

A large decorative graphic on the left side of the page. It features a vertical teal bar on the far left. To its right, several overlapping, curved bands in various shades of teal and light blue sweep across the page from left to right, creating a dynamic, layered effect.

# **Stakeholder Engagement Guideline**

## Preface

The pipeline industry has a vital role in the economic and environmental wellbeing of Australia. Over many decades it has introduced techniques which now place it at the forefront of best practice in the design, construction, operation and decommissioning of pipelines. This reputation is acknowledged internationally.

This Guideline highlights appropriate techniques and methods that can be used to manage meaningful stakeholder engagement. The information is based on the collective knowledge and experience of pipeline industry participants. All pipeline projects are different and, consequently, it is not possible to set prescriptions on any particular course of action. Rather, we have assembled options for action which together form a tool kit. It is from this tool kit that organisations delivering pipeline projects and operating pipelines can select the options best suited to their needs.

The Guideline demonstrates the industry's commitment to developing and maintaining meaningful relationships with the land tenement holders, communities, authorities and businesses around pipeline infrastructure.

The Guideline is a living, evolving document and will be reviewed regularly so that new science, technology and regulation can be incorporated. This will ensure that it reflects the most sensible, practical and effective practice of the time. By this continuing process of improvement, we believe our industry will maintain its good reputation for stakeholder engagement.

This Guideline has been developed by APGA in consultation with its membership and State regulatory agencies.

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## **Disclaimer**

The content of this document is a Guideline only.

This Guideline does not represent a minimum acceptable standard for Australian Pipelines and Gas Association (APGA) members or other participants in the planning, construction, maintenance or decommissioning of gas, water or slurry pipelines.

All care has been taken in the research and collation of this Guideline, but this publication is provided on the understanding that the authors and editors are not responsible for any errors or omissions or the results of any actions taken on the basis of information in this work.

Legislation and regulation relevant to the planning, construction, maintenance and decommissioning of gas, water and slurry pipelines can be frequently amended by State and Territory Governments. To ensure currency and consistency with existing legislation, APGA advises its members to undertake a review prior to commencement of planning each new project. APGA advises its members to seek clarification on approvals processes from personnel with experience in these processes and from the relevant Commonwealth, State/Territory or local government regulatory authorities.

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# 1. Introduction

## 1.1 Preamble

Pipelines supply energy, water and mineral resources to communities and industry, directly contributing to national economic growth and, therefore, playing a vital role in Australia. Pipelines play an integral part in supplying critical commodities and energy sources to domestic and international markets. They play a major role in drought mitigation and support the development and commercialisation of primary industries throughout Australia. Pipelines are synonymous with the generation of a low-carbon economy with efficiently transported commodities such as natural gas providing an important, low-emission fuel with a long-term role in Australia's low emissions future. Pipelines also provide the link between CO<sub>2</sub> source and sequestration sites to enable carbon capture and storage technologies and are well positioned to move fuels of the future, such as hydrogen.

Pipelines are the most energy efficient method of transportation for the commodities that they transfer and distribute throughout Australia.

In Australia, pipelines are used for a range of purposes including:

- domestic and industrial water supply;
- sewage and waste water removal, including recycled water;
- gas transmission, storage and distribution;
- petroleum and petrochemical liquids transmission; and
- slurry transportation.

In 2013/14, the gas transmission pipelines that are APGA's core focus transported more than 1098<sup>1</sup> petajoules (PJ) of the natural gas that is used in the Australian economy each year. Almost 700PJ of natural gas is consumed annually for electricity generation and in manufacturing processes where the gas is used as feedstock to create products such as fertilisers, explosives, plastics and other chemicals.

The Australian pipeline industry has a strong track record of effective stakeholder engagement. Pipeline projects are not automatically granted tenure over a pipeline route. Pipeline projects have some flexibility over the location and route of a pipeline. Engagement, consultation and negotiation are necessary to secure a pipeline easement. Gathering the support of land tenement holders and other stakeholders along the preferred pipeline route is an essential component of the route selection and finalisation process.

Pipelines have the potential for a relatively high impact on stakeholders during construction. The Australian pipeline industry is committed to ensuring that, as well as being a highly efficient mode of transport, pipelines have a low ongoing physical impact on the environments and communities they pass through. Engaging with relevant stakeholders will assist them to understand that the high impact phase of pipeline construction is temporary, and disruption during this phase can be managed. Equally, effective stakeholder engagement during all phases of a pipeline's life will help to ensure the safety and security of the pipeline and provide stakeholders with the information and tools they need to coexist with pipeline infrastructure.

Pipelines constructed, operated and decommissioned in an appropriate manner have minimal impact on the surrounding environment or the stakeholders around them, and in almost all circumstances allow the continued availability of the land they pass through. In some cases, there are necessary limitations within an easement, such as weight restrictions on the movement of farm machinery over the pipeline itself.

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<sup>1</sup> Electricity Gas Australia 2015 – Energy Supply Association of Australia

## 1.2 What is stakeholder engagement?

Stakeholder engagement is a highly relevant activity for the resource and infrastructure sectors. It should be managed through the same planning and formal processes as other fundamental activities, such as risk and environmental management.

Stakeholder engagement is an ongoing process that builds relationships between parties, fostering respect, enabling information exchange and achieving mutually acceptable outcomes. From an organisational perspective, stakeholder engagement should, as far as practicable, allow stakeholders affected by the decisions of an organisation to contribute to the decision-making process.

Engagement requires an open, active and voluntary approach to dialogue and participation that identifies the current positions of all parties, outlines their objectives and outcomes, and discusses and identifies the processes to best achieve them. The parties to engagement may change over time, but engagement is a continual process.

Effective engagement requires more than addressing rights and responsibilities. It must be an integral part of core business planning. Engagement should be maintained throughout the life of a pipeline – from the design and planning stage through to construction, operation and finally to decommissioning.

Engagement is an ongoing and multi-faceted process that can include:

- providing information;
- capacity building to equip communities and stakeholders to effectively engage;
- listening and responding to community and stakeholder concerns;
- including communities and stakeholders in relevant decision-making processes;
- developing goodwill and an understanding of objectives and priorities which will lead to confidence in decisions;
- establishing a realistic understanding of potential outcomes; and
- building an understanding of the decision-making process.

Stakeholder engagement is not stakeholder management or crisis management. The term implies a willingness to listen and to incorporate stakeholder views into project planning and implementation.

### 1.2.1 Who is a stakeholder?

There are various definitions of a stakeholder and APGA does not endorse any particular definition. Some have been developed by academics and others by experienced industry practitioners. The World Bank defines a stakeholder as:

- anyone who is affected by the outcome of an activity and/or is able to influence the outcome positively or negatively; and
- a particular person or group that has a stake in the outcome of an initiative we pursue.

Stakeholders throughout the life of a pipeline project include (but are not limited to):

- land tenure holders, including those with a licensed interest in the land;
- native title claimants;
- communities;
- special interest groups, including the media;
- local, State and Commonwealth Governments and their agencies;
- utility owners and operators;
- development and construction organisations;
- elected officials;
- unions;



- customers;
- local businesses and contractors; and
- people within an organisation (staff and other internal stakeholders).

### **1.2.2 Value of effective stakeholder engagement**

Effective stakeholder engagement should not be viewed as something that must be undertaken only to meet regulatory requirements or appease local communities. An important step in undertaking meaningful engagement is recognising that such discussions provide a range of benefits to companies and the communities and locations in which they operate.

Benefits include:

- reduced approvals timelines by minimising appeals;
- leveraging local knowledge to advise design and planning, timing and location of construction activity and deliver possible alternative solutions;
- creation of advocates for companies and projects, which can be particularly useful to build and maintain awareness of a pipeline over its lifetime;
- having a positive influence on company and project profile; and
- enhancing the communities' perception of the company and how it operates; i.e. it is an inclusive process rather than an imposed one.

Reduced costs may be achieved through:

- reduced risk of social conflict and associated delays and expenditure;
- ensuring compliance with the relevant legislative framework;
- quicker and smoother permit and approvals processes; and
- reduced risk of criticism and resistance from outside parties.

Effective stakeholder engagement is also a form of risk management. Stakeholder engagement risk deals with the probability of a potentially undesirable effect on a stakeholder or the environment.

Appendix A deals with risk management and the risk management process in greater detail.

### **1.2.3 Principles of stakeholder engagement**

In 2005 the Ministerial Council on Mineral and Petroleum Resources (MCMPR) released Principles for Engagement with Stakeholders and Communities. APGA played an active role in assisting to develop these principles.

Successful engagement is based on some simple, practical principles that represent a mix of common sense, good business practice and ethical considerations. The key principles for effective community and stakeholder engagement, which the MCMPR encourages the resources sector to adopt, are based on:

- two-way communication;
- clear, accurate and relevant information;
- timeliness;
- transparency;
- reporting;
- collaboration;
- inclusiveness; and
- integrity.

Further detail on the principles is provided in Appendix B.

### **1.2.4 Characteristics of meaningful stakeholder engagement**

Meaningful stakeholder engagement can be readily identified because it will:

- be targeted at clearly identified, relevant stakeholders;

- be developed early enough to scope key issues and have an effect on operational decisions;
- be proactive as a result of relevant information being disseminated in advance;
- be relevant and meaningful to the stakeholder and context in which they operate;
- be pragmatic and make clear to stakeholders what elements of a project are negotiable;
- put in place processes to build consensus and support among internal departments for stakeholder engagement and as a way to facilitate better engagement;
- use techniques that are culturally appropriate;
- use appropriate technology for the stakeholders;
- be context specific to reflect appropriate timeframes, local realities and languages;
- utilise a records management system to monitor key issues;
- have a system for feeding back and following up on issues raised during consultation as well as clarification of next steps;
- be particularly cognisant to landholder issues such as weed and livestock management;
- be implemented by organisational staff who have facilitation, communication and conflict resolution skills;
- have clear roles and scope about the objectives and activities to be achieved;
- involve clarity of key points of contact on both sides; and
- have the ability to change internal plans and processes.

### 1.3 Purpose and Scope of the Guideline

This Guideline aims to assist the pipeline industry in the development of stakeholder engagement plans during onshore pipeline and associated infrastructure planning, construction, operation and decommissioning phases, encouraging the adoption and integration of sensible, practical and effective stakeholder engagement systems and procedures. It is APGA's view that reference to this Guideline will assist onshore pipeline proponents generate a lasting legacy of engagement and awareness for existing projects and will help generate positive reception of new pipeline projects.

In line with APGA's current core membership base, this Guideline has been written with high pressure gas transmission pipelines as its priority. It should however be noted that many of the project activities and engagement guidelines outlined in the Guideline are readily adaptable to other transmission and distribution pipelines, including oil, water and slurry, and possibly to other linear infrastructure projects.

The Guideline is intended to complement the principles of Australian Standards that apply to pipelines and to assist in ensuring compliance with legislative requirements. It provides assistance on the development and implementation of stakeholder engagement plans and provides comprehensive engagement advice for onshore pipeline planning, construction, operation and decommissioning.

The Guideline does not contain the full and final detail on any aspect of stakeholder engagement and, while it provides a starting point, is not a substitute for a comprehensive stakeholder engagement plan. It is expected that pipeline proponents and operators apply the Guideline to their own specific circumstances to achieve sound outcomes for stakeholder engagement using available resources.

## 1.4 Lifecycle of a pipeline

This Guideline recognises the five distinct phases in a pipeline's lifecycle: planning, design, construction, operation and decommissioning. These phases include the elements summarised below.

**Planning:** Route selection and facility siting, pipeline and facilities design, land access, environmental impact assessment, stakeholder and community consultation and development of construction and operations plans and processes.

**Design:** Design and development of construction and operations plans and processes.

**Construction:** Continual stakeholder engagement; implementation of construction plans; use of public road networks; creation of borrow pits; establishment of construction camps and work sites; clearing, grading, trenching, blasting, watercourse crossings; floating of machinery; construction of facilities; stringing, coating, welding, pipe-laying, backfilling, pipe-testing and final coating, hydrostatic testing, pipeline purging; final commissioning; and disturbed area rehabilitation.

**Operations:** Implementation of operational plans; ongoing easement and facilities management; inspection and maintenance regimes; earthworks if required; safety and emergency planning; pipeline failure and incident response planning; and ongoing stakeholder engagement.

**Decommissioning:** Implementation of a decommissioning strategy and legacy monitoring.

Most aspects of the lifecycle, such as licensing and environmental approvals and landholder engagement, cover all phases. Only a limited number of aspects relate simply to one or two of the above phases.

## 2. Legislation and regulatory requirements

### 2.1 Regulatory context

Regulatory authority for the construction, operation, maintenance and decommissioning of onshore pipelines in Australia is held by each State and Territory jurisdiction under the applicable pipeline or infrastructure legislation. Commonwealth approvals and legislative procedures may also be applicable, particularly the *Environment Protection and Biodiversity Conservation Act 1999* and the *Native Title Act 1993*. Smaller pipelines, including distribution pipelines or pipelines carrying non-petroleum products, may be subject to local government approval through the preparation and submission of a Development Application with supporting documentation.

Increasingly, stakeholder engagement plans are being mandated through regulatory processes (e.g. a Pipeline Consultation Plan under the Victorian *Pipelines Act 2005*, and demonstrated consultation with stakeholders is a consideration in assessment of regulatory approvals, particularly environmental processes (e.g. referral under the *Environment Effects Act 1978* (Victoria)).

The following section includes the legislation and regulation that mandate forms of stakeholder engagement for the construction, operation and decommissioning of pipeline projects across Australia. To ensure currency and consistency with existing legislation, APGA advises members to undertake a review prior to commencement of planning each new project. APGA advises members to seek clarification on approvals processes from personnel with experience in these processes and from the relevant Commonwealth, State/Territory or regulatory authorities.

