Remediation and management of contaminated sites

Guideline for stakeholder engagement
National Framework for Remediation and Management of Contaminated Sites in Australia

The following guideline fits within the National Framework for Remediation and Management of Contaminated Sites in Australia. The Framework was developed to enable a nationally consistent approach to the remediation of contaminated sites.

The Framework provides the context, philosophy and principles underlying the remediation and management of contaminated sites in Australia. It also offers general guidance and links to further information to assist with remediation planning, implementation, review, and long-term management.

Remediation and management of contaminated sites
Guideline for stakeholder engagement

This guideline provides general guidance in relation to stakeholder engagement during the remediation and management of contaminated sites. It also provides references to a range of other potentially useful information.

The aim of this guideline is to provide a practical and up-to-date resource that can be used at contaminated sites across Australia. While the principles, techniques and tools described in this guideline should assist practitioners in every state or territory, there may be specific requirements at the local level, perhaps regarding particular groups or agencies that must be included in an engagement program, or regarding the way that the engagement program should be documented and reported to the responsible government agency.

Readers are advised to consult with their state or territory environment protection authority and other relevant Commonwealth, state or territory government authorities, including local councils, before commencing any remediation and management project to ensure that they are complying with any specific requirements.

Material in this guideline has been drawn from a range of government and non-government sources, with those sources being acknowledged in the reference boxes located at the end of each section.

Sources of information and referencing

Material in this guideline has been drawn, often verbatim, from a range of publicly available government and non-government sources. This reflects the fact that one of the objectives of this guideline is to harmonise existing guidance.

The sources are acknowledged in the reference boxes located at the end of each section. Referencing has been done in this manner in order to maximise readability and to simultaneously recognise specific sources. This referencing and acknowledgement style does not follow conventional styles, as by definition, this guideline does not represent a work of original research. Its originality lies in the approach to harmonisation which is a hallmark of the National Remediation Framework.

As indicated above, this guideline also provides references to a range of other potentially useful information.
STAKEHOLDER ENGAGEMENT

SUMMARY OF GUIDELINE

PREPARE

Identify
- Personnel
- Budget
- Timeline

Research
- Key issues to be addressed
- Previous stakeholder engagement
- Potential stakeholders
- How they have been/will be invited to participate

PLAN

Develop stakeholder engagement program plan
- Purpose of program
- Objectives of overall program and specific activities
- Limitations of engagement

Select engagement strategies
- Techniques and tools to address specific issues
- Rationale for choice of methods and techniques
- Action to mitigate barriers to participation

IMPLEMENT

Conduct program
- Stakeholders provided with statement of intent
- Stakeholder participation in activities
- Stakeholder feedback

Use stakeholder input
- Incorporation of stakeholder input into the remediation project decision-making process

EVALUATE AND REPORT

Develop evaluation strategy
- Purpose of strategy
- Resources required
- Process for evaluation
- Results

Document and report
- Feedback provided to stakeholders
- Information for relevant environment protection authorities and other regulatory bodies
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Appendix A: Suggested stakeholder engagement plan format
## 1 GOVERNMENT ENVIRONMENT PROTECTION AUTHORITIES

<table>
<thead>
<tr>
<th>Government</th>
<th>Agency</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commonwealth</td>
<td>Department of Environment</td>
<td><a href="http://www.environment.gov.au">www.environment.gov.au</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Western Australia</td>
<td>Department of Environment Regulation</td>
<td><a href="http://www.der.wa.gov.au">www.der.wa.gov.au</a></td>
</tr>
<tr>
<td></td>
<td>Environmental Protection Authority</td>
<td><a href="http://www.epa.wa.gov.au">www.epa.wa.gov.au</a></td>
</tr>
<tr>
<td>South Australia</td>
<td>Environment Protection Authority</td>
<td><a href="http://www.epa.sa.gov.au">www.epa.sa.gov.au</a></td>
</tr>
<tr>
<td>Tasmania</td>
<td>Environment Protection Authority</td>
<td><a href="http://www.epa.tas.gov.au">www.epa.tas.gov.au</a></td>
</tr>
<tr>
<td>Queensland</td>
<td>Department of Environment and Heritage Protection</td>
<td><a href="http://www.ehp.qld.gov.au">www.ehp.qld.gov.au</a></td>
</tr>
<tr>
<td>Australian Capital Territory</td>
<td>Environment Protection Authority</td>
<td><a href="http://www.environment.act.gov.au">www.environment.act.gov.au</a></td>
</tr>
<tr>
<td>Northern Territory</td>
<td>Environment Protection Authority</td>
<td><a href="http://www.ntepa.nt.gov.au">www.ntepa.nt.gov.au</a></td>
</tr>
<tr>
<td>New South Wales</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Environment Protection Authority</td>
<td><a href="http://www.epa.nsw.gov.au">www.epa.nsw.gov.au</a></td>
<td></td>
</tr>
<tr>
<td>---------------------------------</td>
<td>---------------------</td>
<td></td>
</tr>
<tr>
<td>Victoria</td>
<td>Environment Protection Authority</td>
<td><a href="http://www.epa.vic.gov.au">www.epa.vic.gov.au</a></td>
</tr>
</tbody>
</table>
2 GLOSSARY

Community—see definition of Stakeholder in this glossary.

Contamination means the condition of land or water where any chemical substance or waste has been added as a direct or indirect result of human activity at above background level and represents, or potentially represents, an adverse health or environmental impact.

Environment protection authority refers to the government agency in each state or territory that has responsibility for matters relating to contaminated sites.

Exposure occurs when a chemical, physical or biological agent makes contact with the human body through breathing, skin contact or ingestion, for example, contaminants in soil, water and air.

Practitioner means those in the private sector professionally engaged in the assessment, remediation or management of contaminated sites.

Remediation means the clean-up or mitigation of pollution or of contamination of soil or water by various methods.

Risk means the probability in a certain timeframe that an adverse outcome will occur in a person, group, or ecological system that is exposed to a particular dose or concentration of a hazardous agent; that is, it depends on both the level of toxicity of hazardous agent and the level of exposure.

Risk assessment means the process of estimating the potential impact of a chemical, physical, microbiological or social hazard on a specified human population or ecosystem under a specific set of conditions within a certain timeframe.

Risk communication means an interactive process involving the exchange among individuals, groups and institutions of information and expert opinion about the nature, severity and acceptability of risks and the decisions to be taken to combat them. Risk communication is delivered most efficiently in the context of a well-structured stakeholder engagement process.

Risk management means the decision-making process to analyse and compare the range of options for site management and select the appropriate response to a potential health or environmental hazard. It may involve considerations of political, social, economic, environmental and engineering factors.

Risk perception is the subjective judgement that people make about the characteristics and severity of a risk.

Site means the parcel of land where remediation activity is occurring.

Stakeholder is often used interchangeably with the term community. For the purposes of this guideline, stakeholder means an individual, group, organisation or other entity that may be interested in, or affected by, the remediation and management of a contaminated site. Depending on specific site circumstances, stakeholders may include residents, site owners, public health officials, government regulatory authorities, media, businesses working on site, and environmental or other action/interest groups, as well as site owners and people working on the project.
Stakeholder engagement – is the process of engaging and communicating with people (individuals and groups) who have an interest, or 'stake' in the remediation and management of a contaminated site. It can include a variety of approaches:

- to inform—one-way communication or delivery of information
- to consult—providing for ongoing stakeholder feedback
- to involve—a two-way process to ensure stakeholder concerns are considered as part of the decision-making process
- to collaborate—developing partnerships with stakeholders to make recommendations
- to empower—allowing stakeholders to make decisions and to implement and manage change.

Worker means any person who carries out work for a person conducting a business or undertaking, including work as an employee, contractor, subcontractor, self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer', or volunteer.
3 ABBREVIATIONS AND SHORT FORMS

4 INTRODUCTION

During the remediation and management of a contaminated site, there may be many people who have an interest in, or may be affected by, site conditions or activities occurring on the site. These stakeholders may include landowners and residents living near the site, officers from public health, environmental or other government regulatory authorities, and members of interest or action groups, as well as site owners and people working on the project.

This guideline aims to provide general guidance to practitioners as they consider, and plan for, the most appropriate involvement of stakeholders during the implementation of a remediation and management plan.

Information about further sources of assistance is provided throughout the document.

5 PURPOSE OF GUIDELINE

The purpose of this guideline is to present guidance on stakeholder engagement so that practitioners can work effectively with the individuals and groups who may have an interest in the remediation and management of a contaminated site.

6 SCOPE OF GUIDELINE

The engagement of stakeholders is important throughout the assessment, remediation and management of a contaminated site. After establishing the objectives of their engagement program, and identifying the individuals and groups with an interest in the site, the practitioner may need to use a number of different techniques and tools to ensure the appropriate level of engagement with these stakeholders —from ensuring that local residents are kept up-to-date about work occurring on a site, to running workshops that involve relevant parties in decision-making around remedial objectives and options.

Guidance for practitioners to engage stakeholders at the time a site is being assessed for contamination is available through the National Environment Protection (Assessment of Site Contamination) Measure 1999 as amended (NEPM), specifically in Schedule B (8), Guideline on community engagement and risk communication.

This guideline builds on the support to practitioners offered in that NEPM guidance. Where relevant and appropriate, the material contained in the NEPM has been adapted for use as a starting point. This guideline then provides additional information regarding the development and implementation of a stakeholder engagement plan during the remediation and management of the site.

Other information used in the development of this guideline includes a range of material, both generic and environmental-specific, regarding stakeholder engagement. In order to maintain relevance for practitioners, sources of information are predominantly Australian in origin. Information about relevant guidance modules that have been developed under the National Framework for Remediation and Management of Contaminated Sites is provided within the text of this guideline.

Because of the limitations presented by differences in the regulation of contaminated sites across Australia, this guideline can only provide general guidance. Environment protection authorities in all states and territories may have their own specific requirements regarding the engagement of stakeholders during remediation and
management of a contaminated site. Practitioners should make regular contact with relevant Commonwealth, state or territory authorities to ensure that their stakeholder engagement program complies with any particular requirements and site-specific conditions.
7 STAKEHOLDER ENGAGEMENT ON CONTAMINATED SITES

7.1 Understanding stakeholder engagement

The basic definition of a stakeholder is an individual who has an interest in a particular project or who may be affected by it. The term is also used to describe a group, or an organisation, or a government body, with an interest in the project or which may be affected by it.

Stakeholder engagement, as it relates to the remediation and management of a contaminated site, refers to deliberate action taken by the practitioner to involve any combination of stakeholders in the risk management process occurring on site. The practitioner may talk to local media and host a public meeting to inform a local community about activities being undertaken on site. In a different scenario, the practitioner may organise a workshop to seek input from interested individuals and groups into decisions being made about remedial options for the site.

The overall aim of stakeholder engagement is to improve the quality of the decisions made for a particular project, while also improving the decision-making process itself.

Stakeholder engagement processes are increasingly used across a number of industries and in a variety of settings. As a result, there is a growing body of general guidance to support these processes. A widely used source of guidance is the International Association of Public Participation (IAP2). This organisation developed a ‘Spectrum of Public Participation’, outlining the different approaches that are possible in any engagement program in any industry – to Inform, to Consult, to Involve, to Collaborate with, or to Empower. IAP2 further described when each of these approaches may be appropriate, and the promise that is being made to participants when a particular approach is taken. The WA Department of Environment adapted this Spectrum to suit a general environmental context—their material was used in the following table.

