

PLANNING AND ENVIRONMENT ACT 1987

PLANNING SCHEME Golden Plains & Corangamite

PERMIT NO. 20092820-A & 20091821-A

ENDORSED PLAN

SHEET 1 OF 24

SIGNED S. Menzies FOR

MINISTER FOR PLANNING

DATE: 17/4/19

Berrybank Wind Farm

Complaints Investigation and Response Plan

Global Power Generation Australia Pty Ltd

April 2019

Reference: 0124589RP3(V4)

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Global Power Generation Australia Pty Ltd
Berrybank Wind Farm
*Complaints Investigation and
Response Plan*

Reference: 0124589RP3(V4)

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INTRODUCTION

Berrybank Wind Farm (the Project) is located in Western District of Victoria, approximately 14 kilometres (km) to the east of Lismore and 16 km to the west of Cressy. The Project extends across two Shires – Golden Plains Shire and Corangamite Shire. The location of the wind farm is illustrated in *Figure 1.1*.

The Berrybank Wind Farm was approved by the Minister for Planning under Planning Permits 2009/2820 (Golden Plains Shire) and 2009/2821 (Corangamite Shire) on 24 August 2010. The permits allow for the ‘*use and development of land for a Wind Energy Facility, including anemometers, business identification signage, access roads, sub-station, water storage tanks and removal of native vegetation subject to conditions*’.

The Department of Environment Land Water and Planning (DELWP) issued an amendment to *Planning Permit 2009/2820* and *Planning Permit 2009/2821* on 4 February 2018. The amended permits, *Planning Permit 20092820-A* and *Planning Permit 20092821-A*, allow an overall maximum tip height of 180 metres and a maximum of 41 and 37 wind turbines respectively.

