

STAKEHOLDER ENGAGEMENT AND DISPUTE RESOLUTION POLICY AND PROCEDURE



Contents

Purpose and scope	2
Related documents	2
Definitions and terms	3
Policy	5
Procedure	6
Legal obligations	6
Needs and expectation of stakeholders	6
Stakeholder identification and engagement	6
Traditional knowledge and associated intellectual property	8
Culturally appropriate stakeholder consultation/recognising the needs of stakeholders	10
Free, Prior and Informed Consent (FPIC)	11
Public disclosures	11
Monitoring	11
Complaints/dispute resolution	11
Media Comment	12
Reviewing this policy and procedure	12
Records	12

Purpose and scope

Australian Bluegum Plantations (ABP) acknowledges that forest management decisions and operations have the potential to affect a wide range of stakeholders, individuals, businesses and organisations, including Indigenous peoples, interest groups and neighbours.

This policy and procedure provides the framework ABP will plan and implement stakeholder engagement and resolve complaints/disputes. The vision of ABP is for stakeholders to have the opportunity to engage in a manner that allows stakeholders needs, interests and expectations to be consistently, transparently and meaningfully considered in ABP's forest management processes and activities.

ABP's stakeholder engagement procedures have the overall goal of effectively communicating and actively engaging stakeholders, community members, including members of the public, and indigenous people to develop strong positive relationships and mutual understanding of economic, social and environmental values.

To achieve this goal, ABP has set the following objectives:

- To communicate effectively and engage with stakeholders.
- To facilitate our ability to understand stakeholder concerns and interests and incorporate them into decision-making processes.
- To provide transparency of our forest management processes and activities.
- To build the trust and respect of our stakeholders.
- To build stakeholder confidence in ABP and our forest management processes to strengthen our corporate reputation within the communities in which we operate.

This policy and procedure provide a guideline for establishing and maintaining good relationships with stakeholders throughout the course of ABP's normal business activities, including, but not limited to forest management planning, plantation establishment operations, plantation harvesting and haulage operations, port operations and emergency situations. It also outlines the process to be followed with regards to complaints/dispute resolution.

Related documents

Communications Hub for Inductions, Policies and Administration (CHIPA)

Natural Values Management Plan

ABP Privacy Policy

Stakeholder Communications Register

ABP Risk Register

Legal Compliance Register

Property Assessment Procedure

Definitions and terms

Affected stakeholder	Any person, group of persons or entity that is or is likely to be subject to the effects of the activities of a Management Unit. Examples include, but are not restricted to persons, groups of persons or entities located in the neighborhood of the Management Unit. The following are examples of affected stakeholders: • Local communities • Indigenous Peoples • Workers (including contractors and service providers) • Neighbours • Local processors • Local businesses • Tenure and use rights holders, including landowners • Organisations authorised or known to act on behalf of affected stakeholders, for example social and environmental NGOs, labour unions, etc. (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN). License Code FSC-C019740).
Culturally appropriate engagement	Approaches for outreach to target groups that are in harmony with the customs, values, sensitivities and ways of life of the target audience.
Dispute	An expression of dissatisfaction by any person or organisation presented as a complaint to ABP relating to its management activities or its conformity with applicable forest management certification standards, where a response is expected. (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN).
Dispute of substantial duration:	Dispute that continues for more than twice as long as the predefined timelines in the FSC system (this is for more than six months after receiving the complaint), with consideration to existing court proceedings and timelines. (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN).
Dispute of substantial magnitude	A dispute of substantial magnitude is a dispute that involves one or more of the following: • It affects the legal or customary rights of Indigenous Peoples and local communities; • The negative impact of management activities is of such a scale that it cannot be reversed or mitigated; • Acts of intimidation, physical violence and/or destruction of property against forest workers and/or stakeholders. (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN).
Engagement	The process by which ABP communicates, consults and/or provides for the participation of interested and/or affected stakeholders ensuring that their concerns, desires, expectations, needs, rights and opportunities are considered in the establishment,

