



hear every voice, know where you stand

STRAIGHTTALK

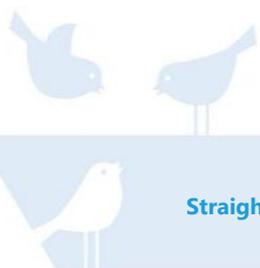
COMMUNITY CONSULTATION STRATEGY

Elf Farm Supplies

May 2016

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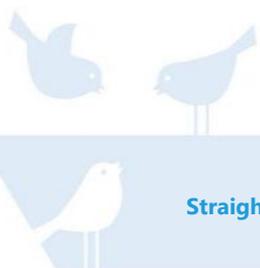
1. INTRODUCTION

Straight Talk has drafted this Community Consultation Strategy on behalf of Elf Farm Supplies. The preparation and implementation of a Community Consultation Strategy is one of the conditions of the approval of the modification to Elf Farm Supplies' previously approved Development Application, which the NSW Department of Planning and Environment (DPE) issued in March 2016.

Straight Talk has developed this strategy in accordance with community engagement best-practice and to ensure it meets, and exceeds, the requirements of the DPE's approval conditions.

The strategy articulates how Elf Farm Supplies will consult with the community on the general operation of its substrate plant and the progress of the modification construction works at the plant. It also identifies when, and in what circumstances, that consultation will be undertaken.

In accordance with the DPE's approval conditions, the strategy (as revised and approved by the Secretary from time to time) will be effective as soon as written endorsement by the Secretary is received and will be implemented for the life of the project.



2. BACKGROUND

2.1. Company history

Elf Farm Supplies Pty Ltd was established at Mulgrave in 1981 and is a family owned Australian company.

Since 1990, Elf Farm Supplies has expanded rapidly. With the environmental and economic pressures placed on the mushroom industry, new and innovative ways of producing mushroom compost were tested and implemented. While the final product has an inoffensive earthy smell, the production process emits odours that are classed as a pollutant by the NSW Environmental Protection Authority (EPA).

Today, Elf Farm Supplies is one of the leading mushroom compost producers in Australia. They are the largest agricultural enterprise in the Hawkesbury and the only compost supplier in the Sydney region. Its products are supplied throughout Australia and are integral to the success of the Australian mushroom industry.

Elf Farm Supplies supports 25% of the country's total mushroom production and 70% of NSW's total production. It directly supports 800 agricultural jobs in the Hawkesbury and Penrith local government areas, and indirectly supports an additional 200 jobs through its extensive contractor network.

2.2. Odour complaints

During the majority of the time the Mulgrave site has been operational, a small number of odour complaints were received each year. However, since January 2013 when its application to expand the capacity of its operation was approved, Elf Farm Supplies has been the subject of an increased number of odour complaints from local residents. Whilst recent complaint data suggests complaints are being made by a small number of individuals, it is clear fugitive odour is being experienced within the community and needs to be addressed.

2.3. Environmental Protection Licence

The Environmental Protection Authority has issued an Environmental Protection Licence to Elf Farm Supplies to authorise the operation of its facility. The current licence contains conditions relating to community consultation, including the maintenance of an odour complaints/feedback management system and a community liaison committee. As these requirements are effective until 6 December 2016, and are not part of the DPE approval conditions, they are not referenced in this strategy.

2.4. Environmental commitment

The life cycle of mushroom compost is effectively a 'double recycling' process. Recycled agricultural waste materials, such as wheaten straw, poultry manure, stable bedding, cotton products and meals, are combined to create the compost in which mushrooms are grown. Once the compost has finished being used to grow mushrooms, the 'spent' compost is recycled again for use in the landscaping industry.

Elf Farm Supplies is committed to continuous environmental improvement. Over the last four years nearly \$2million has been spent on building improvements and investigating, researching and designing ways to mitigate the odour impacts associated with its production of mushroom compost.

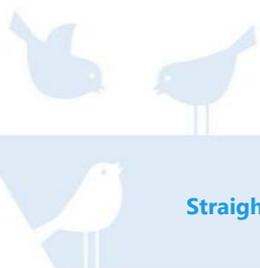
Elf Farm Supplies now plans to make a significantly greater financial investment in the facility to install the latest odour mitigation technology and to fully enclose its operations. In March 2016, the DPE gave its approval for these modified works to be undertaken.