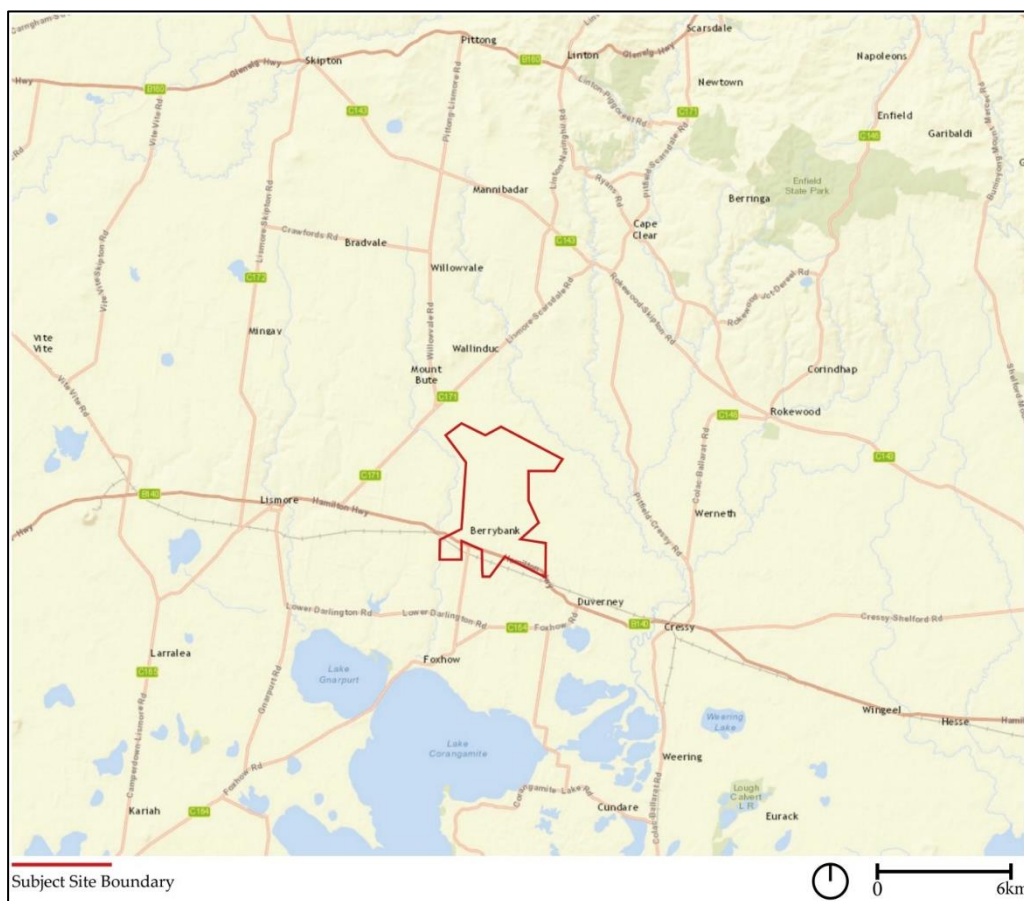


Figure 1.1 Berrybank Wind Farm Location

The purpose of this document is to describe the Complaints Investigation and Response approach through which Global Power Generation Australia Pty Ltd (GPGA) (through its wholly owned SPV, Berrybank Development Pty Ltd) will process stakeholder complaints associated with the Project. The specific objective of this Plan is to provide stakeholders with a transparent, consistent, and predictable means to lodge complaints.

This Plan will be submitted to the Minister for Planning for review and endorsement to form part of the Planning Permits. Once endorsed, this Plan will not be altered or modified without the consent of the Minister for Planning. This Plan has been developed to comply Conditions 20 to 23 of *Planning Permit No. 20092820-A* and Conditions 21 to 24 *Planning Permit No. 20092821-A*.

This Plan has been prepared in accordance with the GPGA's Public Complaint and Evaluation Procedure, and the Australian/New Zealand Standard AS/NZS 10002:2014 – Guidelines for Complaint Management in Organisations. GPGA's Public Complaint and Evaluation Procedure is made available to relevant staff to provide guidance on how complaints should be managed in accordance with GPGA's policies and procedures. Staff will ensure that the requirements of this Plan are met in handling complaints.

This Plan will be implemented during construction and operation of the Berrybank Wind Farm. It applies to all staff receiving or involved in managing complaints from the stakeholders in the context of the wind farm's construction and operation.

This document will be made publicly available on GPGA's website. The GPGA Engagement Officer (EO)¹ in conjunction with the GPGA Engineering Manager are accountable for ensuring all complaints are managed in accordance with this Plan.

For consistency, communications, public relations and media activities will occur in accordance with GPGA's Public Complaint and Evaluation Procedure and this Plan as relevant.

1.1 PLANNING PERMIT NOS. 20092820-A AND 20092821-A

This Plan has been developed to comply with Conditions 20 to 23 of *Planning Permit No. 20092820-A* and Conditions 21 to 24 *Planning Permit No. 20092821-A*.

¹ The GPGA Engagement Officer is in charge of all GPGA wind farms in Victoria.

Planning Permit No. 20092820A Condition Number	Planning Permit No. 20092821A Condition Number	Condition Detail	Section of Plan
20	21	The plan must respond to all aspects of the construction and operation of the wind energy facility	Section 1 acknowledges this condition
21	22	The plan must be publicly available on the wind energy facility operator's website	Section 2.1
22	23	The plan must be prepared in accordance with Australian/New Zealand Standard AS/NZS 10002:2014 - Guidelines for Complaint Management in Organisations	Section 1 acknowledges this condition
22a	23a	The plan must include a process to investigate and resolve complaints (different processes may be required for different types of complaints)	Section 2
22b	23b	The plan must include a requirement that all complaints will be recorded in an incidents register ² .	Section 2.1 and Annex A
22(c,d,e)	23(c,d,e)	The plan must include how contact details will be communicated to the public, a toll free number and email contact for complaints and queries to the operator of the wind energy facility and details of the appropriate council contact telephone number and email address (where available).	Section 2 and 2.1
22f	23f	A table outlining complaint information for each complaint received must be included in the plan. This table must record the complainant's name and address (if provided, including (for noise complaints) any applicable property number if connected to a noise background testing location.	Section 2.1 and Annex A
22f	23f	A Complaints Register must be established which records a receipt number for each complaint, which must be communicated to the complainant.	Section 2.1 and Annex A
22f	23f	A table must be established which records a description of the complaint including the time, the complainant's concerns, including (for a noise complaint) the potential occurrence of special audible characteristics.	Section 2.1, Annex A
22f	23f	A table must be established which records the process for investigating the complaint, and the outcome of the investigation	Section 2.1 and Annex A
23	24	A report including a reference map of complaint locations, and outlining complaints, investigation and remediation actions is to be provided on an annual basis to the satisfaction of the Minister for Planning	Section 4