	implementation and updating of the Management Plan. (Source: FSC-STD-01-001 V5-0). (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN)).
Forest management	Forest management concerns the overall management of forests, including administrative, economic, legal, social and technical aspects such as strategic and operational forest planning, silvicultural operations (e.g. plantation establishment, research and development) and extractive operations (e.g. harvest, processing and haulage).
Free, prior and informed consent (FPIC)	A legal condition whereby a person or community can be said to have given consent to an action prior to its commencement, based upon a clear appreciation and understanding of the facts, implications and future consequences of that action, and the possession of all relevant facts at the time when consent was given. Free, prior and informed consent includes the right to grant, modify, withhold or withdraw approval. (Source: Based on the Preliminary working paper on the principle of Free, Prior and Informed Consent of Indigenous Peoples [...] (E/CN.4/Sub.2/AC.4/2004/4 8 July 2004) of the 22nd Session of the United Nations Commission on Human Rights, Sub-commission on the Promotion and Protection of Human Rights, Working Group on Indigenous Populations, 19–23 July 2004). (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN)).
Indigenous Peoples	People and groups of people that can be identified or characterised as follows: • The key characteristic or Criterion is self-identification as Indigenous Peoples at the individual level and acceptance by the community as their member; • Historical continuity with pre-colonial and/or pre-settler societies; • Strong link to territories and surrounding natural resources; • Distinct social, economic or political systems; • Distinct language, culture and beliefs; • Form non-dominant groups of society; • Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. (Source: Adapted from United Nations Permanent Forum on Indigenous, Factsheet 'Who are Indigenous Peoples' October 2007; United Nations Development Group, 'Guidelines on Indigenous Peoples' Issues' United Nations 2009, United Nations Declaration on the Rights of Indigenous Peoples, 13 September 2007)
Intellectual property	Practices as well as knowledge, innovations and other creations of the mind. (Source: Based on the Convention on Biological Diversity, Article 8(j); and World Intellectual Property Organisation. What is Intellectual Property? WIPO Publication No. 450(E)). (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN)).
Interested stakeholder	Any person, group of persons, or entity that has shown an interest, or is known to have an interest, in the activities of a Management Unit. The following are examples of interested stakeholders: • Conservation organisations, for example environmental NGOs

	• Labor (rights) organisations, for example labour unions • Human rights organisations, for example social NGOs • Local development projects • Local governments • National government departments functioning in the region • FSC national offices • Responsible Wood national offices • Experts on particular issues, for example High Conservation Values. (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN).
Local communities	Communities of any size that are in or adjacent to the Management Unit, and also those that are close enough to have a significant impact on the economy or the environmental values of the Management Unit or to have their economies, rights or environments significantly affected by the management activities or the biophysical aspects of the Management Unit (Source: FSC-STD-01-001 V5-0). For example, recreational areas/users – bird watching groups, bushwalking groups, walking trails, areas of research trials. (Source: FSC® National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN).
Stakeholder – affected	Groups and individuals who might experience a direct change in living and/or working conditions caused by the actions or inactions of the forest manager. (Source: AS/NZS4708 the joint Australia and New Zealand Standard for Sustainable Forest Management.
Stakeholder – interested	Groups and individuals who have interests in the management of the Defined Forest Area (DFA) but are not directly impacted. (Source: AS/NZS4708 the joint Australia and New Zealand Standard for Sustainable Forest Management.
Traditional knowledge	Information, know-how, skills and practices that are developed, sustained and passed on from generation to generation within a community, often forming part of its cultural or spiritual identity. (Source: based on the definition by the World Intellectual Property Organisation (WIPO). Glossary definition as provided under Policy/Traditional Knowledge on the WIPO website)

Policy

ABP is committed to developing effective working relationships with relevant stakeholders and will make every reasonable effort to work with stakeholders to resolve issues that occur while carrying out the management of the ABP estate.

ABP will advise stakeholders of relevant forest operations in accordance with all relevant legislation and procedures. ABP will provide opportunity for stakeholders to provide input into forest management.

