

REPORT TO NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Consultation and Communication Plan, WDL 212-03

Issued: 21 Dec. 23



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Revision History

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Version 1	2016	Trop Water Pty Ltd (formerly known as Tropical Water Solutions)		Territory Generation
Version 2	25-Mar-2022	Sandya Nanayakkara	Jeannie McInnes (Territory Generation)	Jeannie McInnes (Territory Generation)
Version 3	15-Dec-2023	Godfred Duodu	Jeannie McInnes (Territory Generation)	Jeannie McInnes (Territory Generation)

Issue Register

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1 INTRODUCTION

Territory Generation is lodging an application for the amendment of Waste Discharge Licence (WDL 212-03) to the NTEPA pursuant to the Water Act.

The proposed Licensed Action is the discharge of wastewater from the Channel Island Power Station (CIPS) to Middle Arm, Darwin Harbour subject to Licence conditions to be imposed by the Northern Territory Environment Protection Authority (NTEPA).

The objectives of the WDL 212-03 are:

- (i) to fully characterise the wastewater discharge at the designated compliance points; and
- (ii) to ensure that the wastewater discharges do not compromise the beneficial uses of the waters of the Darwin Harbour at the designated compliance points.

This report provides the updated version of Consultation and Communication Plan.

2 OBJECTIVES

The Licensee is required to develop a Consultation and Communication Plan regarding the Licensed Action which includes a strategy for communicating with members of the public who are likely to have a significant interest in or be affected by the discharge. The Plan must be submitted to the NTEPA prior to the granting of a WDL.

Accordingly, the objectives of this Consultation and Communication Plan are to:

- Inform Service Authorities audience on detail of the overarching Wastewater Management at CIPS and its subsidiary Wastewater Treatment Improvement Plan, plant operation and monitoring program.
- Inform the Stakeholder audience on the compliance reporting and monitoring program outcomes as required by the Waste Discharge Licence (when approved).

3 TARGET AUDIENCES

- Service Authorities
 - Department of Land Resource Management
 - Department of Health
 - Power and Water Corporation
 - NT Catchments Advisory Committee
 - Northern Territory Environment Protection Authority (NTEPA)
- Stakeholders
 - Territory Generation
 - Amateur Fishermen's' Association of the Northern Territory
 - Larrakia Nation

4 ISSUE ANALYSIS

Table 1: Issue analysis

Sensitive Issues	Audience	Addressing Issues
Compliance with Licence Conditions	Stakeholders Service Authorities	Effective implementation of Wastewater Treatment Plan Effective monitoring program
Impact on Darwin Harbour water quality	Stakeholders Service Authorities	Effective implementation of wastewater Treatment Plan Effective monitoring program Compliance reporting

5 COMMUNICATION MATRIX

Table 2: Communication matrix

Audience	Communication Method	Date of Release	Actioned by
Stakeholders	NTEPA Discharge Licence publication on web site	November 2020	NTEPA
Stakeholders	Direct contact (Email) – Progress on Improvement Plan in WDL	May 2015	Territory Generation
Stakeholders	Annual Compliance and Audit Report	November 2015	Territory Generation
Stakeholders	Annual Compliance and Audit Report	November 2016	Territory Generation
Stakeholders	Annual Compliance and Audit Report	November 2017	Territory Generation
Stakeholders	Annual Compliance and Audit Report	June 2019	Territory Generation
Stakeholders	Annual Compliance and Audit Report	April 2020	Territory Generation
Stakeholders	Annual Compliance and Audit Report	June 2021	Territory Generation

6 COMPLAINT MANAGEMENT PROCESS

The Waste Discharge Licence requirement for an Annual Audit and Compliance Report includes a requirement for recording of complaints. A procedure is attached to this document (Page 4 - 6).

Key Actions

Action 1 – Information Session

- Information session with service authority representatives to impart technical knowledge of the Wastewater Management Plan and monitoring program.