Appendix C lists legislation across Australia that may be relevant to pipeline stakeholder engagement.

#### 2.1.1 Commonwealth

Key Commonwealth legislation that requires stakeholder engagement for pipeline projects include the *Native Title Act 1993*, the *Environment Protection & Biodiversity Conservation Act 1999* and the *Aboriginal & Torres Strait Islander Heritage Protection Act 1984*.

#### 2.1.2 Victoria

In Victoria the principal legislation relevant to onshore gas and petroleum transmission pipelines are the *Pipelines Act 2005* and *Pipelines Regulations 2007*, and are administered by the Energy and Earth Resources division of the Department of Economic Development, Jobs, Transport and Resources.

The *Pipelines Act 2005* specifies that a proponent for a pipeline project must prepare a consultation plan for the proposed pipeline (and have it approved by the Minister) before giving notice of intention to enter land or notice of a pipeline corridor to land owners and occupiers. The purpose of the consultation plan is to show how the proponent will consult with land owners and occupiers about the proposed pipeline. The Energy and Earth Resources division of the department provides a guideline to assist in the development of a Pipeline Consultation Plan and this can be found on its website.

#### 2.1.3 Queensland

Key legislation in Queensland is the *Petroleum and Gas (Production and Safety) Act 2004* supported by the *Petroleum and Gas (Production and Safety) Regulations* which have been amended a number of times from 2011 to 2015. The Act covers a wide range of areas including exploration and production of petroleum, which includes coal seam gas, the upstream pipeline industry, management of water produced during petroleum production, and issues arising from interactions of petroleum activities, coal exploration and mining activities.

The Act and the regulations are administered by the Department of Natural Resources and Mines and requires the licence holder to consult or “use reasonable endeavours to consult” with each owner and occupier of land proposed to be crossed by a pipeline easement.

At the time of drafting this Guide, the Queensland Government had proposed a new framework for the regulation of resource tenure. The Queensland resource sector is currently regulated by six different Acts that deal with aspects of mineral and petroleum exploration and extraction. The proposed new framework will apply to the *Mineral Resources Act 1989*, the *Petroleum and Gas (Production and Safety) Act 2004*, the *Petroleum Act 1923*, the *Greenhouse Gas Storage Act 2009* and the *Geothermal Energy Act 2010* and the *Mineral and Energy Resources (Common Provisions) Act 2014*. It is not known what changes are proposed that would affect the requirement to consult with landholders and other stakeholders under the proposed framework.

The Queensland *Environmental Protection Act 1994* includes a number of sets of regulations pertaining to air and noise pollution, water protection and other waste management.

The *Aboriginal Cultural Heritage Act 2003* provides for consultation with indigenous interests in relation to land access, in addition to the *Native Title Act 1993*.

#### **2.1.4 South Australia**

In South Australia the principal legislation relevant to onshore gas and petroleum transmission pipelines are the *Petroleum and Geothermal Energy Act 2000 (PGE Act 2000)* and the *Petroleum and Geothermal Energy Regulations 2013*, administered by the Energy Resources Division within the Department of State Development (DSD-ERD).

Under the *PGE Act 2000*, regulatory objectives are developed, assessed and approved through comprehensive and extensive stakeholder consultation processes. The pipeline proponent is required to prepare an Environmental Impact Report (EIR) containing detailed environmental information for the area of the proposed pipeline route, identifying all potential risks relating to the activity and describing the appropriate risk mitigation strategies that will be employed to manage the risks.

The *PGE Act 2000* provides one window to government for the industry whereby documentation developed by the proponent, incorporates the requirements of other pieces of relevant legislation, including the *National Parks and Wildlife Act 1972*, the *Native Vegetation Act 1991*, the *Natural Resources Management Act 2004*, the *Environment Protection Act 1993*, the *Marine Parks Act 2007*, the *River Murray Act 2003* and the *Development Act 1993*.

#### **2.1.5 Western Australia**

Legislation in Western Australia mandating stakeholder engagement includes the *Petroleum Pipelines Act 1969* and the *Petroleum Pipelines (Environment) Regulations 2012*.

Under the process of securing a pipeline licence in WA, the applicant must inform the Minister responsible for administering the *Petroleum Pipelines Act 1969* of any agreements entered into or proposed to be entered into, for acquisition of easements for the purpose of constructing and operating the pipeline. The *Petroleum Pipelines (Environment) Regulations 2012* specifies the appropriate level of consultation that must be carried out by a pipeline proponent with relevant authorities and interested persons and organisations in relation to the environment plan that must be approved by the Minister.

#### **2.1.6 New South Wales**

Legislation in NSW that requires stakeholder engagement includes the *Pipelines Act 1967* and the associated *Pipelines Regulation 2013*.

Proponents must also carry out planning and engagement activities under the *Environmental Planning and Assessment Act 1979*. Project activities under this Act will trigger referrals of a pipeline project to agencies that administer other items of state legislation.

### **2.1.7 Tasmania**

The *Gas Pipelines Act 2000* and the *Gas Act 2000* both contain provisions governing land access for gas transmission and distribution networks, including for investigation prior to construction. At the time of writing this Guide, the Tasmanian Government was planning amendments to the two Acts with the licensing and land access provisions to be consolidated into the one Act.

The *Land Use Planning and Approvals Act 1993* governs local planning schemes that will require project proponents to conduct stakeholder engagement.

### **2.1.8 Northern Territory**

Legislation in the NT that requires stakeholder consultation includes *the Energy Pipelines Act* and the *Petroleum Act*, both as in force 1 January 2015. The *Lands Acquisition Act* as in force 1 January 2015 relates to acquiring an interest in land with native title considerations.

### **2.1.9 Australian Capital Territory**

Legislation relevant to pipeline construction in the ACT includes the *Planning and Development Act 2007* and the *Nature Conservation Act 2014*. The commencement of a project under the *Planning and Development Act 2007* will trigger the involvement of other Territory agencies which will require varying stakeholder engagement, depending on the scope of the project.

## **2.2 Australian Standards for onshore pipelines**

The AS 2885 series of Australian Standards identifies obligatory minimum requirements for steel pipelines and associated piping components that are used to transmit single phase and multiphase hydrocarbon fluids. The basis of the series of Standards is to provide important principles, practices and practical guidelines for use by competent persons and organisations involved with high pressure gas and petroleum pipelines. The applicable Standards currently in this series are:

- AS 2885.0 Pipelines – Gas and liquid petroleum – General Requirements
- AS 2885.1 Pipelines – Gas and liquid petroleum – Design and construction
- AS 2885.2 Pipelines – Gas and liquid petroleum – Welding
- AS 2885.3 Pipelines – Gas and liquid petroleum – Operation and maintenance
- AS 2885.5 Pipelines – Gas and liquid petroleum – Field pressure testing

In 1994 all Australian Governments, through the Council of Australian Governments, adopted AS 2885 as the single national standard to guide the design, construction and operation of high pressure gas transmission pipelines in this country.

### 2.2.1 The relevance of AS 2885 to stakeholder engagement

There are multiple references to stakeholder engagement in AS 2885. APGA suggests familiarisation with the sections of AS 2885 listed below.

#### Part 1 – Design and Construction

Section	Topic
2.5	Environmental Management
4.2	Route
5.8.8	Road Crossings
12.3	Commissioning
Appendix B	Safety Management Process
Appendix I	Environmental Management
Appendix R	High Voltage Electrical Powerlines

#### Part 3- Operation and Maintenance

Section	Topic
2.2.	Pipeline Safety Management System
2.2.2.4	Emergency Management Plan
4.7.2	Pipeline Corridor Management
6.3.1	Community and Stakeholder Awareness
8.10.3	Repair Strategy
9.6	Abandoning a Pipeline

## 2.3 Other relevant guidelines

There are a number of other documents that can guide or direct engagement activity.

### 2.3.1 Australian Pipelines and Gas Association/Victorian Farmers Federation Easement Guideline

APGA, in cooperation with the Victorian Farmers Federation, has developed and published an Easement Guideline outlining the pipeline processes, land acquisition processes, construction sequence and activity and associated background material. While specifically targeted at Victoria, much of the information is relevant to all pipeline land acquisition and construction activity and the Guideline is a resource for pipeliners and stakeholders. The Guideline was first published in 2005 and updated in 2009 and 2014.

### 2.3.2 Queensland Land Access Code

Under the Land Access Code, all agents of resource project proponents that may encounter landholders must have been briefed on the key aspects of the land access legislation and in particular the Land Access Code. The Code specifies best practice guidelines for communication between project proponents and owners and occupiers of private land and imposes mandatory conditions concerning the conduct of authorised activities on private land. Mandatory access requirements that the proponent must meet pertain to:

- access points, roads and tracks;
- livestock and property boundaries;
- obligations to prevent spread of declared pests; and
- equipment or other items brought onto the land.

These laws are designed to improve transparency, equity and cooperation between resource companies and their agents and landholders.

The Land Access Code delivers a graduated process for negotiating and resolving disputes and helps to ensure matters are only referred to the Queensland Land Court as a last resort.



## 3. Stakeholder Engagement Systems

### 3.1 Engagement systems

A stakeholder engagement system (SES) is a tool that is used to develop a comprehensive and systematic approach to stakeholder engagement across an organisation and its activities, forming part of the overall business management process and covering all levels of operation. APGA places a strong emphasis on effective stakeholder engagement through self-regulation. The development and implementation of an integrated SES is a key step towards achieving this goal through the control and management of stakeholder related issues, together with the legislative requirements of the States/Territories within which the pipeline will be located.

APGA encourages its members to develop and maintain an appropriate SES which is tailored to suit their operations and is consistent with the principles in this Guide or another stakeholder engagement framework. An effective SES should facilitate two-way communication.

#### 3.1.1 Stakeholder Engagement System structure and outline

SEs are generally structured into five key areas.

**1. Stakeholder Engagement Policy**

- implementation of an Stakeholder Engagement Policy signed off by the CEO

**2. Planning – Specific Stakeholder Management Plans**

The following are recommended:

- a stakeholder register, identifying all relevant stakeholders;
- an engagement issues register;
- a legal register for identifying and meeting regulatory requirements; and
- engagement objectives and targets.

**3. Implementation and Operation**

The following are recommended:

- appointment of an SES representative
- engagement schedule;
- definition of roles, responsibilities and levels of decision-making delegation;
- identification of training needs related to tasks identified as having potential to impact on the engagement (i.e. media training, crisis management); and
- development and implementation of procedures for communications, engagement, documentation, control, operational and crisis.

**4. Checking**

Implementation of auditing procedures to monitor and measure performance of key components of the SES including:

- compliance with legal requirements;
- dealing with actual and potential nonconformities and taking corrective and preventive actions; and
- stakeholder feedback.

## **5. Management Review**

The following are recommended:

- provision for senior management review, to ensure the SES's adequacy, suitability and effectiveness; and
- demonstration of continual improvement

The SES should be used to form the organisational engagement structure under which a pipeline project would be designed, planned, constructed and operated. The SES allows for the development and implementation of policy, objectives and targets and facilitates a systematic approach to training, compliance, monitoring and auditing among other measures. The organisational SES should be a living document that is consistently referenced in project stakeholder engagement plans and regularly reviewed to maintain consistency and currency.

### ***Benefits of an effective SES***

An SES that is appropriate to the nature of the business and the scale of its activities can deliver the following benefits:

- improved relations with stakeholders, including landowners, regulators, customers/clients, employees, service providers, shareholders, regulators, lenders and neighbours;
- increased regulator and other stakeholder confidence that the project is being managed in a systematic and responsible manner;
- a means for the organisation to control and improve its stakeholder engagement performance, thereby assisting it to contribute to improvements in the quality of project and operations performance;
- improved time management, cost and quality control, through an improved understanding of engagement process input requirements, greater engagement process control and more efficient activity, product and service management;
- reduced operating costs: In nearly every case, an SES reduces operating costs through benefits identified in Section 1.2.2, (Value of Effective Engagement);
- reduced legal risk and potential liabilities: An SES provides a structured framework for identifying and meeting regulatory requirements, resulting in the likelihood of fewer non-compliance findings and other regulatory complications; and
- provision of a means to identify other unforeseen risks to the project.

Appendix D provides an example of a structured stakeholder engagement process upon which members could base their own engagement plan.

The main stages are:

- the engagement process;
- engagement methods and tools;
- resourcing and possible training required;
- organisational culture; and
- auditing and evaluation of the process.

Each of those stages includes structured steps designed to allow for the flow of information in both directions. This will allow the project proponent, or their agent carrying out the engagement plan, the opportunity to recalibrate their message or engagement activities where necessary, or to amend aspects of the scheduling of work.

There are any number of small aspects of an engagement plan that can be amended as required as new information is gathered. A responsive engagement plan will also assist in the identification of risks to the project or the relationship with stakeholders, and allow action to be taken to neutralise or mitigate that risk.

## 4. Stakeholder engagement during pipeline planning and design

### 4.1 Core objectives

Meaningful stakeholder engagement is an important input to the first phase of a pipeline's life cycle, having the potential to influence every activity undertaken during this phase, including:

- technical planning and design – engagement with stakeholders is an important part of the information gathering process and can inform many aspects of pipeline route selection, placement and design;
- developing a social licence – it is necessary for pipeline projects to be accepted by neighbouring landholders and communities and early two-way engagement is important to build awareness of the pipeline with stakeholders and to build awareness of local concerns and issues with the pipeline proponent;
- identify and manage risk;
- obtaining land access – a pipeline project must consult and negotiate directly with land holders to secure easements for the pipeline; and
- gain regulatory approvals – efficiency of approvals processes can be maximised through effective engagement with regulators and authorities (the ability to demonstrate engagement history can be essential in some aspects of securing approvals).