Table 1: Possible approaches to stakeholder engagement (adapted from table in WA Department of Environment 2003, Community involvement framework, DoE, Western Australia, p 11, which was itself adapted from IAP2’s ‘Spectrum of Stakeholder Involvement’).

<table>
<thead>
<tr>
<th>Approach</th>
<th>When the approach may be used</th>
<th>The promise being made</th>
</tr>
</thead>
</table>
| INFORM    | Promote awareness and educate                                                                | A decision has already been made or there is no opportunity to influence the final outcome.  
|           |                                                                                               | The issue is relatively simple.                                                         | We will keep you informed. |
| CONSULT   | Seek input/feedback                                                                            | Decisions are still being shaped.                                                       | We will keep you informed, listen to and acknowledge your concerns, and provide feedback on how stakeholder input influenced the decision. |
| INVOLVE   |                                                                                               | There is a need for two-way discussion amongst, and with,                              | We will work with you to ensure that your concerns and issues are directly
<table>
<thead>
<tr>
<th>Foster meaningful discussion</th>
<th>stakeholders.</th>
<th>reflected in the alternatives developed and provide feedback on how stakeholder input influenced the decision.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>There is a real opportunity to influence the final outcome.</td>
<td></td>
</tr>
<tr>
<td>COLLABORATE</td>
<td>There is a need for stakeholders to talk to each other regarding complex, value-laden issues.</td>
<td>We will support you to provide direct advice and innovation in formulating solutions and incorporate your advice and recommendations to the maximum extent possible.</td>
</tr>
<tr>
<td>Facilitate consensus</td>
<td>There is capacity for stakeholders to shape decisions that affect them.</td>
<td></td>
</tr>
<tr>
<td>EMPOWER</td>
<td>Stakeholders have accepted the challenge of developing solutions themselves.</td>
<td>We will implement what you decide.</td>
</tr>
<tr>
<td>Provide an effective forum for stakeholder decisions</td>
<td>There is an agreement to implement solutions generated by the stakeholders.</td>
<td></td>
</tr>
</tbody>
</table>

On a contaminated site, the practitioner can consider these approaches as they plan engagement activities. The approach taken will, of course, always depend on site-specific circumstances. During the course of a remediation and management project, a practitioner may use a mix of these approaches to support the decision-making process. The selection of an approach will depend on the level of stakeholder involvement in decision-making that is appropriate and possible with regard to the particular issue being considered.

More detailed and/or further information:


Sources of information for this section:

WA Department of Environment 2003, Interim industry guide to community involvement, DoE, Western Australia.

WA Department of Environment 2003, Community involvement framework, DoE, Western Australia.

### 7.2 Risk perception and risk communication

The remediation and management of contaminated sites in Australia generally takes place within a risk management context. Risk management describes a decision-making process to analyse and compare the
range of options for site management and the selection of appropriate responses to potential health or environmental hazards. As part of this process, a practitioner is likely to consider a range of influences—including political, social, economic, engineering, and environmental factors, including issues of sustainability—to inform the decisions they make about activities on a contaminated site.

Underlying any effective risk management process is an appreciation of the concept of risk perception. The term generally refers to the perceptions of those members of the stakeholder group who are outside the regulatory, scientific research and risk assessment spheres. It is important to remember, however, that every person involved in the process, both expert and non-expert, will have perceptions of risks that are influenced by individual beliefs, emotions, and views of the world.

Perception of risk can be influenced by numerous factors beyond scientific data. It is for this reason that what may scientifically constitute a ‘negligible risk’ can still give rise to anger and resentment among stakeholders in a particular project. People see risk as multidimensional and not as being represented by a numerical value alone, judging risk according to its characteristics and context. For example, trauma and death as the result of an involuntary catastrophic reaction is likely to be dreaded more than if those outcomes arise from a situation where the risk is assumed voluntarily and the person feels some degree of control over it (for example, motor vehicle crashes).

Risk perception is largely influenced by age, gender and education, as well as by other factors including ethnicity and cultural background. Certain kinds of risks tend to arouse heightened levels of concern, for example, where risks are:

- involuntary or imposed on the stakeholder
- man-made rather than natural
- inescapable
- controlled by parties outside the relevant community
- likely to have little or no benefit to the community
- subject to media attention
- unfairly distributed
- related to a distrusted source
- exotic or unfamiliar
- likely to affect children or pregnant women
- likely to affect identifiable rather than anonymous people
- the cause of insidious and irreversible damage
- the cause of dreaded health effects such as cancer
- poorly understood by science
- subject to contradictory statements from responsible sources (or, even worse, from the same source)
- related to situations where the risk makers are not the risk takers.

In contrast, concerns about risk tend to be lessened when:

- the risks are voluntarily assumed
- the risks have a natural origin
- individuals, or groups, feel able to exert some control over the risks
- there are clear benefits from the risks
- the risks are fairly distributed
• the risks are associated with a trusted source
• the risks are familiar
• the risks only affect adults
• the risks are understood
• the process of how the risks are determined is understood.

When the practitioner is planning how to respond to concerns that stakeholders may have about remediation and management of a contaminated site, it is important to understand that the risk itself is only one of a number of factors that will influence an individual’s risk perception and acceptance. As mentioned above, other influences such as age, gender, education, ethnicity and cultural background will also affect the way that each stakeholder sees and understands the same situation.

Many approaches to risk communication in the past have been mistakenly directed towards getting the public to accept the risk estimates of experts. Technically orientated risk professionals have attempted to ‘fix’ the public’s ‘misperception’ of risk rather than recognise that there are valid reasons for differing views. When people who are very frightened or angry about a hazard are told that their perception is wrong, that the hazard is insignificant, or that they should ‘calm down’, the development of trust and mutual respect—crucial to effective engagement programs—is immediately undermined.

At its best, risk communication is an interactive process involving the exchange among individuals, groups and institutions of information and expert opinion about the nature, severity and acceptability of risks and the decisions to be taken to combat them. Risk communication is delivered most efficiently in the context of a well-structured stakeholder engagement process.

While the practitioner will need to focus on the site-specific concerns of stakeholders, it may be helpful to keep in mind that, in general, people will want to know:

• more than just technical descriptions of the risk. Risk should also be conveyed in ways that people with non-technical backgrounds can relate to, perhaps through analogies that are familiar and which can assist understanding
• about risk consequences—this includes effects and the level of danger associated with the risk
• what they should do, and what organisations and agencies are doing, about the risk and its consequences. This should include timeframes for actions to be taken
• exposure information—including risk intensity, duration, acceptable risk levels and how they are measured, how long the exposing agent is dangerous, how long it persists, and how it accumulates in the body.

More detailed and/or further information:

For more on risk perception and risk communication, see Sandman, PM 2012, Responding to stakeholder outrage: Strategies for effective risk communication, and other resources available at <www.psandman.com>.


For more on risk perception and risk communication relating to contaminated sites, see pp 3-20, Heath, L, Pollard,
Sources of information for this section:


enHealth 2006, Responding to environmental health incidents: Community involvement handbook, Department of Health and Ageing and enHealth Council, Melbourne, Australia.


7.3 The value of engaging stakeholders

When managed well, stakeholder engagement can benefit all aspects of site contamination management by helping the practitioner to:

- understand stakeholder perceptions and concerns, and more accurately anticipate stakeholder response to actions and decisions
- increase the effectiveness of risk management decisions and empower stakeholders by involving them
- improve communication and trust and reduce unwarranted tension between stakeholders and decision-makers
- explain risk more effectively, to ensure that stakeholders gain an accurate understanding of the risks.

Two-way engagement, which effectively conveys information and enables stakeholder participation in the decision-making process, can provide significant cost savings and improve credibility for organisations involved in contaminated site management.

Stakeholders also benefit by contributing to improved risk management decisions and more acceptable site management options.

Effective stakeholder engagement increases the opportunities for industry to benefit both during and beyond the remediation and management of a particular site. The benefits from industry and stakeholders working together can include:
• less resistance to appropriate proposals
• better decision-making and sustainable outcomes—stakeholders, through their local knowledge, can offer new perspectives and solutions for issues, which may even result in financial savings
• relationship/partnership development
• increased openness and trust
• demonstrated commitment to accountability and transparency
• shared understanding of problems and dilemmas
• wider community pride in organisations that work collaboratively with stakeholders.

Risks of not conducting an effective stakeholder program include:

• delays for a project, requiring additional investigations or consultation to be undertaken and adding to the project cost
• stakeholder outrage
• media scrutiny
• damage to a company’s reputation and ability to conduct business
• potential litigation.

More detailed and/or further information:


Sources of information for this section:


WA Department of Environment and Conservation 2006, Community consultation guideline, Contaminated sites management series, DEC, Western Australia.

7.4 Timing and extent of a stakeholder engagement program

While stakeholder engagement is an important part of any remediation and management project, it is likely to be particularly beneficial when:

• the implementation of the remediation and management plan may affect the amenity of the locality, e.g. by way of temporary noise, odour, emissions, dust, or truck traffic
• where a high level of contamination has the potential to affect the adjacent community, or where the contaminant types are controversial, or where there is a perception that these conditions may exist.
• where the site is near to residential areas or particularly sensitive ecological receptors and/or vulnerable sub-populations, such as childcare centres, schools or nursing homes
• where the site or locality has a controversial history that may be related to the site contamination, or the development of the site is controversial for political, economic or social reasons, or where the characteristics or toxicity of the contamination may be controversial, or where contamination has moved outside the site boundaries, or a remediation method may be proposed that is perceived as controversial or that is likely to affect the amenity of the locality or give rise to nuisance conditions.

Engagement with stakeholders should start as early as possible and continue throughout the remediation and management of the site. As mentioned previously, an engagement program usually commences during the assessment of a contaminated site, but the engagement process is ongoing.

In addition, stakeholders should be engaged whenever a new issue is identified that may pose a risk to health or the environment or raise public concern. This can mean than an engagement activity is started before all information is known and before all options for managing risks have been identified and considered.

Starting an engagement activity early can be difficult for the practitioner who may be unused and/or unwilling to publicise possible risks associated with the site until they are sure what those risks may be and how they will be managed. Early engagement ensures, however, that stakeholders will feel that they have some control over and involvement in the risk management process. This is more likely than not to lead to stakeholder acceptance of the decisions that are made.

Determining the extent of engagement depends upon the nature and impact of the contaminants and the proximity of the local community to the site, including whether activities are likely to affect amenity or give rise to nuisance conditions such as noise or odour. The extent of engagement will also be affected by whether the site, locality or contaminant has a history of controversy. As a general guide, if the contamination has a significant impact on a community, more extensive stakeholder participation is expected.

Factors to consider when determining the extent of stakeholder engagement that may be required include:

• whether contamination is likely to pose a significant risk to the environment
• whether contamination is likely to pose a health risk to the local community
• whether contamination is (or is likely to be) perceived to pose a significant environmental or human health risk
• whether contamination is expected to be contained within the site boundaries or has moved off-site (e.g. a contaminated groundwater plume)
• the number of stakeholders potentially affected
• the proximity of the site to sensitive receptors (e.g. wetlands, rivers, ocean, residences, kindergartens, schools or hospitals)
• whether site remediation and management activities may affect the amenity of the locality or give rise to nuisance conditions (e.g. due to ground disturbance, generation of dust, noise, or increased traffic)
• whether site remediation and management activities may result in increased environmental or public health risks (e.g. release of particulate matter or transportation of contaminated media)
• the contentious nature of the type of contaminant or industry involved
• how visible the site is to the public
• the size of the site
• whether the site forms part of a high profile or controversial development
• whether the site or company has a controversial history
• the degree of involvement desired by stakeholders
• how aware the local community is of contaminated sites issues
• the degree of trust which the local community has in the process, regulatory authorities, and site managers
• whether the contamination is likely to have a negative impact (real or perceived) on property values in the area.