Action 2 – Waste Discharge Licence Reporting Requirements

- Timely production and delivery of Trend and Interpretation Report and Annual Compliance and Audit Report.
 - Direct mail delivery to service authorities

Action 3 - Wastewater Treatment Plant Approval Reporting Requirements

- Timely production and delivery of annual Statement of Compliance and Monitoring Summary of wastewater quality criteria.
 - Direct mail delivery to service authorities.

Timeline

Table 3: Timeline

Activity	Timing
24 Hour Emergency Contact	Immediate
Information re Improvement Plan	May 2015
Annual Compliance and Audit Report (Including Trend analysis and Interpretation)	25 June 2021

ATTACHMENT: COMPLIANT MANAGEMENT PROCESS

Emergency Contacts and Complaint Lodgement

Table 4: Emergency Contacts and Complaint Lodgement.

Contact Person	Tim Danby	Jeannie McInnes
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Introduction

Territory Generation (TGen) is responsible for a range of land and infrastructure management systems located at Channel Island Power Station (CIPS) used for power generation to the Darwin Katherine region.

In accordance with the conditions of a WDL there is established a Communications Plan and as an adjunct to that Plan is this Complaint Management Procedure. Establishment of the Complaint Management Procedure also meets the commitment identified in TGen's Environmental Management Plan.

Pollution Incidents are those incidents which cause or have the potential to cause material or serious environment harm. Pollution Incidents **requiring urgent attention** should be reported via **Pollution Hotline 1800 064 567**. The Pollution Hotline is a one- stop shop for public reporting of pollution incidents requiring urgent attention. This is a 24-hour free call service. Calls are directed immediately to a 24 hour on-call Authorised Officer of the *Waste Management and Pollution Control Act* via a call centre.

Scope

The scope of the Process includes all complaints - whether written or by telephone - concerning the operation of the Wastewater Treatment Plant including in relation to events with the potential to cause environmental harm or an alleged breach of the conditions of WDL. Note: ***This Procedure does not apply to complaints in association with the general operations of the CIPS power generation activities.***

Legislation

Water Act

- WDL is issued pursuant to s.74 of the Act.
- WDL requires an Annual Audit and Compliance Report including complaints and incident recording.
- The Act declares as a Beneficial Uses of the Darwin Harbour Region aquaculture, environment and culture.

Waste Management and Pollution Control Act

- The Act defines 'environmental harm' as:
 - any harm to or adverse effect on the environment; or
 - any potential harm (including the risk of harm and future harm) to or potential adverse effect on the environment,
 - of any degree or duration and includes environmental nuisance.
- The Act defines 'environmental nuisance' as meaning:
 - an adverse effect on the amenity of an area that:
 - is caused by noise, smoke, dust, fumes or odour; and
 - unreasonably interferes with or is likely to unreasonably interfere with the enjoyment of the area by persons who occupy a place within the area or are otherwise lawfully in the area; or
 - an unsightly or offensive condition caused by contaminants or waste.

Roles and Responsibilities

The nominated contact officers of the Licensee are responsible for documenting, investigating and reporting outcomes of complaint investigations.

Procedure

Upon receiving a complaint, the contact officer will:

- Record the complaint details.
- Report receipt of the complaint to the Licensee
- Notify the complainant confirming receipt of the complaint.
- The complainant will be informed of the actions being taken as a consequence of the complaint within 21 days of the complaint having been first received.
- Upon making a final determination on the complaint investigation, the Licensee will advise the complainant on the outcome of the complaint investigation.

Complaint Recording

The Contact Officer will maintain a Complaint register recording:

- The date and time of the complaint;
- The method by which the complaint was made;
- Any personal details of the complainant;
- The nature of the complaint; and where details were provided, a note to that effect;
- The prevailing weather and tidal conditions at the time of the complaint;
- The action taken in relation to the complaint including any follow contact with the complainant; and
- If no action was taken by the Licensee, the reasons why no action was taken.

Dissatisfied Complainants

If a complainant is dissatisfied with the Licensee's response to a complaint, the following options are available:

1. Write to the Licensee requesting a review of the decision and outlining the reasons why such a review is warranted; and
2. As a further resort, contact the NT EPA at www.ntepa.nt.gov.au