workers in the region were employed in mining as of 2016. However, a notable proportion of the region's workforce worked in 'occupations such as Technicians and Trades; Machinery Operators and Drivers; and Labourer, and therefore may have relevant skills and experience in the context of the needs of the Project's workforce requirements.

Table 4-3: Workforce Characteristics

	Male	Female	Persons
Labour Force	8,842	7,400	16,242
Unemployed	456	334	790
Works Mining	74	12	86
Occupation one of: Technicians and Trades; Machinery Operators and Drivers; Labourers	4,030	1,202	5,232
Labour Force Aged 15 to 54	6,195	5,425	11,620
Aged 15 to 54 & Occupation one of: Technicians and Trades; Machinery Operators and Drivers; Labourers	2,989	889	3,878

Source: Census 2016

4.2.4 Ageing an Out-Migration

The populations of The Rural City of Swan Hill, as well as Gannawarra and Buloke Shires are projected to age substantially over the next 15 years. To illustrate, the number of Rural City of Swan Hill residents aged 0 to 19 years of age is projected to decline from 5,081 to 4,154 over the period 2021 to 2036, whereas the number of residents aged 70+ is projected to increase from 2,896 to 4,211 over the period.

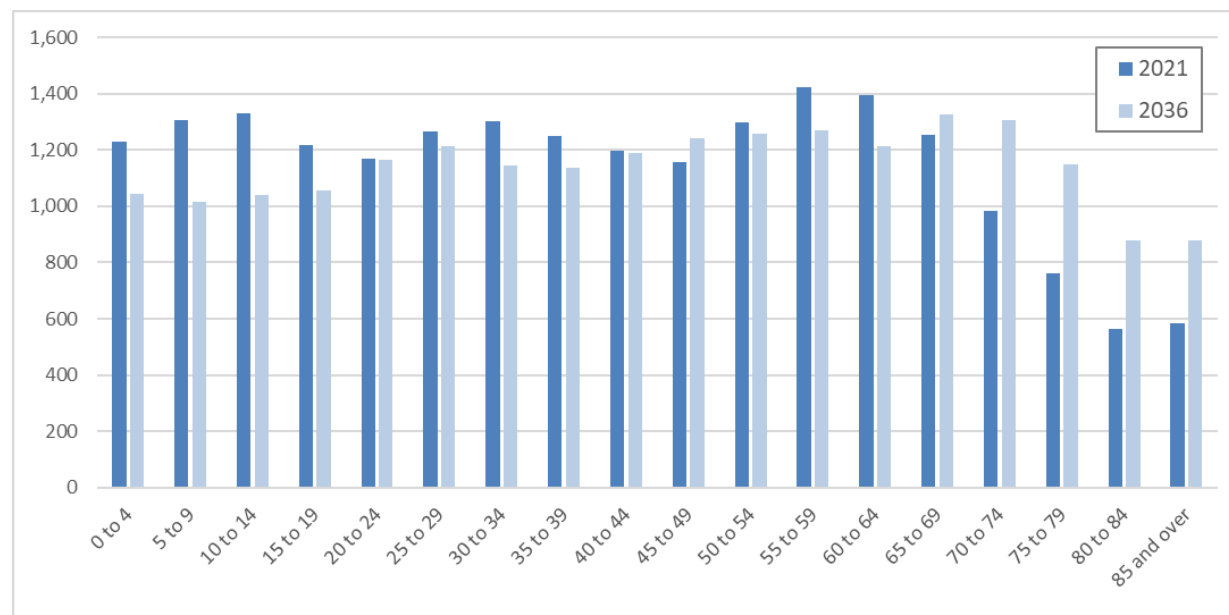


Figure 4-2: Rural City of Swan Hill Age Profile, 2021 & 2036

The trend of ageing in Rural City of Swan Hill and surrounding LGAs is partly explained by an outmigration of younger residents, who may otherwise settle and raise families. As Table 4-4 shows, a disproportionate number of Rural City of Swan Hill residents aged 20 to 29 moved from the LGA in the period prior to the 2016 Census. Specifically, 13.8% of those aged 20 to 29 at the time of the 2016 Census moved away from the Rural City of Swan Hill in the year prior to the Census, with only a small proportion moving to another LGA within the Mallee Region.

While the reasons for out-migration are likely diverse, feedback from the local Councils indicates that a relative lack of attractive education, training and career opportunities in the region is a key driver.

Table 4-4: Outmigration of Residents in Year Preceding the 2016 Census by Age

	0 to 19	20 to 29	30 to 49	50+
Left Rural City of Swan Hill	6.4%	13.8%	6.3%	2.0%
Moved within the Mallee	0.7%	1.6%	0.8%	0.3%
Moved Elsewhere	5.7%	12.2%	5.5%	1.7%

Source: ABS Census 2016

4.2.5 Housing Market Activity

Permanent Accommodation

Housing market activity in locations in immediate proximity to the Project is relatively limited (in terms of dwelling approvals and new lettings), with there being on only a handful of new lettings in the Goschen, Lalbert and Ultima areas per annum (See Table 4-5).

The majority of housing in the area is concentrated in Swan Hill and Kerang. However, in these regional centres there are only approximately 240 and 50 new lettings per annum. In addition, relatively few new residential dwellings are constructed in these centres per annum (approximately 50 and 25 per annum).

The above considered, the Project is located in a sparsely populated farming area with limited current capacity to accommodate an influx of new residents. Moreover, while the area's most significant urban centres, Swan Hill and Kerang, are located within commuting distance of the Project, the scale of rental market and development activity in these urban centres is only of modest scale.

Feedback (September 2022) from the local Councils indicates that the local rental market is 'tight' and that increased demand associated with recent commercial projects in the region has exacerbated existing issues relating to inadequate supply. In this context, the Councils have identified the need to open up more land in the region's major urban centres for housing to facilitate their objective of growing and diversifying the economy (see Section 2.3.3).

Table 4-5: Housing Supply Near the Project

LGA	Settlement	Dwellings	Rented	% of rented dwellings in Shire	New Lettings Year to March 2022	Dwelling Approvals to June 2022
Swan Hill (RC)	Swan Hill	5,067	1,381	62.4%	387	80
	Lake Boga	402	48	2.2%		
	Goschen	89	10	0.5%		
	<i>SHIRE BALANCE</i>	3,952	775	35.0%		
Gannawarra (S)	Kerang	1,989	375	47.8%	106	54
	<i>SHIRE BALANCE</i>	3,328	410	52.2%		
Buloke (S)	Sea Lake	342	39	8.3%	53	11
	Wycheproof	309	38	8.1%		
	<i>SHIRE BALANCE</i>	5,330	392	83.6%		

Source: ABS Census 2021; DHS Rental Report 2022; www.housingdata.gov.au (2022)

Short Stay Accommodation

Short stay accommodation within the Murray River- Swan Region is heavily concentrated in Swan Hill. To illustrate, data on hotels, motels and serviced apartments published by the ABS indicates that as at 2016, there were 19 venues in the region, 13 of which were located in Swan Hill (See Table 4-6).

Due to the small number of venues within SA2 areas such as Kerang and Gannawarra, data on room numbers and occupancy rates are not released by the ABS due to issues relating to confidentiality. In Swan Hill, data show that the 13 venues provided a total of 348 rooms, which were utilised at a rate of 50.5% to 56.2% throughout the year, with only minimal seasonal fluctuation in demand.

Table 4-6: Hotels Motels and Serviced Apartments Near the Project by SA2

	Venue	Rooms	Beds	Room Occupancy 15-16			
				Sep	Dec	Mar	Jun
Buloke	3						
Gannawarra	2						
Kerang	1						
Swan Hill	13	348	981	55.2%	56.2%	50.5%	52.6%
Swan Hill Region	1						
Victoria	849	48,038	122,517	68.7%	73.5%	73.4%	68.5%

Source: *Tourist Accommodation Australia 2015-16*

In addition to short stay accommodation located within hotels, motels and serviced apartments, there are numerous caravan parks located within the commuter catchment of the Project., which may offer a suitable temporary option for the Project workforce. For example:

- BIG4 Swan Hill
- BIG4 Riverside Swan Hill
- Swan Hill Holiday Park
- Swan Hill Resort
- Two Bays Caravan Park (Nyah)
- Nyah Village Caravan Park
- Lake Boga Caravan Park
- Kangaroo Lake Caravan Park
- Lake Charm Caravan Park
- Kerang Caravan & Tourist Park
- Kerang Valley Resort
- Ibis Caravan Park and Kerang Cabins
- Cohuna Waterfront Holiday Park
- Koondrook Caravan Park.
- Pelican Waters Caravan Park, Lake Charm

4.3 Immediate Environs

4.3.1 Farming Land & Dwellings

Land within and near the Mining Area is zoned for farming and supports production of wheat barley, oats, canola and legumes. This area is populated primarily by farming families who live and work on the land.

Five agricultural properties comprise the mining area, one of which accommodates a residential dwelling (R009). These properties are owned by four separate landholders with whom the proponent has land acquisition contracts for the freehold. There are also 14 rural dwellings located outside the Mining Area but within 3.5 kilometres, the spatial area identified during the scoping phase where mining activities have some potential to have a material effect on perceived amenity (see Table 4-7 and Figure 4-3).

Table 4-7: Private Land Intersecting the Project Area

Distance From Mining Area	Resource	Number Within Mining Area (wholly or partially)
Fully or Partially Within the Mining Area	Properties	5
	Dwellings	1
Within 500 meters of the Mining Area	Dwellings	2
500 meters to 1,500 meters of the Mining Area	Dwellings	3
1,500 meters to 3,500 meters of the Mining Area	Dwellings	9

Source: VHM

The circumstances of members of the local rural community whose land and/or dwellings were within or are in proximity to the Mining Area vary considerably, and as do their views about the project.

Views regarding the Project among nearby rural residents are more mixed. In some cases, these landholders have strong emotional ties to their land and/or dwelling and the farming activity which it supports. Moreover, these landholders variously have an intergenerational connection to the land, have invested a considerable proportion of their lives working the land and improving their property and/or have aspirations to pass on their farm and business to the next generation. Others have recently bought into the area or had their land passed to them, and are hoping to build a successful business and career in agriculture, raise a family and enjoy the local rural environment and lifestyle. In this context, some have expressed concerns about the potential effect of the Project on their rural amenity and the productivity of their land, as well as their capacity to expand their farm.

Nearby rural residents also expressed a sense of stewardship in relation to the farming district in which the Project is located. In this context, concerns have been raised about the capacity of the proponent to successfully rehabilitate the land, the potential for additional mining projects to be established throughout the district, and the implications this may have for the health and viability of the local farming community and the farming enterprises on which it depends.

