

Chapter 7
Stakeholder consultation and engagement

ESMERALDA GRAPHITE PROJECT

aarc ENVIRONMENTAL SOLUTIONS
APEM Group

GRAPHINEX

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Glossary, acronyms and abbreviations

Acronym or Abbreviation	Meaning
CHMP	Cultural Heritage Management Plan
CHWP	Community health and wellbeing plan
CSEP	Community stakeholder engagement plan
DSDIP	Department of State Development, Infrastructure and Planning
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EP Act	*Environmental Protection Act 1994*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
HAP	Housing and accommodation plan
HR	Human Resources
LBIPP	Local business and industry procurement plan
LGA	Local Government Area
MNES	Matters of National Environmental Significance
PRCP	Progressive Rehabilitation and Closure Plan
SDPWO Act	*State Development and Public Works Organisation Act 1971*
SIA	Social Impact Assessment
SIMP	Social Impact Management Plans
TOR	Terms of reference
UCL	Urban Centres and Locality
WMP	Workforce management plan

7 Stakeholder Consultation and Engagement

This chapter describes the consultation and engagement activities undertaken for the Project. These activities considered the community and stakeholder engagement methodologies outlined in the following guidelines:

- *Social Impact Assessment Guideline* (SIA Guideline) – Queensland Government; DSDIP (2025).
- *Social Impact Assessment Supplementary material for assessing and managing the social impacts of projects under the Social Impact Assessment Guideline* (SIA Supplementary Material) – (Queensland Government et al. 2025).

The stakeholder consultation and engagement activities undertaken during the preparation of the EIS are detailed in the:

- Public Consultation Report (Appendix C).
- Social Impact Assessment by Attexo Group Pty Ltd 2026 (Appendix O).

7.1 Introduction

The Esmeralda Graphite Project (the Project) will be shaped by engagement and consultation with potentially impacted people, communities and key stakeholders. The Project is located approximately 70 km south of Croydon in northwest Qld. The Project involves developing an open-cut mine to extract graphite-bearing ore from to produce high grade graphite concentrate. Over its operational life the Project will be part of the local and regional communities and interact with community services, assets and social fabric.

Public consultation serves two key purposes. First, it ensures that anyone who may be affected by, or have an interest in, the Project has the opportunity to understand what is proposed and how it may impact them (both positively and negatively). Second, it provides a meaningful avenue for stakeholders to express concerns, share local knowledge and contribute to decisions that may affect their community or region.

Consultation is fundamentally an exchange of information between community members, technical specialists, Project personnel and other interested parties. Through this process the Project and be planned and operated in a way that maximises local benefits whiles avoiding or minimising negative environmental or social impacts.

Engagement with stakeholders is a formal requirement of the EIS process and will continue throughout all phases of the Project, from planning and approval through to construction, operations and eventual decommissioning and closure.

7.2 Consulted parties

A social impact assessment (SIA) was conducted for the Project that identified three study areas (Appendix O). The SIA study area is identified based on the geographic areas and communities likely to experience changes to social conditions from the Project (Table 7-1). Matters that have been considered in determining the SIA study area include:

- the nature and scale of the project, including associated infrastructure;
- the scope of potential social impacts throughout the project lifecycle;
- the location and characteristics of potentially impacted communities, including existing population centres as well as labour and service centres; and
- local and regional transport and connectivity networks, including workforce fatigue management requirements.

Using these study areas, and previously engaged communities, Graphinex developed a list of Project stakeholders. The stakeholder list will be further developed and maintained throughout the Project life cycle. Identification of stakeholders is conducted in accordance with Sections 38, 39 and 41(3)(b) of the *Environmental Protection Act*, 1994 (EP Act), as well as the EIS process under the *State Development and Public Works Organisation Act* 1971 (SDPWO Act). It is also required for development prescribed in the *Planning Act* 2016 (Planning Act).

Examples of 'affected persons' include local landholders with tenure under or adjacent to the Project, including Shire Councils and Native Title holders. Examples of 'interested persons' would include other landholders or groups with potential interest in the Project and may include local service providers, businesses or government departments.

The Proponent and SIA process have continually provided clear and targeted Project information to obtain stakeholder feedback, tailored to the interests of specific stakeholder groups. This was supported by timely and well documented updates on the Graphinex website and various targeted presentations about the Project (refer Figure 7-1).