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² Discussions with DELWP (on: 8 May 2018) have confirmed that the terms 'incident register' and 'complaints register' are interchangeable for the purposes of this plan. For the purposes of investigating and responding to complaints, a complaints register will be established to record and track all complaints received.

COMPLAINTS PROCESS

A complaints process involves receiving and resolving complaints by stakeholders. The approach to doing this has been designed so that complaints are:

- Kept confidential. Complaints will be captured in a register, which will be maintained so that individuals and their complaints are confidential, as described in *Section 2.1* (Step 1);
- Acknowledged in a timely manner, and promptly addressed. Depending on the complaint, there may be an opportunity to resolve the complaint immediately, while in other instances, further time may be required to undertake an investigation, as described in *Section 2.2* (Step 2);
- Investigated in a timely, objective, and fair manner. Where further time is required to investigate the complaint, the stakeholder will be kept informed throughout the investigation process, as described in *Section 2.3* (Step 3);
- Resolved. Where required, a remedy is provided, as described in *Section 2.5* (Step 5). If a stakeholder is unhappy with the resolution, an internal review can be requested; and
- Used to drive continual improvement, as described in the review process (in *Section 3*).

GPGA is responsible for receiving and managing complaints submitted by stakeholders.

2.1

STEP 1: LODGE A COMPLAINT

A variety of avenues have been established for stakeholders to lodge complaints during construction and operation of the Project. This includes in person, via telephone, via electronic mail (email) and/ or postal mail.

Method	Process
In Person	<p>Complaints can be made in-person by prior arrangement at GPGA’s head office, which is located at:</p> <p>Suite 4, Level 3, 24 Marcus Clarke Street Canberra, ACT 2600</p> <p>Complaints can also be made in person at the Project site-office, once construction begins. The site office is located at:</p> <p>680 Berrybank Wallinduc Road, Wallinduc VIC 3351</p> <p>Entrance from Padgetts Lane</p>
Telephone	<p>A hotline has been set-up that stakeholders can use to lodge a complaint. The number is: 1 800 457 181</p> <p>The hotline number is a free-call number and is serviced by staff and a 24-hour message service.</p>
Email	<p>Stakeholders can lodge a complaint via email using the following address: info@unionfenosa.com.au</p>

Method	Process
Post	Complaints can be lodged via letter, or other written format, and can be addressed to the following address: Global Power Generation Australia Pty Ltd Suite 4, Level 3, 24 Marcus Clarke Street Canberra, ACT 2600
Website	The Berrybank Wind Farm website includes an inquiry function, in which stakeholders can lodge a complaint. The website address is: http://www.unionfenosa.com.au/contact-us/

A variety of methods will be used to ensure that stakeholders are aware of the avenues for lodging a complaint. Details will be placed in the following locations throughout construction and operation:

- Local newspapers;
- Golden Plains Shire Council office. Contact details are provided below;
- Corangamite Shire Council office. Contact details are provided below;
- Signage at the main entrance to the project site which will be visible to the public; and
- Project website.