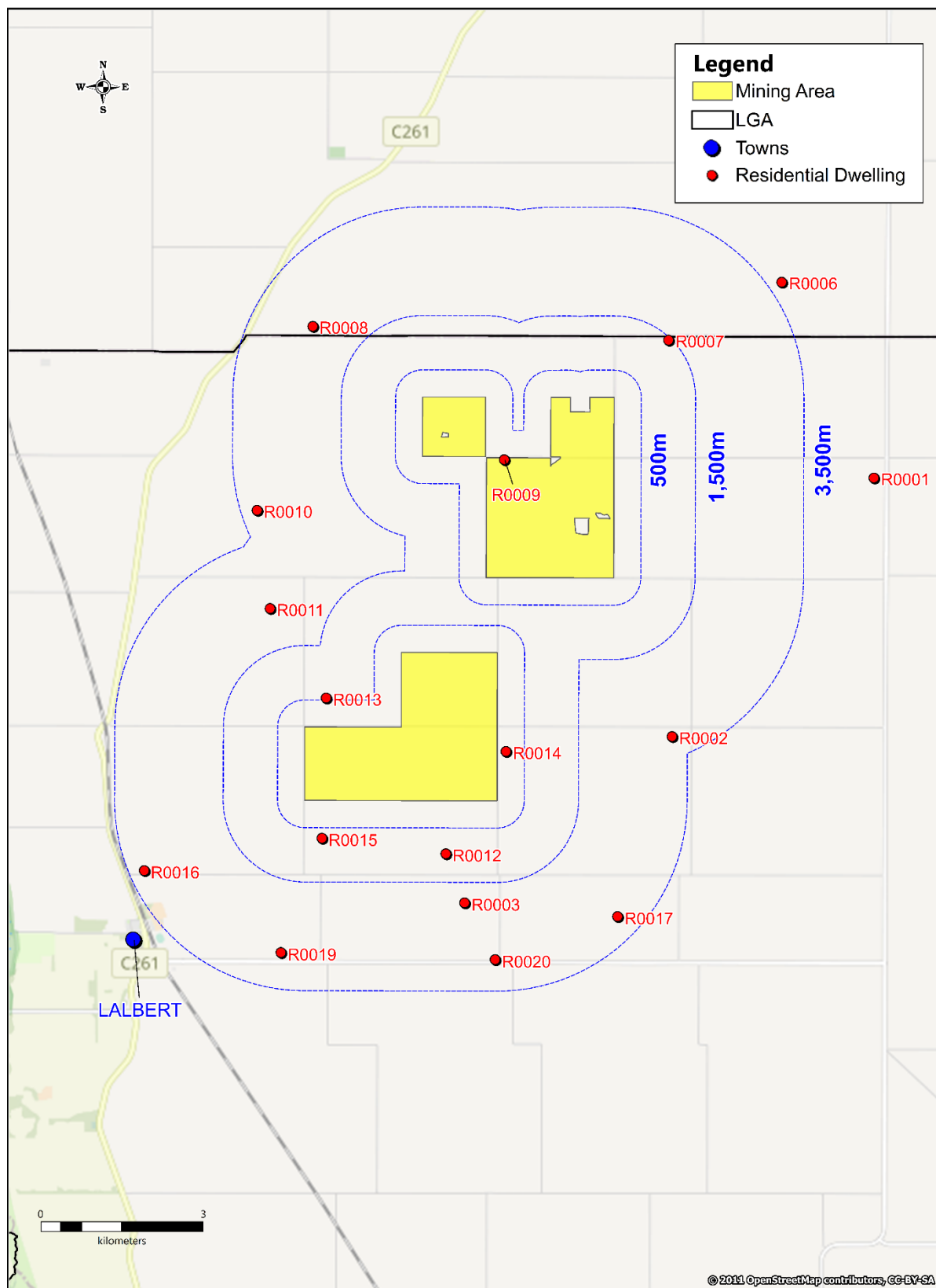


Figure 4-3: Dwellings Near the Mining Area

4.3.2 Nearby Settlements

Lalbert

The closest settlement to the proposed Mining Area is Lalbert, which is located approximately 4 kilometres to the south-west. Figure 4-5 below shows the layout of Lalbert and its orientation with respect to the Mining Area. As the Figure shows, the majority of the township's urban area is located either side of the Donald - Swan Hill Road to the west of the Robinvale Railway Line.

The township's main community resources include the Lalbert Recreation Reserve (home of the Mallee Eagles Football Club), the Lalbert CFA and Memorial Park, all of which located in linear strip along the Donald -Swan Hill Road. There are currently no children's services, school or medical services in Lalbert. As Figure 4-5 shows, a 3.5km buffer from the Mining Area approaches Lalbert's north-east corner, meaning that that all homes and community resources within the township are beyond the spatial area where mining activity would directly affect amenity.

Lalbert community members who attended the July 2022 open house session (see Section 3.6) indicated that Lalbert residents are keen to support projects which deliver employment opportunities, to assist in retaining young people in the district. It was acknowledged that the township has been through a difficult period since the main grain silo shut, but that activities such as the local football club had managed to survive and are integral to the township's future. In this context, the benefits that the Project would bring in terms of offering long term sustainable employment were considered very beneficial.

Notwithstanding, residents were also concerned about the potential impact of the Project on the well-being of the farming land and community within and near the Project, and were very keen to ensure that the tradition of farming in the area and the well-being of farming families was respected.



Figure 4-4: Elevated view of Lalbert (facing north west).



Figure 4-5: Lalbert, Layout

Ultima

The settlement of Ultima is located approximate 20 kilometres to the north west, well beyond the spatial area where mining activity would directly perceptible. However, Ultima is located adjacent the termination point of the proposed transport route (the Ultima Intermodal Terminal), and as a result Project induced traffic may have implications for the use and enjoyment of housing and other community resources in this location.

Figure 4-7 below shows the layout of Ultima and its orientation with respect to the Ultima Intermodal Terminal and proposed transport route. As the Figure shows, the township's principle urban area is framed by the Robinvale Railway Line, Culgoa-Ultima Road and Sea Lake-Swan Hill Road, and has an approximately triangular shape. The majority of the township's community resources are located in this area, including the Ultima General Store, CFA, Skate Park and Primary School (as at 2019, the school has three children enrolled). The Ultima Recreation Reserve is located at the township's western periphery on the western side of Culgoa-Ultima Road. There are currently no children's services or medical services in Ultima.

The proposed transport route enters the Ultima Intermodal Terminal from the east, via Lake Boga - Ultima Road and David Street. Project traffic would pass the Ultima Golf Club and four residential dwellings on David Street, between Lake Boga - Ultima Road and Sea Lake-Swan Hill Road (two of which are situated on land zoned for farming and two being on land within the Township Zone). The remainder of the township, including dwellings and community resources are separated from the transport route by the rail line.



Figure 4-6: Dillon Street, Ultima (Facing North)



Figure 4-7: Ultima, Layout.

4.3.3 Kangaroo Lake

The Project would draw water from Kangaroo Lake, via a proposed underground pipeline between the lake and the Project. A pumping station would be situated on the shoreline of Kangaroo Lake, towards the lake's north-west corner (see Figure 4-9).

Kangaroo Lake is one of the largest freshwater lakes in the district and is supplied by the Torrumbarry Irrigation System. The lake is located on the western side of the Murray Valley Highway between Swan Hill and Kerang.

Kangaroo Lake is a popular location for swimming, fishing, water skiing and other water based recreational activities. Two boat ramps facilitate access to the lake for pleasure boating and fishing, one being located adjacent the Kangaroo Lake Caravan Park, on the lake's north east corner, and the other on the lake's western side, alongside a grassed recreational area. A walking track extends along the lake's western side from the boat ramp to the north for approximately 3 kilometres. Along the lake's western side there are a number of residential dwellings which have uninterrupted views across the lake.

The Kangaroo Lake Caravan Park is located on the lake's north eastern corner, and provides camping sites, cabins, a kiosk and BBQ facilities.

The proposed pumping station would be located at the corner of Mystic Park East Drive and Gorton Drive on the bank of Kangaroo Lake. At this location, an irrigation channel enters the lake, which is crossed by a road bridge. The channel is fitted with a weir, which has an industrial appearance (see Figure 4-8).



Figure 4-8: Kangaroo Lake, Weir Adjacent the Proposed Pumping Station Site



Figure 4-9: Kangaroo Lake

4.4 Swan Hill & Kerang

Swan Hill and Kerang are the largest settlements located within commuting range of the Project, and the primary access point for community facilities and services for residents living within the Swan Hill and the surrounding region.

4.4.1 Community Services – Supply and Demand

The amenity of Swan Hill and Kerang would not be directly affected by the Project. However, the Project's workforce may generate demand for community facilities and services, retail, etc. within the centres. The supply of and demand for, a selection of locally orientated community services in Swan Hill and Kerang is outlined below.

Early Years

Existing provision of early years services in Swan Hill and Kerang, such as childcare and kindergarten, is sufficient to meet the needs of the Swan Hill and Kerang populations, and there is notable surplus capacity to accommodate demand generated by surrounding regional communities. As a result, most existing centres have some vacancies and some have vacancies on all days and in all age groups.⁴ Moreover, the number of children aged 0 to 5 is projected to decline in both Swan Hill and Kerang over the next 15 years, resulting in reductions in demand for demand for early years services.

Table 4-8: Early Years Services Kindergarten in Swan Hill (SA2) and Kerang (SA2)

	Name	Capacity	Supply and Demand	Population
Kindergarten		Max. Enrolments		
Swan Hill	Kunawaa Kindergarten	66	Enrolment capacity of approximately 258. Enrolment demand in 2021 approx. 135	Children aged 4 projected to decline from 150 in 2021 to 130 in 2036.
	Swan Hill South Kindergarten	66		
	Swan Hill North Kindergarten	60		
	Shamrock Park Kindergarten	66		
Kerang	Gannawarra Shire Children's Centre	66	Enrolment capacity approx. 66. Enrolment demand in 2021 approx. 38	Children aged 4 projected to decline from 42 in 2021 to 31 in 2036.
Childcare		Lisc. Places		
Swan Hill	Swan Hill Child Care Centre	36	276 places at 306 places per 1,000 children aged 0 to 5. Average for Victoria 270 places per 1,000 children (2021).	Children aged 0 to 5 projected to decline from 901 in 2021 to 777 in 2036.
	Goodstart - Pritchard Street	75		
	YOUNG ADVENTURERS	44		
	Little Swans Early Learning	78		
	Young Adventurers	43		
Kerang	Gannawarra Shire Children's Centre	100	100 places at 392 places per 1,000 children aged 0 to 5.	Children aged 0 to 5 projected to decline from 255 in 2021 to 190 in 2036.

Source: ACECQA 2020; VIF 2020; DEECD 2019

⁴ see <https://www.childcarefinder.gov.au/>

Schools

There are four primary schools and two secondary schools operating in Swan Hill and three primary schools, one high school and one P-12 school operating in Kerang. As at 2021, there was notable capacity within the network of schools to accommodate additional enrolments (see Table 4-8). Moreover, the number of primary school aged children is projected to decline in Kerrang and Swan Hill, and likewise the number of secondary school children in Kerrang is projected to decline. In Swan Hill, the number of secondary school children is projected to increase marginally to 2036. In this context, the existing network of schools will continue to have notable unused capacity into the future.

Table 4-9: Schools in Swan Hill and Kerang

Type	School	Current Enrolment	Highest Observed Enrolment (Since 2007)	Trends
Primary				
Swan Hill	Swan Hill Primary School	511	569	Children aged 5 to 11 projected to decline from 1008 in 2021 to 903 in 2036.
	Swan Hill North Primary School	226	277	
	St Mary's School	602	602	
	Son Centre Christian College	9	24	
Kerang	Kerang Primary School	65	139	Children aged 5 to 11 projected to decline from 299 in 2021 to 244 in 2036.
	Kerang South Primary School	149	223	
	St Joseph's School	105	111	
Secondary				
Swan Hill	Swan Hill College	771	1,011	Children aged 12 to 17 projected to increase from 781 in 2021 to 800 in 2036.
	St Mary MacKillop College	429	550	
Kerang	Kerang Christian College	126	126	Children aged 12 to 17 projected to decline from 241 in 2021 to 210 in 2036.
P-12				
Kerang	Kerang Technical High School	234	491	Children aged 12 to 17 projected to decline from 241 in 2021 to 210 in 2036.

Source: DET 2020; Pers. Com with Schools October 2020

Medical Clinics

There are six medical clinics in Swan Hill and Kerrang, which provide GP and allied health services. Combined, the clinics employ 29 GPS, which includes a mix of full-time and part time doctors.

The rate of supply of GPs per head of population Victoria is approximately 110 Full Time Equivalent GPs per 100,000 people, indicating that approximately 11 Fulltime GPs would be required to serve the population of the Swan Hill SA2 area and further 4 GPs would be required to serve the needs of the Kerang population (SA2).

Feedback provided by the medical clinics indicated that they service a wide catchment extending for an approximately 45-minute drive from the regional centres. As a result, while the number of GPS in the centres is sufficient to meet local demand, services are currently operating at or near capacity due to demand by residents of the wider district. Clinics located in Kerang indicated they are currently attempting to recruit more GPS to assist in meeting demand.

Table 4-10: Medical Clinic

	Clinic	GPs	FTE
Swan Hill	Swan Hill Primary Health Medical Centre	9	9
	Swan Hill Medical Group	8	5
Kerrang	Kerrang Medical Clinic	3	1.5
	Northern District Community Health Medical Clinic	5	TBC
Swan Hill & Kerrang	Mallee District Aboriginal Services - Swan Hill	4	TBC

Source: Pers.Com Medical Clinics September 2022

4.4.2 Reactions

Residents of Swan Hill and Kerang who attended the open houses and/or who were consulted by VHM at one or more of the 'consultation events' were typically very keen to see employment generating projects developed in the region, and in this context expressed support for the Project. While generally supportive, the following issues and concerns were raised:

- Workforce accommodation - where will workers live; short-stay accommodation is limited and rental markets are tight.
- Processing – keen to see processing of the ore occur locally, to maximise economic and employment benefits for the region.
- Health and Safety – need to make sure that the Project does not compromise the health and safety of local residents, for example due to dust emissions.

