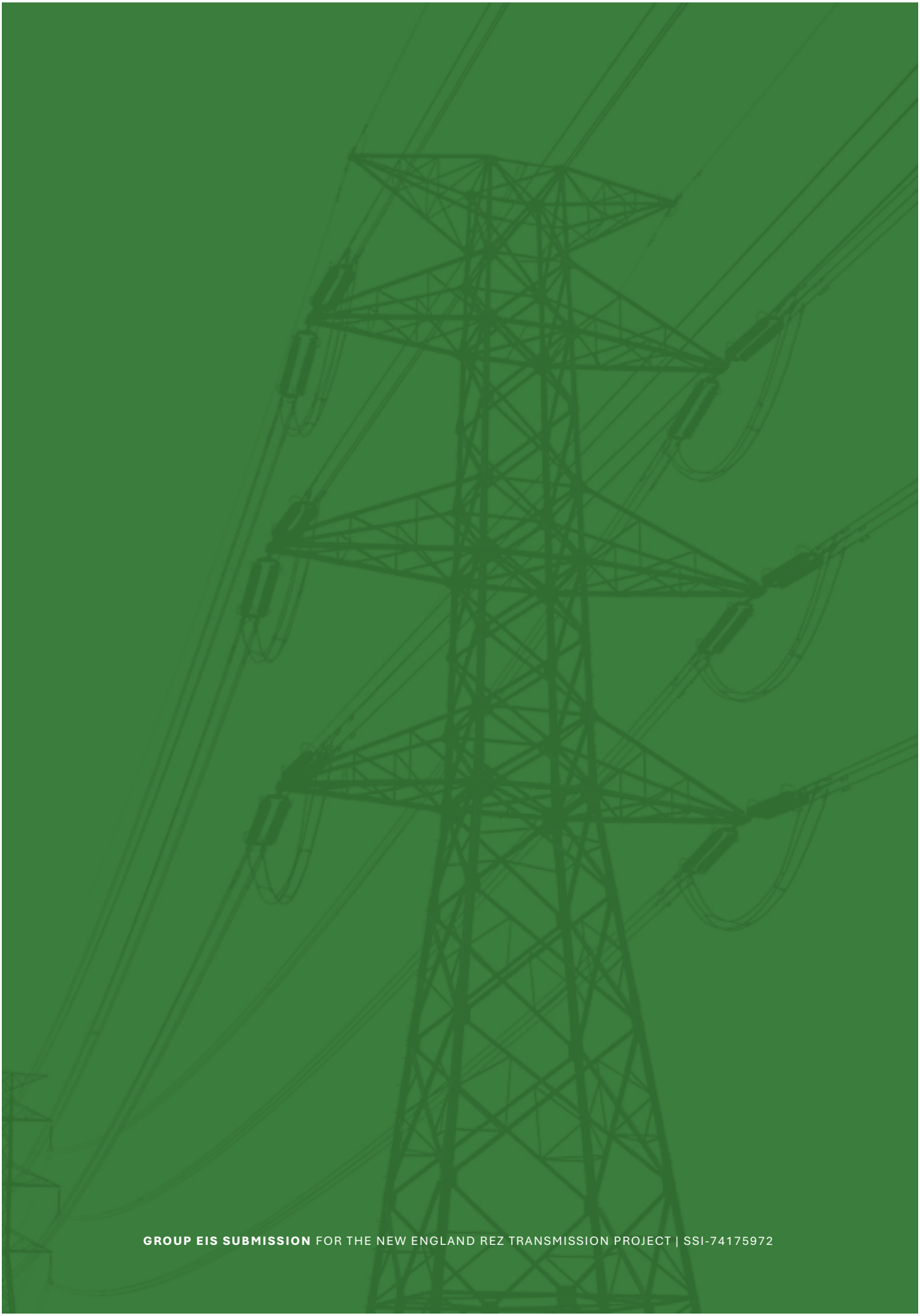
SECTION **17**

Social and Community Impacts

THIS IS **ONE** SECTION OF **TWENTY TWO,**
THAT FORMS PART OF A LARGER GROUP SUBMISSION
TO THE NEW ENGLAND REZ TRANSMISSION PROJECT
SSI-74175972



Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter Responsible Infrastructure Group | Voice for Walcha



GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION 17

Social and Community Impacts

Key issues we have found ...