Golden Plains Shire	Corangamite Shire
2 Pope Street Bannockburn, Victoria 3331 Ph: (03) 5220 7111 Email: enquiries@gplains.vic.gov.au	181 Manifold Street Camperdown Ph: (03) 5593 7100 Email: shire@corangamite.vic.gov.au

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2.1.1 *Registering the Complaint*

To ensure an efficient and succinct process, a set of standardised information will be collected and recorded in a Complaints Register each time a complaint is lodged (*Annex A*). At a minimum, the following will be recorded:

- The name and contact details of the person lodging the complaint;
- The date and time the complaint was lodged;
- A summary of the complaint; and
- The prevailing weather and operational conditions at the time of the incident, such as wind speed, direction and temperature.

For noise complaints, additional information will be obtained at the time the complaint is lodged. Example questions include:

- How often and when is the noise heard;
- What does it sound like, including special audible characteristics;
- Is it heard external to the dwelling only or can it be heard inside the dwelling.

Stakeholders will have the option to lodge an anonymous complaint. Complainants will be made aware that it may be difficult for GPGA to follow-up on anonymous complaints. Anonymous complaints will be logged and reported with other complaints to understand potential issues and trends, and to facilitate continuous improvement.

A Formal Complaints Form (*Annex B*) has been developed to support the collection of complaints in the field.

2.1.2 *Complaints Register*

A Complaints Register will be set up to track complaints. The Complaints Register will be maintained as a secure stakeholder data management system. It is important to note that the personal details of complainants will only be made available to those involved in the resolution of the complaint in question.

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2.2

STEP 2: ACKNOWLEDGING COMPLAINT

The EO (or other nominated person relevant to the complaint) will acknowledge a complaint, and resolve the complaint if possible, within 24 hours of receiving the complaint. This acknowledgement will be made via phone or email, depending on the complainant's preferred communication method.

Depending on the nature of the complaint, it may be at this stage that the EO provides the complainant a copy of the Noise Complaint Diary Form, (*Annex C*).

Acknowledging the complaint provides an opportunity to clarify issues relating to the complaint and request further information, if required. In addition to clarifying the complaint, during the acknowledgement, details will be provided about the approach that will be taken to investigate the complaint, and an estimated timeframe in which the complainant can expect to receive a response.

In some instances, complaints will be easy to resolve, and may in fact be considered requests for additional information. In such instances, the EO will then immediately resolve the complaint and respond to the stakeholder.

2.3

STEP 3: INVESTIGATING COMPLAINT

Where an investigation is required prior to responding to the complainant, the EO (or other nominated person relevant to the complaint) will be responsible for leading the investigation process. The investigation may require:

- Site visits, particularly when complaints relate to property damage;
- Consulting internal staff or contractors, including senior management when required;
- Acquiring monitoring data, such as in the case of dust or noise complaints; and
- Contacting external stakeholders.

The aim will be to resolve all grievances as quickly as possible from acknowledgement, with simple complaints to be resolved immediately if possible, and more complex complaints resolved with a maximum timeframe of 5 working days. The EO will keep the complainant up to date throughout the process via the stakeholder's preferred communication channel. Where it may not be possible to resolve the grievance within 5 working days, the complainant will be notified beforehand and given detailed reasons as to why resolution cannot occur within this timeframe (eg: mechanical faults that require more time to be rectified).

Records of all meetings, discussions and activities associated with a complaint will be recorded in the Complaints Register.

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2.3.1 *Addressing a Complex Complaint*

There may also be instances when fraudulent, fabricated and unsubstantiated claims are made. There may be instances where a complaint can start to escalate into an ongoing dispute. In such instances, the following steps will likely be taken, particularly to avoid counterproductive responses from being given to complainants:

- Inform GPGA Executives, who will assign responsibility and, if feasible, the timeframe for handling any potentially spurious complaints;
- Review and investigate the complaint, collate facts such as timelines, photographs/maps, and documentary evidence. If a fraudulent claim is suspected, depositions from relevant internal and external witnesses may also be collected; and
- Develop a clear list of tasks to be undertaken to investigate the complaint and assess potential confidentiality requirements.