First impressions are important and stakeholder engagement during this phase will have a lasting impact on a pipeline project. Many stakeholders have an interest in the pipeline over its entire lifecycle and the first engagement experience is particularly important. For some stakeholders, including junior regulatory employees, it may be their first exposure to a pipeline project.

### 4.2 Relevant stakeholders

It is during this first phase of a pipeline's lifecycle that the widest range of stakeholders must be engaged. Some of these will have an enduring relationship with the pipeline and others will become less engaged over time. Initial research regarding stakeholders should take a broad approach. It is more desirable to expend resources approaching less relevant stakeholders than to miss a highly relevant one.

Stakeholders	Why you need to engage during planning and design
Customers	Customers will inform capacity requirements of the pipeline, influencing fundamental aspects of design.
Internal stakeholders	<p>Many areas of an organisation have an interest in new pipeline projects and effective internal communication will provide the best outcomes.</p> <p>Board – final investment decision</p> <p>Commercial – secure customers</p> <p>Land liaison – secure access</p> <p>Environmental team – to plan for surveys and other preparation work</p> <p>Engineering – design and route selection</p> <p>Projects – construction</p> <p>Media/corporate – community/local engagement</p>
Planning authorities	Planning authorities develop long-term plans and approve urban (and other) developments. The proponents having an understanding of long-term planning intentions will assist in pipeline route selection and location classification.
Local government	Local government has a statutory role in many areas relevant to a pipeline, including planning, development and infrastructure construction activity (such as roads).
Asset owners	Third-party infrastructure owners will need an understanding of a pipeline's issues to inform future planning and vice-versa, including potential interaction of assets, design requirements for compliance with existing and planned assets, and potential impacts on access and other supporting infrastructure (i.e. roads, rail, hospitals, and accommodation).
Licensing authority	The authority issuing pipeline licenses will be the primary source of approvals. This is typically a state jurisdiction.
Regulatory authority	Safety and environment regulatory authorities often have specific approval requirements. There can be jurisdictions at Commonwealth, State and Local government levels.
Land tenure holders	Land tenure holders will be directly impacted by pipeline easement acquisition, construction and ongoing operational access. Differing land tenure holders include:

	<ul style="list-style-type: none"> <li>• land owners;</li> <li>• lessees;</li> <li>• neighbours;</li> <li>• mineral and resource tenement holders;</li> <li>• water tenement holders;</li> <li>• other easement tenement holders;</li> <li>• Commonwealth and state land holders; and</li> <li>• traditional owners, holders of native title or indigenous freehold.</li> </ul>
Special interest groups	<p>A pipeline project has the potential to impact a range of interests and effective engagement is often managed through specific groups. Areas of interest can include local/national industry issues, environmental and community issues.</p> <p>Local business owners and other support services (i.e. schools, hospitals) may also be considered during this phase dependent on the nature of the project to be constructed and ongoing impacts or interactions once constructed (i.e. short-term and long-term use of these services).</p>
Community leaders	Influential members of a community will have an interest in matters impacting the community.
Elected officials	Local Members of Parliament will have an interest in all matters impacting their constituents. Offering a local MP a site visit is always a good opportunity.
Native title and cultural heritage stakeholders	These stakeholders will have an interest in how a pipeline project can affect native title and cultural heritage matters. Site specific visits may be required to identify alternative routes for heritage sites that cannot be removed or damaged.
Media – local and national	Media can report both positive and negative stories. During planning and design, reporting can focus on the engagement process itself. Other topics of interest are likely to include economic benefits and employment created by the project and environmental impacts.

As well as identifying relevant stakeholders and understanding their areas of interest, it is important to determine each stakeholder's awareness of pipeline issues in order to develop the best engagement tools. A licensing authority may be very familiar with all aspects of a pipeline project, while many land owners and communities are unlikely to have considered pipeline issues. This process will be part of the, 'inform' and 'build trust phases', described in Appendix D, section 1.2.

Any intelligence gathered relevant to the personal safety of project employees, particularly land liaison employees, should be centrally collated and reviewed. This will generally relate to the identification of unstable, irrational, anti-social or reclusive landowners who might represent a challenge or a threat to visiting project employees. The early identification of any such stakeholders will assist in development of strategies to minimise tension.

### 4.3 Purpose of engagement activities

The purpose of engagement activities during pipeline planning and design varies depending on the action.

#### 4.3.1 Pipeline Design

Objective	Goals	Relevant stakeholders
Safety Management Study	Inform Location Classification through determining current and future land use.	Land tenure holders Local government Planning authorities Developers Asset owners
	Threat identification, understanding activities that are likely to occur around a pipeline and the equipment in use.	Land tenure holders Local government Local construction companies Asset Owners
	Threat identification, identifying likely sources of direct threats to landowner liaison staff.	Land tenure holders and other forms of interest in land
Optimise route selection	Gather local knowledge to inform route selection and identify physical constraints.	Land tenure holders Local government Asset owners Planning Authorities Neighbours Native title and cultural heritage stakeholders
	Determine issues of concern for consideration, based on information gathered.	Land tenure holders Local government Community groups Native title and cultural heritage stakeholders

### 4.3.2 Land Access

Objective	Goals	Relevant stakeholders
Establish effective relationships	Develop and implement communication channels to achieve land access in a timely and mutually beneficial manner.	All
Preliminary land access	Secure initial access to land to conduct land survey, gather data, verify route selection and extra workspace opportunities, onsite EIS inspection, flora and fauna survey etc.	Land tenure holders
Land tenure agreements	Obtain interest in land to construct and operate pipeline.	Land tenure holders
Property management plans	Agree terms for access constraints and for reinstatement of the right of way (RoW) post-construction.	Land tenure holders
Ancillary agreements	Secure access for ancillary activities such as transport corridors, storage, turn-arounds, water ponds, temporary camps and borrow pits etc.	Land tenure holders Community Local and State Governments
Native title agreements	Obtain tenure to conduct activity on land subject to native title.	Land tenure holders Native title and cultural heritage stakeholders
Identify site specific constraints	Inform routes selection, constructability study, location classification and construction plan. Identify land tenure holder requirements. Identify environmental factors.	Land tenure holders
Establish rehabilitation requirements	Determine environmental/amenity/social characteristics of value to stakeholders and undertake to restore/enhance any affected by project.	Land tenure holders Community Native title and cultural heritage stakeholders Special interest groups Local government Government Departments



### 4.3.3 Social Licence

Objective	Goals	Relevant stakeholders
Consult with stakeholders about project	Inform stakeholders of benefits and impacts while developing positive impression of project.	All
	Obtain feedback for consideration and response.	All
	Identify engagement opportunities through local content, investment, public works etc.	Land tenure holders Community Native title and cultural heritage stakeholders Special interest groups Local government
Minimise non-technical risk	Limit potential appeals by achieving stakeholder acceptance through effective communication.	All
	Secure best available information through utilisation of local and/or specialised knowledge.	All
Enhance corporate reputation	Meaningful engagement with stakeholders.	All

### 4.3.4 Approvals

Objective	Goals	Relevant stakeholders
Determine regulatory pathways	Establish project approval requirements.	Licensing authority Regulatory authority Planning authorities Local government Native title and cultural heritage stakeholders
	Identify common issues/lessons learned from comparable projects.	Asset owners Internal stakeholders
	Inform documentation requirements.	Licensing authority Regulatory authority Planning authorities Local government Native title and cultural heritage stakeholders Land tenure holders
Meet consultation requirements	Establish notification requirements.	Licensing authority Regulatory authority
	Minimise potential for appeals.	All

### 4.4 Outcomes

By the end of the planning and design phase, meaningful and effective stakeholder engagement should have enabled a pipeline project to achieve:

- a comprehensive stakeholder database setting out the history of engagement and proposed future engagement processes;
- landholder/stakeholder line lists;
- a timely approvals process with minimal delays through:
  - effective approval documentation preparations and a clear understanding of regulatory requirements;
  - limited delays due to additional information requests; and
  - minimal appeals from affected stakeholders as concerns have been addressed;
- stakeholder acceptance of the project. It is particularly important that the project proponent ensure that stakeholder expectations are in line with commitments undertaken;
- a construction plan that clearly lays out:
  - the requirements of each land tenure holder; and
  - specific constructability issues and identification of potential risks;

- land access agreements that clearly set out:
  - communication channels;
  - responsibilities;
  - anticipated impacts;
  - timing;
  - compensation; and
  - rehabilitation requirements – they have not generally been detailed in land access agreements, as they were negotiated before details of the land are known, and have been more commonly specified either on the Construction Line List, or in site-specific Property Management Plans. There is a trend for rehabilitation requirements to be included as a condition of access agreement;
- improved corporate reputation through widespread recognition of effective engagement; and
- a design that is acceptable for all parties potentially impacted, that will be constructed to the best of the organisation's ability.

## 5. Stakeholder engagement during pipeline construction

### 5.1 Core objectives

Meaningful stakeholder engagement during the construction phase of a pipeline project ensures that a pipeline can be built with the least disruption to local stakeholders and that all realistic expectations regarding a project's commitments and conditions are met. In turn, minimising disruption and meeting expectations are likely to ensure stakeholder factors do not affect the construction of the pipeline through delay and/or interference.

The engagement processes to be followed during construction should be planned and documented during the planning stage, leading to a more certain, less resource-intensive process for a project proponent. Contrasting this, there is likely to be a high level of informal engagement during the construction phase, with a large workforce, many of whom are not directly employed by the project proponent, interacting with the community on a number of levels. It is vital to ensure that engagement protocols and key messaging are clearly understood and followed by all members of the workforce.

Core objectives may include:

- clearly designate responsibility for consistently providing key messaging to workforce;
- provide timely construction information, program and notifications in order to inform and minimise impacts on stakeholders;
- promote key construction milestones and achievements as they arise to maintain a positive reputation;
- support local content, employment and training initiatives;
- continue to identify and minimise project risk;
- provide timely resolution of any complaints as they arise; and
- continue to develop positive long-term relationships with all stakeholders.

### 5.2 Relevant stakeholders

By the time construction commences, stakeholders should be well understood by the pipeline project proponents. Not all stakeholders will be positive about the project. There is potential for some special interest groups to become involved or increase their awareness of the project as construction commences and it is evident a project is happening. Ideally, the project proponent will have anticipated these stakeholders, or will promptly identify them.

Stakeholders	Why you need to engage during construction
Customers	Customers will be interested in timing and progress of the project, to ensure associated arrangements are timed to meet construction completion.
Internal stakeholders	<p>The project team will have most of the responsibility for the construction phase and will need to keep other areas of the organisation informed.</p> <p>Board – progress and timing.</p> <p>Commercial – managing customer communication.</p> <p>Land liaison – ensuring expectations are met.</p> <p>Engineering – engineering and construction management.</p> <p>Media/corporate – manage project reputation in the community and government, branding and key messaging.</p> <p>Environmental team -survey results and planning can impact the list of stakeholders.</p> <p>Internal stakeholders will also include all contractors and suppliers related to the project. While they are not part of the organisation, for the duration of the project other stakeholders will consider them representatives of the company and they must be managed accordingly.</p>
Local government	Local government is likely to field many enquiries from the community and needs to be kept up to date with progress and any impact on the community, such as road closures or large numbers of truck movements. It is also possible to use community events planned by local government to increase awareness and positive engagement.
Asset owners	Third party infrastructure owners will need to monitor activity in the vicinity of their assets and coordinate access for their activities. Pipeline constructors will also coordinate access for existing infrastructure access.
Regulatory authority	Safety and environment regulatory authorities will be monitoring and auditing projects to ensure compliance with approval conditions.
Land tenure holders	The construction phase is the most disruptive to land tenure holders and effective communication is required to ensure disruption is minimised, land access agreements are fulfilled, realistic expectations are met and timing/length of time that potential disruptions may occur is understood. Understanding key landholder activities (e.g. annual musters) that may impact construction timings is also important.

Special interest groups	<p>Identified special interest groups will need to be assured their issues of concern are being managed.</p> <p>New special interest groups may attempt to disrupt a project and contingencies should be in place.</p> <p>Businesses/service providers will need to be advised of workforce movements during construction so they can anticipate increases or decreases in demand on their services.</p>
Community leaders	Should be updated during construction.
Elected officials	Should be updated throughout construction. Will be interested in the pipeline's impact on the community and any benefits it brings, i.e. construction workforce, etc. Are likely to field questions from the community, and should be helped to answer such questions.
Native title and cultural heritage stakeholders	The construction phase presents the greatest risk to items of cultural heritage and it is important to demonstrate to native title and cultural heritage stakeholders that their issues are being managed effectively during construction. Note that these stakeholders may also become internal stakeholders if their services are required during construction (i.e. heritage monitors engaged for relocation of artefacts).
Media – local and national	Media can report both positive and negative stories. During construction, focus may be on disruption to communities, increased traffic movements, employment in the region, and coverage of crisis/emergencies/disruptions that may occur (e.g. protests, strikes, serious incidents).

It is necessary to monitor engagement activity with stakeholders during the construction phase in order to ensure it meets the processes and requirements set out in the engagement plan.

### 5.3 Purpose of engagement activities

The purpose of engagement activities during the construction phase is primarily to notify stakeholders of each construction activity and ensure expectations of disruption and rehabilitation are being managed and met.