It is not always appropriate, effective, or possible to involve stakeholders in engagement activities that have a decision-making or decision-influencing aspect. Ineffective or inappropriate engagement is counterproductive and increases apathy and cynicism on the part of stakeholders—not only towards future engagement activities, but also towards the practitioner and their organisation.

It is neither effective nor appropriate to involve stakeholders in decision-making or decision-influencing processes if:

- a final decision has already been made
- stakeholders cannot influence a final decision due to site or project-specific factors
- there is insufficient time and/or resources available
- the scope of the engagement is not clearly understood, including an understanding of who will make final decisions, and how stakeholder engagement outcomes will be used
- the issue requires an urgent decision.

There may also be limitations when the goal of engagement is not necessarily to involve or empower stakeholders, but to inform them about an issue, or about particular activities on site.

While stakeholders have a right to information about environmental factors that affect their lives, there are some legislative issues that may have an impact on the type and/or amount of information that can be provided. For example:

- commercial-in-confidence materials should not be disclosed
- privacy legislation restrains the giving out of personal information to any other person without the permission of the person named in the material in question
- freedom of information (FOI) legislation means that written material held by government agencies can be requested and viewed by any citizen with an interest in that particular information (FOI covers all forms of writing, including emails and sticky notes).

The practitioner should consult with relevant Commonwealth, state or territory authorities regarding specific requirements around stakeholder engagement. For example, in some situations and in some states or territories, more extensive stakeholder engagement is required for sites which pose an environmental or human health risk and where the contamination has the potential to move off-site or affect off-site receptors, than for sites distant from sensitive receptors where risks to the environment and human health are minimal.
8 THE STAKEHOLDER ENGAGEMENT PLAN

8.1 Introduction

Environment protection authorities in Australia expect that practitioners will involve relevant stakeholders in the risk management decisions that are taken during the remediation and management of a contaminated site. They further expect that practitioners will put in place effective risk communication strategies relating to the activities occurring on the site.

Reporting obligations in each state and territory include the provision of information about the way a practitioner plans to involve and communicate with the individuals and groups that may have an interest in the site. Depending on the size and complexity of the project, this information may be included as part of an overall remediation and management plan, or provided as a separate and specific plan.

In general, the development of a plan for stakeholder engagement takes place at an early stage in the preliminary assessment of site contamination. Depending on site-specific circumstances, however, a new plan may be developed at the same time as the remediation and management plan. An existing plan may be updated at various times during the remediation and management of the site. Regardless of the timing of plan development, the process is ongoing and should be responsive to changing conditions on and off site.

This guideline uses the term ‘stakeholder engagement plan’ and outlines the basic information that a practitioner might be expected to provide in such a plan. Individual state and territory environment protection authorities may

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Sources of information for this section:

- WA Department of Environment and Conservation 2006, Community consultation guideline, Contaminated sites management series, DEC, Western Australia.
- WA Department of Premier & Cabinet 2006, Working together: Involving community and stakeholders in decision-making, DPC, Western Australia.
- WA Department of Environment 2003, Interim industry guide to community involvement, DoE, Western Australia.

For more on the timing and extent of engagement that may be required, see:


use a different term to describe this plan, for example, ‘community consultation plan’ or ‘community relations plan’. Authorities in different jurisdictions may use the terms ‘stakeholder’ or ‘community’ or both of these terms interchangeably to refer to the target of any engagement plan.

Regardless of the terminology used, the expectation is that the practitioner will involve and communicate with all parties with a particular interest in the remediation and management of the site in question.

Along with providing supporting information about the resources, budget, timelines and other requirements of stakeholder engagement during the remediation and management of a contaminated site, a stakeholder engagement plan guides the practitioner in answering the following questions:

- Why do you need to engage stakeholders?
- Who you need to engage?
- What is your message?
- What methods and tools will you use to engage your stakeholders?
- How will you use the information you gather?

A good plan should help the practitioner to:

- integrate the engagement and communication efforts with the risk assessment and management process
- increase the effectiveness of the engagement and communication
- allocate appropriate resources to engagement and communication efforts
- increase dialogue and mutual understanding, and reduce unwarranted tension with stakeholders.

The stakeholder engagement plan should provide a degree of flexibility and be responsive to changing circumstances and stakeholder input. It may be useful to ‘road-test' the plan before engagement activities commence to ensure that the appropriate stakeholders have been identified and that the plan is likely to meet stakeholder expectations of the engagement process. The plan should be reassessed as more information becomes available during remediation and management activities, to ensure that it remains appropriate. For example, if site works establish that contamination exists at a greater extent than anticipated, then more stakeholders (e.g. landowners) may be affected and should therefore be included in the engagement process.

The structure and content of a plan will, of course, include site-specific content, and will be in line with any specific documentation and reporting requirements of state and territory environment protection authorities. While the structure of the plan, and its accompanying detail, may vary according to these factors, a stakeholder engagement plan will generally contain the following information:

- a clear description of the overall project, the technical solution proposed, and where the stakeholder engagement aspect fits in
- the purpose and objectives of the engagement process
- a description of the major issues likely to emerge
- the negotiable and non-negotiable aspects/decisions/issues in the project
- a list of stakeholders involved
- the proposed engagement process and key elements/techniques/tools
- the decision-making process which will be followed
- a commitment on how the information from the process will be used
• a commitment on how feedback will be given to participants on how their input was used, and the reasons for final decisions
• timeframe and key milestones
• budget.

An example of the possible structure and content of a stakeholder engagement plan is provided as Attachment A. The example plan is a synthesis of information provided by various state and territory environment protection authorities to practitioners.

The different elements of the plan are discussed in more detail in the following sections of this guideline. The information provided should assist in the development of an overall stakeholder engagement plan that will guide all of the engagement activities undertaken.

It is important to note, however, that in a site-specific plan, the practitioner will also need to provide details about the way each engagement activity will be approached. For example, if the engagement program is to include the involvement of stakeholders in the setting of remediation objectives or decisions around remedial options for the site, then similar information, (i.e. background, list of stakeholders, what will be done with information from the engagement process) will also need to be provided in the engagement plan.

Further information about the role of stakeholder engagement in specific aspects of remediation and management on contaminated sites is contained in other guidelines developed under the National Framework for the Remediation and Management of Contaminated Sites. These guidelines follow the process of site remediation and management as follows:

**Development of remediation and management plan**

CRC CARE, *Framework for Remediation and Management of Contaminated Sites Module, Site-specific remediation objectives*, (to be developed).


**Implementation of remediation and management plan**
CRC CARE, *Framework for Remediation and Management of Contaminated Sites Module, Health and safety*, (first guideline—Worker (on-site) health and safety—developed 2013, second guideline—Public (off-site) health and safety—to be developed).


**Post-remediation considerations**


CRC CARE, *Framework for Remediation and Management of Contaminated Sites Module, Auditing/third party review*, (to be developed).

CRC CARE, *Framework for Remediation and Management of Contaminated Sites Module, Institutional controls*, (to be developed).

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**More detailed and/or further information:**


For **general guides to assist in developing an engagement plan**, see:


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**Sources of information for this section:**


WA Department of Environment 2003, *Community involvement framework*, DoE, Western Australia
8.2 Principles of stakeholder engagement

When planning stakeholder engagement for a contaminated site project, keep in mind the following key principles from the NEPM guidance during the assessment of site contamination. The principles are clearly as relevant and useful to practitioners undertaking an engagement program during the remediation and management of a site.

1. Accept and involve stakeholders as legitimate partners
   - Involve stakeholders early
   - Involve all groups that have an interest in or are potentially affected by the issue
   - Focus on informing stakeholders to enable their participation
   - Never underestimate the level of technical knowledge of stakeholders
   - Invite stakeholders to become involved in the design and evaluation of the engagement process

2. Plan carefully
   - Clearly define the objectives of the stakeholder engagement program
   - Identify and address the particular concerns of specific stakeholders
   - Ensure all relevant staff are trained in risk communication
   - Develop a timeline that allows sufficient time for the engagement process
   - Include allowance for new developments or changes—be flexible and responsive

3. Listen to stakeholders’ specific concerns
   - Do not make assumptions about what people know, think or feel—take time to find out
   - Allow all interested parties the opportunity to be heard
   - Be empathetic; put yourself in the place of the stakeholders and try to understand their concerns
   - Trust, credibility, competence, fairness and empathy can be of as equal or greater importance to stakeholders as facts and figures
   - Develop a stakeholder engagement plan that has the involvement and support of the stakeholders

4. Be honest, frank and open at all times
   - Do not expect to be trusted, and remember that once trust is lost, it is very difficult to regain
   - Acknowledge when you do not have all the answers, and commit to getting back to people with the answers in a given timeframe
   - Disclose information, including ‘bad news’ as soon as it comes to hand
   - Do not exaggerate or minimise the level of risk; be honest
   - Share more, not less, information

5. Coordinate and collaborate with other credible sources
   - Build bridges with other organisations and groups that can provide reliable, credible information and advice
   - Try to issue communications jointly with other credible sources—conflict and disagreement between organisations makes communication difficult and results in loss of credibility
6. **Meet the needs of stakeholders**

- Consider opportunities to assist stakeholders in participating in the engagement process, e.g. by providing assistance with travel to meetings, access to office facilities, free methods to respond to published material (e.g. free phone numbers, return envelopes), information in languages other than English, if appropriate
- Be aware of and sensitive to different cultural behaviours and preferred methods of communication
- Ensure that information is readable, credible and publicly accessible, and written in a style and format (including site maps and diagrams) that encourages stakeholders to comment about general and specific issues, especially where technical detail is involved

7. **Meet the needs of the media**

- Be accessible to the media, be open with information and respect deadlines
- Provide information tailored to the needs of each type of media
- Prepare in advance and provide background information to issues
- Provide feedback (praise or criticism) to the media when appropriate
- Where possible, establish a good working relationship with media personnel
- Nominate one person to liaise with the media and provide the main point of contact; this helps to avoid conflicting or confused messages
- Remember that the media will want to report danger rather than safety, simplicity rather than complexity, and politics rather than risk

8. **Speak clearly and with compassion, kindness and respect**

- Always use clear, plain language
- Simplify language, not content
- Acknowledge and respond to emotions expressed by stakeholders, including anger, fear, outrage and helplessness
- Do not be patronising or condescending; show respect for stakeholders’ intelligence
- Respectfully re-state a person’s questions or statements in your own words to make sure you understand the question before answering it
- Discuss what you can do and what you will do
- Do what you promise
- Remember to tell people what you can’t do, and why
- People can understand risk information, but they may not agree with you; some people will not be satisfied

9. **Evaluate effectiveness**

- Monitor and evaluate the effectiveness of the stakeholder engagement program during and at the end of each stage of the process
- Record accurately and comprehensively the nature and detail of stakeholder contributions and responses made throughout the stakeholder engagement program
- Establish feedback processes and monitor and review the effectiveness of each engagement activity as well as the program overall
• Learn from your mistakes

More detailed and/or further information:

For more on principles underlying engagement with stakeholders during remediation and management of a site, see Heath, L, Pollard, SJT, Hrudey, SE & Smith, G 2010, Engaging the community: a handbook for professionals managing contaminated land, CRC for Contamination Assessment and Remediation of the Environment, Adelaide, Australia, pp 1-20.

For more on general principles underlying stakeholder engagement processes, see WA Department of Environment and Conservation 2006, Community consultation guideline, Contaminated sites management series, DEC, Western Australia, pp 3-4.