For complaints that involve credible allegations of criminal conduct or violence, the complaint will be referred to the relevant authorities and/or credible organisation(s) as appropriate.

2.4 *STEP 4: RESPONDING TO COMPLAINT*

Investigations will be undertaken over a maximum timeframe of 5 working days. Following the investigation (i.e. Step 3, at the end of the 5 working days), the results, including details of the findings and any proposed remediation actions³ will be clearly explained to the complainant within 24 hours. This will occur verbally in the first instance, and will be followed by an email or letter, depending on the preferred communication channels of the complainant.

It will be at this stage that the complainant will determine if the resolution is satisfactory.

As mentioned in Step 3, The EO will keep the complainant up to date throughout the process via the stakeholder's preferred communication channel. Where it may not be possible to resolve the grievance within 5 working days, the complainant will be notified beforehand and given detailed reasons as to why resolution cannot occur within this timeframe (eg: mechanical faults that require more time to be rectified).

³ Examples of potential remedies include an apology, reconsideration of a decision, an offer of non-financial assistance, change in policy or practice, action to modify a behaviour.

STEP 5: CLOSING OUT COMPLAINT

If the complainant accepts the proposed resolution, the EO will close-out the complaint. This will include an email or letter to the complainant confirming that the complaint has been closed-out as well as closed-out in the Complaints Register.

Alternatively, if no response is received from the complainant within ten working days, the complaint will be considered closed.

If a complainant is not satisfied with the investigation and proposed resolution, the complainant has the right to ask for the issue to be escalated within GPGA for review. If this were to occur, an internal review would be conducted.

The complainant can also escalate the complaint internally should the EO (or personnel who is assigned to handling the complaint) not meet timeframes.

Should the complainant not be satisfied with any resolution proposed by GPGA, even after the matter is escalated internally, GPGA will seek assistance from the National Wind Farm Commissioner⁴ on the complainant's behalf or, engage a third party mediator to assist in resolving the complaint. If this occurs, the EO will collate all information concerning the complaint, including all actions taken to date, and provide the materials to the relevant party. Complainants can also seek legal advice should they prefer to do so.

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⁴ The Commissioner is an independent role appointed by the Australian Government, reporting to the Minister for the Environment and Energy. The Commissioner's role is to receive and refer complaints from concerned stakeholders about wind farms, as well as promote best practice within the industry.

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The EO in conjunction with the GPGA Engineering Manager are accountable for ensuring all complaints are managed in accordance with this Plan. The EO and GPGA Engineering Manager will be assisted by other nominated, qualified personnel as required.

The principle responsibilities of the EO will be to:

- Inform stakeholders about the complaints process. It will be important that stakeholders are aware and can readily access the process;
- Accurately record stakeholder complaints, both verbal and written, and seek resolution within the specified time periods;
- Maintain regular contact with complainants and other stakeholders during the investigation process to actively manage complainants' expectations. This includes advising the complainant about:
 - The complaint process and the expected timeframes for its actions;
 - Their likely involvement in the process; and
 - Only where reasonable and realistic, the possible outcome of their complaint
- Advise complainants, as soon as practicable, where GPGA is unable to deal with either part or all of their complaint;
- From time to time, review the complaints received to assess any reoccurring issues, to report any lessons learned to thereby support continuous improvement and to provide GPGA with feedback on their complaint management system; and
- Prepare the compliance reports (as mentioned in Section 4).

The EO (and any nominated personnel handling complaints) will receive relevant training in handling grievances and complaints as required prior to undertaking any complaint management activities. GPGA will ensure that personnel handling complaints (particularly the EO) are empowered with the correct level of authority (particularly resolution authority) to take appropriate action and to implement it as required.

Roles and responsibilities that the EO and GPGA Engineering Manager do not include are setting unreasonable expectations and the authority to change decisions. The understanding of these exclusions of the EO and GPGA Engineering Manager roles is vital for minimising the risk of a complaint escalating into an ongoing dispute.