Current corridor communities remain misrepresented	Evidence from the previous corridor and limited participation by directly affected landholders cannot reliably represent communities along the current route.
Negative impacts are often downplayed, while positive ones overstated	Light touch mitigations somehow lead to a significant reduction in risk. These mitigations generally reference future planning materials yet to be developed.
Assessment downplays survey respondents' opposition	The 2026 online survey records 53% rejection, yet summary language suggests conditional acceptance and diminishes respondents' opposition to the project.
Camps threaten essential community resources	Most engagement preceded camp disclosure, leaving safety, traffic, water and service pressures inadequately assessed with communities facing substantial workforce influx.
Community vulnerability ratings are unreliable	Conflicting population figures, missing locality ratings and unexplained scoring obscure which communities lack the services and capacity to absorb disruption.
Small towns face compounding pressures	Overlapping projects would concentrate workforces in smaller towns, adding pressure on housing, health care, roads, community facilities and social cohesion.
Wellbeing protections must precede approval	Stress and anxiety ratings are reduced using unwritten strategies; require funded, tested protections, independent review and community scrutiny before approval.

Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter | Voice for Walcha

Read in more detail >


ACCESS
DENIED
NO GO
ENERGY CO

SECTION **17**

Social and Community Impacts

EXECUTIVE SUMMARY

EnergyCo's Social Impact Assessment is fundamentally unreliable and should not be accepted as a basis for approving the New England REZ transmission project. It misrepresents affected communities, understates opposition and claims reductions in social harm that depend on measures still left for future development.

EnergyCo has used evidence gathered from landholders and communities along the previous corridor to draw conclusions about people affected by the new route. The report itself acknowledges that alignment changes prevent some survey responses from being merged or directly compared, yet combines them in its account of community values.

Publishing those conclusions despite that acknowledgement is a serious misrepresentation. It is unprofessional and insulting to the landholders and neighbours now facing the project, whose circumstances and concerns cannot be represented by surveying people elsewhere. EnergyCo changed the corridor; it was responsible for assessing the people it brought into the project's path.

The assessment describes community attitudes as "conditional acceptance" while recording 53% rejection in the 2026 online survey. That language downplays the opposition in its own evidence. Inconsistent population figures, unexplained vulnerability ratings and poor representation of directly affected landholders further undermine its findings. Communities should not have to correct a government proponent's misrepresentation of their views and circumstances.

Much of this report comprises subjective risk analysis, exposing bias and misrepresenting community risks.

Consultation before disclosure of camp locations and scale cannot establish informed community views about those camps. Workforce camps and construction pressures threaten housing, water supplies, health care, emergency services, roads and social cohesion. The assessment does not demonstrate how smaller communities will withstand these pressures alongside other developments. It then reduces risk ratings by relying on future management plans without showing that the measures will work. Promised consultation and unproven mitigation provide no demonstrated protection for the communities carrying these risks.

The assessment must be redone, independently reviewed and publicly exhibited before any approval is considered. EnergyCo must survey the communities on the current corridor, disclose the full project scope, correct its baselines and assess local and cumulative impacts with the responsible service agencies. Mitigation must specify funded actions, accountable parties, deadlines and enforceable performance standards. Affected communities must be able to scrutinise the evidence and challenge the conclusions before determination.

Contents

1. Potential SEARS issues to be investigated 3

2. Technical Report Objections 4

3. Requests 20

4. Questions Requiring Further Response 21

5. Objections Summary List – Quick Reference 24

Appendix 1 - Media release from local community groups 26

Appendix 2 - Map from Walcha LGA – landowner response to interest in hosting renewables 28

Appendix 3 - Valley Alliance – Social Impact Assessment Expert Report 29

1 | Potential SEARS issues to be investigated

The Secretary's Environmental Assessment Requirements (SEARs), as amended and issued on 7 April 2026 (as per Technical Report 4 (TR4)), set out what the EIS must do. On the evidence below, the social impact material does not appear to meet the following requirements:

- SEARs require an assessment of social impacts "in accordance with" the Social Impact Assessment Guideline. The assessment does not appear to show this where baseline data is incorrect (Objection 9), the evidence base is incomplete or pre-dates the current corridor (Objection 2 and 3), and residual ratings are not supported by the evidence based and justifiable mitigation actions described (Objection 7).
- SEARs require the EIS to assess the state of the existing environment and the community's views. The baseline errors highlighted in Objection 9, and the reliance on pre-route alignment survey data, do not appear to give a reliable account of the current corridor.
- SEARs require the mitigation measures to avoid or minimise impacts, and a consolidated summary of proposed mitigation measures to be provided. However, management plans central to the mitigation responses are deferred until after approval - meaning that the EIS fails to describe the specific mitigation actions necessary to reduce consequential impacts.
- SEARs require the EIS to detail how engagement was consistent with the Undertaking Engagement Guide for State Significant Projects (DPIE, November 2021). Community groups report that they were not consulted in preparing the assessment and Technical Report 4 acknowledges trust issues.