Objective	Goals	Relevant stakeholders
Minimise project delays	Timely notification of activities and provision of clear advice on expected direct and indirect impacts	Land tenure holders Native title and cultural heritage stakeholders Asset owners Local government Regulators Local and national media
	Demonstrate the implementation of commitments	All
	Meaningful response to issues and complaints	All
	Maintain communication channels	All
Achieve acceptable rehabilitation and reinstatement	Demonstrate the meeting of specific commitments to directly affected stakeholders.	Land tenure holders Native title and cultural heritage stakeholders
	Demonstrate environmental approval conditions have been met.	Environment regulator Government departments Special interest groups Community leaders
Minimise disruption to community	Implement agreed construction and engagement plan.	Land tenure holders Native title and cultural heritage stakeholders Asset owners Local government
	Effective monitoring, reporting and auditing of construction and engagement activity.	Internal stakeholders Regulators
Ensure safety of stakeholders and workforce	Effective communication within construction workforce to re-enforce safety.	Internal stakeholders

## 5.4 Outcomes of engagement activity

By the completion of the construction phase, meaningful stakeholder engagement should have ensured:

- all commitments were met and that these commitments were in line with expectations;
- stakeholders, particularly land tenure holders and regulators, are satisfied with the outcome;
- minimal delays caused by unhappy or disaffected stakeholders;
- all persons associated with pipelines represented the project effectively;
- all engagement has been fully documented and ready to inform the operational phase of the pipeline; and
- the objectives set for stakeholder engagement during construction were achieved (e.g. specific KPIs).



## 6. Stakeholder engagement during pipeline operation

### 6.1 Core objectives of engagement

Pipeline operation typically has a very low impact on stakeholders and there is a danger of downplaying the role of stakeholder engagement during this stage. Third-party interference presents the biggest risk to an operational pipeline and stakeholder engagement is an effective tool to reduce this risk. Stakeholder engagement during the operational phase of a pipeline can:

- maintain awareness of the pipeline with asset owners, contractors, developers, local government and planners;
- minimise the potential for urban developments to change location classifications on the pipeline route;
- enable effective environmental monitoring through input from land tenure holders;
- continue to identify and minimise project risk;
- minimise disruption and impact during routine and emergency events such as maintenance and pipeline blow-downs; and
- minimise the chance of third-party accidental damage.

The pipeline operation phase will typically extend over decades and it is necessary to take steps to maintain awareness of pipeline issues. After the disruption and intense activity of the construction phase is over it can be tempting to lower the priority of stakeholder engagement. Early and ongoing engagement during the operational phase will allow stakeholders to continue to be aware of pipeline issues and to consider them during their own processes.

Meaningful engagement during pipeline operation is also likely to ease the process of pipeline expansion, with engaged stakeholders more likely to support and accept future projects.

### 6.2 Relevant stakeholders

The categories of stakeholders that must be engaged during the pipeline operation phase will, to a large extent, be drawn from those engaged during the planning, design and construction phases. As noted, while stakeholder organisations may remain constant over the operation phase, individuals within organisations or even the stakeholders, are likely to change over time and processes must be developed to ensure effective engagement continues in order to maintain awareness of pipeline issues with current stakeholders.

Stakeholders	Why you need to engage during operation
Customers	Customers need to be included in the planning of maintenance activity to ensure their needs can be met during these times. Customers will also be interested in expansion opportunities and the development of new services.
Internal stakeholders	All areas of the company have some role during pipeline operation: Board – monitor pipeline performance Commercial – maintain customer dialogue Land liaison – maintain pipeline awareness and identify planning or land use changes Engineering – ensure pipeline integrity Media/corporate – Community and encroachment awareness, lobbying and government relations management Internal stakeholders will also include all contractors and suppliers related to the project. While they are not a formal part of the organisation, external stakeholders will consider them representatives of the company and they must be managed accordingly.
Local government	Local government manages the local planning framework governing development around a pipeline. They must be regularly engaged in order to ensure they understand and take into account the potential for planning decisions to alter a pipeline's risk profile.
General Community	Periodic reinforcement of pipeline benefits such as throughput statistics and disclosure of maintenance activities.
Asset owners	Asset owners will conduct a number of activities that need to be monitored by the pipeline.
Planning authorities	Planning authorities will be developing and implementing strategic planning documents that can affect development and land use around pipelines. They are also responsible for managing regulatory frameworks that can affect company awareness and statutory protections.
Regulatory authority	Safety and environment regulatory authorities will be monitoring projects to ensure operating conditions are met.
Developers	The onus should be on land and housing developers to take the necessary steps to research a pipeline's presence and risk profile. Basic assistance to provide that information when sought is appropriate.
Land tenure holders	Land tenure holders will want to be assured pipeline representatives are meeting commitments made under the relevant plan with that stakeholder. While there may be environmental considerations, unless there are particular environmental procedures in the stakeholder plan the operator is bound by the regulatory requirements. Ensuring land holders are aware of the current contact person/process is also vital in the event they need to make contact with the organisation (i.e. they are usually first to notice something not right).

Special interest groups	Identified special interest groups will need to be assured operations are compliant with commitments. Service disruptions or asset faults may bring a pipeline back into focus for a special interest group that will need to be assured that their concerns are being managed.
Community leaders	Should be engaged on a regular basis to ensure awareness of the pipeline within the community.
Elected officials	Will be interested in the pipeline's impact on the community and any benefits it brings. Are likely to field questions from the community, particularly on gas supply and should be helped to answer such questions.
Emergency services	Need to know accurate pipeline location and current company contact information, key risks of a pipeline incident and how to respond.
Native title and cultural heritage stakeholders	Will want to be sure ongoing operations do not disrupt or damage cultural values on the land.
Media – local and national	Media can report both positive and negative stories. During operation, media attention may focus on unplanned events such as vent blow-downs and any urban development around pipelines. Utilise the media to maintain awareness and safety around operational assets.

### 6.3 Purpose of engagement activities

Objective	Goals	Relevant stakeholders
Maintain effective relationships	Timely notification of activities and provision of clear advice on expected direct and indirect impacts.	Land tenure holders Native title and cultural heritage stakeholders Asset Owners Local government Regulators
	Demonstrate the implementation of commitments.	All
	Meaningful response to issues and complaints.	All
	Maintain communication channels.	All
Monitor risks	Reduce the risk presented to the pipeline by third party activities, primarily construction and development.	Land tenure holders Local government Planning authorities Developers Asset owners Community
Conduct SMS reviews	Third party risk identification and any changes in land use.	Land tenure holders Local government Planning authorities Developers Asset owners
Maintain social licence	Community acceptance and support for the pipeline and benefits it delivers to the community.	All

Maintain awareness	Pipeline awareness to reduce risk.  Monitor urban encroachment and third party activities.	Land tenure holders Local government Planning authorities Developers Asset owners Community Media – local and national
Workforce safety and environmental management	Effective communication within maintenance workforce to re-enforce safety and environment considerations and applicable stakeholder commitments.	Internal stakeholders

## 6.4 Outcomes of engagement activity

Throughout the operational phase, meaningful stakeholder engagement should have ensured:

- the pipeline continues to safely operate within the community and stakeholders are informed of maintenance activities;
- community, developers, land tenure holders and local councils are aware of the pipeline and notify the proponent of any activities near the pipeline;
- planners involve pipeline proponents in development decisions in the near vicinity of pipelines;
- customers are informed and able to allow for any supply disruptions; and
- pipeline faults are communicated and are able to be rectified with minimal disruption to customers, community and the environment.

## 7. Stakeholder engagement during pipeline decommissioning

### 7.1 Core objectives of engagement

The primary objectives of engagement during pipeline decommissioning are to manage and meet stakeholders' expectations, both for the decommissioning activity and final rehabilitation of the site. A decommissioning process is likely to take place decades after original construction; land tenement holders are likely to have changed on most of the properties through which a pipeline easement passes. Understanding of the original agreements, particularly regarding restoration and rehabilitation, is unlikely to be high. Project proponents must be mindful of the likelihood that some stakeholders will consider some parts of the original agreements open to negotiation.

### 7.2 Relevant stakeholders

The stakeholders to be actively engaged during the decommissioning process are similar to other phases. Most will be focussed on the restoration of the easement.

Stakeholders	Why you need to engage during decommissioning
Customers	Customers need to be aware of the planned cessation of operation.
Internal stakeholders	<p>All areas of the company have some role during pipeline decommissioning:</p> <p>Board – monitor pipeline performance</p> <p>Commercial – maintain customer dialogue</p> <p>Land liaison – manage the disruption during decommissioning</p> <p>Engineering – ensure pipeline integrity and minimise environmental impact</p> <p>Media/corporate – manage messaging</p> <p>Internal stakeholders will also include all contractors and suppliers related to the project. While they are not part of the organisation, while engaged other stakeholders will consider them representatives of the company and they must be managed accordingly.</p>
Local government	Local government will be interested in the impact of decommissioning on local planning, including managing the potential removal of easements from titles.
Asset owners	Asset owners will wish to monitor relevant decommissioning activity.
Planning authorities	Planning authorities will need to know the impact decommissioning has on local planning activity.
Regulatory authority	Safety and environment regulatory authorities will be monitoring projects to ensure decommissioning conditions are met.
Land tenure holders	Land tenure holders will want to ensure pipeline representatives are following environmental management procedures and other relevant commitments when entering land tenures, and will want to be aware

	of, and provide feedback on, activity that could cause disruption. They will also need to understand how the decommissioned pipeline affects them differently from the effects of an operational pipeline (i.e. access over the pipe).
Special interest groups	Identified special interest groups will need to be assured their issues or concerns are continually being managed. These are likely to relate to restoration of easements.
Community leaders	Should be engaged in order to ensure awareness of the decommissioning process and plans for restoration.
Elected officials	Should be engaged in order to ensure awareness of the decommissioning process and plans for restoration.
Emergency services	Need to know key risks of a pipeline incident during decommissioning and how to respond.
Native title and cultural heritage stakeholders	Will want to be sure decommissioning does not disrupt or damage cultural values on the land and that restoration is occurring.

### 7.3 Purpose of engagement activities

Objective	Goals	Relevant stakeholders
Maintain effective relationships	Timely notification of activities and provision of clear advice on expected direct and indirect impacts.	Land tenure holders Native title and cultural heritage stakeholders Asset Owners Local government Regulators
	Demonstrate the implementation of commitments	All
	Meaningful response to issues and complaints	All
	Maintain communication channels	All
Maintain social licence	Community acceptance and support for easement restoration plan	All
Workforce safety and environmental management	Effective communication within construction workforce to re-enforce safety and environment considerations	Internal stakeholders

### 7.4 Outcomes of engagement activity

Throughout the decommissioning phase, meaningful stakeholder engagement should have ensured:

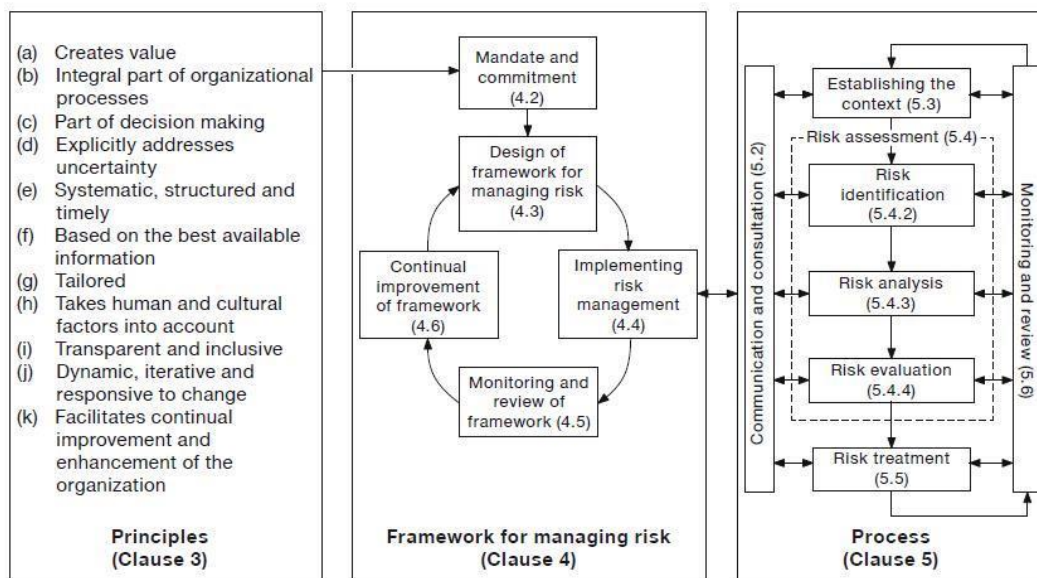
- the decommissioning process caused minimal disruption to land tenement holders and communities;
- restoration plans were understood by stakeholders and were in line with expectations; and
- stakeholder expectations were met.

## Appendix A: Risk Management

Stakeholder engagement risk deals with the probability of an event causing a potentially undesirable effect on a stakeholder or the environment. AS/NZS ISO 31000 defines risk as 'the effect of uncertainty on objectives'. Uncertainties within a pipeline project can arise from:

- pipeline construction and operational activities;
- confidence in available technologies;
- natural variability;
- short- and long-term economic, health, social and commercial outcomes;
- the current political and social environment;
- present and future values held by people and societies and factors that may cause them to change; or
- the effectiveness of control and planned risk treatments.

**Figure A1 - Relationships between risk management principles, risk management framework and risk management process (sourced from HB203:2012)**



NOTE: Clause references are to the Standard.

### The Risk Management Process

Each phase of a pipeline's lifecycle presents distinct risks that must be managed. While the construction risks may feature prominently due to the visible and physical disruption to stakeholders that occurs during this phase, there are equally prominent risks during the planning and design and operations and maintenance phases.

The risk management process should be:

- an integral part of management (which facilitates all decision making);
- tailored to the processes of the organisation; and
- identifying what is and what is not within the organisation's realm of control to manage.

Parts of the risk management process are often carried out by multi-disciplinary teams, and would usually include contributions from a variety of experts, stakeholder organisations and other sources.

The steps of the generic risk management process are described below.