Sources of information for this section:


8.3 Administrative and management aspects

8.3.1 Personnel

Depending on the size and complexity of the remediation and management project, the stakeholder engagement program may be run by the practitioner, a team from within the organisation undertaking the remediation and management project, an external consultant, or a combination of all of these. It is important that the internal culture and structure of the organisation is supportive of the program and that the organisation’s senior management supports and endorses the plan and its implementation.

Whether or not the practitioner is leading the stakeholder engagement team, early contact should be made with the relevant Commonwealth, state or territory authorities to ensure that all legislative requirements are understood prior to the plan being developed.

For more complex or contentious sites, or even for just some issues being addressed through the engagement program, a better outcome is often achieved if the stakeholder engagement role is undertaken by a third party such as a consultant or professional facilitator. This can help to ensure a more open exchange of information and reduce tension if stakeholders are already mistrustful of those responsible for the management of the site.

It is important that whoever is involved in the planning, developing, implementing, monitoring and evaluating of a stakeholder engagement plan has the skills and experience to do so. Factors to consider when building any type of stakeholder engagement team include the following:

• Effective high-level leadership is vital.
• There must be a commitment to openness and transparency.
• Personnel with skills in stakeholder engagement, facilitation, information dissemination, and knowledge of the issues are essential to keeping the engagement process on track.
• Enthusiasm and commitment from the team will directly impact upon the success of the engagement program.
• On complex issues, or if a high level of conflict is having a continuing negative impact on the engagement process, there may be need to access expert advice by bringing in specially skilled and/or experienced staff through the use of consultants and contractors.

Training and information about external assistance with stakeholder engagement is widely available through a variety of sources, including the International Association for Public Participation Australasia (IAP2), as well as government and private training and facilitation service providers.

More detailed and/or further information:

For more about professional development in the area of stakeholder engagement, see the IAP2 website at <www.iap2.org.au>.


Sources of information for this section:


WA Department of Premier & Cabinet 2006, Working together: Involving community and stakeholders in decision-making, DPC, Western Australia.

8.3.2 Budget

The budget required for stakeholder engagement will depend on the size and complexity of the remediation and management project and the extent to which it is contentious. While it is possible to carry out an effective stakeholder engagement program with limited funds, keep in mind that the inclusion of third-party costs, such as fees for an external consultant to undertake the engagement program, will make a significant impact on the overall budget.

Some of the likely expenses associated with a stakeholder engagement program include such things as:

• advertising
• venue hire
• printing
• postage/freight
• child or respite care
• parking
• travel
• accommodation
• public address systems
• stationery
• consultancy
• audio-visual equipment
• translation/interpreting services
• participation payments or honorariums
• catering.

Source of information for this section:
WA Department of Premier & Cabinet 2006, Working together: Involving community and stakeholders in decision-making, DPC, Western Australia.

8.3.3 Timeline

When developing a timeline for the stakeholder engagement plan, the practitioner should keep in mind the requirement, under work health and safety laws, to consult with workers and their health and safety representatives at each step in the risk management process. In addition, the practitioner should consult with the relevant Commonwealth, state or territory authorities, as some jurisdictions have specific requirements regarding the timing of engagement activities.

Considering the following points should assist in the preparation of a well-defined schedule that allows sufficient time at each stage of the engagement program to allow for proper monitoring and due process:

- Having a realistic timetable is valuable for all participants. It can indicate what they can expect (in the short and longer term), and when.
- The timing of engagement activities may need to be adjusted to suit the schedules of participants critical to the success of the project. This may mean conducting the activities after business hours, or outside of public or cultural/religious holidays.
- Timing can also be important in a secondary way because some issues may be more prominent at particular times of the year.
- Ample time should be provided for participants to contribute throughout the engagement process, to become informed of the issues, reflect upon the information, and make considered responses.
- Thought should be given to the meeting cycles of different organisations, and the time it takes for groups and individuals to be involved in formal discussions, debate and awareness raising.

More detailed and/or further information:
For more on stages of contaminated site management that may require stakeholder engagement, see pp 6-7, WA
8.4 Setting the context

The stakeholder engagement plan should include a description of the overall remediation and management project in order to provide context for the stakeholder engagement process. Highlighting key issues will help to explain the strategies, techniques and methods of engagement described later in the plan. This part of the plan should also provide information about any stakeholder engagement that has already taken place, for example, during the assessment stage, including the outcomes from any completed engagement activities.

While much of this preparatory work may have been undertaken by the practitioner if a stakeholder engagement plan was developed prior to the initial assessment of the site contamination, this is not always the case. In addition, the plan should be updated accordingly throughout the remediation and management of the site as new information comes to light or conditions on site change.

The period of research, mapping and scoping that informs this section of the plan not only provides required information to regulatory agencies—it also helps the practitioner to develop a clearer understanding of the role that stakeholder engagement should and will perform during the life of the project. A further advantage is that the documentation of the information gathered during this research period will be useful during the preparation of materials required for specific engagement activities.

8.4.1 Understanding the issues

The term ‘issue’ can cover a range of events or actions where a decision of some form is likely to be made. A project can be based on a single issue or, as is more likely on a contaminated site, can be made up of multiple issues. The practitioner should consider the main project issue (e.g. that a contaminated site is being remediated), along with any potential separate issues within components of the project (e.g. that there are a number of remedial options and technologies that may or may not be appropriate for the site).
As with the notion of risk, it is important to allow for the fact that issues can be viewed in potentially countless ways, depending on a person’s interests, backgrounds and experience, including those of the practitioner.

When deciding which issues would benefit from inclusion in a stakeholder engagement program, the practitioner might find it useful to consider whether any, some or all of the following statements apply to the issue in question:

- The issue affects the rights and entitlements of any stakeholders.
- The issue is likely to affect people’s quality of life.
- The issue affects the natural environment.
- A significant number of people, or particular groups, are likely to have strong and/or competing views on the issue (both negative and positive).
- Insufficient information is available on which to make a decision about an issue.
- The issue is technically complex.
- The organisation undertaking the remediation and management project genuinely wants to find out the views of stakeholders.
- Agreement and acceptance by stakeholders will be critical to the longer term success of the project.

Obtaining meaningful information about issues, which goes beyond the gathering of ‘opinion’, might be assisted by asking the following questions:

- What is the background to the issue?
- What is the nature of the issue?
- Whose responsibility is it to address the issue?
- What is/are the decision/s being made about the issue?
- When will the decisions be made?
- Who has authority to make the decisions?
- What is the level of interest in the central problem surrounding the issue?

8.4.2 Understanding potential stakeholder concerns

The following questions provide an insight into the type of concerns that might be held by stakeholders with an interest in activities occurring on a contaminated site. Obviously, not all stakeholders will be concerned with every issue, for example, the interests of local residents will differ from the interest in the site held by an environmental protection interest group or a government authority interested in the technical aspects of the risk management process. These questions are examples only and should not be used in place of an appropriate two-way communication process to establish the specific concerns of relevant stakeholders.

Health and lifestyle concerns

- What is the danger to my health and that of my family?
- Can I drink our water and eat vegetables from my garden?
- What can I do to find out if my health has already been affected?
- What can I do to reduce the damage already done?
- What can I do to prevent further damage?
- What about my children?
• We are already at risk because of X. Will Y increase our risk?
• How will this affect our quality of life/property values?
• How will we be affected by the stigma of X being attached to our community?
• How will we be protected in an accident?
• How will we be compensated for the loss of value of our homes?

Data and information concerns

• How sure are you?
• What is the worst-case scenario?
• What do these numbers mean and how did you get them?
• How do we know your studies are correct?
• What about other opinions on this issue?
• How do our exposures compare to the standards?
• You say X can’t happen. Why not?

Process concerns

• How will we be involved in the decision-making?
• How will you communicate with us?
• Why should we trust you?
• How and when can we reach you?
• Who else are you talking to?
• When will we hear from you?

Risk management concerns

• When will the problem be corrected?
• Why did you let this happen and what are you going to do about it?
• Why do you favour option X? What are the other options?
• Why are you moving so slowly to correct the problem?
• What other agencies are involved and in what roles?
• What kind of oversight will we have?

A computer-based tool known as ‘message mapping’ may help to clarify the issues that will be addressed during stakeholder engagement relating to the contaminated site. Message maps have three main goals relevant to the communication of risk. They help to:

• organise information in an easily understood and accessible framework
• express the current organisational viewpoint on important issues, questions, concerns
• promote open dialogue among and between stakeholders.

The creation of a message map is a step-by-step process that:

• begins with the establishment of a message mapping team with expert knowledge on the subject, including:
  o a communications specialist
  o members of management
o a facilitator

- identifies stakeholders who are likely to be interested, affected or influenced by the remediation and management process
- lists the specific stakeholder concerns or perceptions, and places them into categories of concerns
- develops three key messages from each category of concern
- constructs supporting facts, information or evidence for each key message
- validates the accuracy of the message map information with experts in the field—who are independent of the message mapping team.

A well-constructed message map can help the practitioner to develop their own understanding of the issues that need to be addressed in any stakeholder engagement activity. The material within the completed message map can also provide a basis for the creation of fact sheets, newsletters, education resources, and public presentations. This will ensure that the message delivered throughout the engagement process is clear, concise and consistent.

More detailed and/or further information:


Sources of information for this section:


### 8.5 Identification of stakeholders
Every contaminated site is different. Similarly, the individuals and groups with an interest in the activities occurring on a site will also be different, depending on a range of site-specific factors. It is possible, however, to identify stakeholders who may typically be involved in any risk communication or engagement activity during remediation and management of a contaminated site. Keep in mind that within these groups there will be people with different backgrounds, resulting in a diverse range of perspectives, expectations and concerns that will need to be considered throughout the project.

It is also important to remember that the identification and inclusion of stakeholders in any engagement program is an ongoing process. New and different stakeholders, whether individuals or groups, may need to be included at any stage in the engagement process, particularly if the project is extensive in size or time.

Generally, stakeholders during the remediation and management of a contaminated site will come from the following sectors:

- **Businesses associated with the contaminated site.** Industry’s aim is to improve community confidence in its operations. Some companies are successful in achieving this and are good environmental citizens, adopting an ‘open door’ approach to the scrutiny of their operations, such as holding open days and inviting complainants to visit the site to attempt to pinpoint particular problems. Conversely, some companies may view all stakeholders, or some stakeholders, as ‘the enemy’ and will avoid interaction at all costs. Companies can also be constrained by commercial confidentiality in terms of undertaking engagement and risk communication, or may not have the budget to meet all the expectations of stakeholders. In general, though, industry is moving towards a more open stance in regard to engaging with stakeholders.

- **Other industries.** Businesses not directly involved in the activities on the contaminated site may be concerned about how remediation and management of the site will affect their own business activities.

- **Commonwealth, state and territory government agencies.** The actions of government agencies, departments and authorities are dictated primarily by their statutory responsibilities, with different agencies having different roles and functions. For example, some will have responsibility for overall management of a remediation and management program, while others will have responsibility for a specific aspect of contaminated site activity such as public health or work health and safety. However, most are involved in balancing a range of expectations from the wider community.

- **Local government.** Conscious of the increasing environmental awareness of communities, local government has been instrumental in responding to the need for more participation, greater accountability and better communication between all stakeholders. Organisations at both local and state government level are experiencing increased pressure from reduced budgets and may find it difficult to fully resource the range of expertise and involvement required to manage a wide range of site management responsibilities.