Table 7-1: Project study areas

Study area	**Location description**	**Relevance to the 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.
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.

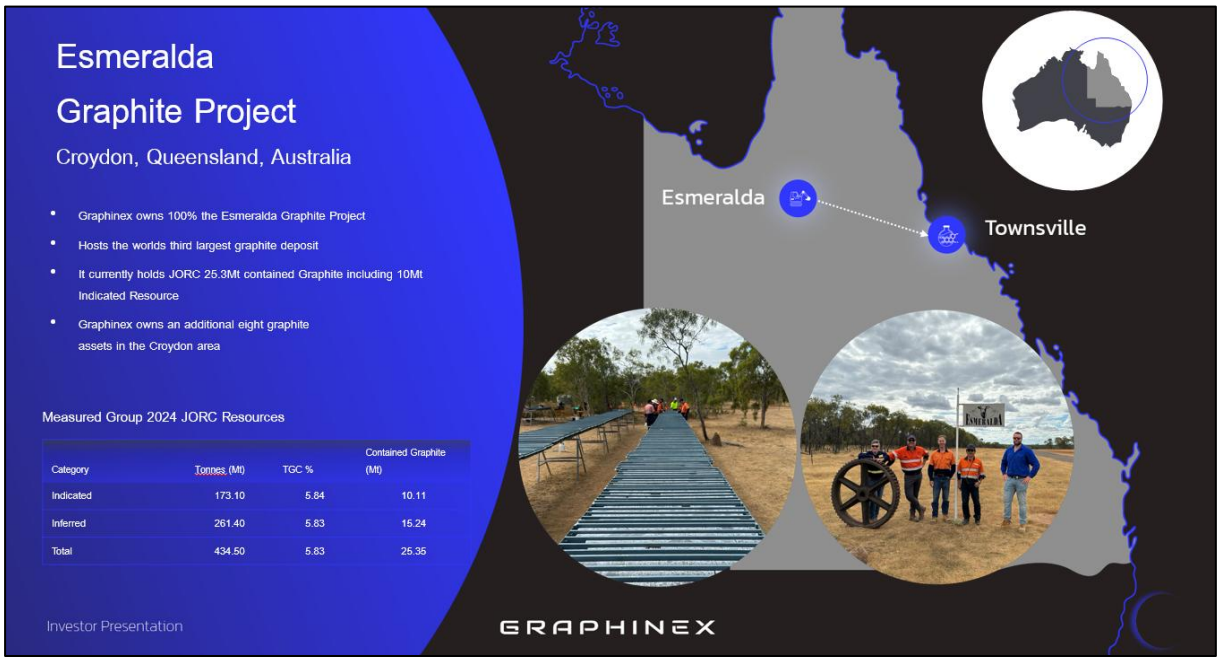


Figure 7-1: Project presentation material

On-going stakeholder engagement and community consultations by the Proponent since April 2024 has involved a range of stakeholders at the local, regional and state level and are well-recorded and maintained in the Graphinex Engagement Register. This register has been reproduced in the Public Consultation Report (Appendix C) with some information redacted for privacy. Stakeholders described in the Graphinex Engagement Register include;

- Host landholders and neighbours;
- Local businesses and organisations;
- Community members and groups;
- Local government;
- State government (Qld);
- Federal Government (Commonwealth);
- Traditional owners (Tagalaka people and representatives); and
- Environmental groups.

Specifically, engagement with Indigenous and Torres Strait Islander people who form part of these communities was conducted. This included the Native Title holders of the Project area, the Tagalaka people, who were also engaged on matters specific to Aboriginal Cultural Heritage and Native Title Matters. This engagement is detailed in Chapter 11, First Nations Cultural Heritage and Appendix C, Public Consultation Report.

Stakeholders engaged during the SIA engagement period include:

- Croydon Shire Council;
- Croydon Rural Fire Brigade;
- Croydon Gulf Gate BP Roadhouse;
- Croydon Men's Shed;
- Croydon Club Hotel;
- Croydon State School;

- Croydon Primary Health Centre;
- State Emergency Services;
- Normanton Airport Accommodation & Vehicle Hire;
- Gulf Regional Services;
- Rural Flying Doctor Service;
- Bynoe Community Advisory Advancement Cooperative Society; and
- Gulf Regional Services.

