Graphinex – Esmeralda Graphite Project Environmental Impact Statement

Appendix J – Social Impact Management Plan

GRAPHINEX



Social Impact Management Plan

Esmeralda Graphite Project

Prepared for: QLD Aus Graphite Pty Ltd

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Abbreviations and acronyms

Abbreviation/acronym	Definition
DIDO	Drive-in, drive-out
FIFO	Fly-in, fly-out
FTE	Full-time equivalent
km	Kilometres
LBIPP	Local Business and Industry Procurement Plan
LGA	Local government area
QAS	Queensland Ambulance Service
QFD	Queensland Fire Department
QPS	Queensland Police Service
QLD	Queensland
SIA	Social impact assessment
SIMP	Social Impact Management Plan
WAV	Workforce accommodation village
WHAP	Workforce Housing and Accommodation Plan
WMP	Workforce Management Plan

1. Introduction

This Social Impact Management Plan (SIMP) documents the social impact mitigation and benefit enhancement measures (collectively referred to as management measures) proposed in response to the social impacts and benefits identified in the Social Impact Assessment (SIA) prepared for the Esmeralda Graphite Project (the Project).

The objective of the SIMP is to provide a practical framework for the implementation of identified management measures and monitoring of the Project's potential/actual social impacts and a means of oversight for ensuring the ongoing effectiveness and relevancy of the management measures.

1.1 Project summary

QLD Aus Graphite Pty Ltd (the proponent / Graphinex) is seeking environmental approvals to develop the Esmeralda Graphite Project (the Project), located approximately 70 kilometres (km) south of Croydon within the Croydon Shire Council (CSC) local government area (LGA).

The proposed Project involves mining of the Esmeralda Granite Unit and on-site concentration of graphite ore within Mining Lease Application (MLA) 100431 and MLA 100430. The Project involves extraction of up to 3.5 million tonnes per annum (Mtpa) of Run-of-Mine (ROM) ore, with a total of approximately 170 Mt of graphite ore to be mined over the operational life of the Project.

The construction phase is anticipated to commence within 12 months of approvals being obtained and would occur over a period of approximately two years. The Project is expected to support a construction workforce of up to approximately 100 full-time equivalent (FTE) workers, with the main workforce categories involving civil works, MPP construction, site building and infrastructure construction, equipment assembly, and accommodation village construction and management.

The operations phase is currently assumed to commence in 2029/2030 (subject to timing of approvals) and would occur over approximately 53 years. At peak production, an operational workforce of up to 192 workers is anticipated, with approximately 128 workers engaged for mine operations and the remaining estimated 64 workers engaged for surface infrastructure operations including mineral processing and other site works.

The majority of both the construction and operational workforce is anticipated to commute via air travel from Brisbane and/or North Queensland to a purpose-built airfield at the Project site. It is likely that some of the workforce may travel via light vehicle (with or without carpooling) from within the Croydon, Carpentaria or Richmond LGAs to the Project.

The construction and operations workforces for the Project will be accommodated in a purpose-built accommodation village established in the southern section of the Project area. The accommodation village will have a capacity to accommodate up to 200 workers, but under normal conditions will be occupied by approximately 113 persons.

1.2 SIMP approach

Developed in line with the requirements of the SIA Guideline (DSDIP, 2025), this SIMP comprises the following sub-plans:

- Workforce Management Plan (WMP)
- Housing and Accommodation Plan (HAP)
- Local Business and Industry Procurement Plan (LBIPP)
- Health and Community Wellbeing Plan (HCWP)
- Community and Stakeholder Engagement Plan (CSEP).

There are inter-linkages between the sub-plans and in particular, all link to the CSEP.

Each sub-plan includes objectives, an overview of the existing social environment of relevance, a summary of social impacts identified (both positive and negative), corresponding management measures, and a monitoring framework.

The management measures outlined in the sub-plans specifically address social impacts but also include measures from other technical assessments undertaken for the Project (e.g., traffic and noise) where relevant.

As this SIMP is directly informed by the SIA, the same study areas are applied, as outlined in Table 1.1.

Table 1.1 Study areas

Study area	Statistical geography	Relevance to Project
Local	Croydon LGA	The local study area encompasses the entirety of the Project site, Esmeralda Station, and Croydon township which are all located within the Croydon LGA. The outback town of Croydon is the closest community to the Project and the main population and administrative centre in Croydon LGA. Croydon LGA is most likely to experience any direct impacts and benefits from the Project. Note that as per the Queensland Government's *Strong and Sustainable Resource Communities Act 2017*, Croydon has not been identified as a 'nearby regional community' within the Project's SIA and this SIMP.
Regional service centres	Normanton UCL Richmond UCL Townsville UCL Cairns UCL	The four communities are considered regional service centres for the Project and Croydon residents. Normanton and Richmond are the nearest regional service centres. • Normanton is a larger centre than Croydon, a key centre for the gulf region, and a potential source of workers and services for the Project. • Richmond is a key centre along the Project transport route from Townsville. Richmond Woolgar Road is a key connector route between Richmond and Croydon. Townsville and Cairns are large population and service centres for the North and Far North Queensland regions. • Townsville provides port access and is anticipated to host additional supporting infrastructure for the Project. • Cairns is an established service centre for the Croydon community where residents access good and services including healthcare. The regional service centres are potential sources for labour, goods and services for the Project.
Regional	LGAs of Croydon, Richmond, Carpentaria	The regional study area includes the host LGA as well as the adjacent LGAs encompassing the nearest regional service centres of Normanton and Richmond.

2. Workforce Management Plan

The Workforce Management Plan applies to the management and monitoring of identified social impacts associated with the workforce during the construction and operational phases of the Project.

2.1 Objectives

The key objectives of the Workforce Management Plan are to:

- maximise employment opportunities and recruitment of residents from Croydon and the broader region where practicable.
- maximise training and skills development opportunities for residents in Croydon and the broader region.
- support the health, safety and wellbeing of the Project workforce.

2.2 Summary of existing social environment

Key labour market characteristics of the Croydon LGA and nearest regional service centres include:

- In 2021, Croydon has a small labour force of 137 persons, with a comparable participation rate (62.6%) and a higher rate of unemployment (8.0%) relative to Queensland (61.6% and 5.4% respectively). Based on latest labour force estimates, the Croydon labour force remains small with 158 persons and reflects a comparatively lower unemployment rate of 2.5% during the December 2025 quarter (DEWR, 2026).
- The First Nations labour force in Croydon was 24 persons in 2021, with a participation rate of 57.1% and unemployment rate of 20.8% (QGSO, 2026).
- Local government administration was the main industry of employment for residents in Croydon (34.9% of population) with other key employing industries including beef cattle farming, road bridge construction and primary education (ABS, 2021).
- Normanton comprised a small labour force of 529 persons in 2021, with a lower labour force participation rate (54.9%) and a notably higher rate of unemployment (10.2%) relative to Queensland (ABS 2021). The top three industries of employment for Normanton residents were local government administration, combined primary and secondary education, and primary education.
- Richmond comprised a small but economically active population in 2021 with a higher labour force participation rate and notably lower rate of unemployment (1.7%) relative to Queensland (ABS 2021). The top three industries of employment for Richmond residents were local government administration, beef cattle farming, and combined primary and secondary education.