### *Communication and consultation*

Consult the internal and external stakeholders regarding the risk management process as a whole, and as appropriate during each step.

### *Establishing the context*

Determine the external and internal context of the organisation and the particular application to which the risk management process is being applied. Establish the structure of the analysis and define the criteria against which risk will be evaluated. Identify stakeholders and define consultation mechanisms.

### *Risk identification*

Identify, as the basis for further analysis, what can happen or what circumstances might change, when, where, why and how. This may include identifying hazards, environmental aspects and environmental impacts, and how uncertainty might affect decisions.

### *Risk analysis*

Develop an understanding of the risks and the controls in place. Analyse risks in terms of the controls, the range of consequences in the context of those controls, and the likelihood of those consequences arising. Consequence/severity and likelihood/frequency may be combined to produce an estimated level of risk.

### *The risk matrix*

Qualitative risk analysis is beneficial to pipeline projects where many risks have been identified. A risk matrix based on qualitative or adjudged measures of consequence and likelihood may be used as a means of combining consequence and likelihood to give a measure of risk. This allows for screening of minor risks from major risks in order to prioritise risks so that resources can be applied to issues of higher importance. Adoption of a quantitative risk assessment tool will help apply a numerical identity to each risk, allowing a hierarchy to be established - which may aid response prioritisation

### *Risk evaluation*

Compare the results of the analysis against the pre-established criteria. Decisions on whether to treat risk are based on this comparison and other factors identified when the context was established.

### *Risk treatment*

Select options for treating risk and develop and implement a management plan, which should include consideration of funding and other resources, as well as response time frames and a schedule. Once treatment actions have been implemented, review the residual level of risk.

### *Monitoring and review*

Regularly monitor and review the risks and controls, and any changes. Update and incorporate newly identified applicable risks or learnings from other projects and events, and assess these for mitigation measures.

## **Benefits of managing engagement-related risk effectively**

Using a structured, systematic and defensible approach to stakeholder engagement risk management can prioritise project risk and help to ensure that focus and resources are applied to areas or stakeholders of greatest risk and influence. The strength of this approach is that it focuses



on reducing risk, applies available technical knowledge, takes into account the results of consultation with stakeholders and has ongoing monitoring and review built in, which provides a means of responding to any changes in internal and external circumstances. Furthermore, it is guided by clear principles, ensures there is an adequate supporting framework, and can provide a baseline from which to establish performance indicators.

Organisational benefits of an inclusive risk management approach can include the following:

- improved stakeholder outcomes and relationships;
- improved profitability and efficiency;
- improved management understanding of engagement risk and its mitigation
- reduced risk of production interference from community and environmental issues
- realistic stakeholder expectations about environment-related and other project risk;
- enhanced reputation;
- demonstrable conformance with an accepted International Standard on the management of risk;
- enhanced consistency, transparency and accountability;
- assisting to comply with legal obligations (including avoidance of liabilities through tort);
- obtaining or protecting regulatory approvals;
- greater flexibility;
- greater ability to attract external support or resourcing;
- lower financing costs;
- avoidance of disruption;
- avoidance of incidents and associated costs;
- more effective and safer incident control; and
- enhanced resilience.

## A 1 Risk within the project lifecycle

Sound risk management techniques should guide decision-making within a pipeline project through each stage of its lifecycle. Key project elements where stakeholder risk should be considered and engagement strategies and tools should be identified include the following elements.

### **Planning:**

- scoping of a project;
- develop social licence for project;
- develop procurement and local content opportunities;
- Decide on stakeholder engagement techniques and strategies;
- pipeline and facility design, route and facility selection;
- decide on constructability constraints and best option selection;
- decide on alternative engineering options for impact mitigation and minimisation;
- decide on relevant environmental performance indicators and requirements;
- decide on temporary camps and logistics locations;
- determine construction methodology;
- determine watercourse crossing methodology;
- allocation of management responsibility, programs and resources for risk management in pipeline lifecycle;
- safety and emergency planning; and
- develop individual Property Management Plans or Land Access Agreements.

**Construction:**

- sites set-up;
- weather;
- employee fatigue;
- travel;
- access through private property and along easements;
- clearing and earthworks, obtaining materials along selected route;
- soil management measures;
- drainage, erosion and sediment management measures;
- flora, fauna and biosecurity management measures;
- cultural Heritage management measures;
- traffic and socio-economic impact management measures;
- monitoring and auditing regime;
- emergency, incident/near miss, natural event response and investigation processes; and
- communicating issues associated with the above.

**Operation:**

- safety and emergency planning;
- access through private property and along easements;
- landholder relations;
- inspection and management of easements and facilities;
- flora, fauna and biosecurity management measures;
- cultural heritage management measures;
- drainage, erosion and sediment control measures;
- monitoring and auditing regime;
- emergency, incident/near miss response;
- natural event responses along and adjacent to the easement; and
- planning changes and urban encroachment, future infrastructure projects/impacts, asset management changes (i.e. organisation, key roles, product being transported).

**Decommissioning:**

- determining suitability of pipeline removal or decommissioning techniques;
- access through private property and along easements;
- removal of above-ground infrastructure;
- limitations on below ground activities where infrastructure remains in place; and
- monitoring and auditing regime.

## A 2 Risk matrix

Techniques for determining risk severity and frequency are outlined in Appendix F of AS2885.1; this system is recommended for adoption as the basis for preparing and undertaking stakeholder engagement analyses.

The principles (and the corresponding elements under each) are general statements of good practice for use by governments, industry and communities. These principles do not prescribe specific ways to engage; many factors, including the type, scale and location of each individual operation, create unique conditions requiring a specific application of the principles to achieve the most practical outcome. The principles are intended to help people in the resources sector improve their engagement skills. They should also help companies recognise when they need to get help from outside experts in community consultation.

## Appendix B: MCMPR Principles of Stakeholder Engagement

The principles (and the corresponding elements under each) are general statements of good practice for use by governments, industry and communities. These principles do not prescribe specific way to engage; many factors, including the type, scale and location of each individual operation, create unique conditions requiring a specific application of the principles to achieve the most practical outcome. The principles are intended to help people in the resources sector improve their engagement skills. They should also help companies recognise when they need to get help from outside experts in community consultation.

### Communication

**Open and effective engagement involves both listening and talking**

#### **1) TWO-WAY COMMUNICATION (WHO DO COMPANIES NEED TO TALK AND LISTEN TO?)**

- Foster co-ownership of the communication process.
- Clearly define lines of communication.
- Maximise community and stakeholder opportunities to say what they want and to provide information and feedback.
- Ensure company representatives take part in consultation and are accessible to communities and stakeholders.
- Demonstrate active listening by responding to the issues of each community and stakeholder group and being sensitive to their concerns.
- Determine and use the right channels of communication to ensure the method of communication is appropriate to the relevant communities and stakeholders.
- Identify appropriate individuals and contacts to ensure the right people are engaged. Ensure the contacts are representative of their group.
- Build and maintain honest working relationships through the provision of accurate and timely information.
- Understand individual and group capacities to participate and incorporate this into planning.
- Recognise the importance of engaging at the most direct level and ensure the level is appropriate for the purpose.

#### **2) CLEAR, ACCURATE AND RELEVANT INFORMATION (WHAT IS COMMUNICATED? WHAT DO COMMUNITIES AND STAKEHOLDERS WANT TO KNOW?)**

- Identify and assess all relevant social, environmental and economic effects of activities.
- Provide information and analysis (where appropriate) that is technically or scientifically sound and relevant.
- Provide information in a form that is understandable by the target audience and in a way that genuinely assists people to understand and make informed decisions.
- Use independent expert advice when appropriate.
- Ensure access to information.
- Ensure the information provided is delivered in a culturally appropriate manner.
- Provide opportunities for communities and stakeholders to ask questions, to seek clarification of information provided and to contribute their own experiences and information.

#### **3) TIMELINESS (WHEN DO COMPANIES COMMUNICATE?)**

- Seek community and stakeholder views as early in the proposal development stage as possible.

- Understand and recognise the need to build relationships, capacity and knowledge before making decisions.
- Allow enough time for community and stakeholder issues to be raised and addressed and for stakeholders to review and respond to information.
- Establish clear and realistic timeframes for community and stakeholder input.
- Maintain engagement throughout the life of the project, from the planning stage through to construction/implementation, operation/review and finally through to closure.
- Respect timeframes that will allow community and stakeholder representatives to consult appropriately with their constituencies.
- Provide information within appropriate timeframes and contexts and identify the reporting period. Make any critical deadlines and timeframes clear to communities and stakeholders.
- Ensure timing is convenient to allow adequate community and stakeholder representation.
- Recognise, respect and accommodate changes to timeframes where necessary.

## Transparency

### Clear and agreed information and feedback processes

#### 1) TRANSPARENCY (HOW IS INFORMATION ABOUT THE ENGAGEMENT PROCESS COMMUNICATED?)

- Clearly identify company objectives for the project. Clearly articulate the preferred outcomes of the engagement process.
- Identify the objectives of the community and stakeholders.
- Clearly explain or negotiate (where required) the decision-making processes and ensure that communities and stakeholders understand company objectives.
- Clearly outline and negotiate (where required) the boundaries of the engagement process, commitment of resources and level of influence of the various parties involved in the process.
- Clearly articulate the preferred outcomes of the project (e.g. operating conditions, environmental objectives).
- Clearly set out the process and provisions for two-way feedback.
- Reinforce the expected outcomes throughout the process. Provide information immediately on any changes to the expected outcomes.
- Report openly the input from all communities and stakeholders and include feedback on their input.

#### 2) REPORTING (WHAT IS DOCUMENTED?)

- Document decisions and outcomes of meetings with communities and stakeholders.
- Report appropriate performance information on the consultation through an agreed process.
- When appropriate and practicable, support performance information with verification.

## Collaboration

### Working cooperatively to seek mutually beneficial outcomes

#### (How capable are stakeholders and community groups of participating in the process? Where can help be found to support community groups in this process?)

- Recognise that adequate time and resources are needed by industry, governments and communities to effectively engage.
- Share expertise.
- Work in cooperation.
- Establish joint ownership of outcomes, seeking mutually beneficial outcomes where feasible.
- Comprehensively deal with the issues and seek community and stakeholder input into responses.
- If appropriate, take an active role in local community affairs.

- Consider independent mediation processes to deal with disagreements and disputes.

## Inclusiveness

**Recognise, understand and involve communities and stakeholders early and throughout the process. (What are the cultural characteristics of communities and stakeholders? Do they have the ability, experience and/or access to support to deal with this process?)**

- Identify the relevant communities and stakeholders, recognising they may change over time.
- Identify and, where possible, understand community issues, interests, aspirations and concerns to better define what matters most to the community.
- Facilitate (where appropriate) community and stakeholder engagement.
- Acknowledge and respect the diversity of communities and stakeholders.
- Respect the culture and heritage of local communities, including the traditional owners of the area.
- Accept the different agendas of different communities and stakeholders and ensure that dominant groups are not the only voices heard.
- Ensure there are appropriate systems, with minorities and other marginalised groups having equitable and culturally appropriate ways to engage, so groups that may be under-represented or hard to reach take part.
- Acknowledge that in few circumstances is it feasible to involve the entire community.
- Prepare a consultation plan and tailor engagement strategies to meet the needs of community groups, their accessibility and information needs.

## Integrity

**Conduct engagement in a manner that fosters mutual respect and trust. (What is the ability to build credibility and confidence?)**

- Agree on the ground rules for the process and obey them – explain what the process is trying to achieve.
- Be open about the nature of the engagement process and make it clear from the beginning what decisions are outside the scope of the process.
- Clearly articulate what is negotiable and what is not negotiable in the engagement process and give reasons for decisions.
- Ensure realistic expectations are set and agreed early in the process.
- Take responsibility for company actions and live up to promises.
- Report often on progress – accurately and promptly.
- Ensure the proclaimed values of company policies and codes of conduct at the corporate level are consistent with practice on the ground.
- Ensure that all community opinions and rights to object or support a project/policy are respected. Acknowledge and respond to community concerns.
- Treat people fairly and without discrimination.
- Respect legal, ethical, and human rights.
- Be honest, even when the news is not good or favours the company.

## Appendix C: Relevant State and Territory Legislation

The following items of legislation are not specifically focused on pipeline activities but may be relevant to aspects of pipeline corridors, construction and operation.