5.0 Impact Assessment

Potential impacts for each phase of the Project, were identified in the scoping phase of the Project and enabled the scope of the SIA to be determined. These potential impact pathways are reiterated in Table 5-1.

Table 5-1: Potential Impact Pathways

Category	Social Effect	Receptors	Phase
Workforce and Social Profile	<ul style="list-style-type: none"> ▪ Influx of workers creates additional demand for community facilities and services in settlements within commuting range of the project 	<ul style="list-style-type: none"> ▪ Users of community facilities and services 	<ul style="list-style-type: none"> ▪ Construction, Operation and Decommissioning
	<ul style="list-style-type: none"> ▪ Influx of workers creates additional demand for housing within commuting range of the project 	<ul style="list-style-type: none"> ▪ Housing market participants. 	
	<ul style="list-style-type: none"> ▪ Influx of workers influences the social profile of communities within commuting range of the project 	<ul style="list-style-type: none"> ▪ Residents of established communities 	
Displacement	<ul style="list-style-type: none"> ▪ Occupation of land disrupts current land use 	<ul style="list-style-type: none"> ▪ Owners and occupiers of directly affected land. ▪ Members of the broader rural community 	
Access and Amenity	<ul style="list-style-type: none"> ▪ Alterations to the amenity and character of rural areas in proximity to the MIN (within approximately 3.5 kilometres) and Water Pipe. 	<ul style="list-style-type: none"> ▪ Occupants of nearby dwellings ▪ Members of the broader rural community 	
	<ul style="list-style-type: none"> ▪ Alterations to the amenity and character of Kangaroo Lake 	<ul style="list-style-type: none"> ▪ Residents living adjacent the lake ▪ Recreational users 	
	<ul style="list-style-type: none"> ▪ Altered access and amenity due project induced traffic interferes with the enjoyment of valued community resources 	<ul style="list-style-type: none"> ▪ Residents of dwellings and settlements along the transport route. 	

6.0 Workforce and Social Profile

6.1 Introduction

This Section outlines how the Project's workforce would affect the social profile of the Study Area across the life of the Project and assesses the potential implications for relevant social receptors. In assessing impacts, the following elements of the Project's design, which have been conceived in order to mitigate potential social impacts, have been taken into account:

- Minimise:
 - VHM has a Local Employment Policy, under which preference would be given to applicants for positions at the proposed mine who live within commuting range of the Project.
 - VHM would develop a Code of Conduct (see Appendix B), which sets out VHM's expectations of temporary and permanent staff when interacting with members of the local community.
 - VHM is in the process of developing a Memorandum of Understanding (MOU) with the Swan Hill RCC and Gannawarra Shire, which include elements relating to information sharing, and planning for the future housing needs of the community.

In addition to mitigation imbedded within the Project's design, through the SIA process the following additional mitigation has been developed:

- SC01 - Workforce Accommodation Strategy: A draft strategy has been developed by VHM and would be refined in consultation with relevant stakeholders, including local councils, prior to commencement of construction (see Appendix A).

The Draft Strategy does not include measures to manage the influx of permanent employees, but rather focuses on accommodating the construction workforce. In this context: the strategy should be amended to include:

- A commitment to agree with local authorities on a maximum influx of permanent workers who would be able to seek accommodation in the local housing market (rental and/or for purchase) in Years 1 to 3, by location. If the number of permanent employees seeking accommodation in the local housing market exceeds local housing capacity, then the positions would be identified as FIFO/DIDO and the employees working in these roles would be accommodated in short stay accommodation developed for the Project, for up to three years, after which the positions would be converted to 'residential' positions.

6.2 Changes

The Project would employ temporary (contractors performing construction work) and permanent staff (operational positions) across the project life cycle. Temporary employment associated with construction is estimated to peak at 275 workers early in the Project life cycle (for a period of 1 month) and after break in construction between Quarter 3 of Year 1 and Quarter 2 of Year 2, would grow to 200 workers in a second and third round of round of construction. Permanent employment number would reach 325 in Quarter 3 of Year 1, grow to 375 in Quarter 1 of Year 4 and grow to 400 in Quarter 1 of year 5, remaining constant thereafter for a period of approximately 20 years.

Table 6-1: Indicative Project Workforce Numbers

Year		Construction/Temporary Role	Permanent Positions	Total
0	Q1	-	-	-
	Q2	-		-
	Q3	150		150
	Q4	275		275
1	Q1	250	325	250
	Q2	100		100
	Q3	-		325
	Q4	-		325
2	Q1	-		325
	Q2	-		325
	Q3	100		425
	Q4	200		525
3	Q1	200		525
	Q2	75		400
	Q3	100		425
	Q4	200		525
4	Q1	200	375	575
	Q2	75		450
	Q3	-		375
	Q4	-		375
5-25		-	400	400

Source: VHM per.com. 2022

VHM is developing a Local Employment Policy, and is working with the Local Councils and Jobs Victoria, to ensure that employment opportunities created by the Project can be accessed by local residents and it is the intention of VHM to recruit as many of the required temporary and permanent employees from the local community as possible. Notwithstanding, the size of the local labour force is such that it is unlikely that all employment created by the project would be filled by local residents (see Table 4-3).

For the purpose of this assessment, three scenarios are explored, a worst-case scenario (Max) under which all mine workers are imported to the region, an 'assessment scenario', under which 75% of the workforce is imported to the region and an aspirational scenario (Min) under which 50% of the workforce is imported to the region.⁵ Workers already living in region, would travel to work from their existing address, while imported workers would generate new demand for accommodation in the region. The assessment scenario represents

⁵ It is noted here that the intention of VHM is to recruit as many of the required temporary and permanent employees from the local community as possible.

an achievable outcome given the size of the local labour force and the success of other mining operations in regional Victoria in attracting workers from within local communities.

Imported construction workers would work on shifts, with extended breaks, and likely travel into the region to work and return home to their permanent place of residence while on breaks. As a result, the majority of imported construction workers would likely make use of short stay accommodation, such as hotels and motels, caravan parks, etc.

The Draft Workforce Accommodation Strategy identifies 28 properties providing short stay accommodation, with a practical driving distance of the Project, which provide a total 559 rooms (323 being located in Swan Hill and Kerrang). While somewhat dated, the latest publicly available data on occupancy rates (see Table 4-6) indicates that approximately 45% of these rooms would be vacant at any one time. The Draft Accommodation Strategy also indicates that the Project is in the process of establishing agreements with local accommodation providers which would stimulate the supply of additional short accommodation in the region (164 new rooms).

Figure 6-1 below compares demand for short stay rooms generated by the construction workforce with that available in the existing market ('unused existing') and accounting for the additional short accommodation identified in the Draft Workforce Accommodation Strategy. As the Figure shows, if the Assessment Scenario is achieved, then there would be sufficient existing unused short stay accommodation in the Project's driving catchment to accommodate the construction workforce, although a large proportion of this unused capacity would be required. If a greater proportion of workers were imported than assumed for the Assessment Scenario, it is possible that demand would approach and exceed existing unused capacity at times in the construction period. Furthermore, imported construction workers would likely prefer to live in Swan Hill or Kerang as these settlements provide a full range of commercial, retail and community services and opportunities and unused existing short stay accommodation in these locations could not accommodate the entire construction workforce. However, once the additional accommodation identified the Draft Workforce Accommodation Strategy is accounted for, there would be sufficient short stay accommodation to accommodate the construction workforce, even under a scenario where 100% of construction workers are imported to the region ('Max').

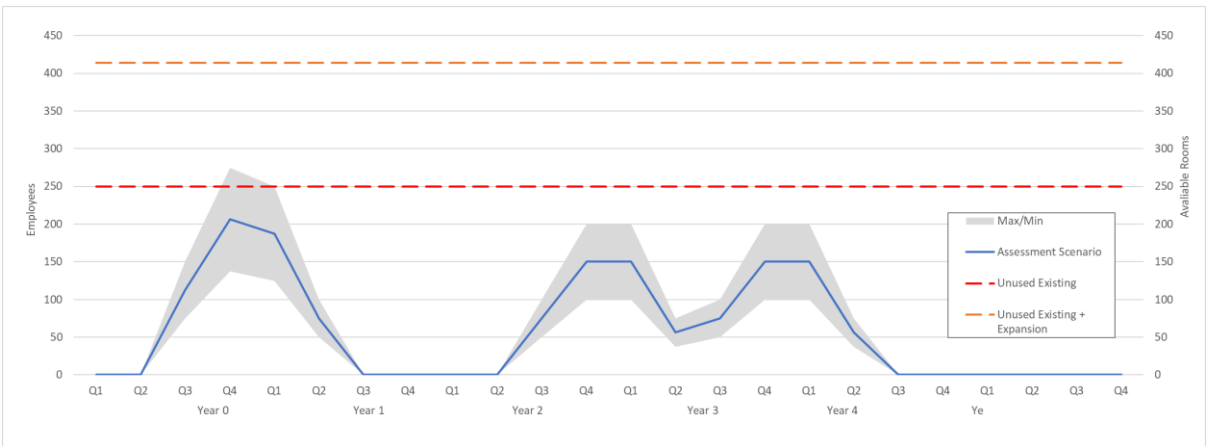


Figure 6-1: Supply of and Demand for Short Stay Accommodation within Driving Distance of the Project

Imported permanent employees would likely prefer to work and live in the region, with the majority making use of conventional rental accommodation when first migrating to the region (some may choose to purchase a home, overtime). As with imported construction workers, the majority of imported permanent workers would likely prefer to live in Swan Hill or Kerang.

Table 6-2 compares the number of new households who would be seeking accommodation as a result of the Project in Year 1, Quarter 3 with the scale of the rental market in locations within a practical commuting

distance of the Project (as identified in the Draft Workforce Accommodation Strategy) and the level of development activity in these areas. At this time, an influx of approximately 244 households is expected, and for illustrative purposes, Table 6-2 assumes these households would be distributed across Swan Hill, Kerrang and surrounding areas in proportion to the scale these existing communities. In Year 4 Quarter 1 and Year 5, Quarter 1, further influxes of permanent staff are expected, although the increases would be much lower (38 and 19 households respectively).

As the Table shows, the influx of permanent workers seeking accommodation would be large in the context of the scale of the existing housing markets.

Table 6-2: Accommodation Demand – Year 1 Quarter 3 (Assessment Scenario)

	Max	Assessment Scenario	Min	Estimated Rental Lettings Per Annum	Estimated Dwelling Approvals per Annum
Swan Hill	236	177	118	242	50
Kerang	50	37	25	51	26
Other	39	29	20	40	16
Total	325	244	163	333	92

Source: *Public Place 2022*

Estimates of additional demand for community facilities and services associated with imported workers (temporary and permanent) are outlined Table 6-2 below for the Assessment Scenario.

- In relation to temporary workers, it has been assumed that:
 - Temporary/Construction workers would not relocate families to the region, due to the temporary nature of the work, long shifts and the demographic profile of construction workers (includes a high proportion of younger males).
 - The temporary/construction workforce would generate demand for medical services, but not other community facility types, such as children's services, schools, etc.
 - Temporary/construction workers use medical services at a rate equivalent to the state average.⁶
- In relation to imported permanent employees it has been assumed that:
 - Imported permanent employees would relocate partners and dependent children to the region, where relevant, and as such would contribute to demand for a wider range of facilities and services, including schools.
 - The household and age profile of imported permanent employees (inclusive of partners and dependents) is equivalent to that of the working age population of Rural City of Swan Hill.
 - Permanent employees and their families use community facilities and services at a rate equivalent to the state average.

⁶ This assumption is conservative, as the construction worker cohort (being relatively young and healthy) would use medical services at a lower rate than the state average, and it is possible these workers would defer at least some medical appointments until they return to their permanent place of residence, in order to engage with their regular practitioner.