2.3 Summary of impacts

Table 2.1 provides a summary of workforce management related impacts identified from the Project and their significance prior to (pre-managed) and following the effective implementation (post-managed) of management measures.

Table 2.1: Workforce management impact summary

Project phase/s[1]	Social impact	Stakeholders	Impact significance[2]	
			Pre-managed	Post-managed
C	Increase in employment opportunities	• Croydon, Normanton and Richmond community	Low (+)	Medium (+)

[1] Project phases are denoted through 'PC' for site establishment / pre-construction activities; 'C' for construction 'O' for operations; and 'D' for decommissioning and rehabilitation
[2] Negative impacts are denoted with (-) and positive impacts (benefits and opportunities) are denoted in (+).

Project phase/s[1]	Social impact	Stakeholders	Impact significance[2]	
			Pre-managed	Post-managed
O		• Regional service centres – Cairns and Townsville communities • Croydon and Richmond Shire Councils	Medium (+)	Medium (+)
O	Increase in training and skills development opportunities	• Croydon community (including First Nations residents) • Training and education providers (regional service centres)	Low (+)	Medium (+)
C O	Increase in workforce health, safety and well-being risk factors	• Project workforce • Health and emergency service providers – Croydon and regional service centres	High (-)	Medium (-)
D	Impact on workforce wellbeing from redundancies due to closure / cessation of operations	• Project workforce • Local government • State government agencies	High (-)	Medium (-)

2.4 Management measures

Key management measures that will be implemented to address workforce management associated impacts identified from the Project are outlined below. The proponent will continue to further develop these measures as the Project progresses and ensure they are ready for implementation prior to the relevant Project phases.

2.4.1 Recruitment

Graphinex is committed to maximising local and regional employment where feasible during both Project construction and operations.

To support local and regional employment opportunities being realised (where feasible), the recruitment hierarchy that will be implemented for the Project will look to apply the following order of prioritisation:

1. Existing residents of Croydon LGA.
2. Existing residents of Carpentaria and Richmond LGAs.
3. Residents from the broader North and North West Queensland regions.
4. Residents from elsewhere in Queensland.

Preference will be given to recruiting from local and regional communities where possible in line with the recruitment hierarchy. However, given the anticipated workforce size and existing constraints (population, labour and skills) in the Croydon region, a large proportion of the Project workforce would still likely need to be sourced from outside the region. Graphinex will require major contractor(s) involved in the Project to adhere with the objectives of the Project's Workforce Management Plan. This includes demonstrating their proposed approach/strategies to enabling local and regional participation.

Graphinex will work with Project contractors to work towards achieving the following aspirational targets for local, regional and First Nations employment outlined in Table 2.2.

Table 2.2: Aspirational targets for local, regional and First Nations employment

Workforces	Aspirational targets	
	Local and regional employment	Local and regional First Nations employment
Construction	• 10% of workforce comprises residents of Croydon and Normanton	• 5% of workforce comprises First Nations residents of Croydon and Normanton
Peak operations	• 10% of workforce comprises residents of Croydon, Carpentaria, and Richmond LGAs (including relocating workers).	• 5% of workforce comprises First Nations residents of Croydon, Carpentaria, and Richmond LGAs (including relocating workers).

To support the implementation of the recruitment hierarchy, recruitment advertising will be staggered, with opportunities promoted through local and regional channels in the first instance, such as local noticeboards, community newsletters, and Jobs North West Queensland platform. The proponent will also provide advance notice to existing employment and training providers in the region (such as Bynoe CACS and Gulf Regional Services) about upcoming opportunities with the Project.

A dedicated page on the Project website will be established for Project employment opportunities and major employment platforms (e.g., SEEK, LinkedIn, etc) will also be used to promote/disseminate employment opportunities with the Project during construction and operations.

2.4.2 Training and skills development program

Graphinex will work with the principal contractor to deliver annual apprenticeships and/or traineeships during the operations phase of the Project. Details around Project apprenticeship/traineeship opportunities (e.g., annual intake, qualification outcomes, and eligibility criteria) will be developed when the principal contractor for operations is determined. Similar to employment opportunities, training and skills development opportunities will be advertised and promoted through the Project website as well as established local and regional platforms. Additional training and skills development opportunities the Project will offer include general on-the job mentoring and training.

Graphinex recognises that there are various training and skills development initiatives/opportunities currently offered through employment and training providers in the Croydon and Normanton region. Prior to the commencement of Project construction, Graphinex will engage with employment and training providers (such as Bynoe CACS and Gulf Regional Services) to understand existing skills constraints/barriers in the region and collaborate on ways to facilitate greater participation in opportunities. This may take the form of supporting providers with their existing program delivery (e.g., funding or in-kind support) or developing bespoke training programs/initiatives for the Project in collaboration with providers. In addition, Graphinex will also engage with education providers in the region to identify potential opportunities such as industry-based partnership (e.g., work experience, graduate program).

2.4.3 Health and Safety Management System

The Project will fully comply with relevant mine safety and health legislation including the *Mining and Quarrying Safety and Health Act 1999* and *Resources Safety and Health Legislation Amendment Act 2024,* as well as associated regulations and other relevant industry standards.

A Health and Safety Management System will be established for the Project. The system will be supported by policies and standards addressing a range of matters including (but not limited to) fatigue management, remote work risks, DIDO risks and protocols, safety communication (pre-starts/toolbox meetings), extreme heat and heat stress, and fitness to work requirements.

The system will include a range of measures to support the safety, health and wellbeing of the Project workforce. Some of the key measures to be developed and implemented are outlined below.

Mental health support

The Project will be located within a very remote region with an extreme climate. Responding to the challenges that these conditions may present for the Project workforce, the proponent is committed to supporting the health and wellbeing of its workforce and will look to contract an employee assistance program (EAP) provider to support this. The Project workforce and their families will have access to independent, confidential, voluntary, and freely accessible professional counselling services covering a wide range of matters including (but not limited to) mental health, conflict at work, personal and family issues, health and lifestyle issues, critical incident support, and challenges pertaining to isolation and the extreme climate.

In addition to the EAP, the proponent will also look to leverage existing industry-specific and publicly accessible initiatives/program such as Mates in Mining, RUOK, Quitline, Lifeline and the Alcohol and Drug Information Service (ADIS) Queensland.