2.5. Approval conditions

The DPE's approval of the odour mitigation works at Elf Farm Supplies included conditions related to the community's access to information about the operation of the facility and the mitigation works that will be implemented. Details of the approval are available on DPE's website at www.majorprojects.planning.nsw.gov.au/.

Preparing a strategy for and undertaking community consultation is a condition of that approval, and Elf Farm Supplies welcomes the opportunity to consult with the community about its ongoing operations and the construction of odour mitigation works. Elf Farm Supplies also understands that for some in the community the resolution of fugitive odour is of primary interest and that informing the community about construction at the site in advance will allay any fears there may be that the facility is expanding before odour management issues have been resolved.

The community consultation approach articulated in this strategy complies with, or exceeds, DPE's approval conditions.

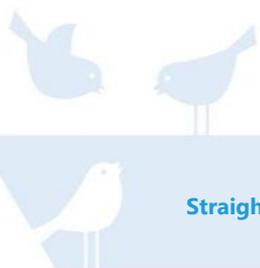


3. AIMS AND OBJECTIVES

The aim of this strategy is to ensure Elf Farm Supplies keeps the community informed about its operation and, in particular, the construction of its odour mitigation technology, as required by the approval conditions of its DA modification.

The objectives of the strategy are to:

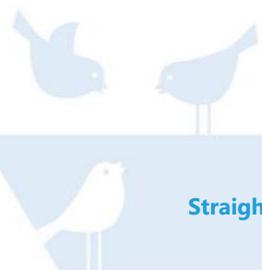
- 👉 Articulate Elf Farm Supplies' commitment to meeting its approval conditions and consulting with the community
- 👉 Identify how Elf Farm Supplies will pro-actively and effectively consult with the community, particularly during the construction of odour mitigation works
- 👉 Detail the range of available opportunities for community members to access information about Elf Farm Supplies' operations and the construction works
- 👉 Explain the complaints handling procedures that will apply and the actions that will be taken if complaints are received.



4. RISKS AND MITIGATION MEASURES

Potential risk	Mitigation strategies
Misinformation is circulated about the facility and its operation	<p>Provide information on a publically accessible website about the facility and the composting process it undertakes</p> <p>Issue media releases to the local print media in response to any emerging community issues</p>
Community concern that construction works are an expansion of the operational capacity of the site	<p>Provide information on a publically accessible website about:</p> <ul style="list-style-type: none"> • The approved construction and what it will involve • Odour mitigation technology • Construction progress and timescales. <p>Distribute a community newsletter, electronically and in hard copy, which explains what the construction will involve and provides status updates of the works</p> <p>Conduct public information sessions in a central location during which community members can 'drop-in', have access to information and ask questions</p>
Community members do not know who to make a complaint to about fugitive odour and/or construction impacts	<p>Issue media releases to local print media which provide information about the website and the complaints phone number</p> <p>Periodically advertise the complaints line and the website in the local media</p> <p>Publish complaints line details online and provide details at public information sessions</p>
Community confusion about the facility and what it does	<p>Provide information on a publically accessible website about the facility and the composting process it undertakes</p> <p>Distribute newsletters with information about the facility</p> <p>Hold public information sessions so that community members can speak directly to a project team member and ask questions</p>
Community concern about loss of local jobs and the impact on the local economy should the facility's production capacity be reduced or halted	<p>Publish this strategy, once approved, and Elf Farm Supplies' commitment to meeting its licence conditions to ensure its ongoing operation on the publically accessible website</p>
Cynicism about mitigation works and the resolution of fugitive odour	<p>Provide information on a publically accessible website about the odour mitigation technology being installed, its use elsewhere around the world and the outcomes of its use</p>

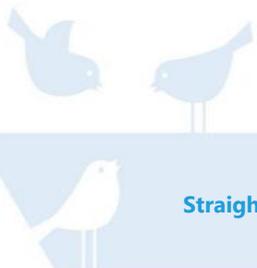
Potential risk	Mitigation strategies
	Distribute newsletters with information about the odour mitigation technology and its outcomes, and status updates of the construction works