Stakeholders who engage with ABP will be advised of how their views may be considered in decision-making processes and which aspects of forest operations and planning can be influenced by stakeholder input.

ABP will use a variety of methods to engage stakeholders recognising that tools and strategies must be tailored to suit the decisions, activities and processes we are seeking to engage on.

ABP is committed to:

- Being open and honest with stakeholders
- Providing accurate and timely information to stakeholders
- Listening to and responding to stakeholder views and concerns
- Evaluating the effectiveness of ABP stakeholder **engagement** activities and working to continually improve **engagement** performance.

Establishing and maintaining stakeholder engagement processes that are effective, culturally appropriate, meaningful and timely, and that clearly set out what information will be communicated, when engagement will occur, with whom and how.

Procedure

ABP stakeholder **engagement** processes are guided by three **engagement** principles which provide a basis for acceptable standards and good practice of stakeholder engagement:

Principle 1 – Inclusivity

ABP will engage with a broad range of stakeholders potentially affected by, or interested in, forest management processes and activities, and provide them with the opportunities and information they need to participate in a meaningful way.

Principle 2 – Transparency

ABP will act openly and honestly with stakeholders in the **engagement** process, and subsequent decision-making processes.

Principle 3 – Emphasis on mutual learning and relationship development

ABP will create opportunities for stakeholder **engagement** that emphasises mutual learning outcomes and the development of relationships. **Engagement** approaches will welcome the sharing of diverse knowledge and values without prejudice or judgement.

Legal obligations

In implementing this Stakeholder Engagement and Dispute Resolution Policy and Procedure, ABP must comply with all applicable laws, regulations and relevant forest management certification requirements on stakeholder engagement and community consultation as listed in the ABP Legal Compliance Register and relevant Certification Compliance Register.

Needs and expectation of stakeholders

ABP will identify stakeholders, evaluate which activities are likely to directly impact stakeholders, determine how they are affected by our operations, identify the needs and expectations of stakeholders and identify which of those needs and expectations will become compliance obligations. Where this process has been followed, and such compliance obligations have been identified, they will be recorded in LRM and the Legal Compliance Register.

Stakeholder identification and engagement

In pursuing stakeholder **engagement** best practice, ABP will:

- Maintain a Stakeholder Information Register to record relevant stakeholder information (e.g., contact details, and whether the stakeholder is affected or interested), and a Stakeholder Communications Register to record engagement activities and interactions, including issues raised, complaints (where applicable) and actions taken to address concerns. Stakeholder personal information will only be recorded with consent and managed in accordance with applicable privacy legislation. The Environmental Manager will monitor the registers monthly to confirm complaints are progressed and closed within the timeframes set out in the Complaints/dispute resolution section.

- Identify neighbors adjacent to operations, and other relevant **affected stakeholders** within close proximity of operations who may be impacted (including sensitive neighbors such as vineyards, organic farms, or fish/marron farms), using the Land Resource Management (LRM) form and consultation with ABP staff and adjacent landowners. Neighbors are advised of operations where required.
- Notify responsible authorities and lodge requisite documentation with the relevant authorities prior to operations commencing.
- Maintain communication with directly **affected stakeholders** throughout the duration of relevant forest operations where required.
- Respond to stakeholder questions and enquiries in a timely manner.
- Documenting the views and concerns of stakeholders in the Stakeholder Register to provide a systematic understanding of the nature of the social impacts of ABP forest management activities, and to identify sensitive issues in advance. Social impact studies may also be used to gauge impacts.
- Seek to engage with special interest groups with a relevant interest in ABP forest management and operations (e.g. wildlife carers, land care organisations).
- Provide stakeholders with an opportunity to engage in the development of the Plantation Management Plan and related documents. The level of **engagement** sought will depend on the scale and intensity of planned operations.
- Demonstrate how stakeholder concerns and input have been considered in decision-making using a method commensurate with the level of input and the scale of operations (e.g. verbal response, formal letter, summary report).
- Actively participate in relevant advisory groups and strategic partnerships to achieve mutual goals and/or develop strategies when considered important for ABP operations or the forest industry.