Detailed Emergency Response Plan for the Project

An Emergency Response Plan will be prepared in collaboration with local and regional emergency service providers prior to the commencement of Project construction. Matters that will be considered and addressed in the ERP include:

- Site access
- Risk assessment and hazard identification
- Onsite resources and equipment
- Training and competency
- Command structure including roles and responsibilities
- Assessment of key hazards and risks during construction and operations
- Evacuation procedures
- Internal and external communication and notification procedures.

A first aid facility will be established onsite and include dedicated first aid qualified personnel to support the workforce throughout the life of Project.

Workforce Code of Conduct

The Workforce Code of Conduct will be developed prior to the commencement of construction. The objective of the code is to clearly detail the standard of behaviour expected of the Project workforce and consequences for non-compliance.

Expected behaviour standards outlined in the code will apply to when Project workers are onsite, at the accommodation facility, in local towns and surrounding areas, travelling to and from work, and when interacting with community members and stakeholders. Compliance with the code will be required for all Project workers including contractors and visiting personnel. Serious or repeated non-compliance with the code will result in termination of employment.

2.5 Implementation and monitoring of management measures

Table 2.2 outlines the workforce management measures that Graphinex has committed to further developing and implementing with support from stakeholders (where relevant) for the Project. A monitoring framework is also outlined to track the implementation of committed measures to ensure their ongoing effectiveness in managing potential impacts and identify when corrective or adaptive actions may be required.

Table 2.3: Management measures implementation and monitoring – Workforce Management

Impact	Management measure	Targeted stakeholder/s	Implementation			Monitoring				
			Timeframe	Responsibility	Partner/s (if any)	Desired outcome	Performance indicator/s	Data source	Responsibility	Frequency
Increase in employment opportunities	Recruitment hierarchy	Croydon LGA residents Carpentaria and Richmond LGA residents	PC, C and O	Graphinex Construction contractor	-	Project employs residents from Croydon, Carpentaria, and Richmond LGAs	• 10% of construction workforce comprising residents of Croydon and Normanton. • 5% of construction workforce comprises First Nations residents of Croydon and Normanton • 10% of peak operations workforce comprising residents of Croydon, Carpentaria, and Richmond LGAs • 5% of peak operations workforce comprises First Nations residents of Croydon, Carpentaria, and Richmond LGAs	HR records	Graphinex	Annually during construction and operation
Increase in training and skills development opportunities	Apprenticeships and/or traineeships	Job seekers and high school leavers	C and O	Graphinex Construction contractor	Bynoe CACS Limited Gulf Regional Services Local and regional high schools	Project provides opportunities to apprentices and trainees	1-2 apprentices and trainees engaged annually	HR records	Graphinex	Annually during construction and operation
Increase in workforce health, safety and well-being risk factors	Project Health and Safety Management System	Employees	PC, C and O	Graphinex Construction contractor	-	Worker health and safety supported and maintained	Number of reported health and safety incidents	Workplace health and safety records	Graphinex	Quarterly during construction and operation
	Detailed emergency response plan for the Project	Employees	PC	Graphinex Construction contractor	Local and regional health and emergency service providers		Emergency response plan developed in consultation with health and emergency services	Environmental management system Stakeholder engagement records	Graphinex	Once, 3 months prior to construction
	Self-sufficient and well-equipped onsite accommodation village	Employees	C and O	Graphinex	-		Accommodation village meets or exceeds workplace health and safety standards	Environmental management system	Graphinex	Six monthly during construction and operation
Impact on workforce wellbeing from redundancies	Mine closure planning	Employees	O	Graphinex	State and local governments		Workers are satisfied with mine closure planning process	Workforce survey	Graphinex	Six monthly from Year 48 of operation

3. Housing and Accommodation Plan

The Housing and Accommodation Plan applies to the management and monitoring of identified social impacts associated with housing and accommodation arrangements for the Project workforce during the construction and operational phases.

3.1 Objectives

The key objectives of the Housing and Accommodation Plan are to:

- minimise potential Project impacts on local housing availability and affordability in Croydon.
- manage Project demand on local short-term accommodation.
- provide Project workforce with high-quality onsite accommodation that does not contribute towards excessive burden on existing infrastructure, facilities and services used by local and regional communities.

3.2 Summary of existing social environment

Key housing characteristics in the Croydon LGA and regional service centres include:

- Croydon had a small housing stock of 213 dwellings in 2021, with lower levels of occupancy and homeownership compared to Queensland (ABS, 2021). Key housing challenges in Croydon include limited housing activity (i.e., minimal housing sale and new residential construction over the past few years) and prohibitive housing deposit requirements from banking institutions (Croydon Shire Council, 2023).
- Latest vacancy data indicates an extremely tight rental market in Croydon with a vacancy rate of 0.3% in February 2026. Rental vacancy rates in Croydon have consistently remained under 2.0% over the five-year period to January 2026 (SQM Research, 2026). The very constrained rental market in Croydon was consistently raised by local stakeholders during SIA engagement.
- High levels of rented dwellings (over-two thirds of occupied dwellings) and low levels of homeownership in Normanton in 2021 (ABS, 2021). Latest vacancy data indicates an extremely tight rental market in Normanton with a vacancy rate near/at 0.0% in February 2026 (SQM Research, 2026), and SIA engagement revealed a high degree of homelessness.
- In Richmond, there were high levels of homeownership in 2021, with almost two-thirds of occupied dwellings owned outright or with a mortgage (ABS, 2021). Latest vacancy data indicates an extremely tight rental market in Richmond and surrounds with a vacancy rate near/at 0.0% in February 2026 (SQM Research, 2026).

3.3 Summary of impacts

Table 3.1 provides a summary of housing and accommodation related impacts identified from the Project and their significance prior to (pre-managed) and following the effective implementation (post-managed) of management measures.

Table 3.1: Housing and accommodation impact summary

Project phase/s[3]	Social impact	Stakeholders	Impact significance[4]	
			Pre-managed	Post-managed
PC	Increase in demand on local short-term accommodation affecting accessibility by other users	• Accommodation providers in Croydon • Tourists • Visiting contractors	Low (-)	Negligible (-)
PC	Additional economic opportunities for short-term accommodation providers	• Accommodation providers in Croydon	Low (+)	Low (-)
O	Decrease in local housing availability and affordability due relocating Project workforce demand	• Croydon community • Croydon Shire Council	Medium (-)	Low (-)

3.4 Management measures

Key management measures that will be implemented to address housing and accommodation associated impacts identified from the Project are outlined below. The proponent will continue to further develop these measures as the Project progresses and ensure they are ready for implementation prior to the relevant Project phases.