5. STAKEHOLDER ANALYSIS

Stakeholder type/name	Why they are important	How we will reach them
Immediate neighbours of the facility	Will be most affected by the facility's operation and any construction impacts	Face-to-face meetings Direct telephone line
'Sensitive receivers' potentially impacted by odour (such as schools, hospitals, child care centres etc)	May be affected by fugitive odours and, if in the immediate vicinity of the facility, construction impacts	Website Newsletters Media releases and media advertisements Project emails
Local community members	May be affected by fugitive odour May be concerned about construction works and their intent	Website Newsletters Media releases and media advertisements Public information sessions
Community interest groups, such as the Hawkesbury Environmental Network, Stop the Stink	Have a long-standing interest in the facility and its impact on the local community Represent community perspectives	Website Newsletters Media releases and media advertisements Project emails
Regulatory authorities, including Council, EPA, DoP etc	Have statutory responsibilities in relation to the operation of the facility and construction works Must respond to community concerns and issues	Face-to-face meetings Direct correspondence - emails, letters
Employees	Will be directly impacted by construction works	Face-to-face meetings Direct emails
Suppliers and customers	Will be impacted if any constraints are placed on Elf Farm Supplies' operational capacity	Through established mechanisms (face-to-face meetings, direct emails)

Stakeholder type/name	Why they are important	How we will reach them
Broader mushroom industry	Will be impacted if any constraints are placed on Elf Farm Supplies' operational capacity	Through established industry networks



6. COMMUNITY CONSULTATION

6.1. Consultation approach

In order to deliver best practice community consultation, Elf Farm Supplies will undertake a two-tiered approach to community consultation. This approach responds to Elf Farm Supplies' requirement to consult with the community about both its ongoing operations and the approved odour mitigation construction works.

Tier One - community consultation about Elf Farm Supplies' ongoing operations

Tier one community consultation includes the ongoing provision of information about Elf Farm Supplies and its operation, and a complaints mechanism. This tier of community consultation will be implemented on approval of this strategy, and in accordance with the terms set out in this document:

Community information

- Website

Complaints line.

Tier Two - pro-active community consultation about the construction of odour mitigation technology

Tier two community consultation includes: a range of opportunities for the community to access information related to the construction of odour mitigation technology; a complaints mechanism; and a focus on working with immediate neighbours to manage construction impacts:

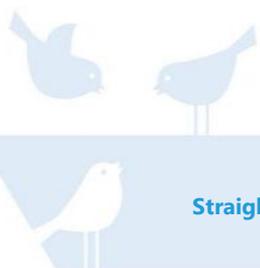
Community information

- Website
- Newsletters
- Public information sessions
- Media releases
- Advertisements

Good neighbours procedures

Complaints line.

Tier two community consultation will cease three months after the completion of odour mitigation works.



6.2. Community information procedures

Elf Farm Supplies will create and maintain the following information channels in order to:

- 👉 Provide accurate, timely and relevant information about the operation of the facility, and the intent and progress of construction works
- 👉 Ensure the greatest accessibility of information across the community.

6.2.1. Website

A website will be created and maintained to provide information about the operation of the facility and the intent and progress of construction works.

The site, which will be accessible to the public within three months of the approval of the DA modifications, will include:

👉 **Background information** about:

- Elf Farm Supplies and its role in the mushroom industry
- Mushroom composting information that explains what the facility does and how it operates
- The 'green' credentials of the mushroom composting process

👉 **Document portal**, contain the following documents, reviews and reports unless commercially sensitive (as per the approval conditions):

- All current statutory approvals and any modifications
- Plans and programs required under the approval of the DA modification
- Technical analysis and reports of monitoring results, which are reported in accordance with the approval of the DA modification
- A copy of any required reviews
- Any other information required as part of the DA modification approval and any subsequent modifications

👉 **Construction information**, which will include:

- The intent and scope of construction works
- Indicative timetable of construction works
- Updates on the status of construction works (at a minimum, quarterly but more regularly during periods of rapid status changes, if any)
- Environmental management procedures being undertaken during construction works

👉 **Complaints portal**, which will include:

- Details of the complaints procedures
- Complaints register (information about previous complaints made through the Elf Farm Supplies complaints line from the date of approval of this strategy), which will be updated monthly
- A complaints lodgement form for the electronic lodgement of complaints

- 👉 **Contact functionality** for community members to submit feedback and send questions to Elf Farm Supplies, and to register for electronic construction updates.

6.2.2. Quarterly newsletters

From the date of approval of this strategy, Elf Farm Supplies will issue quarterly newsletters to the local community.