Significant Stakeholder Groups

Indigenous heritage

To protect and maintain Indigenous heritage, ABP will:

- Identify **Indigenous peoples** that exist within ABP's estate or those affected by our management activities through database searches and consultation with relevant stakeholders.
- Engage with the identified **Indigenous peoples** to identify and subsequently document the following (where necessary):
 - Their legal rights of tenure;
 - Their cultural responsibilities to care for country, including use rights of the forest resources and ecosystem services that apply within the ABP estate;
 - The agreed and reasonable evidence supporting these rights, responsibilities and obligations;
 - Areas where rights and responsibilities are contested between **Indigenous Peoples** connected to ABP's estate, governments and/or others;
 - Summarise how the legal rights, cultural responsibilities and any contested rights, are acknowledged by ABP; and
 - The aspirations and goals of **Indigenous Peoples** related to their identified legal rights and cultural responsibilities.
- Provide identified **Indigenous Peoples** with an opportunity to request modifications to ABP's management activities to the extent necessary to protect their rights, cultural responsibility, resources and lands and territories. Seek to attend and participate in relevant forums and meetings in response to Indigenous heritage sites, or for other purposes upon request.

Local communities

ABP will identify **local communities** within their estate and those that are affected by management activities using a social impact assessment approach as follows:

1. Identify potential communities through data collection; research; and consultation with stakeholders and ABP operations staff.
2. Identify any impact ABP's activities may have on the community.
3. Rank the impact using ABP's risk ranking matrix.
4. Identify controls to address any impacts. For example, engage **local communities** in the development of THP's, providing information notices, and invitations to comment on plantation management plans or operations plans.
5. Local communities including the risk assessment results are recorded in the relevant Local Communities List.

In the event there are **local communities** identified that could potentially have a legal right to the management unit or a long-established use during the social impact assessment, ABP will engage with the local community to identify and document:

- Their legal rights of access to the *forest*, and use rights of the forest resources and ecosystem services;
- Their demonstrated long and established use or association;
- Their *legal* rights and obligations that apply within ABP's estate;
- The evidence supporting these rights, associations and obligations;
- Areas where these rights, associations and obligations are contested between ABP, local communities, governments and/or others; and
- Summary of how the legal and contested rights, association and uses are acknowledged by ABP.

Where such a legal right or long-established use or association is established, the local community will be provided with opportunity to comment and request modification to any management activity likely to impact their legal rights or use of the management unit through direct consultation.

Where existing legal or long-established uses or access are inconsistent with ABP's forest management objectives or relevant forest management certification requirements, ABP will use its established stakeholder engagement mechanisms to negotiate with the affected local communities to identify mutually acceptable solutions.

Records of legal rights and/or established long term use/association to the management unit shall be documented in the LRM system as a red flag warning and then shown on E&H maps.

Traditional knowledge and associated intellectual property

Traditional knowledge and its associated intellectual property are protected and are only used when the owners of that traditional knowledge have provided their **Free, Prior and Informed Consent (FPIC)** formalised through a binding agreement.

Indigenous Peoples and local communities are equitably compensated according to the legally binding agreement reached through **FPIC** for the use of traditional knowledge and intellectual property.

Traditional knowledge may include the knowledge of Indigenous Peoples, local communities and relevant non-government organisations.

Activities likely to impact stakeholders

ABP has assessed its activities and identified that stakeholder needs and expectations may become compliance obligations where impacts involve:

- harm to a stakeholder's health and/or safety
- adverse impacts on a stakeholder's business or operations
- damage to a stakeholder's property
- nuisance impacts that are likely to trigger regulatory involvement (e.g. complaints to, or attendance by, regulatory officers)

The circumstances in which this compliance obligations apply will vary by property and by operation type. The following provides a summary of situations where stakeholder needs and expectations should be treated as compliance obligations.