3.4.1 Onsite accommodation village

During site establishment works, temporary mobile accommodation will be brought to site to accommodate the small establishment workforce involved. The Proponent will work with the relevant contractor(s) to ensure the provision of appropriate temporary accommodation which may include caravan or donga style units.

A workforce accommodation village will be established onsite to support Project construction and operations. The accommodation village will have a capacity to accommodate up to 200 persons which will be sufficient to fully accommodate the peak workforces anticipated during the construction (up to 100 workers) and operations (up to 192 workers) phases. Due to fatigue management requirements, all Project workers (including resident workers from Croydon) will be required to stay in the onsite accommodation village while on roster during both the construction and operations phases.

The accommodation village will be constructed to be fully self-contained and include ablutions and a sewerage treatment plant. Prior to grid power connection being established, power demand from the accommodation village (and Project overall) will be supplied by an onsite solar farm and energy storage system with diesel generation as back-up.

Workforce sleeping quarters are anticipated to be equipped with basic amenities including ensuite, table, chair, bed and TV. In addition to the sleeping quarters, the village is anticipated to include supporting facilities such as full-serviced kitchen facilities, site offices, first aid rooms, recreation facilities, self-service laundry facility, cleaning services and access to internet and Wi-Fi.

[3] Project phases are denoted through 'PC' for site establishment / pre-construction activities; 'C' for construction 'O' for operations; and 'D' for decommissioning and rehabilitation
[4] Negative impacts are denoted with (-) and positive impacts (benefits and opportunities) are denoted in (+).

3.4.2 Local housing and accommodation monitoring

During the long operational life of the Project, there may be some workers who may choose to relocate to Croydon or surrounding communities with their families. While is it not possible to accurately estimate how many operational workers may relocate at this point in time, experience of other resource projects operating in rural and remote areas indicates that the number will likely be limited. During the recruitment process, the proponent and/or principal contractor will gauge how many workers are considering/seeking to relocate (individual or with family) and their potential housing requirements, such as location, dwelling type and number of bedrooms.

The proponent will regularly monitor potential workforce demand and local housing market conditions (availability and cost) in consultation with Croydon Shire Council. If ongoing monitoring identifies impacts on housing conditions in Croydon from the Project, the proponent will proactively address any current or emerging issues in collaboration with Council. This will include developing appropriate solutions in collaboration with Council, where required.

As outlined in the CSEP (Section 6), the proponent will continue to engage with the community and stakeholders on the development of the Project, which includes providing advance notice on workforce mobilisation or changes throughout the life of the Project.

3.5 Implementation and monitoring of management measures

Table 3.2 outlines housing and accommodation management measures Graphinex has committed to further developing and implementing with support from stakeholders (where relevant) for the Project. A monitoring framework is also outlined to track the implementation of committed measures to ensure their ongoing effectiveness in managing potential impacts and identify when corrective or adaptive actions may be required.

Table 3.2: Management measures implementation and monitoring – Housing and accommodation

Impact	Management measure	Targeted stakeholder/s	Implementation			Monitoring				
			Timeframe	Responsibility	Partner/s (if any)	Desired outcome	Performance indicator/s	Data source	Responsibility	Frequency
Increase in demand on local short-term accommodation affecting accessibility by other users	Onsite accommodation village	Accommodation providers in Croydon Tourists/visitors	C and O	Graphinex Construction contractor	-	Minimise workforce demand on local short-term accommodation	Workforce accommodated in the on-site camp	HR records	Graphinex Construction contractor	Six monthly during construction and operation
Decrease in local housing availability and affordability due relocating Project workforce demand	Housing demand monitoring	Croydon community Croydon Shire Council	O	Graphinex	Croydon Shire Council	Avoid workforce impacts on local housing	Number of Project-related emerging housing issues addressed with Croydon Shire Council	Stakeholder engagement records	Graphinex	Six monthly during construction and operation
Additional economic opportunities for short-term accommodation providers	Notification of Project accommodation requirements	Short-term accommodation providers in Croydon	PC	Graphinex Construction contractor	-	Short-term accommodation providers benefit from Project demand	Number of workers staying at short-term accommodation	Local supplier records	Graphinex	Six monthly during construction and operation

4. Local Business and Industry Procurement Plan

The Local Business and Industry Procurement Plan applies to the management and monitoring of identified social impacts associated with local business and service providers during the construction and operational phases of the Project.

4.1 Objectives

The key objectives of the Local Business and Industry Procurement Plan are to:

- maximise opportunities for competitive and capable local businesses to provide goods and services to the Project.
- build relationships with local businesses to maximise local awareness of supply opportunities.
- manage any inadvertent labour competition impacts on local businesses.

4.2 Summary of existing social environment

Key business and industry characteristics in Croydon LGA and the nearest regional service centres include:

- The Croydon LGA economy is predominantly driven by agriculture (specifically cattle grazing) and supported by other key contributing industry sectors including tourism and public administration (ABS, 2021). There are a small number of businesses based in Croydon township including the pub, roadhouse, small grocer, quarry, tyre centre, and three main earthmoving contractors.
- In June 2025, there were a small number of actively trading businesses in Croydon LGA (35 businesses), with the agriculture, forestry and fishing the largest industry accounting for 42.1% of total business, followed by the construction industry with 23.7% (QGSO, 2026).
- Key industries in the Carpentaria LGA include agriculture, fishing, mining, tourism and government administration (ABS, 2021). Much of the Carpentaria LGA's commercial activity comes through Karumba, which has an active port based around export of zinc and lead as well as a fishing industry. Established industries in Richmond LGA include agriculture, mining and tourism as well as an emerging critical minerals industry.
- Desktop research did not identify any First Nations business in Croydon, with the closest located in Normanton and Richmond – both with two registered businesses (Supply Nation 2026; Gateway by ICN 2026). Services provided by First Nations businesses in Normanton and Richmond include civil contracting, Indigenous labour hire, traffic management, biosecurity and environmental services.

4.3 Summary of impacts

Table 4.1 provides a summary of local business and industry procurement related impacts identified from the Project and their significance prior to (pre-managed) and following the effective implementation (post-managed) of management measures.

Table 4.1: Local business and industry procurement impact summary

Project phase/s[5]	Social impact	Stakeholders	Impact significance[6]	
			Pre-managed	Post-managed
C	Increase in supply and procurement opportunities	• Croydon businesses and industry • Croydon Shire Council • Businesses and industry groups – regional service centres	Low (+)	Medium (+)
O			Medium (+)	Medium (+)
O	Increase in industry diversification	• Croydon Shire Council • Croydon community • State government	Medium (+)	Medium (+)
C O	Increase in labour draw and competition for other businesses	• Croydon businesses and service providers • Croydon Shire Council • Businesses and industry – regional service centres	Medium (-)	Low (-)
C O	Increase in economic activity for businesses	• Croydon businesses • Richmond and Normanton businesses	Low (+)	Low (+)

4.4 Management measures

Key management measures that will be implemented to address local businesses and industry procurement associated impacts identified from the Project are outlined below. The proponent will continue to further develop these measures as the Project progresses and ensure they are ready for implementation prior to the relevant Project phases.