Newsletter content

The initial newsletter will be provided in hard-copy and contain:

- 👉 General, **introductory information** about Elf Farm Supplies and its role in the mushroom industry
- 👉 Information about the **proposed construction works**, the activities that will be undertaken and the expected timeframe for construction
- 👉 Information about the **environmental management** procedures that will be followed during construction
- 👉 Details of the **telephone number** for complaints or enquiries
- 👉 Details of the website
- 👉 Details of the public information sessions.

All subsequent newsletters will be provided in soft-copy, unless hard-copy requested and contain:

- 👉 **Status updates** - information about the construction works that have been undertaken during the previous three months
- 👉 **Upcoming activities** - information about the construction works that are expected to be undertaken during the coming three months
- 👉 Details of the complaints/enquiry **telephone number**, and public information sessions
- 👉 Other general information.

Newsletter distribution

The initial newsletter will be provided in hard-copy and distributed to local residents who live in the four suburbs surrounding the facility. These are: Mulgrave, McGraths Hill, Windsor and Windsor South.

All subsequent newsletters will be distributed electronically to community members who have expressed an interest in being kept informed by registering on a construction project mailing list. Hard copies of newsletters will also be provided to any community members who request them, and will be available at community information sessions.

Following the completion of the odour mitigation construction works, the provision of newsletters will cease.

6.2.3. Media releases and advertisements

Media releases

In order to keep the broader community informed about the construction work and its progress, Elf Farm Supplies will issue media releases to local media outlets.

These will be issued:

- 👉 Prior to the commencement of construction works
- 👉 At key construction stages and prior to disruptive construction works, if any
- 👉 On completion of the construction works
- 👉 In response to emerging community concerns, if any.

Advertisements

On release of its website, Elf Farm Supplies will take out advertisements in the local print media to promote the website, the complaints telephone number and the public information sessions. Additional advertisements will then be taken out in the local print media bi-annually, until odour mitigation construction works are complete.

6.2.4. Public information sessions

Face-to-face community consultation will be delivered via 'drop-in' public information sessions. Sessions will be held at convenient central location, such as the Hawkesbury Central Library, in Windsor over three hours on Saturday morning. In the month immediately prior to the commencement of construction works, one public information session will be held each week. Following the commencement of construction works, one information sessions will be held each quarter.

The sessions, which will be attended by a member of the project team who is able to answer questions and take community feedback, will include information display boards about Elf Farm Supplies and the construction of the odour mitigation technology. Information display boards will be updated as the construction progresses. Hard-copy newsletters will also be available during the sessions and feedback forms will allow community members to provide formal feedback to Elf Farm Supplies.

Following the completion of the odour mitigation construction works, public information sessions will cease.

6.2.5. Complaints line

A complaints and enquires telephone line will be established and maintained in accordance to the complaints procedures indicated in Section 6.4 Complaints procedures of this strategy.

The complaints line will be staffed from 8.00am to 5.00pm Monday to Friday and a recorded messaging system, to allow complaints to be made outside of those times, will be available. An online complaints form will also be made available on the project website.

The complaints telephone number will be promoted via the project website and advertised periodically in the local print media.

6.3. Good neighbours procedures

To ensure good relations with its immediate neighbours during the construction of mitigation works, Elf Farm Supplies will:

- 👉 Meet with immediate neighbours (those within 100 metres of the facility) who may be impacted by the construction of mitigation works - due to increased truck movements, noise, light spill, dust etc - to explain:

- Construction stages
 - What will be involved during each stage
 - Expected impacts
 - How to notify Elf Farm Supplies of excessive impacts
- 👉 Work with its immediate neighbours to understand their needs and identify ways the construction can be managed to limit its impact on them
 - 👉 Provide immediate neighbours with contact details of the onsite manager for direct one-on-one reporting of impacts and the resolution of issues.

6.4. Complaints procedures

On approval of this strategy, the following complaints procedure will apply:

6.4.1. Introduction

Complaints will be received via the complaints telephone line (1800 155 079) or via the Elf Farm Supplies website (once operational). On receipt, complaints will be forwarded immediately to the relevant officer for investigation, and will be responded to within five business days, should the complainant request a response. This response will be provided back to complainant through their nominated choice of:

- 👉 Follow up phone call with reference number
- 👉 Email with reference number
- 👉 Letter with reference number.