Table 6-3: Estimated Increase in Demand for Community Services (Assessment Scenario)

Year		Imported Population		GP	Dentist	MCH Office	Preschool Licensed Place	Childcare Licensed Place	Primary School Enrollment	Secondary School Enrollment	Community Centre
		Temp/ Construction	Operations								
0.0	Q3	150.0	0	0.1	0.1	0	0	0	0	0	0
	Q4	275	0	0.2	0.1	0	0	0	0	0	0
1.0	Q1	250	790	0.2	0.1	0	0	0	0	0	0
	Q2	100	790	0.1	0.1	0	0	0	0	0	0
	Q3	0	790	0.7	0.4	0.1	4.7	15.4	65.5	56.7	0.1
	Q4	0	790	0.7	0.4	0.1	4.7	15.4	65.5	56.7	0.1
2.0	Q1	0	790	0.7	0.4	0.1	4.7	15.4	65.5	56.7	0.1
	Q2	0	790	0.7	0.4	0.1	4.7	15.4	65.5	56.7	0.1
	Q3	100	790	0.7	0.5	0.1	4.7	15.4	65.5	56.7	0.1
	Q4	200	790	0.8	0.5	0.1	4.7	15.4	65.5	56.7	0.1
3.0	Q1	200	790	0.8	0.5	0.1	4.7	15.4	65.5	56.7	0.1
	Q2	75	790	0.7	0.5	0.1	4.7	15.4	65.5	56.7	0.1
	Q3	100	790	0.7	0.5	0.1	4.7	15.4	65.5	56.7	0.1
	Q4	200	790	0.8	0.5	0.1	4.7	15.4	65.5	56.7	0.1
4.0	Q1	200	911	0.9	0.6	0.1	5.4	17.7	75.5	65.4	0.1
	Q2	75	911	0.8	0.5	0.1	5.4	17.7	75.5	65.4	0.1
	Q3	0	911	0.8	0.5	0.1	5.4	17.7	75.5	65.4	0.1
	Q4	0	911	0.8	0.5	0.1	5.4	17.7	75.5	65.4	0.1
5 to 25		0	972	0.8	0.5	0.1	5.8	18.9	80.6	69.8	0.1

6.3 Summary of Residual Impacts

Table 6-4 outlines potential social impacts associated with the Project workforce's effect on the social profile of the region. In summary:

- Attracting and retaining working age residents – By creating employment, the Project would assist in attracting and retaining young adults in the region, contributing to the viability of community services such as schools and childcare, and injecting energy and enthusiasm into activities such as community sports, the arts and alike.
- Community cohesion – Implementation of the proposed Workforce Accommodation Strategy (including the proposed additions, see Section 6.1) and Code of Conduct would limit exposure of small communities to disproportionate influxes of mine workers, and establish high behavioural standards for workers when interacting with members of existing communities. As a result, public order and safety (actual or perceive) would not be materially affected. A managed influx of workers would contribute to economic and social vibrancy in the region.
- Housing market participants – the uplift in demand for housing associated with Project would be significant in the context of the scale of local rental and short-stay accommodation markets. However, the implementation of the Workforce Accommodation Strategy (including the proposed additions, see Section 6.1) would ameliorate potential negative impacts for users of short-stay accommodation and enable the Project's effect on the local rental market to be minimised. A managed increase in demand would contribute to the viability of the short-stay accommodation sector and incentivise the development of new housing.
- Community Facilities and Services – the uplift in demand for community facilities and services associated with imported workers would be relatively small, geographically dispersed. The Project would not place an unmanageable burden on existing facilities and services but rather would contribute to the ongoing viability of services in the region, including in Swan Hill, Kerang and smaller towns near the Project. However, in the case of GP services, the additional demand would arise in the context of supply network that is operating at or near capacity.

Table 6-4: Construction Impact Assessment - Employment and Community Services

Receptor	Changes & Impacts	Magnitude	Importance	Rating
Residents of the Region	<ul style="list-style-type: none"> ▪ The Project would directly address one of the principal drivers of out migration of young adults from the region, that being the relative absence of attractive employment and training opportunities. ▪ The Project would diversify employment and training pathways available within the region and offer an attractive long term career option. ▪ The Project would assist in attracting and retaining young adults and in doing so offset population ageing, contributing to the viability of community services such as schools and childcare, and inject energy and enthusiasm into activities such as community sports, the arts and alike. 	<ul style="list-style-type: none"> ▪ Large Change ▪ 20 years ▪ Regional community 	<ul style="list-style-type: none"> ▪ Some capacity to cope without the change ▪ Highly beneficial ▪ Considerable importance 	<ul style="list-style-type: none"> ▪ Major Positive
Residents of smaller communities	<ul style="list-style-type: none"> ▪ An unmanaged influx of mine workers into the regions smaller communities may result in an actual or perceived reduction in public order and safety, and reduce community cohesion. ▪ However, implementation of the proposed Workforce Accommodation Strategy (including the proposed additions, see Section 6.1) and Code of Conduct would limit exposure of small communities to disproportionate influxes of mine workers, and establish high behavioural standards for workers when interacting with existing community members. As a result, public order and safety (actual or perceived) would not be materially affected. ▪ The proposed management approach would facilitate creation of economic and social benefits for smaller communities by directing an appropriate volume of mine workers into smaller settlements, ensuring that mine workers contribute positively to the economic and social vitality of these settlements. 	<ul style="list-style-type: none"> ▪ Noticeable Change ▪ 20 years ▪ Local communities 	<ul style="list-style-type: none"> ▪ Receptors can cope ▪ Somewhat beneficial ▪ Very Important 	<ul style="list-style-type: none"> ▪ Minor Positive
Short Stay Accommodation Users	<ul style="list-style-type: none"> ▪ The uplift in demand for short stay accommodation would be potentially significant in the context of the scale of local short-stay accommodation markets. ▪ However, the proposed Workforce Accommodation Strategy would facilitate development of additional short stay accommodation in the region, and ensure that there is sufficient capacity to accommodate the construction workforce, avoiding impacts for current users, relating to price increases and/or capacity constraints . ▪ The development of additional short stay accommodation in the region would benefit the region on an ongoing basis, by facilitating visitation for business and tourism, purposes. 	<ul style="list-style-type: none"> ▪ Noticeable Change ▪ Permanent ▪ Local communities 	<ul style="list-style-type: none"> ▪ Receptors can cope ▪ Somewhat beneficial ▪ Very Important 	<ul style="list-style-type: none"> ▪ Minor Positive

Receptor	Changes & Impacts	Magnitude	Importance	Rating
Housing Market Participants	<ul style="list-style-type: none"> ▪ The uplift in demand for rental housing and/or housing for purchase would be potentially significant in the context of the scale of local market. While there is some capacity to absorb additional demand within Swan Hill and Kerang, and to a lesser extent in surrounding smaller settlements, an unmanaged influx of workers would result in rent-seeking behaviours and associated price spikes. ▪ Assuming the proposed Workforce Accommodation Strategy is amended as suggested in Section 6.1, negative impacts associated with Project related accommodation demand could be reduced, although the additional demand may result in local price increases and/or limit choice and availability of housing for existing residents of the region, for a limited period of 1 to 3 years (during the initial influx of permanent staff). ▪ Among lower income households who are renting, this may reduce housing affordability and/or choice resulting in housing stress and/or limit household formation. 	<ul style="list-style-type: none"> ▪ Considerable Change ▪ 1 to 3 years ▪ Rental market participants 	<ul style="list-style-type: none"> ▪ Some capacity to cope ▪ Change is somewhat disruptive ▪ Very Important 	<ul style="list-style-type: none"> ▪ Minor – Moderate Negative
Users of Community Facilities and Services	<ul style="list-style-type: none"> ▪ Imported workers would generate additional demand for medical and other community facilities and services. ▪ The increase would be dispersed across Swan Hill and Kerang and to a lesser extent, nearby smaller settlements. ▪ Swan Hill and Kerang are regional urban centres and currently accommodate a substantial number of community facilities and services including early years services, school and medical services. ▪ In the case of early years facilities and schools, the projected increases would occur in the context of notable unused capacity within the network and declining demand due to population ageing and thus would support the ongoing viability of existing services. ▪ In community facility and service types such as community centres, etc., demand uplift would not result in material capacity challenges. ▪ In relation GP and allied health services, the projected uplift in demand is relatively small but would occur in the context of a level of supply level that is presently just adequate. ▪ In the above context, the additional demand generated by imported workers and their families would not place an unmanageable burden on existing facilities and services but rather would contribute to the ongoing viability of services in the region, and in particular in Swan Hill and Kerang. 	<ul style="list-style-type: none"> ▪ Noticeable Change ▪ 20 years ▪ Service users in Swan Hill and Kerang 	<ul style="list-style-type: none"> ▪ Receptors have some capacity to cope ▪ Change is beneficial ▪ Very Important 	<ul style="list-style-type: none"> ▪ Moderate Positive

7.0 Displacement

7.1 Introduction

This Section outlines the extent of displacement of rural land and dwellings by the Project and assesses the potential implications for relevant social receptors. In assessing impacts, the following elements of the Project's design, which have been conceived in order to mitigate potential social impacts, have been taken into account:

- Minimise:
 - The Mining Area has been limited to land over which VHM has obtained land acquisition contracts for freehold land.

In addition to mitigation imbedded within the Project's design a Neighbour Agreement for the Project would be developed, as follows:

- SC02 - Neighbour Agreement: Rural residents living within 3.5 kilometres of the Mining Area would be given the option to enter into a neighbour agreement with VHM for the duration of the Project. The agreement would recognise that the rural amenity within this area would be altered by the project, and that this may affect residential satisfaction among those affected. Residents living with Zone A (up to 1km from the Mining Area), Zone B (1km to 2km from the Mining Area), Zone C (2km to 3.5km from the Mining Area) would be offered support, assistance or remuneration, to offset the altered amenity. Specifically, owners of existing dwelling in Zone A would be offered \$25K per annum for the life of the Project, whereas dwellings owners in Zone B and C would be offered \$10K per annum and 5K per annum respectively.

The location of each zone and the associated recompense would be disclosed to all participants, to ensure transparency. Payment would commence when works (construction) start and continue until operations cease (projected to be between 20 to 25 years). If any dwelling owners chooses to sign a neighbour agreement, this would not preclude them from making a submission to the EES or making a claim for compensation for an any unacceptable impact that occurs as a result of the Project. Dwellings owners would be able to sign on to the neighbour agreement at any time during the life of the Project.

7.2 Changes

The proposed Mining Area covers 14.7 square kilometres of farming land, comprising 5 separate properties one of which accommodates a dwelling (R009). These properties are owned by four landholders with whom the proponent has land acquisition contracts for the freehold. The Project would displace the existing land use on each property during construction and mining, with the duration of displacement being in the order of 20 years. At the completion of mining, the land would be rehabilitated and retuned to agricultural use.

The residential dwelling denoted 'R014' (see Figure 4-3), which is located outside the Mining Area, would be vacated during the mining of Area 1, on terms agreed between the proponent and the owner-occupier. During this period, the dwelling would be not available for residential use by the current owner-occupier, or any other person.

7.3 Summary of Residual Impacts

Table 7-1 outlines potential social impacts associated with displacement of rural and residential land uses by the Project. In summary:

- The Project would directly displace rural uses and one dwelling, and arrangements have been made to facilitate the vacating of one further dwelling. Owners of the land within the mining area and the owner of the one additional dwelling which would be vacated, are supportive of the Project and have or are expected to reach mutually agreeable terms with the proponent. As a result, while displacement of rural and residential uses may place a minor impost on the personal time and resources of those affected, it would have no material implications for their well-being.
- The proposed Neighbour Agreement model constitutes an explicit recognition that residents living near the project would be living and working within a modified environment. The proposed approach may not fully satisfy all neighbours, but would mitigate perceived inequities between those who benefit financially from the Project via the sale of their land and those who must live with the Project's effects, dampening potential conflict between neighbours and consequent reductions in social cohesion. Notwithstanding, the Project may place a minor strain on inter-personal relationships among members of the local farming community.