This engagement is detailed further in Chapter 20, Social and Appendix O, Social Impact Assessment.

7.3 Methods of consultation

Ongoing consultation has been conducted through various channels and events to ensure comprehensive stakeholder engagement for the Project and to collect and analyse information about social and cultural issues likely to have the most pronounced impacts. Engagement was undertaken through transparent and accessible methods. Engagement methods described in the Graphinex Engagement Register include;

- phone;
- emails;
- online meeting;
- in-person meetings / on-country meetings;
- SMS messages / text;
- linkedIn or social media;
- workshops;
- community information sessions; and
- focus group meetings.

A Social Impact Assessment (SIA) was completed for the Project and is provided as Appendix O. Targeted SIA engagement was undertaken between late March and early April 2026. A total of 22 stakeholders were engaged across 13 individual and group meetings conducted in-person and online via Microsoft Teams. The aim of this engagement was to garner an understanding about community perceptions relating to the Project including potential social impacts and benefits, and community benefit sharing opportunities.

7.4 Potential impacts

Key matters identified during the consultation activities by Proponent is provided in detail in the Public Consultation Report (Appendix C) as well as the Social Impact Assessment (Appendix O). Key matters identified during the consultation are summarised in Table 7-2. Potential impacts identified through the public consultation and SIA process centred around potential impacts associated with workforce management, housing and accommodation, local business and industry procurement, health and community wellbeing. Potential impacts in these areas are summarised in Table 7-3 to Table 7-5.

Table 7-2: Areas of interest raised in consultation

Stakeholder group	Areas of interest / Feedback
Native Title holders	General Project updates Various agreements underway

Stakeholder group	Areas of interest / Feedback
	Employment opportunities
Landholders	Access to properties Exploration activities and ground water bores Environmental monitoring
Government (Federal)	General Project updates Matters of National Environmental Significance (MNES) under EPBC Act
Government (Qld)	General Project updates EIS progression Hospital and ambulance coverage
Government (local) Croydon Shire Council	General Project updates
Allied Health Services	Impact on Allied Health services Opportunities for collaborative support to communities
Emergency Services	Impact on Emergency services Opportunities for joint emergency response
Local businesses	General Project Updates Opportunities for local employment and business
Others	Traditional owner business opportunities

Table 7-3: Workforce management impacts

Project phase/s	Social impact	Stakeholders	Impact significance	
			Pre-managed	Post-managed
C	Increase in employment opportunities	Croydon, Normanton and Richmond community Regional service centres – Cairns and Townsville communities Croydon and Richmond Shire Councils	Low (+)	Medium (+)
O			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	Project workforce Local government State government agencies	High (-)	Medium (-)

Project phase/s	Social impact	Stakeholders	Impact significance	
			Pre-managed	Post-managed
	closure / cessation of operations			

Table 7-4: Housing and accommodation impacts

Project phase/s	Social impact	Stakeholders	Impact significance	
			Pre-managed	Post-managed
SE	Increase in demand on local short-term accommodation affecting accessibility by other users	Accommodation providers in Croydon Tourists Visiting contractors	Low (-)	Negligible (-)
SE	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 (-)
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 (+)

Table 7-5: Health and community wellbeing impacts

Project phase/s	Social impact	Stakeholders	Impact significance	
			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 (+)
SE	Community scepticism and apathy towards project	Croydon community	Medium (-)	Low (-)

7.5 Mitigation measures

The feedback obtained directly informed the SIA process. Issues raised during the stakeholder engagement process have been incorporated into the development of the Social Impact Management Plans (SIMP, Appendix J). The SIMP comprises of the following sub-plans, wherein management measures outlined specifically address social impacts and community concerns, both identified in the SIA and raised during consultations.

- Community stakeholder engagement plan (CSEP);
- Community health and wellbeing plan (CHWP);
- Housing and accommodation plan (HAP);
- Workforce management plan (WMP); and
- Local business and industry procurement plan (LBIPP).

Key management measures included in other sub-plans to address social impacts from workforce, community health and wellbeing, housing accommodation and local businesses and industry procurement have been summarized in Table 7-6. These are further detailed in the SIMP (Appendix J).

Furthermore, regular engagement and consultation with the Tagalaka People have occurred and a cultural heritage management plan (CHMP) will be finalised for the Project.