4.4.1 Local and regional content strategy

The local and regional content strategy will include measures to maximise benefits for local and regional businesses. The measures include a local and regional business register, targeted engagement with local and regional suppliers, and a contracting model that supports local business participation.

The local and regional business register will be maintained by Graphinex. Local and regional businesses will have the opportunity to register their interest in supplying to the Project via the Project website from the pre-construction phase. The Project website will include a form for interested local and regional businesses to add their contact and business details.

Graphinex will conduct targeted engagement with local and regional businesses through hosting supplier briefing and tender information sessions during the pre-construction and construction phases. Supplier briefings and tender information sessions will be held in Croydon and nearby regional services centres including Normanton. Graphinex will also provide advance notice of Project supply requirements and tendering opportunities via the Project website, local noticeboards and networks including through Gulf Savannah Development's channels.

Expectations and strategies around local and First Nations content will be embedded into the Project's contracting model, and local and First Nations businesses will have a higher preference weighting in competitive bidding

[5] Project phases are denoted through 'PC' for site establishment / pre-construction activities; 'C' for construction 'O' for operations; and 'D' for decommissioning and rehabilitation, throughout this report.
[6] Negative impacts are denoted with (-) and positive impacts (benefits and opportunities) are denoted in (+).

processes. Graphinex will also explore opportunities to break down large work packages and provide small-to-medium friendly payment terms (where appropriate) to support local business participation.

Graphinex will collaborate with relevant state government agencies and business and industry groups to support the delivery of tender readiness and business capacity building programs, including targeted programs to support First Nations business participation. Collaboration will commence in the pre-construction phase.

4.4.2 Workforce interaction with Croydon community

Graphinex will provide opportunities for workers to interact with the Croydon community to support local businesses. Opportunities may include facilitating monthly trips to town by bus and attendance and participation in local events.

4.4.3 Labour market monitoring

Graphinex will collaborate with Croydon Shire Council, local businesses, and essential service providers to monitor and understand changes in the local labour market to understand local workforce availability and staffing levels. Monitoring will commence in construction and continue throughout operation.

4.5 Implementation and monitoring of management measures

Table 4.2 outlines local business and industry procurement management measures Graphinex has committed to further developing and implementing with support from stakeholders (where relevant) for the Project. A monitoring framework is also outlined to track the implementation of committed measures to ensure their ongoing effectiveness in managing potential impacts and identify when corrective or adaptive actions may be required.

Table 4.2: Management measures implementation and monitoring – Local Business and Industry Procurement

Impact	Management measure	Targeted stakeholder/s	Implementation			Monitoring				
			Timeframe	Responsibility	Partner/s (if any)	Desired outcome	Performance indicator/s	Data source	Responsibility	Frequency
Increase in supply and procurement opportunities	Local and regional content strategy and capacity building	Local and regional businesses First Nations-owned businesses	PC, C and O	Graphinex Construction contractor	-	Maximise benefits for local and regional businesses	Proportion and value of contracts awarded to businesses based in Croydon LGA, Carpentaria LGA and Richmond LGA	Procurement records Supplier register	Graphinex Construction contractor	Six monthly during construction and operation
Increase in industry diversification							Number of local businesses participating in proponent delivered/involved capacity building programs/sessions	Stakeholder engagement records	Graphinex	Annually during pre-construction and construction
Increase in economic activity for businesses	Workforce interaction with Croydon community	Croydon businesses	C and O	Graphinex Construction contractor	-		Number of coordinated visits to Croydon town	Workplace health and safety records	Graphinex	Six monthly during construction and operation
Increase in labour draw and competition for other businesses	Labour market monitoring	Local governments Local and regional businesses Essential service providers	C and O	Graphinex	Local governments Local and regional businesses Essential service providers	Minimise labour draw and competition	Number of engagements with local governments, local and regional businesses and essential service providers	Stakeholder engagement register	Graphinex	Six monthly during construction and operation

5. Health and Community Wellbeing Plan

The Health and Community Wellbeing Plan applies to the management and monitoring of identified social impacts from the Project related to the health (physical and mental) and well-being (social, cultural, environmental and economic) of potentially impacted communities during the Project lifecycle.

5.1 Objectives

The key objectives of the Health and Community Wellbeing Plan are to:

- minimise adverse impacts on the level of service provision of existing services, facilities and infrastructure to residents of Croydon and the broader region.
- mitigate potential health and wellbeing impacts on local communities.
- contribute towards positive community wellbeing outcomes in Croydon through investment and support of community events, groups and initiatives.

5.2 Summary of existing social environment

Key characteristics of the Croydon LGA community include:

- In 2024, the Croydon LGA was home to 270 people, with most living in Croydon town and the remainder on pastoral properties (ABS, 2025). The population has been slowly contracting over the past decade (average annual rate of -1.1%) and latest projections indicate a continued decline with a projected population of 234 persons in 2046 (QGSO, 2026).
- Socio-cultural characteristics of the Croydon LGA population include a median age of 41 years and a high proportion of residents who identify as Aboriginal and/or Torres Strait Islander population, with 28.6% of the LGA's population (ABS 2021).
- Services and amenities hosted within Croydon are limited, but include a health service, police station (open limited hours), ambulance vehicle, and a rural fire brigade and State Emergency Service (SES) unit staffed by volunteers.
- The major roads servicing Croydon LGA are the Gulf Developmental Road and Croydon-Richmond Road. Both roads are susceptible to flooding and regular road closures during the wet season. SIA engagement revealed that Croydon and surrounding communities can often be isolated for long periods during the wet season due to road condition constraints.
- The Project is within the traditional country of the Tagalaka People, which covers various lands in the Gulf Savannah region around the townships of Croydon, Normanton and East Hayden. The Tagalaka Aboriginal Corporation RNTBC administers land on behalf of the Tagalaka People (Tagalaka Aboriginal Corporation, 2026).
- SIA engagement revealed limited levels of awareness and knowledge about the Project within the community, with the general perception that there would be limited impacts or benefits for the town due to distance. Overall, most stakeholders engaged as part of the SIA generally perceived the proposed Project as positive but identified the importance of ongoing Project engagement and interaction with the Croydon community.

5.3 Summary of impacts

Table 5.1 provides a summary of health and community wellbeing related impacts identified from the Project and their significance prior to (pre-managed) and following the effective implementation (post-managed) of management measures.