Table 7-1: Impact Assessment – Displacement

Receptor	Changes & Impacts	Magnitude	Importance	Rating
Directly affected owners/residents	<ul style="list-style-type: none"> ▪ The Project would displace agricultural land (5 properties, owned by four land holders) and residential uses (two dwellings), for an extended period. ▪ The affected land holders/residents have sold their land or agreed to vacate their dwelling on mutually agreeable terms. ▪ The Project would place a minor impost on the personal time and resources of the affected landholders/residents, but would have no material implications for their well-being. 	<ul style="list-style-type: none"> ▪ Large Change ▪ 10+ Years ▪ Small number of individuals 	<ul style="list-style-type: none"> ▪ Receptors can cope ▪ Somewhat acceptable ▪ Considerable Importance 	<ul style="list-style-type: none"> ▪ Minor Negative
Residents of the surrounding rural area	<ul style="list-style-type: none"> ▪ Residents of the surrounding area whose land is not located within the Mining Area, would not benefit financially from the Project via an access agreement. However, these residents may experience an altered amenity and/or consider the project an unwanted presence in the local area. In this context, it is possible that animosity may arise between land holders who benefit financially from the Project via an access agreement and those who do not. ▪ In this context, the proposed Neighbour Agreement model would facilitate a more equitable sharing of the benefits of the Project within the local community. ▪ While the proposed Neighbour Agreement model may not completely satisfy all neighbours, the proposed approach would assist in dampening potential conflict between neighbours and consequent reductions in social cohesion. ▪ Notwithstanding, the Project may place a minor strain on inter-personal relationships among members of the local farming community. 	<ul style="list-style-type: none"> ▪ Large Change ▪ 20 years ▪ Small number of individuals 	<ul style="list-style-type: none"> ▪ Receptors can cope ▪ Somewhat acceptable ▪ Very Important 	<ul style="list-style-type: none"> ▪ Minor Negative

8.0 Access and Amenity

8.1 Introduction

This Section outlines how the Project would affect access and amenity within the Study Area over the life of the project and assesses the potential implications for relevant social receptors. In assessing impacts, the following elements of the Project's design, which have been conceived in order to mitigate potential social impacts, have been taken into account:

- Avoid
 - The residential dwellings denoted 'R009' and 'R014' (see Figure 4-3) would be vacated during the mining of Area 3 and Area 1 respectively, on terms agreed between the proponent and the owners.
- Minimise
 - Construction work would be conducted under a Construction Environmental Management Plan incorporating a Noise Management Plan and would occur during 'normal' day-time hours only. Under the Construction Environmental Management Plan the timing of works would be planned to minimise or avoid interference with sensitive activities (for example, the narrow harvest period).
 - A proportion of workers visiting the Mining Area would be transported on shuttle buses from Swan Hill and/or Kerrang to reduce traffic movements on local roads.
 - A rigorous community engagement and complaints process would be established.
 - The pumping station at Kangaroo Lake would be fitted with a suitably designed acoustic enclosure and silencer selection for the generator

In addition to mitigation imbedded within the Project's design a Neighbour Agreement for the Project would be developed, as follows:

- SC02 - Neighbour Agreement: Rural residents living within 3.5 kilometres of the Mining Area would be given the option to enter into a neighbour agreement with VHM for the duration of the Project. The agreement would recognise that the rural amenity within this area would be altered by the project, and that this may affect residential satisfaction among those affected. Residents living with Zone A (up to 1km from the Mining Area), Zone B (1km to 2km from the Mining Area), Zone C (2km to 3.5km from the Mining Area) would be offered support, assistance or remuneration, to offset the altered amenity. Specifically, owners of existing dwelling in Zone A would be offered \$25K per annum for the life of the Project, whereas dwellings owners in Zone B and C would be offered \$10K per annum and 5K per annum respectively.

The location of each zone and the associated recompense would be disclosed to all participants, to ensure transparency. Payment would commence when works (construction) start and continue until operations cease (projected to be between 20 to 25 years). If any dwelling owners chooses to sign a neighbour agreement, this would not preclude them from making a submission to the EES or making a claim for compensation for an any unacceptable impact that occurs as a result of the Project. Dwellings owners would be able to sign on to the neighbour agreement at any time during the life of the Project.

8.2 Changes

Rural Dwelling Near the Mining Area

With the exception of R009 and R014, which would be vacated, construction and operation of the Project would have only modest implications for residential amenity at nearby dwellings. To illustrate:

- Noise generated during construction and operation would not exceed project noise limits at the majority of nearby dwellings, the exception being R013, where the night-time limit would be exceeded by 2dBA when Area 1 is being mined. However, even in this case, mitigation measures are suggested in the NIA which would allow for compliance to be achieved.
- The Project is located in a dusty environment and background concentrations of PM10 and PM2.5 currently exceedances of the relevant 24-hour criteria at all residential receptors. The Project would generate dust, however in most cases this would not result in additional exceedances (modelling shows one exceedance of the PM10 24-hour criteria at a nearby receptor under one scenario). Annual average PM10, PM2.5, RCS and metals criteria predicted to be met at all receptors. Likewise, dust deposition rates are not predicted to result in significant impacts to the rainwater tanks of nearby sensitive receptors, nor to surrounding vegetation (Refer to Technical Report G – Air Quality Impact Assessment and EES Chapter 12 Air Quality for further detail)
- Joblings Road would be temporarily closed during construction works of: 1) water pipeline from Kangaroo Lake (3 to 6 months), and 2) installation of mining services (power/pipelines) connecting Area 1 and Area 3 (< 1 month).
- The main access roads during construction as identified in the Traffic Impact Assessment (TIA) would be Bennett Road, to access Area 1 and Mystic Park Meatian Road (and Bish Road) to access Area 3.
- Jobling Road is identified as an alternate access point to the mine (access southern point of Area 3) and may be upgraded to facilitate site establishment of Area 3 in approximately 2031.
- During operation, the Project would generate traffic, including heavy vehicle traffic, on local roads. However, vehicles transporting mining products would access the Donald Swan - Hill Road via Bennet's Road, minimising exposure of residences to traffic noise and the number of heavy vehicle movements would be relatively small (12 heavy vehicle loads per day).
- Thompson Road would be closed to the public for the majority of mining in Area 3, whereas Bennet Road would be closed for the majority of mining in Area 3. The TIA acknowledges that closure of Bennett Road and Thompson Road may have implications for local residents which will need to be managed in consultation with the affected landowners.
- Most dwellings in the immediate environs of the Mining Area would not have clear views of the processing facility or mining operations due to screening vegetation and local topography. However, filtered views would be available from some dwellings and from adjacent roads. Also, light glow from lighting within the Mining Area at night would be noticeable in the surrounding landscape including at a number of the nearby dwellings.

Notwithstanding the predicted changes to amenity and character of the local area would occur in the context of a quiet and peaceful rural setting.

Water Pipe Line Route

The proposed pipeline would extend from the Mining Area to Kangaroo Lake, a distance of 38 kilometres. The pipeline would take 8 to 10 months to construct, with construction activity moving along the linear alignment at a rate of approximately 120 to 150 metres per day. Associated construction noise would be significant and would have to the potential to affect the residential amenity of dwellings located in close proximity to the alignment for a period of 2 to 4 days. However, the majority of the area traversed by the

alignment is sparsely populated, and as a result there is only a small number of dwellings located near the alignment, in the Mystic Park area.

Kangaroo Lake

The project would draw water from Kangaroo Lake during the operational phase. However, the volume of water extracted would be insufficient to affect the lake's recreational values. Specifically, the proposed VHM draw represents a 9% increase on the current daily demand. This assumes VHM draws peak of 4.7 GL/year evenly over 365 days (or 0.013 GL/day) and represents less than 1% of the potential volume of water allocation from Goulburn Murray Water which can be drawn from the lake.

A pumping station would be installed on the shoreline of Kangaroo Lake within a modified visual setting which includes roads and houses, and adjacent an existing weir⁷. The proposed site for the pumping station is not located in close proximity to the lake's main recreational focal points area, such as the caravan park, boat ramps and walking trail. However, distant views of the pumping station would be available from these areas. The pumping station would be housed in a shed, which has a similar appearance to adjacent buildings.

Noise emissions from the pumping station at Kangaroo Lake are predicted to comply with Project noise limits all dwellings for all time periods, provided suitably designed acoustic enclosure and silencer selection for the generator. Noise from the station may be audible in locations in close proximity. However, no recreational focal points would be affected.

Ultima

There are a small number of dwellings located on Lake Boga - Ultima Road and David Street in Ultima. The proposed transport route passes these dwellings as it approaches the Ultima Intermodal Terminal. The Project would generate up to 12 heavy vehicle loads per day, during daylight hours. The remainder of the township, including dwellings and community resources, is separated from the transport route by the rail line.

Table 8-1: Operational Impact Assessment - Access and Amenity

Receptor	Changes & Impacts	Magnitude	Sensitivity	Rating
Rural residents located with 3.5 Kilometres of the proposed mine	<ul style="list-style-type: none"> Changes to residential amenity which would arise for residents of rural dwelling in proximity to the Project would be relatively modest and would not fundamentally undermine the liveability of nearby dwellings. Notwithstanding, the projected changes would occur in a quiet and peaceful rural setting, the amenity of which is highly valued by the local farming community. Local residents may consider the project's effect on the character and liveability of the local area to be incompatible with their current lifestyle and consequently view the project as an unwelcome intrusion. Concerns about rural amenity may be heightened by broader concerns about the effect mining on the health and viability of the local farming community and the farming enterprises on which it depends. The proposed Neighbour Agreement model implicitly recognises that the Project would result in a perceptible alteration to the amenity and character of the local area, and in this context provides a mechanism for sharing the benefits of the Project with those in local community who would live alongside the project. That is, the Neighbour Agreement model would reduce, if not fully ameliorate, perceived imbalances between the benefits of the project for the broader community, and the negative effects the project for immediate neighbours. Notwithstanding, the Project may result in lower residential satisfaction among local residents. 	<ul style="list-style-type: none"> Noticeable Change 20 years Small number of individuals 	<ul style="list-style-type: none"> Receptors can cope Somewhat acceptable Very Important 	<ul style="list-style-type: none"> Minor Negative
Residents living near the Water Pipe Line Route	<ul style="list-style-type: none"> Construction activity would move along the linear alignment (38km) at a rate of approximately 120 to 150 metres per day, and take 8 to 10 months to complete. Construction would occur during day time hours only. A small number of residents living in proximity to the proposed water pipeline route would experience a short burst (a few days) of construction activity, including substantial construction noise. The construction process may cause some irritation for residents, however, given the short exposure duration, material social impacts would not arise. Affected residents would be notified of the nature and duration of construction activities. While some minor irritation may arise, affected individuals would manage. 	<ul style="list-style-type: none"> Considerable Change Less than 1 week Small number of individuals 	<ul style="list-style-type: none"> Receptors can cope Somewhat acceptable Very Important 	<ul style="list-style-type: none"> Negligible
Recreational Users and Residents of Kangaroo Lake	<ul style="list-style-type: none"> The Project would draw a relatively small volume of water from Kangaroo Lake and install a pumping station on the lake's shoreline. Distant views of the station would be available recreational focal points. The pumping station would emit noise which may be audible in close proximity. However, noise emissions are predicted to comply with Project noise limits at all dwellings for all time periods. The Projects' effects would have no material implications for the use and enjoyment of Kangaroo Lake by residents and visitors. 	<ul style="list-style-type: none"> Noticeable Change 20 years Hundreds of residents and thousands of and visitors per annum 	<ul style="list-style-type: none"> Receptors are unaffected Neither desired or resisted Considerable Importance 	<ul style="list-style-type: none"> Negligible

Receptor	Changes & Impacts	Magnitude	Sensitivity	Rating
Residents of Ultima	<ul style="list-style-type: none">▪ Heavy vehicle traffic generated by the Project may affect the perceived amenity of small number of homes located on Lake Boga - Ultima Road and David Street in Ultima.▪ The dwellings in question located on a bend and in close proximity the road.▪ The total volume of heavy vehicle traffic generated by the project would be 12 heavy vehicle loads per day, during daytime hours.▪ The affected dwellings are located on Lake Boga - Ultima Road, the largest road providing access to Ultima and the Ultima Intermodal Facility from the east. Lake Boga - Ultima Road does not enter the core urban area of Ultima.▪ The amenity of the effected dwellings is currently influenced by their location on a road which are suitable for heavy vehicle traffic and which provides access to the Ultima Intermodal Terminal, which is a traffic attracting land use.▪ A minor reduction in residential satisfaction may arise.	<ul style="list-style-type: none">▪ Noticeable Change▪ 20 years▪ Small number of individuals	<ul style="list-style-type: none">▪ Receptors can cope▪ Somewhat acceptable▪ Very Important	<ul style="list-style-type: none">▪ Minor Negative

8.3 Residual Impacts

- Local residents may consider the project's effect on the character and liveability of the local area to be incompatible with their current lifestyle and consequently view the project as an unwelcome intrusion. Notwithstanding, neighbourhood amenity would remain within acceptable limits. Moreover, the proposed Neighbour Agreement model would reduce perceived imbalances between the benefits of the project for the broader community and negative effects for immediate neighbours.
- A small number of residents living in proximity to the proposed water pipeline route would experience a short burst (a few days) of construction activity, including substantial construction noise. The construction process may cause some irritation for residents, however, given the short exposure duration, material social impacts would not arise.
- The Projects' effects would have no material implications for the use and enjoyment of Kangaroo Lake by residents and visitors.
- Heavy vehicle traffic generated by the Project may affect the perceived amenity of small number of homes located on Lake Boga - Ultima Road and David Street in Ultima. However, heavy vehicle traffic generated movements would be infrequent (1-2 movements per hour during day time hours), contained to daytime hours and occur in the context of existing amenity conditions, which are currently affected by the presence of the dwellings on a road suitable for heavy vehicle traffic and which provides access to the Ultima Intermodal Terminal. A minor reduction in residential satisfaction may arise.