Scenario	Possible impacts to stakeholders	Compliance obligations apply?
Trucks - Haulage	• Road damage • Noise disturbance • Dust • Safety • Mud onto road • Community event • Radio communications • School bus routes • Recreational sites/values	Yes
Spraying	• Chemical sensitivity • Safety • Noise/vibration • Disturbance to domestic/farm animals • Off-site movement/drift • Organic contamination/certification • Odour	Yes
Shooting	• Noise • Safety • Animal welfare • Encouraging other pests (foxes, wild dogs) • Off target impacts • Fearful neighbours (previous trauma) • Odour	Yes
Baiting	• Animal welfare • Off target impacts (domestic animals) • Organic certification	Yes
Burning/smoke	• Air quality • Visibility • Public health • Escape • Smoke damage to crops • Disturb community event • Smoke sensitivity • Fearful neighbours (previous trauma)	Yes
Machine based activities	• Noise • Dust • Damage to assets • Damage to external property • Damage to community utilities • Visual impact • Water quality • Disturbance to neighbouring animals • Disturb community event	Yes

	• Impacts to water flows • Erosion • Introduction of weeds • Fire hazard • Fearful neighbours (previous trauma)	
Land management	• Weed management • Pest management • Erosion control • Trespass • Escaped stock (leased properties) • Fences • Fire breaks and access	Yes

ABP recognises that different levels of stakeholder engagement are appropriate depending on the engagement objectives, relevant regulatory requirements, timeframes, resources and the concerns or issues being considered.

- Inform
- Consult
- Involve
- Collaborate
- Empower

More information on various engagement approaches that may be used by ABP can be found in Appendix A of the Stakeholder Management Plan 2024-28.

Culturally appropriate stakeholder consultation/recognising the needs of stakeholders

ABP recognises the different needs of stakeholders. This includes different educational backgrounds, literacy levels, disabilities, language and cultural differences. ABP will endeavour to accommodate these differences when communicating and engaging stakeholders and ensure it provides opportunities for culturally appropriate consultation.

Culturally appropriate engagement is a, respectful, and reciprocal process of interacting with individuals or communities from diverse backgrounds, ensuring their cultural values, traditions, and communication styles are honoured. It moves beyond mere consultation to foster genuine, long-term relationships based on trust, equality, and, in many contexts, the principles of self-determination and free, prior, and informed consent (FPIC).

Key Principles and Strategies:

- **Relationship-Building and Trust:** Prioritize building long-term, honest, and respectful relationships over simply achieving a project outcome.
- **Self-Determination and Empowerment:** Involve community members early in the planning process, allowing them to lead or influence decision-making.
- **Cultural Competence and Safety:** Actively develop knowledge about the specific community and understand one's own biases.
- **Communication Styles:** Use plain language (avoid jargon), actively listen, and adapt communication to fit the context.
- **Flexibility and Timeframes:** Allow sufficient time for community consultation and decision-making, acknowledging that processes may differ from standard, fast-paced business timelines.
- **Respect for Protocols:** Understand and follow local cultural protocols, such as Welcomes to Country, and respect the role of Elders.
- **Recognition and Compensation:** Acknowledge and value the time, knowledge, and expertise of community members, including offering appropriate payment for their contributions.

Core Components for Effective Culturally Appropriate Engagement:

- Understanding Context: Recognize the historical, social, and political context of the community.
- Place-Based Approach: Focus on local needs and solutions, often by meeting on Country.
- Inclusivity: Ensure that engagement is accessible to all, including marginalized groups within the community.
- Transparency: Be open about the purpose of the engagement and how the information will be used.

Free, Prior and Informed Consent (FPIC)

Prior to any management activities that affect the rights of Indigenous Peoples and local communities, FPIC is provided through a process that includes:

- Informing the Indigenous Peoples and/or local communities of their right to withhold or modify consent to the proposed management activities to the extent necessary to protect their rights, resources, land and territories; and
- Informing the Indigenous Peoples and/or local communities of the current and future planned forest management activities.