- **Landowners and residents.** No residential community of any size is a homogeneous entity. It is not possible to generalise about the role or attitude of residential communities affected by a particular site. For example, not all the residents will want or choose to be involved in engagement activities, even though they may be concerned about the remediation and management project; others will have an intense interest; and some residents who are not involved initially may change their minds later.
Moreover, some people will act and think autonomously, while others will represent the views of an organisation or group.

- **Non-government organisations.** Non-government organisations include environment groups, special interest groups, and committees and associations that comprise various representatives from industry, council, non-government agencies and departments, and residents. ‘Activists’ within these organisations may sometimes be perceived as a threat to those managing site contamination, but the advice and assistance offered by these organisations often helps local residents to understand the issues and frame their concerns in a meaningful way. In order to ensure broad involvement, it is important to consider small, local groups as well as peak stakeholder organisations.

- **Workers, unions and associations.** Workers, unions and associations are generally concerned that, in undertaking site remediation and management, adequate health protection measures are in place. Australian work health and safety laws require that workers be consulted about a health and safety matter where they are, or are likely to be, directly affected by that matter. This duty to consult is based on the recognition that worker input and participation improves decision-making about health and safety matters and assists in reducing work-related injuries and disease. Fulfilling these legal requirements may necessitate engagement with other business operators who also have work health and safety duties on the site. It is essential that planning for stakeholder engagement includes consideration of health and safety matters.

- **Media.** Media coverage can focus either on the negative or positive aspects of the issues involved, which can then determine whether stakeholders feel threatened and defensive or confident and cooperative. Accordingly, it is important to ensure that the material available to the media is framed in a rational, consistent and non-inflammatory manner. A good working relationship with media personnel can provide the opportunity for information dissemination outlets to stakeholders. It is sensible to nominate one person to liaise with the media and to act as the main point of contact. This helps to avoid conflicting or confused messages being disseminated.

The above list gives an indication of the sectors which are likely to include stakeholders in any remediation and management project. For the practitioner who wants to identify stakeholders for a specific project at a specific site, asking the following questions can provide a good start to the process:

- What is the project’s geographical area of impact?
- Who is affected by the issues (negatively or positively)?
- Who are the representatives of those likely to be affected?
- Who are the ‘voiceless’ for whom special efforts may have to be made?
- Who is likely to mobilise for or against the issue?
- Whose absence from participation would detract from the final results?
- Are there any key groups or individuals with the ability to block the project?

There are many sources of information that may be useful in building a picture of the local community, identifying particular stakeholders within that community, and finding out how to contact them. These sources include:

- the Australian Bureau of Statistics (ABS) website (at <www.abs.gov.au>)—the website provides tools that enable the extracting and viewing of census data for specific geographical areas. This data can be used to build a demographic profile of the local community, including information about male-to-female ratios,
number of children and elderly people, socio-economic status, level of educational attainment, minority groups and languages spoken at home

- the local council—as well as being a stakeholder in its own right, the local council usually holds information, including contact details, about schools, community organisations, and interest groups within the area

- local politicians and political groups—may be able to help with identifying key community leaders

- the internet—many communities and interest groups have websites, usually written in the language and style preferred in the area

- local newspapers—articles and letters to the editor in local newspapers and/or magazines can provide a good indication of the issues that are of most concern to the community and which groups are most vocal

- local media advertising profiles—local newspapers, magazines and television and radio stations may be willing to share this information (they may charge a fee to do this)

- environmental impact statements (EISs) – many EISs contain information about the local communities and economy and can often be viewed online.

More detailed and/or further information:


Sources of information for this section:


WA Department of Environment 2003, *Community involvement framework*, DoE, Western Australia.


### 8.6 Purpose and objectives of the stakeholder engagement process

When there is clarity about the issues and stakeholders involved in the project, it is time to clearly set out the objective/s of the stakeholder engagement program. This will include information about the purpose of the engagement program as a whole, as well as more specific objectives relating to the engagement activities being
planned to address particular issues. This part of the engagement process enables everyone involved—practitioner and stakeholders—to be clear about what they expect to achieve through the engagement program.

For example, the purpose of the stakeholder engagement program overall might be to:

- inform stakeholders of the remediation and management project, or elements of the project that may have an impact on them
- inform stakeholders about a decision that has already been made
- consult with stakeholders and obtain their input for consideration within the decision-making process
- identify and attempt to resolve potential issues early in the planning process
- maximise the level of accurate and accessible information about the project to affected stakeholders
- gather data in the form of statistics or opinions to guide future decisions
- foster a partnership with stakeholders
- gain or gauge public support
- resolve disputes
- obtain mutually acceptable outcomes on the project.

The involvement of stakeholders in the setting of objectives has a number of advantages, including the early development of good working relationships between the practitioner and stakeholders, and the management of expectations regarding the engagement program. The extent to which stakeholders are involved at this stage will depend on the size and complexity of the project. Regardless of the timing of involvement, the purpose of engagement should be made clear to stakeholders, along with information about issues that are open for discussion before a decision is made, and issues that are non-negotiable.

Early explanations about the negotiable and non-negotiable aspects of stakeholder engagement during the project will help to clarify the boundaries and limitations of the engagement program as a whole as well as for individual stakeholder engagement activities. Negotiable items are those choices and options and outcomes that can be changed to reflect or incorporate stakeholder input. Non-negotiable items are those things already set that cannot be changed or negotiated and might include standards and policies that must be adhered to, or the time and resources available.

It may be that early research identifies that stakeholders are satisfied that the project (or elements of the project) should proceed promptly. In this case, it may not be necessary to undertake wide and comprehensive engagement activities, although there will remain a need for stakeholders to be kept informed of progress.

More detailed and/or further information:


Sources of information for this section:

8.7 Evaluation process

Evaluation of processes and outcomes is a crucial part of the stakeholder engagement program. A well-designed evaluation process can help to:

- identify if stakeholders are satisfied that the process you have followed is fair, even if they would have preferred a different outcome. If people are satisfied with the process they may be more willing to live with the outcome
- improve future stakeholder engagement activities and programs
- establish if there is a need for ongoing engagement activities
- give stakeholders a broad picture of how others view your project by sharing the outcome of your evaluations with them
- improve the cost-effectiveness of future processes.

Plan to involve all stakeholders in evaluation and feedback on the effectiveness of the program throughout implementation of the stakeholder engagement plan, as well as after the conclusion of the process. This will allow for midcourse improvements to be made, where necessary.

When designing an evaluation strategy for inclusion in the stakeholder engagement plan, the practitioner might find it useful to follow these steps:

1. Identify the purpose of your engagement evaluation. Understanding the purpose of an evaluation helps clarify how it should be conducted and how the results should be used. Examples of common purposes for conducting an evaluation include:
   - to demonstrate how well goals and objectives have been met
   - to improve how stakeholder engagement is done
   - to gain insight into what is effective stakeholder engagement in different situations.

2. Identify the parties with an interest in the evaluation. Who wants to know what? There may be a number of people who will use the findings of your evaluation to make decisions, for example, about future directions for the engagement program. The best way to determine people’s interests in the evaluation is to ask them directly:
   - What constitutes success from their perspective?
   - What questions would they like answered by the evaluation?
3. Consider evidence needed to undertake the evaluation. What information will be collected and how? Collecting evidence in the field of stakeholder engagement can be more complicated than for other aspects of project evaluation, for the following reasons:

• engagement is a relatively new field of expertise, so has not been tested and measured as extensively as other fields
• results are often exhibited through better relationships, trust and connectedness—all of which are difficult to observe or articulate in tangible terms
• the effects of engagement activities are often not obvious for some time after the completion of the activity or project.

4. Consider the resources that are required to undertake the evaluation. When deciding who will be responsible for collecting evidence and when they will undertake these tasks, you should also consider what, if any, evaluation tasks would be better allocated to outside consultants or other members of the site management team.

More detailed and/or further information:


For more on the evaluation process and evaluation tools that can be used to gather evidence to answer evaluation questions, see pp 37-43 in Victoria Department of Sustainability and Environment 2005, *Effective engagement: building relationships with community and other stakeholders. Book 2: the engagement planning workbook*, DSE, Victoria, available at <http://www.dse.vic.gov.au>. For more about each of the evaluation tools, go to *Book 3: the engagement toolkit*.


Sources of information for this section:

WA Department of Environment 2003, *Interim industry guide to community involvement*, DoE, Western Australia.


WA Department of Environment 2003, *Community involvement framework*, DoE, Western Australia.

Victoria Department of Sustainability and Environment 2005, *Effective engagement: building relationships with community*
8.8 Stakeholder engagement techniques

There are many techniques and tools that the practitioner can use to engage with stakeholders during the remediation and management of a contaminated site. They can be used in isolation or in combination.

When choosing the most appropriate method for engaging stakeholders, the practitioner will need to consider such factors as:

- the purpose of the engagement activity, e.g. to inform or to involve in decision-making
- available time and resources
- any legal requirements relating to the type or extent of engagement that should take place

Examples of techniques and tools to engage stakeholders include:

- individual consultations
- printed information—through newsletters, advertising, websites, media stories
- surveys
- public meetings
- workshops
- design meetings
- hotlines
- websites.

A number of engagement techniques have been identified as potentially useful in the context of contaminated sites in Australia. Information about these techniques, including their advantages and disadvantages, is provided in the table below.

Table 2: Engagement techniques: summary of advantages and disadvantages (information synthesised from Schedule B (8), Guideline on community engagement and risk communication, in NEPC 1999, NEPM (Assessment of Site Contamination), as amended, pp 16-19, and Community consultation guideline, Contaminated sites management series, WA DEC 2006, pp 17-20)

<p>| Group techniques |
|------------------|-----------------|-----------------|-----------------|
| Technique        | Description     | Advantages       | Disadvantages   |
| Public meetings  | Usually more than 20 participants, self-selection by advertised invitation, formalised | • Provides a forum for information dissemination and exchange with large | • Focused discussion on one issue is difficult |
|                  |                  |                  | • More articulate and better |</p>
<table>
<thead>
<tr>
<th>Method</th>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
<tbody>
<tr>
<td>On-site meetings</td>
<td>Enables interested individuals to gain an understanding of the issues involved. Demystifies the project. Provides an opportunity to develop rapport with key stakeholders.</td>
<td>Number of participants is limited by logistics. Accessibility to the site not always possible, e.g. for aged or disabled participants, or because of safety concerns.</td>
</tr>
<tr>
<td>Search conference</td>
<td>Can assist in the early stages of the engagement process to identify stakeholder characteristics and relevant issues. Program is devised with participants. Future-oriented. Allows lengthy discussion to develop and refine ideas.</td>
<td>Large time commitment. May appear to be an elite group. May result in the development of unrealistic 'wish lists'.</td>
</tr>
<tr>
<td>Design meeting</td>
<td>Allows participants to better express their views and visualise the impact of changes. Enables the practitioner/consultant to understand how a proposal appears to stakeholders.</td>
<td>Number of participants limited. Will not enable complete socio-economic and environmental impact to be determined.</td>
</tr>
<tr>
<td>Workshops</td>
<td>Provides opportunity for all participants to contribute. Is a flexible technique that can be used at all stages of the engagement program. Can provide a forum for testing alternatives, training opportunities, information gathering and dissemination, receiving feedback and refining input.</td>
<td>The 'right' expert may not be available. Participants may not be adequately prepared. Experts may dominate and inhibit discussion.</td>
</tr>
</tbody>
</table>
| Morning/afternoon “tea and chat” sessions | Small meetings within the local community, usually at a person’s home. | • Relaxed setting is conducive to effective dialogue  
• Provides for maximum two-way communication. | • Requires a lot of labour to reach many people. |
| Small format meetings | Small meetings with existing groups or stakeholders with similar interests. | • Provides opportunity for an in-depth information exchange in a non-threatening forum. | • May be too selective  
• Can leave out important stakeholders. |