9.0 Cumulative impacts with other projects

AECOM undertook a search to determine if there are major capital projects proposed within the Murray River – Swan SA3 Area which are sufficiently advanced to warrant serious consideration, and that may interact with the Project to create cumulative impacts. No projects were identified.

In the event that other major capital projects were proposed in the Murray River – Swan SA3 Area, this may place demand on the region's labour-force and/or draw temporary workers to the region, potentially increasing demand for housing and community services alongside that generated by the Project. In such as case, the proposed Workforce Accommodation Strategy would allow for these (as yet uncertain) influences to be accounted for in managing demand for housing and community services generated by the Project.

10.0 Summary of mitigation, monitoring and contingency measures

10.1 Mitigation measures

The mitigation measures that are proposed to avoid, mitigate or manage social impacts associated with the project are summarised in Table 10-1.

Table 10-1: Mitigation measures relevant to the Social Impact Assessment

Measure ID	Mitigation measure	Phase
SC01	Workforce Accommodation Strategy	Construction, Operation, Decommissioning
SC02	Neighbour Agreement	

10.2 Monitoring and contingency measures

A comprehensive environmental monitoring regime and complaints process would be established for the Project. The complaints management process for the Project would be established in-line with that required by Earth Resources Regulation. The complaints management process, would include the following:

- Provision of a visible and user-friendly system for providing feedback
- Information on how and where to provide feedback would be published on the VHM website and discussed during community engagement activities
- Detailed feedback register
- Clear accountabilities and procedures for staff to investigate and respond to community feedback
- Commitment to respond promptly, fairly and confidentially to feedback received
- Commitment to respond promptly, fairly and confidentially to feedback received. VHM will target a response timeframe of less than 48 hours
- An internal monitoring and auditing system to ensure effectiveness of the complaint management process, and to identify recurrent themes and appropriate management responses.
- VHM undertakes direct contact with the complainant to determine the nature and extent of any impact. All complaints are recorded into the company communication database and reported to the appropriate regulators and community at the time of the incident. VHM continues to liaise with the complainant to assist in alleviating any concerns or potential ongoing issues.

In addition, the proposed Workforce Accommodation Strategy would include monitoring and contingency measures. As such, no further monitoring and contingency measures are recommended.

11.0 Conclusion

The Project would generate notable benefits for the Region, in the form of employment creation and wealth generation and the extraction and utilisation of a productive resource which is in demand. Furthermore, the employment created by the Project would assist in attracting and retaining young adults to the region and in doing so, contribute to the viability of community services such as schools and childcare, and inject energy and enthusiasm into activities such as community sports, the arts and alike.

The Project would attract a considerable number of new people to the region and this influx has the potential to place strain on existing housing markets, community facilities and services, and social dynamics, particularly in smaller townships. However, implementation of the proposed Workforce Accommodation Strategy (including the proposed amendments) would ensure that the influx of workers into established communities does not exceed each township's capacity to absorb new residents. Notwithstanding, there may be a short-term reduction in the affordability and accessibility of rental accommodation in the region, following the initial influx of permanent Project Staff.

The Project would also displace rural land uses and alter the character and amenity of the rural area in proximity to the mining areas (within approximately 3.5 kilometres). While all nearby residences would remain habitable, changes to amenity would occur in the context of a quiet and peaceful rural setting. Such changes have the potential to result in a sense of powerlessness among those who are displaced, and perceived inequities between those who benefit financially from the project and those who are negatively affected by the Project. Notwithstanding, the proponent has or is negotiating land acquisition contracts for the directly affected farm properties and proposes to support nearby residents via a Neighbour Agreement. This approach would mitigate negative impacts for displaced rural landholders and nearby residents.

12.0 References

Fenton, M. (2005) Guidebook on Social Impact Assessment, prepared for Department of Planning, Environment and Behaviour Consultants, Townsville QLD.

Rowan, M (2009). Refining the attribution of significance in social impact assessment, *Impact Assessment and Project Appraisal*, 27:3, 185-191.

Van Schooten, M. V. (2003). Conceptualising social change processes and social impacts. The International Handbook of Social Impact Assessment: Conceptual and Methodological Advances, 6:74-91.

Appendix A

Workforce Accommodation Strategy

Workforce Accommodation Strategy

Working Draft – November 2022

1. Introduction

This Workforce Accommodation Strategy has been developed primarily for the construction and early operational phases of the Goschen Mineral Sands and Rare Earths Project (Project). It is needed as the Company has an objective to not have a standalone project related accommodation village, based on local and wider regional community feedback.

It is anticipated that the accommodation for the majority of operational personnel will be based on locals already living in the area and new families moving into the district.

Enhancing the current capacity of long-term rentals and properties for sale is addressed in the MOUs the Company has with Swan Hill City Council and Gannawarra Shire Council.

2. Intent

The Company's long-term intent is to have its entire operational workforce (estimated to be in the order of 325 to 400) living through the district and fully integrated into the local community. However, for some specialist construction teams and in the early phases of operations this is not possible, and the Company wishes to utilise, and potentially enhance, the existing local town infrastructure and accommodation to address most of its accommodation requirements.

The Company has made it clear it does not intend to construct its own accommodation village at the Project Site.

This strategy will support local tourist and accommodation vendors during all stages of the Project's accommodation cycle and aim to have a lasting positive legacy.

Although certain areas located close to the Project site have been prioritised for scale and travel efficiencies, the Company expects to draw accommodation requirements from many of the local towns.

The Company is expecting peak accommodation requirements to be 275 rooms for a short period during construction and a lower peak of 150 demand throughout operations.

3. Accommodation Standard – Single Person

It is expected that the standard accommodation type for a construction worker on the Project is a secure room with a minimum king single bed, ensuite bathroom, fridge, tv, desk and storage area. On the basis that some accommodation types may have multiple rooms (e.g. cabins) with less than one bathroom per person, their occupancy capacity has been downrated according to the Project's minimum requirements.

4. Assessment of Regional Accommodation Capacity

The Company, in consultation with the local shires has reviewed the accommodation capacity in the regional area based on a catchment area approximately 1 hours' drive from the Project Site, using current road infrastructure. The results of the desktop study which included some direct engagement local accommodation providers is as per Table 1.

Table 1 – Regional Review as of September 2022

Town	Properties	Room Capacity
Swan Hill	10	246
Kerang	5	77
Lake Boga	2	44
Sea Lake	2	57
Cohuna	3	49
Wycheproof	4	55
Lake Charm	2	31
Birchip	2	10
Boort	2	46
Koondrook	2	10
Quambatook	1	7
Total	35	632

Following a review of the bus driving routes and from each town and fatigue management of the work force a smaller number of towns were identified as preferred locations for the accommodation of workers. Table 2 represents the capacity of the preferred location towns:

Table 2 – Preferred Location [Travel Time and Route]

Town	Properties	Room Capacity
Swan Hill	10	246
Kerang	5	77
Lake Boga	2	44
Sea Lake	2	57
Cohuna	3	49
Wycheproof	4	55
Lake Charm	2	31
Total	28	559

5. New Construction and Accommodation Capacity

The Company has been in consultation with a number of potential new construction or expansion options with a number of proprietors. The details are as follows:

- New construction of 50 x 3-bedroom cabins in the Lake Boga area. Proprietor has already applied to the local council at Swan Hill for planning approval and is expected to commence construction in Q1 2023. The purpose of the construction is to increase the long-term availability of tourist accommodation in the area. The Company expects to negotiate access to 100% of the available rooms throughout the life of the construction phase of the Project with the potential for some lower occupancy throughout the life of the operations.
- Hotel expansion in the Lake Boga area with the existing operator. Location is close to town and utilities and has sufficient land area to accommodate 64+ single occupant cabins for the

duration of the Project and on an ongoing basis by negotiation with the operator. Discussions and planning are only preliminary. Any excess accommodation following the construction stage can be utilised for tourism.

- Initial interest from the proprietor of a caravan park in Kerang to add additional cabins to the existing facilities. Preliminary discussions have commenced in consultation with the Gannawarra Shire Council. (Note: Capacity not yet factored into Expansion Analysis below.)

Summary of the expansion accommodation is as per Table 3.

Table 3 – Accommodation Expansion

Town	Room Capacity
Lake Boga – New Construction	100 (up to 150)
Lake Boga – Hotel Expansion	64
New Capacity	164

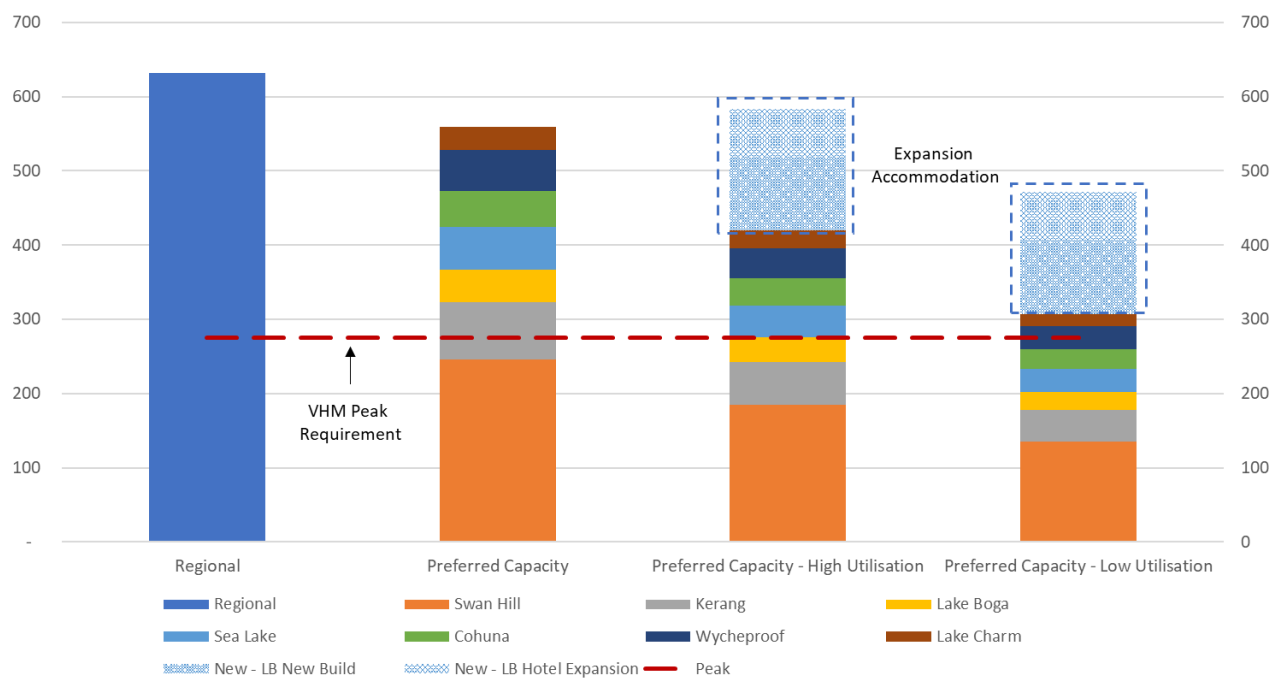
6. Utilisation and Sensitivities

The Company has modelled the high and low utilisation cases for the project to ensure that it can meet its peak accommodation requirements from its preferred locations. Analysis is as per Table 4.