4 *REPORTING AND REVIEW*

4.1 *REPORTING*

A report will be provided annually, and at other times as requested, to the satisfaction of the Minister for Planning. The report will include a reference map of the complaint locations, a summary of the number of complaints received, an outline of the type of complaints received, investigations undertaken, and remediation actions completed, inclusive of the nature and breadth of the organization's interactions with the complainants to achieve resolutions. A copy of the Complaints Register will be appended to the report.

In addition, details of complaints received will be included in compliance reports and made available to relevant parties on request, ensuring complainant confidentiality is maintained.

Conclusions made in relation to areas of the complaint

4.2 *REVIEW*

This Plan will undergo quarterly reviews during construction and half-yearly reviews during operation to identify any trends in complaints. The timing for reviews will be revisited at the end of the first year of operation.

This will help ensure complaints are being addressed in a timely manner.

The following indicators that will be used to understand trends and issues during the reviews:

- Total number of complaints received;
- Total number of stakeholders lodging complaints;
- Number of open complaints;
- Timeframes for closure of complaints; and
- Repeat complaints.

The review will also provide an opportunity to drive continual improvement of the organization's operations. It will assist in determining whether adequate resources are provided to staff who are managing complaints.

DEFINITIONS

Term	Definition
Acknowledge	Recognition that a complaint has been received.
Complainant	A person, organisation or their representative (including clients, consumers, service users, customers, etc.) making the complaint.
Complaint	Any expression of dissatisfaction with a real or perceived problem relating to Global Power Generation Australia. This may result when a member of the public believes that Global Power Generation Australia has: done something wrong, failed to do something it should have done, and/or acted outside legislative requirements or planning conditions.
Complaints Register	A stakeholder data management system used to record complaints.
Investigation	An inquiry undertaken to ascertain facts and detailed to inform the resolution of a complaint.

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Annex A

Complaints Register

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Berrybank Complaints Register

Receipt Number	Date of Complaint	Time of Complaint	Name of Complainant	Address or Applicable Property Number of Complainant	Complaint type ¹	Time and Date of Incident	Weather and Operational Conditions	Complaint (including audible characteristics)	Response Action	Actioned by	Status	Date of Completion	Complainant Satisfaction ²	Insert link to associated documents

- Notes:
- 1. Complaint type examples include: Landowner Agreement, Neighbour Agreement, Noise, Safety, Traffic, TV/Radio Interference and Visual)
 - 2. Complaint Satisfaction categories include Very satisfied, Satisfied, Neutral, Not Satisfied, Escalating

Annex B

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Formal Complaint Form

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Name: _____ Date: _____
Postal Address: _____ Phone: _____
Email: _____ GPG Representative: _____

Complaint Type (please indicate the general type of complaint, eg visual, noise, traffic, TV interference):

Complaint Location:

Part of Property affected:

Frequency of the Issue

Source of the Issue

Full Description of the Issue:

Any Additional Information:

Attached Documents:

Has the form been seen and approved by both parties?
Yes / No

Signature of complainant
.....

Signature of Global Power Generation Representative
.....

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Annex C

Noise Complaint Diary Form



GLOBAL POWER GENERATION

NOISE DIARY

Your accuracy in recording the nuisance noise is of extreme importance. Please create a detailed diary over a two-week period as demonstrated in the example below, and submit the diary to Global Power Generation Australia with the Formal Complaint Form.

Name:

Property Address:

Date	Time Noise Started	Time Noise Stopped	Total Noise Time	Reason for Noise
23/07/2016	3:00pm	3:10pm	10 Minutes	i.e Turbine Blade, Faulty Equipment, Substation etc

Please attach any supporting documents and send the completed Diary and Complaints Form to either info@unionfenosa.com.au or post to Suite 4, Level 3, 24 Marcus Clarke Street, Canberra ACT 2601

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