Table 5.1: Health and community wellbeing impact summary

Project phase/s[7]	Social impact	Stakeholders	Impact significance[8]	
			Pre-managed	Post-managed
C O	Increase in demand for health and emergency services contributing to service provision disruptions to for existing residents	• Health and emergency services in Croydon and regional service centres • Croydon community	Medium (-)	Low (-)
C O	Increase in road safety risks (e.g., accidents, road condition deterioration, etc)	• Residents along transport route – Croydon and Richmond LGA • Health and emergency service providers • Croydon Shire Council • Richmond Shire Council	High (-)	Medium (-)
C O	Improved access and connectivity	• Croydon and Richmond community • Croydon Shire Council • Richmond Shire Council	Low (+)	Medium (+)
C O	Changes to cultural heritage value	• Tagalaka Aboriginal Corporation	Medium (-)	Low (-)
C O	Changes to ecological / environmental values	• Croydon community • Croydon Shire Council • State government agencies • Traditional Owners	Medium (-)	Low (-)
O	Disruptions to surrounding amenity	• Landholders – Esmeralda station and neighbours	Low (-)	Low (-)
C O	Support overall socio-economic wellbeing of Croydon	• Croydon community • Croydon Shire Council	Low (+)	High (+)
O	Support increase in resident population	• Croydon community • Croydon Shire Council	Low (+)	Low (+)
PC	Community scepticism and apathy towards project	• Croydon community	Medium (-)	Low (-)

[7] Project phases are denoted through 'PC' for site establishment / pre-construction activities; 'C' for construction 'O' for operations; and 'D' for decommissioning and rehabilitation
[8] Negative impacts are denoted with (-) and positive impacts (benefits and opportunities) are denoted in (+).

5.4 Management measures

Key management measures that will be implemented to address health and community wellbeing associated impacts identified from the Project are outlined below. The proponent will continue to further develop these measures as the Project progresses and ensure they are ready for implementation prior to the relevant Project phases.

5.4.1 Traffic and road use management

Prior to the commencement of Project construction, Graphinex and the construction contractor will develop relevant management plans to appropriately manage Project associated road use and traffic impacts. These plans may include a Traffic Management Plan and/or Road Use Management Plan.

Matters that will be covered by the plan/s include road safety risks, safe operations of Project vehicles (particularly heavy haulage), interactions with other road users (agriculture, local residents, tourist), driver awareness and training, and fatigue management.

Management of Project associated traffic changes will be further supported by measures outlined in the Workforce Management Plan (i.e., Health and Safety Management System) and the CSEP (Section 6). Graphinex will continue to keep the community and stakeholders informed about Project development. This includes advance notice on key Project transport movements and anticipated disruptions though various channels such as notices on Council and Project website and/or text message alerts.

5.4.2 Environmental management

Graphinex will monitor and manage potential Project impacts on environmental values in accordance with relevant conditions of approval and the Environmental Authority for the Project. A range of environmental management plans will be developed for the Project and within them include details on specific management measures and monitoring programs that will be implemented.

These management plans may include (but not limited to):

- Waste and Tailings Management Plan
- Progressive Rehabilitation and Closure Plan
- Noise and Vibration Management Plan
- Water Management Plan
- Air Quality Management Plan.
- Construction Environment Management Plan

Graphinex will continue to keep the community and stakeholders informed about Project development, including providing advance notice on key upcoming activities. As outlined in the CEP (Section 6) a Project complaints and feedback process will also be further developed and promoted to the community and stakeholders.

5.4.3 Cultural heritage

Measures that will be implemented to manage potential Project impacts on cultural heritage values will be as per those detailed in the Cultural Heritage Management Plan (CHMP) developed between Graphinex and the Tagalaka Aboriginal Corporation (TAC). This process commenced with Graphinex notifying the TAC of their intention to develop a plan and executing a negotiating protocol on 16 December 2024. The TAC responded within the required notice period and negotiations on the CHMP commenced. The CHMP is being developed concurrently as Project planning matures alongside the EIS approvals process. The CHMP will be developed and finalised prior to any construction activities to ensure that it reflects the aspirations and expectations of the Tagalaka and ensure that potential impacts are mitigated or managed. In addition to implementing the CHMP, Graphinex will also explore opportunities for Tagalaka Ranger involvement in cultural heritage and environmental management activities where relevant. In line with the CSEP (Section 6), Graphinex will continue to regularly engage with the TAC during all phases of the Project and provide advance notice on upcoming key Project activities.

5.4.4 Community Support Program

Graphinex is committed to establishing a Community Support Program aimed at supporting and enhancing the socio-economic wellbeing of the Croydon community. The program will include an annual budget of up to $25,000 (indexed to CPI) for grants to community groups and non-government organisations to deliver initiatives and/or programs supporting community aspirations and wellbeing. Key themes raised by stakeholders during SIA engagement as potential areas for community investment through the Project included:

- local community groups and events
- community amenity, services, and physical infrastructure
- opportunities to support kids and young people
- housing and accommodation
- education and training
- health and emergency services.

The program will come into effect during year 1 of Project operations and continue for the operational life of the Project. The annual budget will be reviewed and revised as needed throughout the operational life of the Project at specific intervals to be determined by Graphinex.

Details of the program will be further developed as the Project progresses, including the application process and eligibility criteria.

In addition to the Community Support Fund, Graphinex will also continue to engage with community groups and service providers on opportunities (e.g., in-kind support or partnerships) that the Project could support.

5.4.5 Live local policy

Graphinex will establish a Live Local Policy to support Project workers considering / seeking to relocate to Croydon, whether individually or with their families.

At this stage, details of the policy are still being considered, but the policy is likely to include potential support mechanisms such as relocation allowance or package, wage incentives, and flexible rostering considerations.

5.5 Implementation and monitoring of management measures

Table 5.2 outlines health and community wellbeing management measures Graphinex has committed to further developing and implementing with support from stakeholders (where relevant) for the Project. A monitoring framework is also outlined to track the implementation of committed measures to ensure their ongoing effectiveness in managing potential impacts and identify when corrective or adaptive actions may be required.