Table 4 – Utilisation and Sensitivities

Accommodation	Capacity		
	<i>100%</i>	<i>75%</i>	<i>55%</i>
Preferred Location [Table 2]	559		
Utilisation – High Case (75%)		419	
Utilisation – Low Case (55%)			307
Expansion Accommodation [Table 4]	164	164	164
Total Available to Project	723	583	471
Construction Peak Requirement	275	275	275
Excess	448	308	196

Figure 1 – Utilisation and Sensitivities

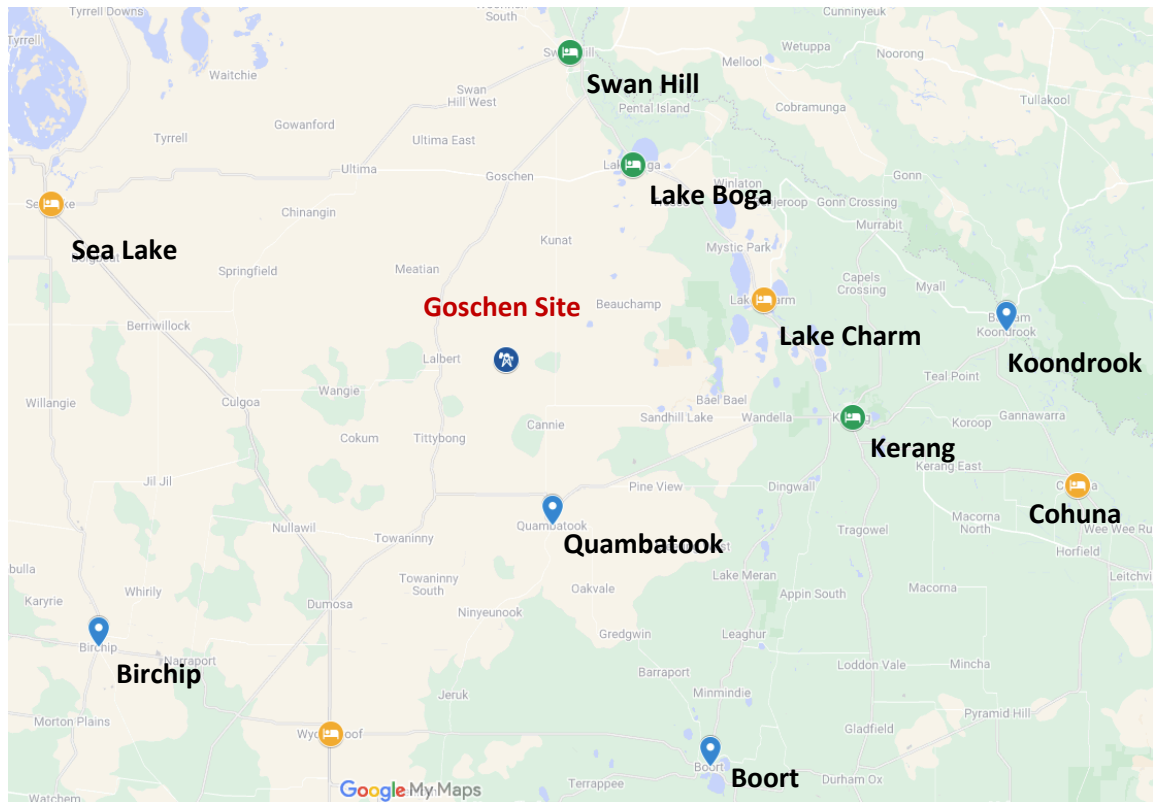


7. Further Opportunities

The Company expects to continue to refine its accommodation strategy by:

- Continue engagement with the accommodation sector in the Region;
- Continue to develop and balance the accommodation stock that can be used for construction, operations and tourism.
- Develop commercial agreements and guarantees for accommodation with new expansion providers. Particularly for new build construction to ensure that additional capacity can be brought on that is fit for purpose;
- Refine preferred regional locations to consider travel routes and worker fatigue considerations; and
- Engagement on future requirements in the operating phase

Annexure 1 – Regional Location Map [Areas of Consideration]



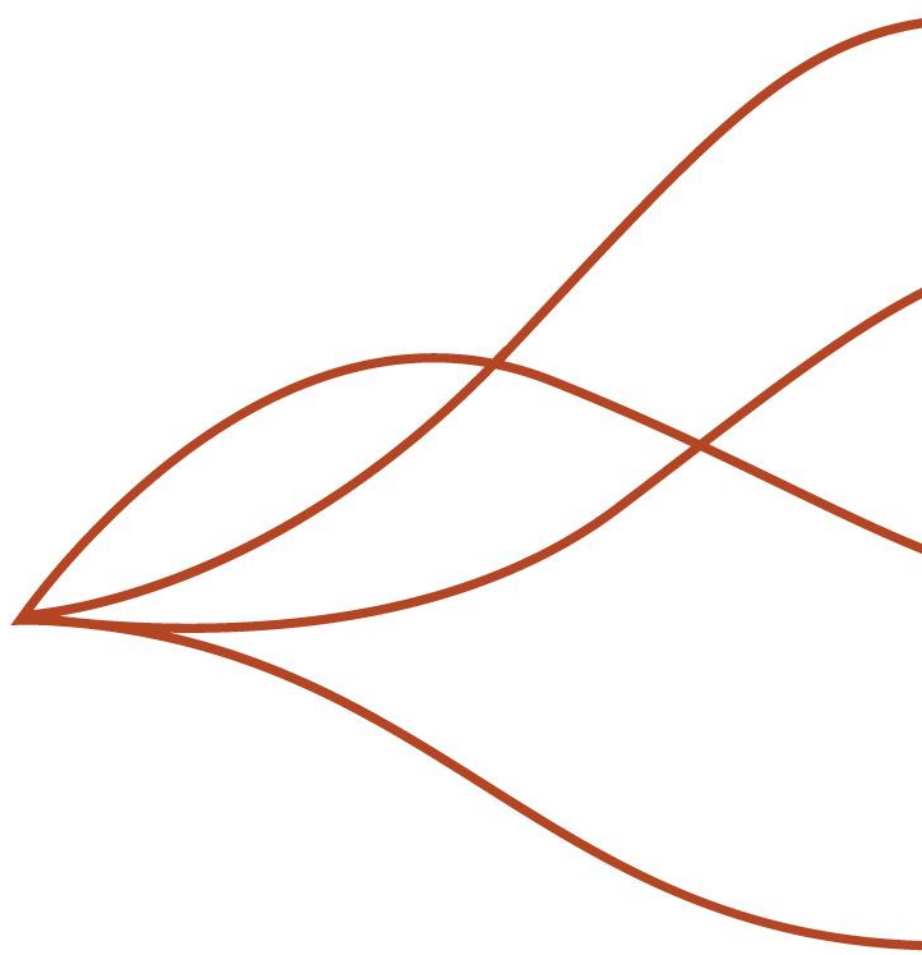
Annexure 2 – Source List of Accommodation

Location	Name	Total Rooms
Birchip	The Birchip Hotel	5
Birchip	Birchip Motel Caravan Park	5
Boort	Boort Lakes Holiday Park	38
Boort	The Railway Hotel	8
Cohuna	Cohuna Waterfront Holiday Park	18
Cohuna	Happy Wanderer Cohuna	16
Cohuna	Acacia Rose Motor Inn	15
Kerang	Kerang Motel	10
Kerang	Loddon River Motel Kerang	12
Kerang	Kerang Caravan and Tourist Park	21
Kerang	Ibis Caravan and Kerang Cabins	24
Kerang	Kerang Valley Resort	10
Koondrook	Koondrook Caravan Park	4
Koondrook	Murray Waters Motor Inn and Apartments	6
Lake Boga	Lake Boga Hotel	32
Lake Boga	Lake Boga Caravan Park	12
Lake Charm	Foreshore Caravan Park	19
Lake Charm	Pelican Waters Caravan Park	12
Quambatook	Quambatook Hotel	7
Sea Lake	Sea Lake Motel	37
Sea Lake	Lake Tyrell Accommodation	20
Swan Hill	Paddle Steamer Motel	20
Swan Hill	Swan Hill Resort	62
Swan Hill	Quality Inn Swan Hill	24
Swan Hill	Comfort Inn Lady Augusta	24
Swan Hill	Paurna Motel	16
Swan Hill	Hilltop Resort	16
Swan Hill	Burke and Wills Motor Inn Swan Hill	6
Swan Hill	Australian Settlers Motor Inn	15
Swan Hill	Lazy River Motor Inn	48
Swan Hill	Jacaranda Holiday Units	15
Wycheproof	Mount Wycheproof Motor Inn	16
Wycheproof	Terminus Hotel	16
Wycheproof	Royal Mail Hotel	16
Wycheproof	Vale Of Avoca	7
Total		632

D R A F T

Appendix B

Code of conduct



Code of Conduct



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CODE OF CONDUCT

1. General Statement

The Board of Directors for VHM Ltd (the Company) has adopted and agreed to be bound by this Code of Conduct which aims to encourage the appropriate standards of behaviour of the Directors, Company Secretary, officers, employees and contractors (collectively called the employees) of the Company.

Employees are expected to act with integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

Our values describe the standards by which we measure ourselves, and are the most important and fundamental principles regarding the way we do business.

From these values we seek to define a set of policies that guide behaviour according to our beliefs. These policies are applicable throughout the company.

2. Code of Conduct

This Code of Conduct seeks to outline the principles governing our general behaviour. All employees are expected to observe the highest standards of ethics, integrity and behaviour during the course of their employment with VHM.

3. General Principles

- Employees must act honestly, in good faith and in the best interests of the Company
- Employees have a duty to use due care and diligence in fulfilling the functions of their position and exercising the powers attached to that role
- Employees must use the powers of their role for a proper purpose, in the best interests of the Company
- Employees must recognise that the primary responsibility is to its shareholders as a whole but should, where appropriate, have regard for the interests of all stakeholders of the Company
- Employees must not take advantage of their position for personal gain, or the gain of their associates
- Confidential information received by employees or Directors in the course of their duties for the Company remains the property of the Company. Confidential information can only be released or used with the specific permission of the Company or as required by law
- A Director must not take improper advantage of the position of Director within the Company
- A Director must not allow personal interests, or the interests of any associated person or company, to conflict with the interests of the Company
- A Director has an obligation to be independent in judgement and actions and to take all reasonable steps to be satisfied as to the soundness of all decisions taken by the Board



- Employees have an obligation to comply with the spirit, as well as the letter, of the law and with the principles of this Code of Conduct

The Company views breaches of the Code of Conduct as serious misconduct. Employees who have become aware of any breaches of the Code of Conduct must report the matter immediately to the Chairperson or the Managing Director (MD)/Chief Executive Officer (CEO).

Any employee who in good faith, reports a breach or a suspected breach will not be subject to any retaliation or recrimination for making the report.

Employees who breach the Code of Conduct may be subject to disciplinary action, including in the case of serious breaches, dismissal.

4. Employees

4.1 Discrimination, Harassment and Intimidation

The Company will not tolerate discrimination, harassment or repeated, unreasonable behaviour directed towards a worker or group of workers, that creates a risk to the health and wellbeing of anyone on the job. All decisions on selection, promotion and development will be based on merit and on the requirements of the position.

Work conditions, conduct or comments that make co-workers uncomfortable due to their race, colour, religious beliefs, national extraction or social origin, disability, medical condition, age, marital status, family or carers responsibilities, pregnancy, gender or sexual preference are completely unacceptable. Unacceptable behaviour includes foul language, lewd or suggestive comments, sexual advances and racial or ethnic jokes that are offensive, intimidating or divisive behaviour, or fighting whilst on duty.

It is everyone's responsibility to contribute to a work environment that is positive, encouraging and enjoyable. Each of us must monitor our words and actions to ensure that we are not, intentionally or unintentionally, contributing to an offensive work environment for our colleagues. Continued behaviour of this nature would mean that an employee is unsuitable for VHM Ltd.