### Commonwealth

Commonwealth legislation that may be relevant to pipeline stakeholder engagement includes:

- *Australian Heritage Council Act 2003*
- *Environment Protection & Biodiversity Conservation Act 1999*
- *Industrial Chemicals (Notification and Assessment) Act 1989*
- *National Greenhouse & Energy Reporting Act 2007*
- *Offshore Petroleum and Greenhouse Storage Act 2006*
- *Ozone Protection and Synthetic Greenhouse Gas Management Act 1989*

### Victoria

Legislation that may be relevant to pipeline stakeholder engagement in Victoria includes:

- *Aboriginal Lands Act 1991*
- *Catchment and Land Protection Act 1994*
- *Climate Change Act 2010*
- *Coastal Management Act 1995*
- *Dangerous Goods Act 1985*
- *Environment Protection Act 1970*
- *Fences Act 1968*
- *Fisheries Act 1995*
- *Flora and Fauna Guarantee Act 1988*
- *Heritage Act 1995*
- *Land Acquisition and Compensation Act 1986*
- *National Parks Act 1975*
- *Occupational Health and Safety Act 2004*
- *Offshore Petroleum and Greenhouse Gas Storage Act 2010*
- *Planning and Environment Act 1987*
- *Water Act 1989*
- *Wildlife Act 1975*

### Queensland

Legislation that may be relevant to pipeline stakeholder engagement in Queensland includes:

- *Aboriginal Land Act 1991*
- *Forestry Act 1959*
- *Integrated Planning Act 1997*
- *Land Protection (Pest and Stock Route Management) Act 2002*
- *Nature Conservation Act 1992*
- *Petroleum (Submerged Lands) Act 1982*
- *Plant Protection Act 1989*
- *Queensland Heritage Act 1992*
- *Soil Conservation Act 1986*
- *Strategic Cropping Land Act 2011*
- *State Development and Public Works Organisation Act 1971*
- *Sustainable Planning Act 2009*
- *Torres Strait Islander Cultural Heritage Act 2003*
- *Torres Strait Islander Land Act 1991*
- *Vegetation Management Act 1999*
- *Water Act 2000*
- *Work Health and Safety Act 2011*

## South Australia

Legislation that may be relevant to pipeline stakeholder engagement in SA includes:

- *Forestry Act 1950*
- *Heritage Act 1993*
- *Land Acquisition Act 1969*
- *Pastoral Land Management and Conservation Act 1989*
- *Work Health and Safety Act 2012*

## Western Australia

Legislation that may be relevant to pipeline stakeholder engagement in WA includes:

- *Aboriginal Heritage Act 1972*
- *Biosecurity and Agriculture Management Act 2007*
- *Conservation and Land Management Act 1984*
- *Dangerous Goods Safety Act 2004*
- *Environment Protection Act 1986*
- *Heritage of Western Australia Act 1990*
- *Native Title (State Provisions) Act 1999*
- *Petroleum and Geothermal Energy Resources Act 1967*
- *Planning and Development Act 2005*
- *Soil and Land Conservation Act 1945*
- *Waterways Conservation Act 1976*
- *Wildlife Conservation Act 1976*

## New South Wales

Legislation that may be relevant to pipeline stakeholder engagement in NSW includes:

- *Aboriginal Land Rights Act 1983*
- *Crown Lands Act 1989*
- *National Parks and Wildlife Act 1974*
- *Water Management Act 2000*
- *Land Acquisition (Just Terms Compensation) Act 1991*
- *Native Vegetation Act 2003*

## Tasmania

Legislation that may be relevant to pipeline stakeholder engagement in Tasmania includes:

- *Aboriginal Lands Act 1995*
- *Aboriginal Relics Act 1975*
- *Boundary Fences Act 1908*
- *Crown Lands Act 1976*
- *Dangerous Goods (Road and Rail Transport) Act 2010*
- *Environmental Management and Pollution Control Act 1994*
- *Forestry Act 1920*
- *Historic Cultural Heritage Act 1995*
- *Land Acquisition Act 1993*
- *Land Use Planning and Approvals Act 1993*
- *Major Infrastructure Development Approvals Act 1999*
- *National Parks and Reserves Management Act 2002*
- *Native Title (Tasmania) Act 1994*
- *Natural Resource Management Act 2002*
- *Nature Conservation Act 2002*
- *Petroleum (Submerged Lands) Act 1982*
- *Threatened Species Protection Act 1995*
- *Weed Management Act 1999*
- *Work Health and Safety Act 2012*

## Northern Territory

Legislation that may be relevant to pipeline stakeholder engagement in the NT includes:

- *Aboriginal Land Act*
- *Bushfires Act*
- *Crown Lands Act*
- *Dangerous Goods Act*
- *Environmental Assessment Act*
- *Heritage Act*
- *Lands Acquisition Act*
- *Northern Territory Aboriginal Sacred Sites Act*
- *Offshore Water (Application of Territory Laws) Act*
- *Pastoral Land Act*
- *Petroleum (Submerged Lands) Act*
- *Planning Act*
- *Soil Conservation and Land Utilisation Act*
- *Territory Parks and Wildlife Conservation Act*
- *Waste Management and Pollution Control Act*
- *Water Act*
- *Weeds Management Act 2001*

## Australian Capital Territory

Legislation that may be relevant to pipeline stakeholder engagement in the ACT includes:

- *Environment Protection Act 1997*
- *Fisheries Act 2000*
- *Heritage Act 2004*
- *Lands Acquisition Act 1994*
- *Pest Plants and Animals Act 2005*



## Appendix D: Stakeholder Engagement Process

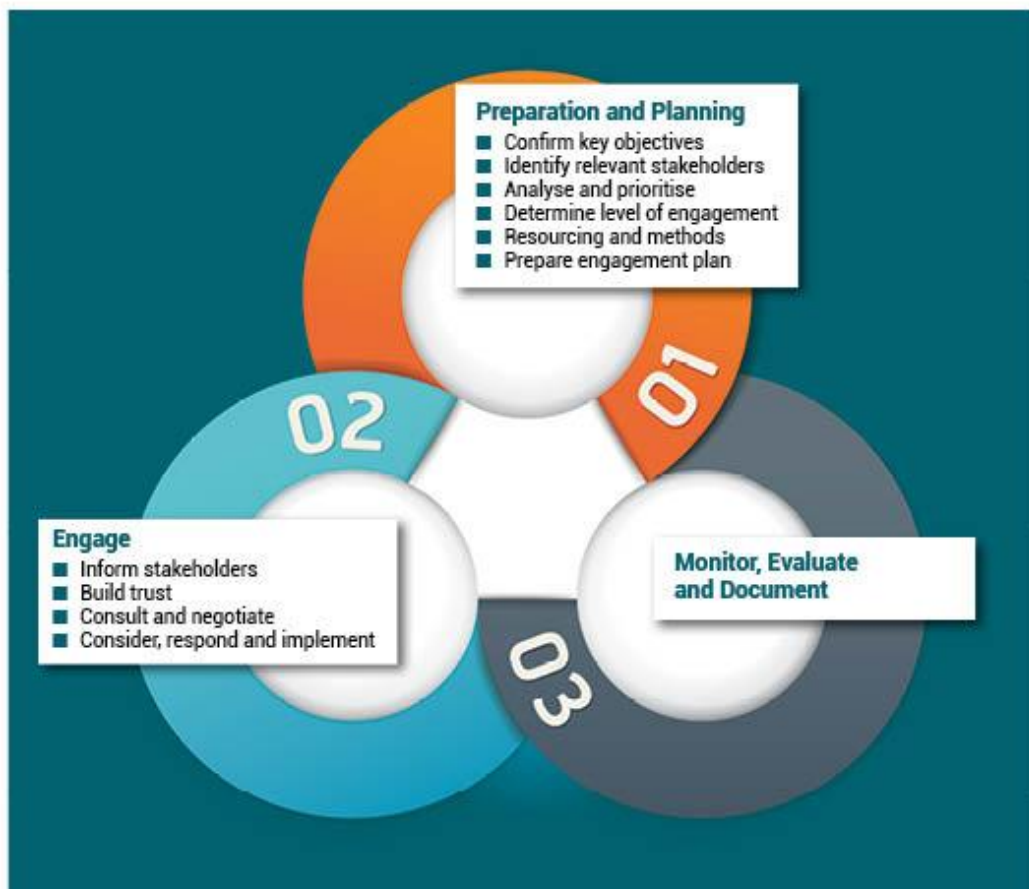
### D1 Engagement process

Described below is a model of a meaningful stakeholder engagement process. It sets out the development and implementation of an effective two-way process between the organisation and stakeholders. Meaningful engagement is characterised through a flow of communication, opinions and proposals in both directions and the use of collaborative approaches to influence and explain decisions. The process is one in which an organisation learns and improves its ability to perform meaningful stakeholder engagement while developing relationships of mutual respect, in place of one-off consultations.

The evolving nature of this process is particularly relevant to pipeline projects, which will have differing stakeholder engagement requirements at each phase of the project lifecycle.

Activity undertaken at all stages of the process should be documented to ensure engagement success can be reviewed and improved and to ensure historical decisions or engagements are captured in case stakeholders change during the progression of time and previous consultation records are required.

Figure D1: Stages in a meaningful stakeholder engagement process



## D1.1 Preparation and Planning

### *Confirm key objectives*

Before commencing any engagement process, it is essential to identify the organisation's basic objectives. An organisation should ask itself the following questions:

- Why do we need to engage?
- What would successful engagement look like?

At each stage of a pipeline project's lifecycle, there are a number of objectives for engagement. Many of these objectives are covered in sections 4 to 7 of this Guideline.

It may be useful to create a list of negotiable and non-negotiable factors for each objective. The negotiable factors are those that stakeholders can influence, while the non-negotiable factors are those that have already been decided. A clear understanding of negotiable and non-negotiable factors will inform the level of stakeholder engagement a project needs and the engagement methods to consider.

### *Identify relevant stakeholders*

Once objectives are understood and documented, the stakeholders relevant to each objective can be identified. The initial identification should be as broad as possible. It is more useful to a project to initially consider stakeholders who might be relevant to an objective. Once a detailed investigation is concluded, any identified stakeholders deemed not relevant to an objective can be removed from further consultation in that part of the engagement strategy. Documenting the reasons these stakeholders are not considered relevant is a useful risk management exercise. Project parameters may change during the pipeline delivery process and the excluded stakeholders might become relevant again.

Common stakeholders at each stage of a pipeline's lifecycle are identified in Sections 5-8. These lists are provided as a guide to inform a stakeholder identification exercise and are not a substitute for such an exercise.

### *Analyse and prioritise*

After relevant stakeholders have been identified, it is necessary to develop an understanding of the objectives and issues relevant to each and to prioritise stakeholders for each objective. Equally important is to appraise the level of understanding of issues relating to pipelines that each stakeholder has. Prioritisation of stakeholders is usually undertaken according to a predetermined set of characteristics.

Three typical characteristics are:

- interest, the degree to which stakeholders are motivated by an issue
- influence, the ability of stakeholders to achieve an outcome or affect public opinion
- relevance, the degree to which the issues of importance to a stakeholder and the organisation overlap.

Each stakeholder is different and rigorous analysis is recommended so priorities can be established. Methods of gathering the relevant information is described under D1.2 (Engage) and D 2 (Engagement methods and tools).

Analysis techniques can include:

- A comparison of stakeholder wants and needs (SWANs) and organisational wants and needs (OWANs).
- Categorising stakeholders using accepted typology models.
- Conducting formal risk assessments based on the characteristics identified above.

### *Determine level of engagement*

The final step in the stakeholder analysis process is to identify the appropriate level of engagement for each stakeholder. This will be based on the earlier assessments of interest, influence and relevance and will assist with specific engagement strategies. The International Association for Public Participation has developed a widely used engagement spectrum that identifies the differing levels of engagement as:

- Inform – stakeholders need to be provided information on decisions that affect them.
- Consult – stakeholders are given an opportunity to provide feedback on options and decisions.
- Involve – stakeholders are given an opportunity to participate in the development of options.
- Collaborate – partnering with stakeholders for the development of alternatives and solutions.
- Empower – stakeholders have the ability to make the decision.

The International Association for Public Participation Engagement Spectrum (Figure D2) is included to demonstrate the broad range of participation in engagement. APGA considers that the majority of the stakeholder engagement carried out for pipelines will be that in the inform, consult and involve categories. There are likely to be examples of activity that will result in collaboration with stakeholders. An example is the negotiation over the route of an easement across a broadacre farm held under freehold. A farmer who has invested in the development of a precision agriculture operation may have relocated fence-lines, watering points and other farm infrastructure to allow for GPS guidance of farm machinery and associated yield mapping of paddocks. The required equipment and computer software for tractors, combine harvesters and other equipment, and land preparation can represent a major investment for a farm business and the proprietor may be opposed to the easement crossing paddocks that have been adapted for precision cropping.

The proponent may need to collaborate with the landholder to understand the potential impact on their business, and negotiate an agreement for the route of the easement to minimise the impact on the precision farming operation.

**Figure D 2 - International Association for Public Participation Engagement Spectrum**

Increasing level of public impact

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problems, alternatives and/or solutions.	To obtain public feedback on analysis, alternatives and/or decision.	To work directly with the public throughout the process to ensure that public issues and concerns are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge your concerns and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and issues are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for direct advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.
EXAMPLE TOOLS	Fact sheets Websites Open houses	Public comment Focus groups Surveys Public meetings	Workshops Deliberate polling	Citizen advisory committees Consensus building Participatory decision making	Citizen juries Ballots Delegated positions

### *Resourcing and methods*

Determining the level of engagement necessary for each stakeholder will help an organisation determine the resourcing required and suitable methods for engagement. Further information of resourcing and methods is included in this appendix, section D 2.1, D 2.2 and D 3.

### *Prepare the engagement plan*

Once the analysis of stakeholders is complete, it is possible to plan the engagement phase and prepare a detailed engagement plan. The engagement plan should include:

- aims and objectives of engagement, to ensure that expectations are realistic;
- specification of desired outcomes from engagement with each stakeholder;
- the results of the stakeholder identification and analysis;
- an individual or responsible position within the organisation should be assigned responsibility for each stakeholder. It is possible that this responsibility could be reassigned as the project proceeds through phases;
- the organisational resources and responsibilities for engagement;
- engagement methods appropriate for different stakeholder groups (e.g. surveys, questionnaires, focus groups etc);
- a list of the information required to help meaningful engagement;
- timeframes for engagement and response;
- feedback mechanisms (including direct, such as grievance procedures, and indirect, such as monitoring of social and other media);

- key risks and sensitivities;
- escalation processes; and
- information management systems and record keeping processes to track engagement.

The final engagement plan should be prepared with the same care and rigor as an environment management plan, construction plan or operations plan. Well documented, detailed processes will ensure an organisation is most likely to achieve its engagement goals.

The document is of increasing interest to regulators and is often mandated through the approvals process. The plan needs to remain current as stakeholders can change. Responsibility for this monitoring role should be captured within the plan

## **D 1.2 Engage**

There are four key steps to the engagement process following planning and identification of stakeholders.