Public disclosures

To facilitate and encourage informed stakeholder engagement and participation, ABP will make available to the public (via the website):

- copies of relevant Policies;
- the Planation Management Plan;
- the Natural Values Management Plan;
- Annual Monitoring Report;
- PEFC Chain of Custody Policy Commitment;
- summaries of 3rd party Responsible Wood certification audit reports; and
- Defined Forest Area and Forest Management Unit maps.

Monitoring

To monitor and evaluate social impacts, ABP will:

- Review and assess all information received from stakeholders pertaining to real or perceived social impacts and add to the ABP Risk Register.
- In accordance to the scale and intensity of operations, actively engage with stakeholders to identify and evaluate potential social impacts.
- Use available information sources (e.g. research and consulting reports, ABS online statistics) to assist in the effective evaluation of social impacts.
- Maintain communication and relationships with a range of stakeholders including local councils, relevant government agencies, and various stakeholder groups.
- Attend and/or address relevant events including stakeholder group meetings.

Complaints/dispute resolution

ABP will ensure that all grievances or formal complaints regarding company activities, issues of statutory or customary law, or alleged non-conformance with relevant forest management certification requirements are addressed in a consistent manner, with a guarantee of protection from harassment, prosecution or any other form of reprisal or retaliation.

Such grievances or formal complaints received, will be investigated and reviewed, with any necessary corrective and remedial actions identified, implemented and tracked to completion, and outcomes communicated to the complainant in a timely manner.

The following grievance process is to be used in the event that a stakeholder is not satisfied with ABP's response. The stakeholder will be notified of this process.

- a) The stakeholder should seek first to resolve their complaint directly with the specific ABP staff member, or his/her direct manager, whose action or decision they challenge.
- b) Stakeholders who are unable to resolve their issue directly should be referred to the Chief Executive Officer (CEO) to lodge their complaint, in writing, within 30 days. The stakeholder should describe the basis for the complaint; identify potential parties involved in the complaint; summarise the proceedings and results to date; and suggest a solution.
- c) The CEO will decide whether the issue can be addressed by him/herself. If not, the CEO will appoint a Dispute Resolution Committee, or request that the dispute be heard by the Dispute Settlement Centre (or equivalent body) if there's no legal proceedings. Operations will cease where **disputes are of substantial magnitude, substantial duration** or involve a significant number of threats.
- d) This Dispute Resolution committee, will be chaired by the CEO or someone nominated by the CEO. The CEO will appoint two other ABP representatives to the committee and invite external members where appropriate.
- e) The principal tool for resolving the dispute will be written submissions. However, the Dispute Resolution Committee has discretion to conduct face-to-face negotiations and site visits where necessary. Complainants will receive copies of all documents filed regarding the dispute.
- f) ABP will bear the costs of routine communication with parties to the dispute. Additional expenses must be agreed, in advance, in writing, between the parties.
- g) The committee chairman will communicate, in writing, the outcome of the dispute resolution procedure to all parties directly involved within 60 days of receipt of the complaint.

All complaints shall be recorded in the Stakeholder Register. Corrective Actions shall be added to the Stakeholder Register and tracked by ABP staff member involved to completion.

Media Comment

Staff are to be polite and courteous to all media enquiries, however media comments are restricted to:

- CEO for general comment
- General Manager - Operations or Marketing - to comment on matters within the regions with prior approval of the CEO.

No other staff member is permitted to make comments to the media without the approval of the CEO.

Reviewing this policy and procedure

ABP is committed to continually improving the effectiveness of stakeholder **engagement**. A key element of this improvement will be evaluating our performance under these Policy and Procedures and, if necessary, amending and adding to this document.

Informal monitoring of the effectiveness of the Policy and Procedures will be ongoing and incorporate feedback from staff and stakeholders. A formal systematic review will be undertaken in accordance with CHIPA requirements, or earlier if considered necessary.

Records

Records of stakeholder communications are kept in the Stakeholder Communications Register on CHIPA.