Table 5.2: Management measures implementation and monitoring – Health and Community Wellbeing

Impact	Management measure	Targeted stakeholder/s	Implementation			Monitoring				
			Timeframe	Responsibility	Partner/s (if any)	Desired outcome	Performance indicator/s	Data source	Responsibility	Frequency
Increase in demand for health and emergency services	Health and Safety Management System	Health and emergency services – Croydon and regional service centres Croydon community	PC, C and O	Graphinex Construction contractor	-	Minimise demand on health and emergency services	Number of health and safety incidents involving local health and emergency services	Workplace health and safety records	Graphinex Construction contractor	Six monthly during construction and operation
Increase in road safety risks Improved access and connectivity	Traffic Management Plan and Road Use Management Plan	Health and emergency services Croydon Shire Council Richmond Shire Council	C and O	Graphinex Construction contractor	-	Minimise road safety risks	Compliance with Traffic Management Plan and Road Use Management Plan	Workplace health and safety records Complaints register	Graphinex Construction contractor	Six monthly during construction and operation
Changes to cultural heritage value	Cultural Heritage Management Plan	Tagalaka Aboriginal Corporation	C and O	Graphinex Construction contractor	Tagalaka Aboriginal Corporation	Minimise Aboriginal cultural heritage impacts	Compliance with cultural heritage management protocols	Cultural heritage records	Graphinex	As and when required
Changes to ecological / environmental values	Environmental management plans	Croydon community Croydon Shire Council State government agencies Traditional Owners	C and O	Graphinex Construction contractor	-	Minimise environmental impacts	Compliance with environmental management plans	Environmental management system	Graphinex Construction contractor	Six monthly during construction and operation
Disruptions to surrounding amenity		Landholders – Esmeralda station and neighbours Residents along transport route – Croydon and Richmond LGA	C and O	Graphinex Construction contractor	-					
Support overall socio-economic wellbeing of Croydon	Community Support Program	Croydon community Croydon Shire Council	O	Graphinex	-	Project supports community aspirations	Number and total value of sponsorships and in-kind support provided	Community investment records	Graphinex	Annually during operation
Community scepticism and apathy towards project	Community and Stakeholder Engagement Plan		PC			Build and maintain positive relationships with local community	Ongoing, open communication	Engagement register	Graphinex	Quarterly during pre-construction and construction, annually during operation
Support increase in resident population	Live local policy	Croydon community Croydon Shire Council	O	Graphinex	-	Increase in Croydon population	Number of workers who relocate to Croydon LGA	HR records	Graphinex	Annually during operation

6. Community and Stakeholder Engagement Plan

The Community and Stakeholder Engagement Plan applies to the development and implementation of the management measures contained within this SIMP. This plan outlines how the proponent will continue to engage with communities and stakeholders throughout the Project's lifecycle to ensure potential impacts are effectively managed and potential benefits are maximised.

6.1 Objectives

The key objectives of the Community and Stakeholder Engagement Plan are to:

- deliver and maintain transparent and inclusive community and stakeholder engagement
- facilitate further development and implementation of proposed management measures and monitoring of potential social impacts
- address stakeholder and community issues and concerns in a timely, consistent, and transparent manner.

6.2 Stakeholder profile

Table 6.1 identifies stakeholders from potentially affected communities who may have an interest or influence on the Project. Several of these stakeholders informed the SIA and may be involved in developing, implementing and/or monitoring the management measures outlined in this SIMP.

Table 6.1: Stakeholder analysis

Stakeholders	Potential interests /concerns
Local government	
• Croydon Shire Council • Carpentaria Shire Council • Richmond Shire Council	• Demand on infrastructure and services • Socio-economic benefits • Workforce behaviour
Landholders	
Host and neighbouring	• Biosecurity • Traffic and road safety
First Nations	
Tagalaka Aboriginal Corporation	• Socio-economic benefits • Employment and training opportunities • Cultural heritage impacts and management • Cultural heritage and indigenous land use agreements
Health and emergency services	
• Croydon Police Station • Croydon Rural Fire Brigade • Croydon Primary Health Centre (Cairns and Hinterland HHS) • Royal Flying Doctor Service (RFDS) – Cairns • Normanton Primary Health Care Centre (Gidgee Healing)	• Traffic and road safety • Demand on health and emergency services • On-site health service provisions and emergency response plans and procedures • Workplace health and safety protocols

Stakeholders	Potential interests /concerns
Local businesses and industry	
• Croydon Centre Supermarket • Croydon Club Hotel • Croydon Gulf Gate BP Roadhouse • Gulf Savannah Development • Gulf Regional Economic Aboriginal Trust (Normanton) • Gulf Regional Services • Kickin' Kitchen (food truck) • Northern Gulf Resource Management Group (Georgetown) • Pickering Earthmoving • She Boss Connections • Townsville and North West Qld RDA • Tropical North RDA • TWT Rural Services	• Local content opportunities • Opportunities to support local businesses and community • Competition for workers
Housing and accommodation providers	
• Croydon Club Hotel • Croydon Caravan Park	• Demand for accommodation • Opportunities to support workforce demand
Education and training providers	
• Croydon State School • Croydon Day Care Centre • Normanton State School • Gulf Christian College (including Thompson Street Campus) • Georgetown State School	• Employment and training opportunities
Social services and community groups	
• VisitCroydonQLD (Croydon Shire Council) • True Blue Visitor Information Centre • Croydon Men's Shed • Croydon Heritage Preservation Association • Croydon Library • Croydon Swimming Pool • Gulf Savannah NRM • Southern Gulf NRM • QCWA Normanton and Georgetown	• Employment and training opportunities • Community benefits
Other project proponents	
• Jubilee Metals	• Competition for workers • Community benefit collaboration opportunities

6.3 Engagement mechanisms

Communication and engagement with key stakeholders and the community to develop and implement the SIMP will be delivered using the communication tools and the complaints and grievance protocol described below.

6.3.1 Key communication tools

Key communication tools to be used to engage with key stakeholders and the community include:

- Project website – a dedicated project website will be developed and will include relevant background information on the project, business supply and tendering opportunities, employment and training opportunities, contact details, and complaints and grievance procedure.
- Email address and phone number – these details will be published on the project website for ensure members of the community can contact Graphinex about the Project.
- Meetings, briefings, letters, emails, etc – Graphinex will maintain relationships with key stakeholders via face-to-face and remote methods of consultation.
- Engagement register – Stakeholder engagement activities and contact details will be recorded in an engagement register. All information will be collected and recorded in accordance with the *Privacy Act 1988*.

6.3.2 Stakeholder agreements

Graphinex has entered / will enter into agreements with key stakeholders including:

- An agreement with the host landholder
- Cultural heritage agreement with Tagalaka Aboriginal Corporation
- Infrastructure agreements with Croydon Shire Council, Richmond Shire Council and the Queensland Government Department of Transport and Main Roads (TMR).

Agreements will include measures to manage potential impacts and/or enhance potential benefits including elements of social impacts, as relevant. They may also include ongoing engagement, monitoring and reporting protocols.

6.3.3 Complaints and grievance procedure

The complaints and grievance procedure will be made available on the Project website.

Members of the community will be able to lodge a complaint or grievance via the Project website, email address or via phone with a Graphinex team member.

All complaints and grievances will be formally acknowledged and recorded in the Project's complaints register. Complaints will be assigned to a responsible Graphinex employee or third party working on behalf of Graphinex. The responsible person will investigate and seek to resolve the complaint or grievance within the nominated timeframe. Nominated timeframes will depend on the severity of the complaint. Complaints that are straightforward to resolve should be resolved promptly. More complex complaints may need more time, and this is to be communicated to the complainant when it is formally acknowledged.