The consultation and engagement activities that have commenced for the Project will continue. Ongoing engagement will inform key planning decisions and shape risk controls to minimise adverse impacts and maximise opportunities presented by the Project. Ongoing engagement will be founded on the Community and stakeholder engagement plan (CSEP) for the Project. The CSEP will continue to develop through the ongoing engagement and review of effectiveness of the plan. The CSEP is provided in Table 7-7.

All feedback received from stakeholders during consultation has been and will continue to be used to inform and refine both the Project, its SIMP, it's sub-plans and ongoing community engagement. The Project will continue to regularly engage with landholders, the local Croydon township community and government bodies to ensure open and transparent communication throughout Project construction, operation and rehabilitation. The Proponent will work towards understanding, managing and exceeding community expectations with the aim of achieving mutually beneficial outcomes for all Project stakeholders.

Table 7-6: Key Social Impact Management sub-plans, objectives and measures

Social Impact Management Sub-Plans	Management objective	Management measure
Workforce Management Plan	• Increase in employment opportunities for local and regional residents • Increase in training and skills development opportunities • Increase in workforce health, safety and well-being risk factors	• Recruitment hierarchy • Apprenticeships and/or traineeships • Implement Project Health and Safety Management System
Housing and Accommodation Plan	• Minimize demands on local housing availability and affordability	• On-site accommodation village • Notification of Project accommodation requirements
Local Business and Industry Procurement	• Increase in supply and local procurement opportunities • Increase in economic activity for businesses • Minimize labour competition	• Local and regional supply chains and capacity building • Workforce interaction with Croydon community • Labour market monitoring

Social Impact Management Sub-Plans	Management objective	Management measure
Community Health and Well-Being Plan	• Minimize demand for health and emergency services • Minimise changes to cultural heritage values, environmental values and community values	• Implement Project Safety and Health Management System • CHMP, various EMPs • Engagement channels with Traditional Owners and community

Table 7-7: Summary of Community stakeholder engagement plan

Engagement action	Responsibility	Targeted stakeholders	Timing[1]	Monitoring			
				Performance indicators	**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 constructive relationships with Traditional Owners	Graphinex	Tagalaka Aboriginal Corporation	PC, C, O, and D	Ongoing, open communication	Engagement register	Graphinex	Annually
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 to develop emergency and disaster response plans	Graphinex	Health and emergency services	PC	Inputs received from all health and emergency service providers involved	Engagement register	Graphinex	Once during pre-construction

[1] 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	Timing[1]	Monitoring			
				Performance indicators	**Data source**	**Responsibility**	**Frequency**
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
Provide ongoing updates about Project activities including increased traffic volumes, etc	Graphinex	All	PC, C, O, and D	No complaints received regarding lack of awareness	Complaints register	Graphinex	Annually during pre-construction, construction, 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,

Engagement action	Responsibility	Targeted stakeholders	Timing[1]	Monitoring			
				Performance indicators	**Data source**	**Responsibility**	**Frequency**
							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

7.6 TOR Reconciliation table

Terms of reference - Content requirements of the EIS		EIS Section
Section 7 – Stakeholder Consultation and Engagement		
7.1	In preparing the EIS, consult with potentially impacted people, communities and key stakeholders, including but not limited to directly and indirectly affected land and tenure holders, Native Title holders, Aboriginal peoples and Torres Strait Islander peoples, local, State and Australian government agencies, local and regional commerce, community and conservation groups, and social and public service providers. Utilise the community and stakeholder engagement methodologies outlined in the Social Impact Assessment Guideline (SIA Guideline) and Social Impact Assessment Supplementary material for assessing and managing the social impacts of projects under the Coordinator-General's Social Impact Assessment Guideline (July 2025) (SIA Supplementary Material).	Sections 7.2, 7.3
7.2	Describe in a stakeholder consultation and engagement report, the consultation and engagement activities undertaken during the preparation of the EIS. Include the dates of consultation and describe the information that was provided to stakeholders. Demonstrate that engagement methods and processes have clearly described the project and its potential impacts, and are effective, transparent, accessible, timely, well-recorded, provide appropriate content and context, and encourage and facilitate participation.	Appendix C, Sections 7.2, 7.3 and 7.4
7.3	Identify issues raised during stakeholder engagement and explain how feedback from stakeholders has been considered and/or resolved during the EIS process and been incorporated into project design and outcomes.	Sections 7.4, 7.5