4.2 Safety and Health

A safe workplace is the shared responsibility of employer and employee. Our work environment will promote the health and well-being of our staff and any other party working for us.

Safety – for oneself and for others – is the first priority of everyone's job. Every employee has a responsibility to prevent accidents and promote safety consciousness among fellow employees and outside contractors.

We are all responsible for:

- Protecting ourselves;
- Working according to established safety procedures; and
- Extending our concern to the personal safety to co-workers

4.3 Drugs and Alcohol

VHM recognises that drug and alcohol abuse can impair an employee's ability to perform properly and can have serious adverse effects on the safety, efficiency, and productivity of other employees and the Company as whole.



Anyone reporting to work under the influence of drugs or alcohol may be dismissed, regardless of where it is consumed. Anyone “on call” for the company must not be under the influence of drugs or alcohol. Abuse, leading to unacceptable behaviour while on duty will not be tolerated.

4.4 Social Sustainability and Human Rights

VHM is committed to having a positive impact on our local communities and to enhancing the lives and careers of our employees. We respect the Human Rights of our local communities and our employees.

No employee shall be discriminated against on grounds of their gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, or disability.

VHM requires our suppliers, vendors, contractors, consultants, agents and other providers of goods and services comply with these requirements.

4.5 Bribery and Corruption

Employees must not commit or be a party to or be involved in bribery or corruption and will not make facilitation payments. Employees must comply with and uphold all laws against bribery and corruption in all jurisdictions where the Company operates.

Employees may from time to time entertain or be entertained by the Company's customers and suppliers and give or receive gifts in the course of their duties, however any entertainment should not extend beyond a level reasonably required to maintain an arm's length business relationship. If any employee is in doubt on the appropriateness of the entertainment either given or received the employee should seek prior approval from the MD/CEO or Chairperson.

VHM recognises and respects that gift giving is an important tradition and is an important part of many cultures. Employees must avoid conflicts of interest and embarrassment to the Company by behaving in accordance with the following guidelines:

- They are consistent with customary business practices and do not violate ethical standards
- They are not excessive in value
- They cannot be seen as a bribe, payoff or improper incentive
- Public disclosure would be embarrass VHM

Should a gift of excessive value be accepted, the gift must be given to the Company to determine how to best accept or donate that gift.

(Note: for detailed information, please refer to VHM Anti-Bribery and Corruption Policy)

4.6 Conflict of Interest (Actual, Perceived or Potential)

A conflict of interest refers to any situation where there is, has been, may appear to be, or may potentially be in the future, a conflict between an individual's personal interests and their duties and responsibilities as an employee of VHM.

All VHM employees must:

- a. take reasonable steps to avoid any conflicts of interest (actual, potential or perceived) in connection with their duties as an employee of VHM
- b. disclose any actual, potential or perceived conflict of interest in writing.
- c. Any employee with a conflict of interest must raise this directly with their supervisor.



- d. act transparently when making work-related decisions, reflecting the probity and ethical standards of VHM including the VHM values and behaviours
- e. take all reasonable steps to restrict the extent to which a private interest could compromise, or be seen to compromise, their impartiality when carrying out their official duties

VHM employees must not, either by action or inaction:

- a. make improper use of their authority, status, power, position or access to information in order to solicit or obtain a benefit or advantage, or to cause a disadvantage, for themselves or any other person or group (including partners, relatives, friends, associates and any person that does or may do business with VHM)
- b. use VHM resources to gain, or seek to gain, a private benefit or advantage or to cause a disadvantage for themselves or any other person or group
- c. accept any benefit that might lead a reasonable person to view such acceptance as a conflict of interest
- d. behave in a manner in which their action or inaction could be construed as favouritism, bias or coercion or
- e. take improper advantage of their official position or privileged information gained in that position when seeking or participating in employment, business or other activities outside of VHM.

VHM employees must consider possible strategies that may be available to resolve or appropriately manage the conflict of interest. VHM employees must report situations where their partners, family, friends and associates are engaged in activities or have interests that may place the VHM employee in an actual, potential or perceived conflict of interest situation.

VHM Managers must bring any serious conflicts of interest involving VHM employees within their area of organisational responsibility chain to the attention of the VHM CEO or Legal Counsel

The VHM CEO and Legal Counsel must assess each situation reported to them and determine if a conflict of interest exists as soon as is practicable. They must promptly decide on an appropriate strategy to manage the situation and retain appropriate records of the facts surrounding the conflict of interest and the process adopted to manage it.

4.7 Media Statements

Only people specifically assigned the responsibility should make public statements or address the media.

5. Company Property

Property which belongs to the Company is available for company employees who have an appropriate reason to use the property. Company information can be used only for Company business.

5.1 Company records

All employees are expected to pay careful attention to the accurate and honest maintenance of records. The records we keep are an important company asset. Any false or inaccurate records may lead to poor, unsafe, or loss-making decisions.



No false, artificial, or misleading entries in the books and records of the company shall be made for any reason whatsoever. No payment or asset of the company which is not fully recorded in the books of accounts and which does not honestly reflect the transaction to which it relates shall be permitted.

When dealing with financial or accounting related matters, all personnel must:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships
- Comply with rules and regulations of federal, state, provincial and local governments and other appropriate private and public regulatory agencies
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts

5.2 Confidentiality of Information

Company information is confidential, and all staff should treat it as such. Staff shall not disclose to any third party any confidential information concerning VHM Ltd, its customers or suppliers both during employment and after cessation of your employment, except as required to fulfill work obligations or as required by law

6. Environmental Standards

VHM is committed to high environmental standards and is dedicated to minimising any impacts. We will comply with all applicable laws and regulations governing environmental protection and will strive to incorporate environmental considerations within the criteria by which projects, products, processes and purchases are evaluated.

Our goal is to rehabilitate the land so it is in as good, or better, condition to when we started our operations.

7. Directors

The following additional requirements apply to Directors of the Company and aim to ensure Directors have a clear understanding of the Company's expectations of their conduct.

7.1 Fiduciary Duties

All Directors have a fiduciary relationship with the shareholders of the Company. A Director occupies a unique position of trust with shareholders, which makes it unlawful for Directors to improperly use their position to gain advantage for themselves.

7.2 Duties of Directors

Each Director must endeavour to ensure the Company is properly managed so as to protect and enhance the interests of shareholders. To this end, Directors need to devote sufficient time and effort to understand the Company's operations.

Directors should ensure that shareholders and ASIC are informed of all material matters which require disclosure and avoid or sully disclose conflicts of interests.



7.3 Duties to Creditors

Whilst obligations of Directors are primarily owed to the Company (that is the shareholders as a whole), there are situations in which it is necessary to evaluate the interests of parties such as creditors.

7.4 Conflict of Interest

At all times a Director must be able to act in the interests of the Company. Where the interests of associates, the personal interest of a Director or a Director's family may conflict with those of the Company, then the Director must immediately disclose such conflict and either:

- Eliminate the conflict; or
- Abstain from participation in any discussion or decision-making process in relation to the subject matter of the conflict

Executive Directors must always be alert to the potential for conflict of interest between their roles as executive managers and the fiduciary duty as Directors.

7.5 Meetings and Due Diligence

A Director must understand their duties as set out in the Company's Board Charter and ensure that systems are established within the Company to provide the Board, on a regular and timely basis, with necessary data to enable it to make a reasoned judgement and so discharge its duties of care and diligence.

8. Stakeholders

The Board recognises that the primary stakeholders in the Company are its shareholders. Other legitimate stakeholders in the Company include employees, customers and the general community.

The Company's primary objective is to create shareholder wealth through capital growth and dividends by the discovery and marketing of valuable minerals. This is achieved by undertaking effective and focussed exploration programs to discover any reserves or resources.

The Company is committed to conducting all its operations in a manner which:

- Protects the health and safety of all employees and community members
- Recognises, values and rewards the individual contribution of each employee
- Achieves a balance between economic development, maintenance of the environment and social responsibility
- Maintains good relationships with suppliers and the local community, and
- Is honest, lawful and moral

All employees are expected to act with the utmost integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

9. Reporting and Investigation

VHM employees who become aware of any issue or practice that involves potential violation of this code has a responsibility to report the matter immediately to senior management, the CEO or Chairman of the Board.



Any reported breaches will be investigated by the appropriate person and escalated where deemed necessary.

Any material breaches of the Code of Conduct or applicable law must be reported to the Audit and Risk Committee of the Board, or the Board Chairperson.

The Board may initiate special investigations as it sees fit.

Note: refer to the Whistleblower policy if applicable.

10. Consequences of Non-Compliance

Failure to comply with the VHM Code of Conduct may result in disciplinary action.

Action may be taken as a result of any employee who:

- Is found to have authorised, condones, participated in, or concealed actions that are in violation of these standards
- Provides approval for or disregards a violation
- Through lack of diligence in supervision, fails to prevent or report violations
- Retaliates directly or indirectly, or encourages others to retaliate, against an employee who reports a violation of these standards; or
- Is found to be uncooperative or untruthful during an investigation into any violation or potential violation of the VHM Code of Conduct, or any other VHM Policy

Disciplinary actions may include, but are not limited to, verbal counselling, formal warning, demotion or termination of employment.

11. Review Process

This Code of Conduct will be reviewed every twelve (12) months. Any changes to the Code of Conduct will require approval of the Board.

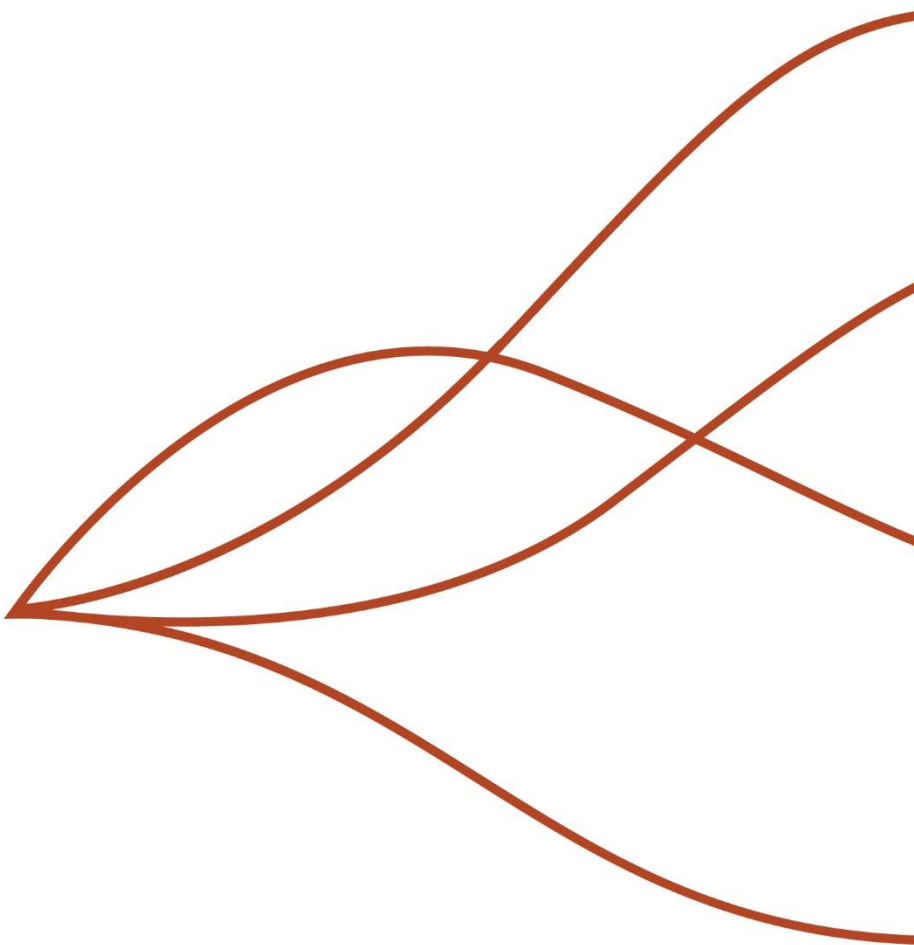
This Code of Conduct was approved by the Board on 29 April 2022.

Don Runge

Chairperson

29 April 2022





VHM Limited

VHM Limited
ABN 58 601 004 102

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