### Individual techniques

<table>
<thead>
<tr>
<th>Technique</th>
<th>Description</th>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
</table>
| Individual discussion      | Selected individuals consulted by telephone, meetings, and doorknocking an area. Home visits should be preceded by a safety/risk analysis. | • Provides a quick and efficient means of disseminating information and identifying a range of issues and views  
• Provides an opportunity for the practitioner/consultant to learn how best to communicate with a particular stakeholder group  
• Appropriate when confidentiality is essential. | • Provides limited opportunities for large numbers of stakeholders to participate in the process  
• Does not allow for broad-scale exchange of ideas  
• Multiple individual discussions can be very time consuming. |
| Observations               | Means of gathering information and establishing contacts in a community. | • Provides a thorough understanding of the community in preparation for engagement of stakeholders. | • This technique is generally only suitable in the early information collection stage of engagement. |
| Survey                     | Structured questioning of a stakeholder sample that statistically represents the whole population or sector, used to gather information about objective characteristics or attitudes. | • Provides data for:  
  - analysis of characteristics of a particular community  
  - to document probable effects of a proposal  
  - for gauging likely public reaction to a proposal  
  - provides opportunity for input | • Minimal discussion and no interaction between participants  
• Respondents may be indifferent to the subject matter and require persuasion  
• Can be labour-intensive and expensive to generate |
| Display and exhibitions | Means of disseminating information to stakeholders, mobile or permanent exhibition, may be staffed if seeking response and/or giving detailed explanation. | • Opportunity to inform and meet with members of the wider community who can speak directly to the practitioner/consultant  
• Opportunity to demonstrate commitment to engagement. | • May be costly and ineffective, particularly if the stakeholders do not perceive the issues as being of high importance. |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| Open houses             | Informal arrangement where tables or booths are manned by knowledgeable staff/consultants who are able to discuss what stakeholders want. | • Sets up a comfortable discussion situation for staff and stakeholders  
• Especially useful early in the process to establish rapport and explain complex processes  
• Stakeholders can drop in at any time that suits them. | • Attendances may be low if distrust of the organisation or process is already high. |
| Printed information     | Information bulletins, fact sheets, newsletters and brochures distributed regularly to households and/or made available to stakeholders at key public outlets. | • Provides ongoing information on the project  
• Can reach large audience  
• Facilitates written responses if comment form is enclosed. | • A good mailing list or distribution network is required to ensure that information reaches all interested parties  
• Difficult to communicate information about complex concepts in brief newsletters  
• The level of literacy and English-language proficiency of recipients will limit effectiveness  
• Generic flyers may be perceived as junk mail and may be ignored. |
| Site office             | Temporary on-site accommodation for any consultants brought in to conduct any or all aspects of the engagement program, provides information for the wider community, needs to be suitably | • Provides consultants with a convenient base from which to work and establish contact in the area  
• Satisfies the need of some stakeholders for individual | • Does not involve interaction between stakeholders  
• May be costly  
• Has limited value in the overall engagement process if used alone. |
| **Open door** | Periodic open days to invite interested people and complainants to visit the site. | Fosters small group or one-on-one communications, creating a comfortable atmosphere for discussion. | Generally more staff-intensive than a meeting. |  
| | | May meet the information and interaction needs of stakeholders who are not served by typical public meetings. | Difficult to document stakeholder input. |  
| | | Useful to explain complex issues or processes. | Protesters may try to disrupt the event/s. |  
| | | Can shift stakeholder confidence in current and proposed operations, pinpoint particular problems and result in problems being addressed and resolved. | May not provide some stakeholders with a preferred ‘public’ forum to express their opinion. |  
| | |  | May not be possible for reasons of commercial confidentiality or work health and safety. |  

| **Hotline** | A telephone service to provide information and to record comments, concerns and suggestions. | Information is easily and directly accessible. | Would not be accessible for people from non-English speaking backgrounds unless the hotline is available in different languages, or a translation service is provided. |  
| | | Information flow is controlled and consistent. | The designated contact person must be committed to and prepared for prompt and accurate responses. |  
| | | Easy to ensure up-to-date information is provided. |  |  
| | | Provides access to information for stakeholders with mobility concerns. |  |  

| **Websites** | Information dissemination through an interactive web page, aimed at informing and generating interest among stakeholders. | Capable of reaching large audiences. | Only available to people who have access to a computer with web connection. |  
| | | Keeps stakeholders informed. | Tends not to be accessible to minority groups such as the elderly, poor, people with non-English speaking backgrounds. |  
| | | Site can be updated quickly and easily. | Can contribute to information overload if not managed effectively. |  
| | | Allows people to access large amounts of information and provide feedback. |  |  

| **Submission** | Oral or written submissions to enable people to register their ideas and concerns, including through a complaints register, open to all stakeholders. | Demonstration of organisational commitment to open engagement. | Limited role as submissions are unlikely to draw response from minority groups in the community. |  
| | | provides focus for groups to |  |  


| **organise a basis from which to lobby** | • Provides the practitioner/consultant with information on viewpoints of key stakeholders. | • Only 'organised' and articulate stakeholders are likely to respond  
• If oral submissions are organised, the formality of hearings may intimidate some people. |

**Use of media**  
Information through printed and electronic media, aimed at informing or generating interest and feedback. May also include use of paid advertisements.  
• Demonstration of organisational commitment to provision of information  
• Keeps stakeholders informed  
• Provides opportunity for all stakeholders to participate in the engagement process  
• May satisfy any legal notification requirements.  
• Will not reach all groups unless special attention is given to minority groups by the use of ethnic media, and other avenues to reach other target groups  
• If paying for advertisements, can be expensive, especially in urban areas.  
• Likely that only a limited amount of information will be conveyed.

There is a significant amount of guidance available around engagement methods and techniques. While most have not been developed specifically to suit a contaminated site context, the material focuses on the techniques themselves, meaning that the practitioner should be able to adapt the guidance to suit their own purposes. See box below for source information.

**More detailed and/or further information:**

For more about **techniques and tools for engaging stakeholders**, see:


For more about **selecting the most appropriate level and method of engagement**, see:
8.9 Working well with stakeholders

The stakeholders for a contaminated site project may be individuals with a specific concern regarding remediation and management of a particular contaminated site. They may be officers of local, state or Commonwealth agencies with responsibility in the area of contamination, or groups of people brought together by the potential impact of site conditions or planned activities, e.g. residents.

It is important that the practitioner approaches every aspect of an engagement program with an appreciation of the diversity that occurs between individuals, as well as within and between groups. Such appreciation paves the way for the practitioner to take practical action to facilitate the best possible outcome for the engagement process.

Whether working with individuals, groups, or organisations, an aim of the practitioner should be to remove as many barriers to participation as possible. This might involve anything from structuring engagement processes to fit around the existing schedules of a group, to a willingness to adjust engagement practices in ways that respect the competing demands experienced by many individuals who are members of interest groups.

Tips to consider when working with stakeholders are outlined below. Information about more detailed guidance is provided in the box at the end of the section.

8.9.1 Local government

When working with Councils and council staff, consider the following:
• Council meetings are regular (often once a month), as are subcommittee meetings. Agenda deadlines are
tight and normally non-negotiable. A response from local government may take several months. For this
reason, always provide a generous timeframe for consultation and, in setting deadlines for submissions,
always take into account local government needs.

• If a matter is complex, and would benefit from personal contact with councillors and/or council staff, offer
a presentation to Council. Council briefings occur with most local governments and provide an opportunity
for direct contact with the decision-makers. Don’t expect discussion or debate at these presentations,
they are for briefings only.

• When communicating with local government, think of the subject from their point of view. What would the
Council expect of a remediation and management project? What do you expect from the Council? What
will it cost, and what benefits would their involvement bring?

• Local government is a major player at a local level. In communicating with local government, understand
whether they are a decision-making authority in the matter you are raising. In all cases, the view of local
authorities is important and should be treated as such. Involve them as early as possible in the
engagement process.

• At a local level, local government provides a single measurement of community opinion that is often
impractical to gather from engagement with other interests. Input from local government can provide
consensus and direction, which submissions from more focused interest groups cannot provide.

• No-one is better qualified to represent the local community than local government, because they are
elected by and accountable to the local community. Local government is therefore a strong ally in
engagement activities.

• Local governments are often large. Knowing who to contact, at what level, in what department can be a
challenge. A dependence on written communication will never provide the positive outcomes you can
expect from face-to-face contact. Establish good links with local government officer, at all levels.

• Local government is sent lots of information, and things can get lost. Send requests to specific officers,
and speak to those officers first to forewarn of the request. Any written correspondence must be specific
about what is required, and by what date.

• Be sure to keep good records of your engagement with local government, or any other stakeholder, as
people may query the process and their opportunity to be involved.

8.9.2 Indigenous people

When working with Indigenous communities, consider the following:

• There is often more than one group with traditional links to, or interests in, an area. Rarely does one
person or group speak for all the groups affected, so it is important to take all views into account as one
would in any type of community. If more than one group is affected, meetings will need to be organised
with representatives from each group. Otherwise, discuss compatible arrangements separately. Different
groups may be in conflict and this needs to be factored into the engagement process.

- Approach relevant bodies, for example, government departments with responsibility for Indigenous
  matters, Indigenous land councils, and local Indigenous groups, to determine the relevant communities’
  preferred approaches and the appropriate people to meet with initially. It is important to consult with all
  relevant Indigenous community representatives if practicable, since this reduces the possibility of
  information on the existence of Aboriginal sites being ‘missed’ during the process. It is preferable to
  relocate any proposed works to avoid disturbance to a site. However, if that is not possible, formal
  approval to alter a site may need to be sought from the relevant authority.

- Establish contact early with recognised Elders in the community. Engagement with Aboriginal groups may
  become complex and prolonged so start the consultation (and also investigate legal obligations) early in
  the planning process. It is important to develop and maintain long-term relationships, and to provide an
  adequate lead-time in order to have successful involvement.

- There may be several people within a particular community that speak for different country and sites, all
  of which may need to be consulted. Be aware that within a region, there may be a number of different
  communities.

- It is unlikely to be sufficient to simply send a group a letter and expect people to turn up when requested.
  Telephone invitations or personal written invitations are preferable to formal letters. Different approaches
  may be necessary to engage relevant groups.

- A number of different engagement techniques and tools may need to be used. Elders should be asked
  about their preference. Be prepared for engagement processes ranging from one-on-one discussions to
  community meetings, depending on the particular circumstances encountered (e.g. older knowledgeable
  people may be too frail to be involved in anything more than short, one-on-one conversations). The type
  of meeting place should also be considered (e.g. groups may not want to come to an office to meet;
  consider meeting on site and providing some food). Be aware that diabetes is often prevalent amongst
  older Aboriginal people and may require particular consideration of dietary requirements. If a meeting has
  been scheduled, ring and confirm the meeting one or two days in advance. Consider the format and
  medium of any information that will be provided, consider verbal presentations rather than expecting
  people to read technical documents.

- Timing of significant cultural events may mean that groups are unavailable for consultation at certain
  times. Aboriginal community events, Native Title case hearing schedules, law business and more family-
  oriented business (e.g. bereavement) may affect people’s availability, at both a community and personal
  level. Timelines should therefore be set with this in mind.