6.4.2. Step one: receive and record the complaint

All complaints received by the complaints telephone line (and via the complaints email portal) will be recorded and the following information will be sought from the complainant:

- 👉 Personal information of the complainant – ideally their name and contact details (complaints made without personal information will still be recorded and investigated)
- 👉 Nature of complaint
- 👉 Time of complaint
- 👉 Location of complaint (to the nearest cross street, if complainant prefers not to give their exact location)
- 👉 Description of odour (character and strength), if odour complaint
- 👉 How long the odour has been present, if odour complaint
- 👉 Wind direction and other pertinent meteorological information (e.g. raining, fog, hot, wind strength), if odour complaint.

Once the complaint has been recorded the complainant will be provided with a reference number and advised of the response timeframe. In circumstances where complaints can be resolved at the point of contact, a record will be taken and the complainant will be provided with the reference number of their complaint.

6.4.3. Step two: investigate, assess and determine action

Once a complaint has been received and the details recorded, the complaint will be investigated and an assessment made:

- 👉 Complaint information is forwarded to the appointed officer at the time of complaint for the matter to be investigated
- 👉 For odour complaints, attendance at reported site of complaint in order to confirm the nature of odour and its source:
 - Confirmation of character and strength of odour
 - Identification of direction of odour
 - If not possible to attend (i.e. no location given, WHS requirements) the complaint is still to be investigated as per the following steps of this procedure
- 👉 Cross-reference complaint against production schedule and activities at the Elf Farm Supplies at the time of complaint and one hour preceding the complaint
- 👉 For noise, odour and dust complaints, cross-reference complaint against meteorological conditions, including wind direction and strength at time of complaint and one hour preceding the complaint
- 👉 On the basis of the data gathered during the preceding stages, make an assessment of cause of the complaint
- 👉 Determine if corrective action is required and any contingency measures pending implementation
- 👉 Implement contingency measures and corrective action, where required.

6.4.4. Step three: respond to the complaint

Once the complaint has been assessed, a formal response will be provided to the complainant, if they requested one. The EPA will also be advised of the formal response.

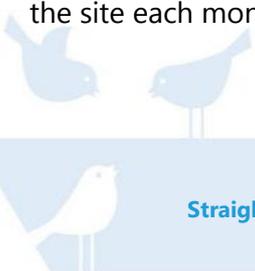
This response will be provided within five business days of the complaint being made and will include:

- 👉 Time and date of the complaint
- 👉 If an odour complaint, the location of the complaint
- 👉 If an odour complaint, the wind strength and direction one hour prior to complaint lodgement
- 👉 Overview of activities at Elf Farm Supplies one hour prior to complaint lodgement
- 👉 Outcomes of the assessment of the complaint.

Should the complainant be dissatisfied with the outcome of the complaint, details of other complaint options will be provided and their dissatisfaction with the outcome will be recorded.

6.4.5. Step four: report the complaint

Complaint data will be compiled in a complaints register to record the quantity and nature of complaints. The complaints register will be published on the Elf Farm Supplies website, and updates will be posted on the site each month.



The register will detail:

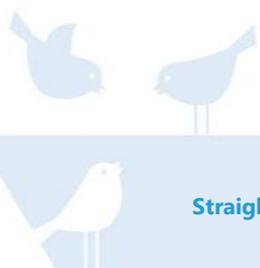
- 👉 Number of complaints received
- 👉 Number of unique complainants where possible to identify
- 👉 Nature of complaints
- 👉 Outcomes of complaints
- 👉 If complaint was resolved in compliance with this procedure.

Reports and complaint records will be held for a period of four years after the complaint is made, as per EPA licence requirements.

6.4.6. Promotion of complaints telephone line

The complaints telephone line will be advertised through:

- 👉 Signage at the entry to Elf Farm Supplies Pty Ltd site (108 Mulgrave Road, Mulgrave NSW 2756)
- 👉 Telephone directory listing for Elf Farm Supplies
- 👉 Elf Farm Supplies website
- 👉 Newsletters, whilst provided
- 👉 Public information sessions, whilst conducted
- 👉 Periodic advertisements in the local print media, whilst provided.



7. STRATEGY REVIEW

The strategy has been developed in accordance with the approval conditions associated with Elf Farm Supplies' DA modification and requires approval by the Secretary of the DPE. The strategy will be revised as required by the Secretary, from time to time.