- inform stakeholders.
- build trust with stakeholders.
- consult/negotiate with stakeholders.
- respond to stakeholders and implement agreed approaches.

### *Inform stakeholders*

Stakeholders should be informed both verbally and in writing regarding the nature of the project and given a contact to whom they can address questions. Multiple means of communication may need to be considered in this instance, enabling each different stakeholder an opportunity to contact the representative nominated (i.e. phone, email, free-call number, postal address, social media, website, letterbox drop). Where the stakeholder contacted is no longer the key entity, there needs to be a simple process for notification of the change so that records can be amended. It should also be noted that, if initial contact does not generate a response, that contact should be followed up so that records can be updated and a level of engagement identified with the relevant parties. If there is no initial response this should not imply the possible stakeholders have no interest.

### *Build trust*

Building trust is a critical aspect of effective, meaningful stakeholder engagement and is identified here as a discrete step in order to highlight this importance.

It is difficult to quantify and implement a process to build trust. Important actions to build trust with stakeholders include:

- confirm internal agreement on the importance of meaningful engagement;
- first engagement should be informal, before a formal approach;
- be cognisant of the importance of first impressions;
- be aware your organisation is always on display; workers in local town/restaurant/facilities etc;
- use appropriate language for audiences;
- be open and honest about impacts of the project, and if unable to answer a question make a point of finding out and following up with the information;
- regularly update the stakeholder of ongoing or open issues regardless of whether the news is good or bad.
- ensure timelines, processes and contacts are well understood;
- develop mechanisms to be held accountable by stakeholders and make sure they are clearly understood;
- be available, and if not available, respond as soon as possible to enquiries/contact made by stakeholders;
- be cognisant of engagement fatigue. Often stakeholders have limited time and patience to indulge stakeholder managers in issues they consider counter to their core business.
- having the right people to deliver the message; and

- don't make promises that can't be kept.

### *Consult and negotiate*

Consultation should be a transparent process and include key elements.

**Representative.** It is important that those involved in the consultation process are as representative as practicable of the full range of stakeholders affected by the organisation's actions, to ensure that the organisation can build as meaningful relations as possible. While it may be easier to engage with the most sympathetic, organised, vocal or powerful stakeholders, consulting with minority organisations or those who are less vocal or powerful, can help to produce more representative, accurate and appropriate conclusions regarding stakeholders' issues and mechanisms to respond to stakeholders. Winning the support of one or two big stakeholders does not necessarily indicate that meaningful engagement has been achieved; not all community or environmental groups (for example) have the same view of or priority for an issue.

The type of engagement should match the requirements and expectations of stakeholders. Sometimes forums such as group discussions will be appropriate and other times one-on-one discussions will be better. As the stakeholders become better defined and their needs more clearly identified, the best method for contact and meaningful engagement will become evident.

**Responsive.** By providing information, analysis and proposals that respond directly to stakeholder expectations and interests already identified through the preparation phases – i.e. be stakeholder driven and focused where possible, balanced with internal objectives and activities of the business. Ultimately senior management will have to judge the value and importance of stakeholder demands and the appropriate response.

**Context focused.** By making available information and analysis in context so stakeholders are able to gain a detailed and complete picture of organisational motivations, culture and behaviour. This will allow assessment against the observable actions of the organisation. Organisations evolve and what might have initially been appropriate could change, but the organisation will remain judged by its initial actions, particularly with stakeholders. Initial impressions are extremely difficult to change.

**Complete.** Providing appropriate background information and technical justification allows stakeholders to draw a fair and reasonable conclusion as to why the organisation responded to an issue in a particular way. An efficient internal knowledge management system will help collate and provide this information. Having current information is vital in this instance as it adds to the credibility and completeness of the information being provided.

**Realistic.** In the negotiation process with stakeholders there may be an inevitable trade off of expectations, needs and objectives, where both parties recognise that they may not ultimately achieve everything they had originally set out to accomplish. Nevertheless this trade off in itself can be extremely positive to the overall engagement process, allowing trust to be strengthened as each side demonstrates that they can be moderate and realistic. As part of this process, ensure that intentions are accurately represented, providing clarity on expectations of the negotiation i.e. what is on the table for discussion and what is not. The importance of clearly identifying non-negotiable matters as early as possible cannot be overstated; it is vital to establish clear boundaries of any discussion and set expectations at an appropriate level.

**Material.** The consultation process should be relevant to an organisation's key economic, social, and environmental risks, how they are presently being managed and, where possible, dovetail with present activities and outputs, and support already accomplished outcomes and impacts.

### *Consider, respond and implement*

Once consultation has taken place, stakeholders will want to know how their input has influenced outcomes. Issues that are priorities for either the organisation or the stakeholder will be clear areas of focus.

Processes must be in place to evaluate feedback in light of stakeholder and organisational priorities and develop appropriate responses.

How an organisation responds or is perceived to respond to stakeholders, particularly over areas of disagreement, can have significant implications for business reputation and performance. A perception of fairness in the process is critical, even if not all stakeholder demands are met, as well as responding promptly and transparently. The timeliness of a response, even if incomplete can be very important.

In many cases, even if a stakeholder's particular requirement is not met, that stakeholder will be receptive to the outcome simply by knowing and understanding that their concerns were fully considered. A clear explanation of the reason for the final decision will help to alleviate concerns.

### **D 1.3 Monitor, evaluate and document**

A systematic approach to designing a monitoring and evaluation system enables an organisation to:

- define the impact of stakeholder engagement activities on the project.
- establish accountability with stakeholders.
- justify the need and budget for stakeholder engagement activities; and
- increase the rigor of stakeholder engagement programs, including the potential need to change strategy and planning.

Monitoring, evaluation and documentation processes should be part of an organisation's knowledge management systems for all aspects of business operations. The reasoning and requirements of these processes for stakeholder engagement are similar.

Evaluating the effectiveness of stakeholder engagement from an organisational perspective can be a difficult task and there is not a well-developed set of readily available resources to assist the process. Nevertheless, it is important that sufficient resources and planning are allocated to implement a useful evaluation process. The potential volume of data to be collected, reviewed and updated will provide some indication of the tool required for capturing and monitoring stakeholder engagement. There are a number of database systems available for processing large volumes of data and communications, addressing a range of options and data requirements.

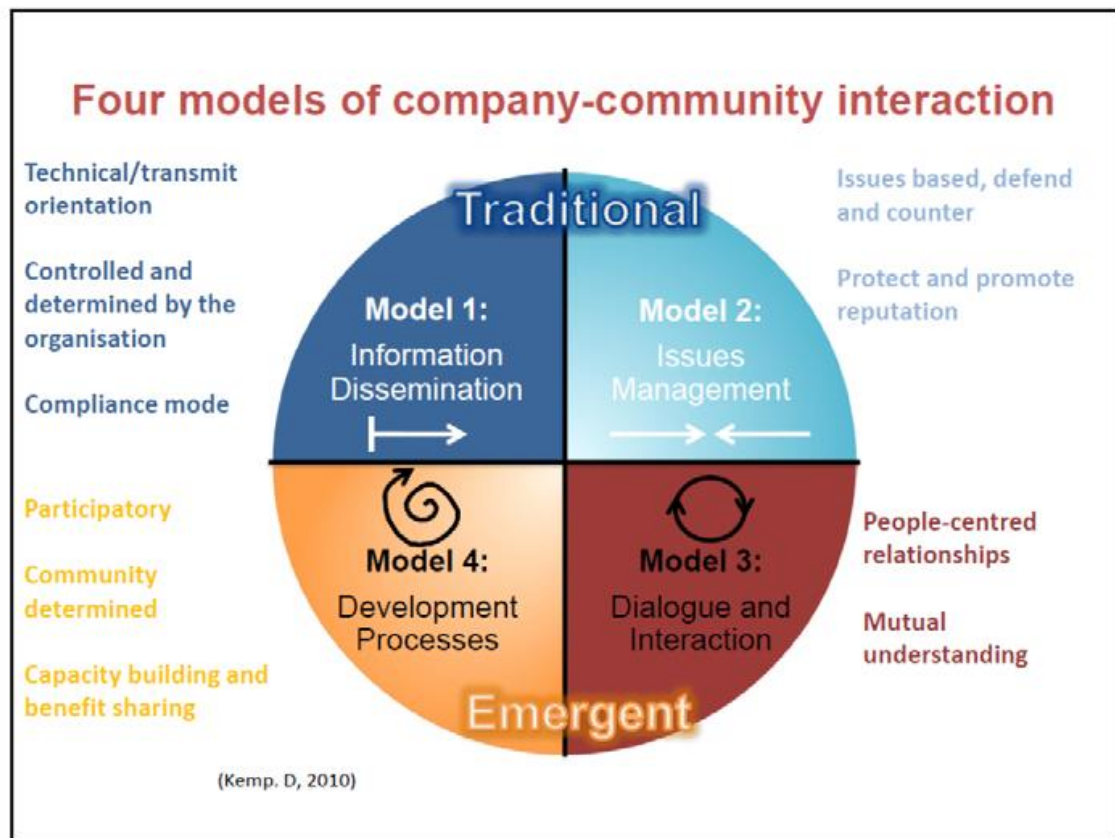
### *Records from previous projects*

The looping of sections of pipelines has become more common and a lessons learned approach from the initial stakeholder engagement planning, for design, construction and operations phases is recommended.

Written records or corporate memory from the initial pipeline planning and construction phases can be very valuable. They can provide detail of any stakeholder engagement problems encountered, and strategies used to address these issues. This will assist the proponent to anticipate possible planning, land acquisition or construction problems and plan a stakeholder engagement strategy accordingly.

D1, D2 and D3 describe one stakeholder engagement process. Figure D3 describes other forms of interaction that can take place between a company, or project proponent, and stakeholders. Elements of the emergent models of interaction between the community and project proponents, as shown, are arguably becoming the favoured approach for stakeholder engagement.

### D3: Models of Company/Community Interaction<sup>2</sup>



### D 2 Engagement methods and tools

There is a wide range of engagement methods and tools available to organisations undertaking meaningful stakeholder engagement. These can be broadly categorised into two purposes:

- methods that are used for communication and engagement with stakeholders; and
- tools that manage information related to stakeholders.

While there are positives and negatives to all engagement the effectiveness and use of each engagement tool depends on the objective and purpose of engagement and often a range of methods are required on any given project.

<sup>2</sup> Community Relations in the Global Mining Industry: Corporate Social Responsibility and Environmental Management – D.Kemp 2010



## D 2.1 Methods for engagement

Method	Use	Advantages	Disadvantages
Written notifications	<p>Direct, formal communication with stakeholders.</p> <p>Advise stakeholders of statutory requirements.</p> <p>Advise upcoming activity, impacts and mitigations.</p>	<p>Efficient, documented communication.</p> <p>Targeted approach to any number of stakeholders.</p> <p>Low resource.</p>	<p>Not effective to build relationships - impersonal.</p> <p>Perceived lack of opportunity for direct feedback.</p>
Public information	<p>Disseminate information broadly.</p> <p>Websites/public notice boards</p>	<p>Low resource.</p> <p>Wide reach.</p> <p>Puts information in public domain.</p> <p>Ensures accurate information is available.</p>	<p>Typically only provides high-level, generic information.</p> <p>Not effective to build relationships.</p> <p>Will not be viewed objectively by some stakeholders.</p> <p>No opportunity for explanation.</p> <p>No guarantee the people who need to see it will do so.</p>
Personal interviews	<p>Identify issues specific to each stakeholder.</p> <p>Provide opportunities for stakeholder to provide confidential feedback.</p> <p>Build relationships with individual stakeholders</p>	<p>Demonstrate commitment.</p> <p>Excellent tool to build relationships, particularly through use in first approach.</p> <p>Provides detailed data through direct two-way communication.</p>	<p>Time and resource intensive.</p> <p>Relies on interviewer being able to correctly interpret the attitude and assertion of stakeholder.</p> <p>Individuals may not be representative of whole group.</p> <p>Risk of misinformation being promulgated.</p> <p>Personal safety risk.</p> <p>If personnel change, there may be a need to rebuild relationship.</p>
Workshops	<p>Form relationships with and between high-level stakeholders and</p>	<p>Demonstrate commitment.</p> <p>Build network of relationships.</p>	<p>Participation is limited.</p> <p>Participants may not be representative.</p>

	<p>experts.</p> <p>Involve stakeholders in thinking through issues.</p> <p>Communicate aspects of engagement process or issues management.</p> <p>Analyse impacts.</p> <p>Prioritise issues and potential solutions.</p>	<p>Allows issues and solutions to be verified and tested.</p> <p>Increases ownership by participants.</p> <p>Good opportunity for feedback and discussion.</p>	<p>Need to provide sufficient information ahead of workshop to allow participants to provide informed view.</p> <p>Can be dominated by loudest participants and social bullies.</p>
Focus groups	<p>Identify stakeholder view on a specific issue.</p> <p>Discuss the views of a common interest stakeholder group.</p> <p>Gather baseline data.</p> <p>Support, pilot, test or gain feedback on issues and results of other engagement.</p> <p>Evaluate stakeholder response to issues and proposed approaches.</p> <p>Monitor and evaluate perception of organisation/project.</p> <p>Provide information to opinion leaders.</p>	<p>Demonstrate commitment.</p> <p>Build network of relationships.</p> <p>Allows issues and solutions to be verified and tested.</p> <p>Increases ownership by participants.</p>	<p>Participation is limited.</p> <p>Participants may not be representative.</p> <p>Need to provide sufficient information to allow participants to provide informed view.</p>
Public meetings	<p>Reach large audiences quickly.</p> <p>Present information to wide range of stakeholders.</p> <p>Include as many people as possible.</p>	<p>Relatively inexpensive and quick.</p> <p>Allows organisation to reach large number of people.</p> <p>Demonstrates openness.</p> <p>Provides all in community an opportunity to speak.</p>	<p>Risk that vocal groups will control discussion.</p> <p>Some stakeholders not comfortable speaking in public forum.</p> <p>Cannot explore issues in detail.</p> <p>Can be difficult to facilitate if dealing with controversial or emotive issues.</p>
Surveys	<p>Identify issues and assess needs.</p>	<p>Provide detailed data on specific issue.</p>	<p>Not everyone can participate in written</p>