- Some Aboriginal group representatives will require payment of a consultation fee, or at least
  reimbursement for out-of-pocket expenses. Where payment is required, be sure to sign the invoice on the
  day the consultation is done. Practitioners may be required to assist with administrative matters (e.g.
  drawing up an invoice on behalf of the people(s) consulted).

- It is important to note that each Aboriginal community has an individual and special connection to their
  ‘home’ area. This should be taken into consideration when approaching a local Aboriginal community, as
what may be acceptable to one group might not necessarily be acceptable to another. Each community needs to be addressed on an individual basis. For example, some communities may require a fee, others not; some work through a Land Council, some prefer direct contact; some are happy to endorse projects, while others do not want an area to change or works to be undertaken on sites.

- Different Aboriginal groups may have conflicting views regarding who should be consulted about what and in what manner. There may be numerous competing claims about who are the ‘true’ custodians of sites and who has the right to speak for them. The cause of these conflicts and the various views should be documented.

8.9.3 People from culturally and linguistically diverse (CALD) backgrounds

When working with culturally and linguistically diverse stakeholders, consider the following:

- Researching and respecting cultural norms that may be important when communicating with particular individuals and groups, for example, the use of eye contact, or appropriate dress
- Working face-to-face in the early stages of relationship building is extremely important, so you will need to allocate sufficient time in planning your engagement activity
- At times, including a social component in a presentation or event—an opportunity for people to meet and interact with others—can help break down any barriers or fears that people may have about participating.
- Different communication styles may be required, depending on the group and underlying influences such as:
  - sensitivities to discussing personal topics and making decisions on behalf of their community
  - proficiency in English (written and verbal). Some people from non-English speaking backgrounds may, understandably, lack the confidence to use their English in a public speaking situation
  - literacy in a first language. Remember that for many refugees, their schooling may have been repeatedly interrupted or ceased altogether due to war, political upheaval or having no access to formal education services
  - preferred methods to receive and communicate information, such as local papers, radio, word-of-mouth, organisations, and the internet.
- Consider early on in the engagement program the possibility of using interpreters to assist with the translation of written material or to interpret during workshops or meetings.
- Local councils may have good contacts and networks with culturally and linguistically diverse communities in their area.

8.9.4 Volunteers and interest groups

When working with interest groups, and the individuals within them, consider the following:
• Members of these groups often volunteer their time and may have other work responsibilities during the day. Determine on your first contact whether the person would prefer you to contact them during business or personal hours.

• Be mindful of the timing of events, given people’s work commitments or the fact that parents may need to pick up and drop off their children from school at set times. Be mindful of key social, community and sporting events that may affect attendance levels.

• Consider providing resources for travel or covering other costs for volunteers.

• Take into consideration the potential for ‘over-engagement’ and ‘burnout’; do your homework and find out what else is going on that volunteers might be involved in; don’t just meet for meetings’ sake, have a clear objective in mind and inform your stakeholders of the objective. Meet with the right people and be clear what it is you want from them. Ensure you stick to the timeframe.

• Groups will differ in the way they run meetings; some are very formal, some informal. Know this in advance.

• Try something innovative, e.g. a BBQ, music, as many volunteers go to a large number of meetings and workshops.

• Be aware of the usual meeting times of the groups you are engaging with, and provide a generous timeframe for engagement activities, including any correspondence that needs to be discussed at their regular meetings.

• Go and visit volunteers and catchment groups on their ‘turf’. Sometimes, groups hold meetings in the homes of volunteer members. In these situations, if your presentation requires any special resources (e.g. projector screen), hiring a local venue is an option. If meetings fall at mealtimes, make sure you provide food and refreshments.

• Some volunteers do not regularly attend meetings so make sure you recap on what it is you want to discuss, why and how it came about, so everyone understands the issue.

• Make sure you allow lots of time for questions/comments.

• Arrive early and stay late so you can mingle with the volunteers.

• Remember these people are volunteers and have other commitments that may take priority over your event. Expect a percentage to not turn up at the last minute.

• If you don’t know the answer, say so! Offer to find out and provide the answer.

• If you would like a group to vote on a particular issue, make sure the group will have a quorum at the meeting.

• Some volunteers have a lot of knowledge and skills that they are willing to share. Value their contribution.
• Keep people in the loop with updates. Let them know the outcome of their input. If you say you are going
to do something, do it. If you can't, make sure you inform people of why you can no longer fulfil your
commitment and suggest an alternative if relevant, otherwise you will lose their trust.

• If you are planning a site visit or event which may involve a health or safety risk, be aware of your duties
under work health and safety legislation and manage the risk appropriately.

8.9.5 Gender

When working with any group, it is important to create opportunities for everyone to participate in your
engagement process. Things to keep in mind as you plan your engagement program:

• Try to involve a gender balance in your engagement activity to ensure that participation reflects
stakeholder diversity.

• Be mindful of the multiple responsibilities of parents. Consider working with this situation in creative ways,
e.g. provide children with creative learning activities under their parents' supervision while the
engagement activity is taking place.

• For some women from culturally and linguistically diverse backgrounds, you may need to provide women-
only opportunities for engagement.

• Rural women can face additional barriers to participation such as distance, access to alternative forms of
transport and access to childcare—particularly to cover the long hours that may be taken up by travel.

8.9.6 Age—young people

When working with young people, consider the following:

• Do not consider all young people as one homogenous group. Characteristics such as gender and cultural
background also need to be considered.

• Building trust with young people is a fundamental basis for effective engagement.

• Consider whether organisations and agencies who work with young people could assist with your
engagement.

• Avoid making assumptions about what may interest a young person; let them define what is important
from their perspective.

8.9.7 Age—seniors

When working with older people, consider the following:
• Many seniors are fit, healthy and mobile, but it is important to be aware of the changing mobility of seniors and the impact it can have on their ability to participate. Two significant changes that may have an impact are when people stop driving and when they can no longer walk unaided.

• When selecting and using engagement techniques and tools, be aware of the difficulties some seniors may have with vision and hearing.

• Seniors may have time to participate in engagement activities, but remember that they are increasingly taking on additional family roles, in particular, childcare for grandchildren.

• Be aware of possible intergenerational differences between facilitators and seniors that may block clear communication, such as language and values.

8.9.8 People with a disability

When working with people with a disability, consider the following:

• The main types of disabilities are:
  o intellectual disability, e.g. a person who has significantly below average intelligence (based on an IQ test), or who may have difficulty with everyday life skills
  o physical disability, e.g. a person who uses a wheelchair or has difficulties with communication
  o sensory disability, e.g. deaf people, people who are blind or vision impaired
  o psychiatric disability, e.g. a person who has a mental illness
  o acquired brain injury, e.g. a person who was not born with a disability, but acquired their disability; perhaps through a car accident or drug abuse
  o neurological impairment, e.g. a person who has a degenerative condition such as multiple sclerosis, Huntington’s Disease or motor neurone disease.

Some people may have more than one type of disability. For example, a person who has a vision impairment may also have an intellectual disability.

• Ask the people you are planning to engage what their needs are. They will be in the best position to tell you how you can best assist them to contribute to the engagement processes

• Use organisations or community groups that support people with disabilities to help arrange and conduct the engagement activity

• Put the person first, not their disability. Describe ‘a person with a disability’ rather than ‘a disabled person’. Remember that you are engaging with the person, not with the disability they may have.
• Some people with disabilities have carers. It is important to address any communication to the person with the disability and not to their carer or friend. It is also important to be mindful of the carer’s needs in organising any engagement activities.

• In general, all engagement activities should be inclusive so that people with disabilities can participate in the same ways as others in the community. However, some people with disabilities may have difficulties, for example, being heard or understood in a large public forum, and it may be necessary to organise smaller forums that better suit their needs.

• In choosing venues for engagement activities, consider whether the site is accessible (public transport, ramps), whether the building is internally accessible (suitable door widths, accessible toilets) and whether it meets the specific requirements of the people you are engaging (Braille and tactile signage, hearing augmentation system).

More detailed and/or further information:

For detailed guidance on working with groups and facilitating engagement activities, see Keating CDM 2003, Facilitation toolkit: a practical guide for working more effectively with people and groups, WA Department of Environmental Protection, Water and Rivers Commission and Department of Conservation and Land Management, Western Australia, available at <www.portal.environment.wa.gov.au>.


For more on engaging with Indigenous people, see:

• ATSIC, Aboriginal and Torres Strait Islander Services, Department of Indigenous Affairs and Department of the Premier and Cabinet, Citizens and Civics Unit 2002, Consulting citizens: Engaging with Aboriginal Western Australians, ATSIC, ATSS, DIA, DPC, Western Australia, available at <www.daa.wa.gov.au>.


For more on engaging with people from culturally and linguistically diverse (CALD) backgrounds, see:


For more on engaging with people with a disability, see:

8.9.9 Presenting data

As described above, stakeholder groups involved in engagement activities comprise people from a range of different backgrounds and circumstances. Their knowledge and experience of environmental matters in general, and contaminated sites in particular, will also vary. The practitioner needs to be aware that they can, however unintentionally, introduce a barrier to participation if they deliver environmental data and technical information without careful consideration of their audience.

Simplifying the language used to convey scientific or technical information can be a challenge for practitioners who may be experts in the complexity of scientific language. The following tips (adapted from the teaching of Peter Sandman, a risk communication specialist) may be useful to practitioners who need to explain data to a diverse audience:

- Do not try to impress people with words they do not understand.
• If a word needs defining, define it, e.g. “potable water is water suitable for drinking”. Then, if the concept is addressed again, avoid using the word ‘potable’ and instead refer to ‘drinking water’.

• If you have to use jargon, introduce the concept before the word, i.e. “Science has a term for this and it is ‘potable water’”.

• Ask your audience to stop you immediately if you use jargon they don’t understand.

• Be especially careful about words that have different technical meanings than their common meaning, e.g. ‘significance’, ‘conservative’ and ‘bias’.

• Be aware of risk messages that are culturally sensitive.

• Keep messages consistent.

• Don’t skimp on the use of non-technical information that your audience already knows:
  o demonstrating that you know and share the same issues and concerns as the stakeholder gives credibility to the technical information
  o your knowledge of the history of the site and its conditions (including showing slides or other visual information) will help your audience to develop trust regarding any new information you provide.

• Personalising a presentation empowers your audience:
  o introduce yourself and your colleagues
  o talk about your background to provide a picture of you and a context for the work you are doing
  o allow your emotions (excluding anger) to show
  o be honest and transparent—the audience is more likely to raise issues respectfully and courteously.

• To ensure that your presentation is engaging your audience:
  o be aware of your audience members’ body language, e.g. glazed eyes, restlessness, excessive writing may suggest they don’t understand what you are saying
  o clarify that your audience is following you. Ask a question like “Am I making this complicated?”, rather than “Do you understand?” People are more likely to be honest in their response knowing that the focus is on the way you are presenting the information, and that their level of knowledge or understanding of the topic is not being judged.
  o ask for questions and seek feedback.

• Uncertainties do exist on contaminated sites, and they should be acknowledged by talking about them upfront, not waiting until you are confronted about them. Clarify those issues you are certain about, for example:
  o the location of the contamination
  o what the contaminants are
o the size of the problem
o ways to mitigate the problem
o ways that stakeholders can assist.

Explain what you have done so far to reduce the uncertainties and when you will know more:

o explain where the greatest uncertainties lie
o review expert judgement and the assumptions recorded
o look for comparable situations elsewhere within Australia if possible
o if clear scientific and technical information does not exist, say so.

• Be conscious of making risk comparisons—they can undermine trust and credibility.