If the complainant is dissatisfied with the proposed resolution, it may be escalated to a third-party mediator.

6.3.4 Processes for incorporating stakeholder feedback into project-specific management measures

Stakeholder feedback may be received through formal engagement activities that may include:

- Consultation on management plans, e.g. emergency and disaster response plans
- Consultation on the community support program
- Regular meetings with key stakeholders
- Complaints and grievance procedure

- Formal processes outlined in stakeholder agreements
- SIMP review processes.

Feedback may also be received informally in interactions with Graphinex employees. Stakeholder feedback on the Project will be recorded in the stakeholder engagement register, considered by Graphinex and incorporated into relevant plans, policies, procedures and programs, as relevant.

6.3.5 Progressive rehabilitation and closure plan

In accordance with the *Mineral and Energy Resources (Financial Provisioning) Act 2018* and Community consultation for Progressive Rehabilitation and Closure Plan Information Sheet[9], Graphinex will continue to engage with key stakeholders who have a genuine interest in the land where the mine is proposed. Engagement will include but not be limited to notifying and consultation on the rehabilitation and eventual closure of the site as outlined in the proposed Progressive Rehabilitation and Closure Plan.

6.4 Engagement action and monitoring plan

Table 6.2 outlines the future engagement actions Graphinex will deliver to support the development and implementation of management measures outlined in this SIMP. It also outlines the monitoring requirements for each engagement action to track effectiveness. Graphinex is responsible for implementing the CSEP.

[9] Queensland Government (9 December 2025) *Community consultation for Progressive Rehabilitation and Closure Plan Information Sheet (ESR/2019/5101)*, accessed 27 April 2026.

Table 6.2: Community and stakeholder engagement action and monitoring plan

Engagement action	Responsibility	Targeted stakeholders	Timeframe for implementation [10]	Monitoring			
				Performance indicator	Data source	Responsibility	Frequency
Establish and maintain Project website, contact details, and complaints and grievance procedure	Graphinex	All	PC, C, O, and D	Website content regularly maintained	Project website	Graphinex	Annually
Maintain positive relationships with Traditional Owners	Graphinex	Tagalaka Aboriginal Corporation	PC, C, O, and D	Ongoing, open communication	Engagement register	Graphinex	In accordance with CHMP
Build and maintain positive relationships with local governments	Graphinex	Croydon Shire Council Normanton Shire Council Richmond Shire Council	PC, C, O, and D	Ongoing, open communication	Engagement register	Graphinex	Quarterly during pre-construction and construction, annually during operation
Hold community information sessions	Graphinex	Croydon community Normanton community Richmond community	PC	Level of Project awareness in communities	Stakeholder feedback Website interactions	Graphinex	Half yearly during pre-construction
Seek inputs on emergency and disaster response plans	Graphinex	Health and emergency services	PC	Inputs received from all health and emergency	Engagement register	Graphinex	Once during pre-construction

[10] Project phases are denoted through 'PC' for pre-construction activities; 'C' for construction 'O' for operations; and 'D' for decommissioning and rehabilitation

Engagement action	Responsibility	Targeted stakeholders	Timeframe for implementation [10]	Monitoring			
				Performance indicator	Data source	Responsibility	Frequency
				service providers involved			
Communicate Project schedule and needs including skilled and unskilled workers, services and supplies	Graphinex	Local businesses Employment and training services	PC and C	Level of Project awareness amongst targeted stakeholders	Stakeholder feedback Website interactions	Graphinex	Half yearly during pre-construction and construction
Promote local employment and local content opportunities and tender requirements	Graphinex	Local jobseekers Local businesses	PC and C	Number of applicants and tenders received from local communities	HR records Tender records Engagement register	Graphinex	Half yearly during pre-construction and construction
Seek community inputs on community support program and initiatives	Graphinex	All	PC and C	Community feedback received	Engagement register	Graphinex	Annually during pre-construction and construction
Engage with key stakeholders regarding potential Project accommodation requirements	Graphinex	Short-term accommodation providers Croydon Shire Council	PC, C, and O	Key stakeholders involved with planning for Project accommodation requirements	Engagement register	Graphinex	Annually during pre-construction, construction, operation
Provide ongoing updates about Project activities	Graphinex	All	PC, C, O, and D	No complaints received regarding lack of awareness	Complaints register	Graphinex	Annually during pre-construction, construction,

Engagement action	Responsibility	Targeted stakeholders	Timeframe for implementation [10]	Monitoring			
				Performance indicator	Data source	Responsibility	Frequency
including increased traffic volumes, etc							operation and rehabilitation
Participate in and support community events and initiatives	Graphinex	Croydon community Normanton community Richmond community	PC, C, O, and D	Graphinex employees participate in and/or support events and initiatives	Engagement register Community support program reporting	Graphinex	Annually during pre-construction, construction, operation and rehabilitation
Acknowledge and resolve any complaints and grievances	Graphinex	All	PC, C, O, and D	All complaints and grievances resolved within a timely manner	Complaints register	Graphinex	Annually during pre-construction, construction, operation and rehabilitation
Seek inputs from interested stakeholders on rehabilitation and closure, if amendments to the PRCP are required	Graphinex	Interested stakeholders	PC, C, and O	Feedback received from interested stakeholders	Engagement register	Graphinex	Annually during pre-construction, construction, operation
Notify the community about and promote the community support program	Graphinex	All	O	Community involved with community support program	Engagement register Community Support Program reporting	Graphinex	Annually during operation

7. Monitoring, review and update of SIMP

The SIMP adopts an adaptive management approach that allows for the periodic updating of the management plans, including how and what measures are implemented to mitigate potential negative impacts or enhance potential positive impacts. Updates will be made in response to data collected through regular monitoring and reviews.

The monitoring framework for this SIMP is described in the following sections of each management plan:

- Workforce Management, Section 2.5
- Housing and Accommodation, Section 3.5
- Local Business and Industry Procurement, Section 4.5
- Health and Community Wellbeing, Section 5.5
- Community and Stakeholder Engagement, Section 6.4.

In accordance with these management plans, monitoring will commence pre-construction and continue for the life of the Project.

The SIMP will be updated prior to construction in consultation with the construction contractor, and then again prior to operations. Monitoring data will inform these updates to the SIMP, and any measures developed in consultation with key stakeholders and the community will also be incorporated into the revised SIMPs.

In addition to these major updates, the SIMP will be reviewed and, if required, updated annually during construction and the first 3 years of operations.

Reporting on monitoring outcomes and updates to the SIMP will occur via a SIMP Report produced annually via a SIMP Report during construction and for the first 3 years of operation, or as otherwise conditioned by the Coordinator-General.

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