	<p>Obtain objective overview.</p> <p>Develop approaches.</p> <p>Gather data to evaluate perception.</p> <p>Ongoing monitoring and evaluation through repeat surveys.</p>	<p>Provide good insight into extent of significance of issues.</p> <p>Widely known and acceptable.</p> <p>Surveys can be more useful in early stage of project.</p> <p>Where surveys test for baseline issues and map stakeholders prior to a project, they can be very useful in establishing baseline stakeholder data which can inform project design.</p>	<p>surveys due to time or literacy constraints.</p> <p>Can be manipulated.</p> <p>Can yield poor response rates.</p> <p>Resource intensive to prepare, implement and evaluate effective survey.</p> <p>May be seen by some stakeholders as a push polling method to bring them onside.</p>
<p>Participatory tools – inclusion in company SMS , other social media etc</p>	<p>Scope and identify community needs.</p> <p>Involve stakeholders in development.</p> <p>Mitigate risk of negative perception.</p> <p>Monitor and evaluate social impacts and performance.</p>	<p>Demonstrates commitment.</p> <p>Build relationships and stakeholder ownership.</p> <p>Gain in-depth understanding of stakeholder culture and views.</p>	<p>Need to manage conflicting stakeholders.</p> <p>Can result in unrealistic expectations.</p> <p>Process can be dominated by articulate/organised stakeholders.</p>
<p>Ongoing stakeholder panels</p>	<p>Ongoing engagement with key stakeholders, such as customers or consumers.</p>	<p>Examine specific aspects of organisation such as policy, actions or performance.</p> <p>Provides comments and recommendations for actions.</p> <p>Assists organisation to receive and respond to advice and criticism.</p> <p>May anticipate future threats.</p>	<p>May not be representative.</p> <p>May betray trust.</p> <p>May not have relevant expertise in all issues.</p>

## **D 2.2 Tools for engagement**

There are a number of tools that organisations should use to manage and track engagement activities. The more complex an engagement task or pipeline project, the more useful and important these tools can be.

### *Stakeholder engagement plan*

The important content of the stakeholder engagement plan has been discussed. It is the key tool setting out the framework for the stakeholder engagement undertaking.

### *Stakeholder identification and tracking*

There are a number of GIS tools that can be used to identify and track stakeholders. Particularly useful for preliminary stakeholder identification, these tools primarily provide information on land tenure holders.

As discussed in previous sections, stakeholder identification should be as broad as possible. It is more useful to a project to initially consider stakeholders who might be relevant to an objective. Once a detailed investigation is concluded, any identified stakeholders deemed not relevant to an objective can be removed from further consultation in that part of the engagement strategy. Documenting why these stakeholders are not considered relevant also serves to indicate that they have been considered and not overlooked.

Some stakeholders may be missed and a methodology is required to include and consult with them.

### *Stakeholder databases*

A database should be developed and implemented to track stakeholders, their issues and engagement activities. The database should be continually updated with all interactions or engagements and allocations of actions arising from engagement with stakeholders.

A well-maintained database is essential for future reference and helps to provide evidence of stakeholder engagement when pursuing statutory approvals. This data base also provides the history of engagement with each stakeholder so that, in the event changes occur (i.e. key personnel leave) corporate knowledge is not lost.

### *Communication tools and engagement support materials*

Information materials should be developed to provide standard information that can be used across the engagement methods selected for the project. Care should be taken to ensure information is pitched at the appropriate level for each stakeholder and amendments should be made where necessary. Communication tools and engagement support include:

- agreement on key messaging and branding;
- project or company fact sheets and brochures;
- website information;
- media releases;
- advertising;
- letters (post and electronic); and
- consistent messaging for telephone operators.

## **D 3 Resourcing and training**

Sufficient resourcing and training is essential to the successful implementation of an SES and also as part of the stakeholder engagement for an individual pipeline project. Training provides personnel with the necessary skills and knowledge to fulfil their stakeholder engagement responsibilities and to meet the organisation's stakeholder engagement objectives. Implementation of a training program leads to increased stakeholder awareness in the workforce and encourages continual

improvement in the behaviour and performance of individual employees. If in-house personnel are not sufficiently experienced or skilled, the outsourcing of engagement professionals may be required until staff are at a level of competency to manage the task.

An effective stakeholder engagement training program should be developed and implemented as part of the SES, it should cover the full range of stakeholder engagement issues relevant to an organisation's activities and should target all relevant personnel. It is critical to recognise that engagement training should not be solely focussed on an organisation's engagement professionals. All employees with the potential to interact with stakeholders in formal and informal environments need to be given the skills and knowledge to engage appropriately.

The relevant portions of the training program should be referenced in relevant company documents. Training program documentation should also describe the role and content of inductions and should include descriptions of job-specific training requirements for all members of the project team, including an outline of the content and schedules for necessary training refreshment.

Specific training requirements should be identified during the development of site procedures and training should be conducted on an 'as needs' basis. Training can be delivered by using internal or external resources.

### **D 3.1 Stakeholder engagement professional characteristics**

Stakeholder engagement practitioners can work across all levels of an organisation or project to deliver effective stakeholder engagement and positive relationship outcomes.

Any stakeholder engagement professional working in the pipeline industry should be suitably qualified and should be able to demonstrate the following capabilities:

- competency in understanding the organisation and its activities and the level to which law and regulation applies;
- a sound understanding of and experience in the construction and operations of a pipeline;
- understanding of the relevance of social licence to the projects;
- ability to apply effective stakeholder engagement systems and controls;
- integrity towards stakeholder engagement values; and
- competency within their specific communication/engagement discipline.

It is possible that personnel without formal qualifications in stakeholder management, but with experience and the ability to listen, communicate and empathise, can make a valuable contribution or be capable of taking on the role.

### **D 3.2 Training matrix**

Implementation of a training matrix clearly demonstrates the level of training needs within a project or organisation against set criteria, tasks or roles. A training matrix can take the form of a table or chart that clearly shows what types of training is required for all members of the project team. This should include training requirements that are mandatory for the entire project team, as well as task-specific training. The training matrix should include a schedule, including any dates where training currency expires and a forecast when these require renewal. A matrix should clearly show where training is required to fulfil competency and compliance requirements, and should include the capability to show where such training has been completed.

### **D 3.3 Stakeholder engagement induction**

The organisation may consider incorporating the following aspects of stakeholder engagement in project inductions.

### *Organisational*

- the organisation's stakeholder engagement and related policies, including in relation to media engagement (e.g. social media)
- overview of the organisation's operations and its SES
- the organisation's statutory, organisational, project and community commitments/obligations (e.g. indigenous engagement plans and cultural awareness)
- the organisation's representatives with responsibilities, authority, resources to achieve meaningful stakeholder engagement at all levels, throughout lifecycle
- an understanding of the proponent organisation

### *Site-based*

- general background of the project, the area and its environment
- name and contact details for stakeholder engagement personnel on the workforce and process to notify the responsible person of contact made by stakeholders or how stakeholders are to contact the responsible person (i.e. consistent messaging for contact protocols)
- identification of site-specific stakeholder engagement risk and proposed mitigation measures
- summary of relevant stakeholder engagement project regulatory requirements
- work health and safety related issues
- the individual's general work-related stakeholder engagement obligations and behavioural expectations
- project-specific stakeholder engagement performance requirements
- land access and landowner engagement requirements (e.g. contact prior to entry onto their property)
- specific stakeholder engagement work procedures and project protocols relevant to the site or project (e.g. communication obligations, particular community issues, responsible persons on site, capturing data relating to engagement with stakeholders such as formal or informal conversations)
- incident reporting requirements and procedures and escalation process where required.
- introduction to specific stakeholder engagement training and awareness tools (e.g. project handbooks, SES materials and forms, project alerts and project noticeboards).

Stakeholder engagement inductions should be conducted as part of an organisation's overall induction program. It is recommended that the induction contains a questionnaire or similar to reinforce some key requirements and ensure that inductees can demonstrate that induction contents have been understood at the time of induction.

### **D 3.4 Job-specific training**

Job-specific stakeholder engagement training is designed to target particular personnel whose duties have a greater potential to result in interaction with stakeholders. Such training should be targeted specially to the role and the stakeholders likely to be encountered. For example, members of a construction crew are likely to have more casual interactions with members of a community whereas office-based personnel may be more likely to interact with regulators and government agencies.

It is recommended that, where feasible, job-specific training is conducted by specialists, regulators (where appropriate) or nationally accredited training providers. The number of outsourced specialists and service providers that can be justified will be dictated by the size and nature of the project. Training should also identify the required expectations for individuals who complete the training and the criteria against which their performance will be measured.

### **D 3.5 Stakeholder awareness**

Stakeholder awareness programs maintain and enhance the engagement ethics of the organisation's corporate culture. Generally, programs will focus on topics relevant to the organisation, including:

- changing legislation;
- current stakeholder engagement issues relevant to the project/organisation, especially site-specific issues;
- an understanding of how specific company activities impact on stakeholders;
- the engagement expectations of stakeholders; and
- industry best practice or innovations.

By participating in such programs, individuals may enhance their knowledge and learn new skills. This in turn will enable them to better understand ongoing issues, to align on-ground activities with organisational expectations and to contribute to the achievement of organisational/project social goals.

### **D 3.6 Site-based training**

Site-based training, or toolbox training, can be extremely valuable in reinforcing important stakeholder requirements on a pipeline construction site. This can be applied through specific toolbox talks that are dedicated to an aspect of stakeholder management (e.g. interactions with landowners), or as part of a daily pre-start meeting for construction crews and other site personnel to recap or reinforce site-specific stakeholder engagement matters.

### **D 3.7 Crisis management and dispute resolution**

Proper stakeholder engagement is especially important during crisis and dispute situations. It is crucial processes are in place and personnel are trained to deal with engagement during these times. Engagement will play an important role in:

- informing stakeholders of any crisis, its impacts and any required actions;
- informing stakeholders that need to respond to the crisis;
- ensuring disputes are escalated to appropriate personnel as quickly as possible;
- ensuring the best information is available through public channels, particularly media;
- ensuring the organisation can respond effectively and efficiently to such situations within their specific communication/engagement discipline;
- ensuring that individuals in the organisation know what their responsibilities are and what they can/cannot respond to; and
- ensuring issues/assets valued by stakeholders are attended to as well as possible during crisis response and post-crisis activities.

## **D 4 Organisational culture**

An organisation with a deeply embedded culture that reflects a commitment to meaningful stakeholder engagement at all levels is most likely to achieve success. An organisational culture committed to stakeholder engagement is characterised by leadership which demonstrates that stakeholder engagement is a valuable and routine element of doing business, by employees who understand the value of stakeholder engagement and by work practices that ensure that it is essential to engage with stakeholders.

In order to assist in embedding a commitment to successful stakeholder engagement in their cultures, organisations may undertake the following:

- include stakeholder engagement in vision statements, core values and strategic plans;
- include stakeholder engagement in the corporate accountability framework;
- develop key performance indicators for stakeholder engagement;
- ensure high-level involvement in key stakeholder relationships;

- communicate internally the value of stakeholder contributions to project value;
- introduce practices to ensure stakeholder analyses capture all relevant stakeholders; and
- ensure that staff members engaging with stakeholders are given the skills needed to conduct a successful engagement with all stakeholders.

#### **D 4.1 Organisational structure**

The senior management of an organisation should clearly demonstrate that stakeholder engagement is regarded as a strong facilitator of business success. As discussed earlier, engagement should be embedded within the organisation, with nominated individuals who can impart the appropriate skills and knowledge to those who need them.

- The organisation should promote the understanding of the importance of – and support for – the creation of relations between the organisation's employees and stakeholders, recognising that such relations can bring unique and immense value to the organisation.
- Consideration should be given as to whether this task should report directly to the CEO, rather than be located in corporate affairs.
- Successful stakeholder engagement is a strategic function and not a communications function as it provides value for, and feeds into, all business areas of the organisation.
- Those responsible should promote excellence in stakeholder engagement across the organisation, ensuring that staff in critical positions have the necessary support and tools to carry out this role.
- Appropriate employees from across different departments, different functions and different levels in the organisation should be encouraged to engage with stakeholders in a strategic manner.
- Sharing internal learnings about stakeholder issues and their handling can reduce duplication and improve handling of the stakeholders.

#### **D 4.2 Contractor engagement**

Processes must be in place to ensure an organisation's commitment to stakeholder engagement is understood by all parties acting on behalf of the organisation and that responsibilities and key project messaging relating to stakeholder engagement are clearly understood. Including contractors in the training and induction process is one avenue; another is through writing it into contract conditions. These contractors are also stakeholders for the organisation.

### **D 5 Auditing and evaluation**

Auditing and evaluation are standard performance management tools for all aspects of operation of an organisation and stakeholder engagement is no exception. As noted above, evaluation methods for stakeholder engagement processes are not as well-developed as some other fields and extra attention needs to be given to this task.

Some forms of stakeholder feedback could be regarded as subjective so consideration must be given to how assessment will be carried out.

The project proponent may consider using key performance indicators (KPIs) to measure specific elements of an engagement plan. These may include local content and training targets and closeout targets for complaints, inquiries or information requests made by stakeholders.