More detailed and/or further information:

For a range of articles, videos and columns on explaining environmental risk and managing risk communication, see Peter Sandman’s website at <http://www.psandman.com>.

Sources of information for this section:


8.10 Documentation and reporting

8.10.1 Developing a statement of intent

A statement of intent is a public document that can be easily provided to stakeholders. While it is similar in general content and structure to a stakeholder engagement plan, it has less detail, for example, while it may describe resources available for the program, it will not contain a detailed budget. It is best seen as a clear and concise summary document. Its purpose is to provide enough information to enable everybody involved to have a shared understanding of the engagement program and how it will proceed.

A statement of intent should include the following:

• background information about the site, incorporating a brief, clear statement about the project itself, and the purpose and objectives of the engagement process

• a description of the major issues likely to be addressed

• a clear statement about the negotiable and non-negotiable aspects/decision/issues within the program

• a broad description of stakeholders
• a statement about the kind of involvement that is being sought
• a list of key engagement techniques and tools that will be used
• a commitment on how the information from the process will be used
• a commitment on how feedback will be given to stakeholders on how their input was used, and the reasons for final decisions.
• a timeline for the engagement program that allows sufficient time for stakeholders to discuss and form opinions on the issues
• a list of staff and funding resources available for the engagement program
• sources of further information, including website links and email and phone contact details for the person responsible for the engagement program.

Sources of information for this section:


WA Department of Environment 2003, Community involvement framework, DoE, Western Australia.

8.10.2 Reporting back to stakeholders

Providing feedback to stakeholders regarding their involvement in an engagement program is a vital aspect of an engagement program. Feedback should be provided at each stage of the engagement process, and following engagement activities, as well as at the completion of the program.

Timely reporting back to stakeholders both validates information as it is gathered, and encourages continued involvement. It provides evidence that stakeholders’ views, comments and suggestions have been recorded accurately and taken seriously, contributing to the level of trust between all participants in the engagement program. It also enables people to hear other people’s views.

When reporting back to stakeholders, feedback should include details about:

• the rationale for, and extent of, the engagement process undertaken
• the potential stakeholders who were identified and invited to participate, the names of stakeholders who actually participated (subject to compliance with privacy legislation)
• how, when and where engagement activities were carried out, including methods and techniques that were used
• the information that was provided to stakeholders
• input provided by stakeholders
• what decision was made
• how the stakeholders’ input was considered and incorporated into the decision-making process
• what other factors influenced the decision that was made, e.g. legislation or policy
• the availability of documentation for viewing by stakeholders.

More detailed and/or further information:

For worksheets on summarising stakeholder issues and providing feedback, see WA Department of Environment 2003, Interim industry guide to community involvement, DoE, Western Australia, available at <www.environment.wa.gov.au>.

Sources of information for this section:


WA Department of Environment 2003, Community involvement framework, DoE, Western Australia.

8.10.3 Reporting to government agencies

While Commonwealth, state and territory authorities may vary in their specific reporting requirements relating to the stakeholder engagement program, e.g. in the timing of reporting and in requiring information as a separate report or as part of a wider remediation and management report, the basic premise for reporting is similar in all jurisdictions. Documented evidence should justify the timing, scope, extent, and outcomes of the stakeholder engagement that was undertaken during the course of the project.

Regardless of the structure of the report, the following topics should be addressed (where relevant and appropriate):

• names of potential stakeholders (individuals and groups) who were identified and invited to participate, subject to compliance with privacy legislation (may be included as an appendix)

• how potential stakeholders were invited to participate (e.g. notices, advertisements)

• names of stakeholders who participated and had their names recorded, subject to compliance with privacy legislation (may be included as an appendix)

• how, when and where engagement activities took place (with further information such as the minutes of meetings included in an appendix)
• summary of information provided to stakeholders (with further details provided in an appendix)

• input and comment received from stakeholders

• how stakeholders’ input was considered and incorporated in the decision-making process.

The practitioner should consult the relevant Commonwealth, state or territory authorities regarding reporting requirements particular to that jurisdiction.

Sources of information for this section:

WA Department of Environment and Conservation 2006, Community consultation guideline, Contaminated sites management series, DEC, Western Australia.
9 REFERENCES

9.1 Framework for Remediation and Management of Contaminated Sites Materials

9.1.1 Development of remediation and management plan

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Site-specific remediation objectives, (to be developed).

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Identifying remedial options, (to be developed).

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Selection of remediation technologies, (to be developed).

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Treatability studies, (to be developed).

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Cost-benefit analysis, (to be developed).

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Regulator submission requirements, (to be developed).

9.1.2 Implementation of remediation and management plan

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Health and safety, (first guideline—Worker (on-site) health and safety—developed 2013, second guideline—Public (off-site) health and safety—to be developed)

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Documentation, record-keeping and reporting, (developed 2014).

9.1.3 Post-remediation considerations

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Long-term monitoring, (to be developed).

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Auditing/third party review, (to be developed).

CRC CARE, Framework for Remediation and Management of Contaminated Sites Module, Institutional controls, (to be developed).
9.2 NEPM Materials


9.3 Jurisdictional guidance

9.3.1 Australian Capital Territory

ACT Government 2011, Engaging Canberrans: A guide to community engagement, Publishing Services for Communications and Engagement, Chief Minister and Cabinet Directorate, ACT.

9.3.2 New South Wales

NSW Office of Environment and Heritage 2011, Contaminated sites: Guidelines for consultants reporting on contaminated sites, OEH, New South Wales.

NSW Department of Environment and Conservation 2006, A guide for engaging communities in environmental planning and decision-making, DEC, NSW.

9.3.3 Northern Territory

NT Department of Natural Resources, Environment, The Arts and Sport 2010, Working guidelines for consultants reporting on environmental issues, NRETAS, Northern Territory.

9.3.4 Queensland

QLD Department of Environment Heritage and Protection 2012, Guideline for contaminated land professionals, DEHP, Queensland.

Queensland Department of Communities 2007, Engaging Queenslanders: A guide to community engagement methods and techniques, DoC, Queensland.

Queensland Department of Communities 2007, Engaging Queenslanders: A guide to working with lesbian, gay, bisexual, transgender and intersex (LGBTI) communities, DoC, Queensland.

Queensland Department of Communities 2007, Engaging Queenslanders: A guide to working with people with a disability, DoC, Queensland.

Queensland Department of Communities 2007, Engaging Queenslanders: An introduction to working with culturally and linguistically diverse (CALD) communities, DoC, Queensland.

9.3.5 South Australia


9.3.6 Victoria


9.3.7 Western Australia

WA Department of Environment 2003, *Community involvement framework*, DoE, Western Australia.

WA Department of Environment 2003, *Interim industry guide to community involvement*, DoE, Western Australia.


WA Department of Environmental Protection 2001, *Reporting on site assessments*, Contaminated sites management series, DEP, Western Australia.


9.4 Other references

ATSIC, Aboriginal and Torres Strait Islander Services, Department of Indigenous Affairs and Department of the Premier and Cabinet, Citizens and Civics Unit 2002, Consulting citizens: Engaging with Aboriginal Western Australians, ATSIC, ATSS, DIA, DPC, Western Australia.


enHealth 2006, Responding to environmental health incidents: Community involvement handbook, Department of Health and Ageing and enHealth Council, Melbourne, Australia.


International Association for Public Participation: Australasia (IAP2) website at <www.iap2.org.au>.

Keating CDM 2003, Facilitation toolkit: a practical guide for working more effectively with people and groups, WA Department of Environmental Protection, Water and Rivers Commission and Department of Conservation and Land Management, Western Australia.

Appendix A: Suggested stakeholder engagement plan format

This appendix provides an example of the content that may be covered in a stakeholder engagement plan.

Environment protection authorities and other appropriate Commonwealth, state or territory government agencies should always be consulted regarding any specific requirements. This may involve referral to other relevant regulatory agencies.

This plan provides a format for the planning of stakeholder engagement during the remediation and management of a contaminated site.

The stakeholder engagement plan should be updated throughout the remediation and management of the site, whenever new stakeholders are identified, or in response to new situations or conditions on the site.

The topics referred to in the suggested plan reflect information about the conduct of stakeholder engagement programs provided in the following guidance material (see Reference section for source details):


- WA Department of Environment and Conservation 2006, Community consultation guideline, Contaminated sites management series, DEC, Western Australia.

- enHealth 2006, Responding to environmental health incidents: Community involvement handbook, Department of Health and Ageing and enHealth Council, Melbourne, Australia.

Further information about each topic has been sourced from these documents as well as from a range of other guidance material. This additional information can be found in the main body of this guideline.
**EXAMPLE CONTENT OF A STAKEHOLDER ENGAGEMENT PLAN**

<table>
<thead>
<tr>
<th>Administrative and management aspects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information in this section includes details about:</td>
</tr>
<tr>
<td>• personnel who will be undertaking the stakeholder engagement program, including any external consultants who may be contracted to conduct all or any aspects of the program</td>
</tr>
<tr>
<td>• budget</td>
</tr>
<tr>
<td>• timeline, including identification of factors that may influence the timing of engagement activities, e.g. the meeting cycles of particular organisations and the need to allow ample time for participants to receive and reflect on information provided to them.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Background</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information included in this section includes:</td>
</tr>
<tr>
<td>• a description of the overall remediation and management project</td>
</tr>
<tr>
<td>• details about key issues and stakeholder concerns that will be addressed through the stakeholder engagement program</td>
</tr>
<tr>
<td>• a summary of the outcome of any stakeholder engagement that may have already taken place, e.g. during preliminary investigations at the site.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identification of stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information in this section includes:</td>
</tr>
<tr>
<td>• the names of potential stakeholders (individuals and groups)</td>
</tr>
<tr>
<td>• details about how these stakeholders have been/will be invited to participate in the engagement program.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Purpose and objectives of the stakeholder engagement program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information in this section includes:</td>
</tr>
<tr>
<td>• details about the purpose of the overall stakeholder engagement program</td>
</tr>
</tbody>
</table>
- specific objectives relating to the engagement activities being planned to address particular issues
- details about the limitations of stakeholder engagement for the project, i.e. negotiable and non-negotiable aspects of the program
- details about the inclusion of stakeholders in the setting of objectives for the engagement plan.

### Evaluation strategy

Information in this section includes details about:

- the purpose of the evaluation strategy—for both the program as a whole, and for individual engagement activities
- the evidence that will be used—the what and how of information collection
- the resources required to undertake the evaluation
- the way that the evaluation will be undertaken—the process and tools that will be used
- what will be done with the results of the evaluation.

### Stakeholder engagement techniques

Information in this section includes:

- details about the different engagement techniques and tools that will be used to address specific issues identified earlier in the plan
- rationale and justification for the methods and techniques chosen
- details about strategies in place to remove or lower barriers to participation that may be experienced by particular stakeholders.

### Use of stakeholder input

Information in this section includes details about the way the practitioner plans to incorporate stakeholders’ input into the decision-making process.

### Statement of intent

Information in this section includes details about the information that will be provided to stakeholders regarding the engagement program. The statement of intent is generally a clear and concise summary of information set out in the stakeholder engagement plan.
<table>
<thead>
<tr>
<th>Reporting requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information in this section includes:</td>
</tr>
<tr>
<td>• details about the feedback that will be provided to stakeholders regarding their involvement in the engagement program, including the content and timing of the feedback</td>
</tr>
<tr>
<td>• details about information that will be provided to relevant state and territory environment protection authorities and other regulatory bodies regarding the stakeholder engagement program, including the content and timing of any reports.</td>
</tr>
</tbody>
</table>