  > *See Appendix 1 which outlines community groups halting engagement due to their loss of trust in processes. These groups confirm they were not directly contacted by the authors of the social impact assessment to try and engage in the surveys. EnergyCo and Minister Sharpe were aware of these concerns and the breakdown of communication and did not address or rectify the issues highlighted.*
- SEARs require consideration of the need for construction workforce accommodation. Camp 3 at Barry has no vulnerability, access or remoteness rating (Objection 9), suggesting that the assessment of its social impact is incomplete. As per Objection 1, the camps are also presented as a mitigation measure to population influx issues and are not assessed for the potential impacts they impose.
- SEARs require cumulative impacts to be considered with existing and proposed developments in the region. The Central-West Orana REZ experience (Parliamentary Inquiry Report 65) suggests cumulative and compounding effects. There is no mention of specific plans for how cumulative impacts with this project are going to be mitigated/ managed.
- SEARs require the EIS to cover community views. This has not been adequately achieved as per below.

2 | Technical Report Objections

We request that the following objections be addressed and questions be answered appropriately within the EIS Technical Report 4: Social Impact Assessment prior to approval.

Objection 1

The EIS Social Impact Assessment SEARS requirement *"An assessment of the social impacts in accordance with Social Impact Assessment Guideline and consideration of the need for construction workforce accommodation"* has not been sufficiently met as the social evaluation and assessment of the camps has not taken place.

> Evidence

- The vast majority of community engagement activities took place prior to the announcement of the camps' locations and size - effectively silencing community feedback in relation to the potential impacts of the camps themselves and significantly misrepresenting community engagement data that was collected before the project scale was understood in full.
- The authors have deliberately positioned the workforce camps as a mitigation measure to population influx risks and limited housing but have failed to consider the impacts of the camps themselves on affected communities, neighbouring landholders as well as local resources.

Incoming construction workforce	Service centres Hub/workforce accommodation camp locations	Broader community Users of affordable /community/ crisis housing	C/3 = Medium	• Inclusion of workforce accommodation camps to reduce the demand on local accommodation • Implementation of the Workforce Management Plan that identifies expectations associated with the use of short-term and rental accommodation by contractors

Source: Umwelt, Social Impact Assessment, page 186.

> Why it matters

- While the camps are a mitigation tool to reducing pressure on local housing, the population size of these camps is significant as outlined in Technical Report 4, especially in proportion to communities in proximity. This poses significant safety concerns for neighbouring families, increases vehicle movements and traffic congestion and strains local resources.
- The camps represent a significant increase in the scale of infrastructure needed to complete the project, building temporary housing and living facilities for a workforce of hundreds of people. Assessing the suitability of sites, access to critical shared resources including water, and ensuring that the appropriate checks and balances are in place is needed.
- Community participation in the design, implementation and decision making of the workforce camps is needed to reduce risks and highlight potentially unforeseen risks.

Objection 2

The survey data used to inform the Social Impact Assessment has not been consistently targeted to affected communities - as surveys were conducted prior to the announcement of the line assessed within the EIS. This is likely to have misrepresented affected community concerns and influenced the risk analysis component of Technical Report 4.

> Evidence

- Data from a previous study corridor is utilised throughout the social impact assessment, misrepresenting community sentiment, perceptions, concerns and feedback. The social impact assessment and EIS were prepared while the transmission route was still changing. Technical Report 4 records the first round of engagement (February–March 2025) and the first online survey (April–July 2025) as taking place before the newly announced 3-km study area (October 2025) and the 1-km corridor (1 May 2026).
- Technical Report 4 states that the 2025 survey responses reflected the project area as proposed at that time, and that some questions and responses across the 2025 and 2026 online surveys "cannot be merged or directly compared" because of the alignment change.

  Despite this, Technical Report 4 does not identify which baseline data, community views, quotes, ratings or conclusions rest on the first-route investigations throughout their report, so a reader cannot tell which parts of the assessment describe the current route and which related to the previous route and corresponding social impacts
- The social impact assessment presents findings from both surveys (and the CATI) as a unified summary of "community values" (e.g., Figure 4.1, 2026: 85). If the datasets cannot be compared, the social impact assessment cannot use them jointly to demonstrate trends, consistency, or the nature and extent of community attitudes.

> Why it matters

- The corridor change was announced in October 2025 and it impacted over 100 new properties. (Proposed New England REZ corridor shift sparks landholder talks | The Northern Daily Leader | Tamworth, NSW). The newly affected landholders feedback and concerns have not been captured in the survey data presented in Technical Report 4.
- The feedback from previously affected communities, including Dungowan, is currently being used in measuring community perceptions and detailing potential impacts, whereas newly affected areas including Barry, Timor, Waverly and Niangala have not been able to participate in the survey process
- Social, cultural and community impacts depend on place: who lives on or near the line, how they use the land, and what it means to them. Data gathered for a different route describes different people, landscapes and communities. Using findings from a previous corridor provides an inaccurate picture of the likelihood and magnitude of impacts, making the ratings built from this data unreliable. This poses significant risk to the affected communities and landholders and misrepresents the social, cultural and community impacts of the current route.

Objection 3

The survey data used to inform the Social Impact Assessment has been collected prior to the full scope of the proposed project being announced – likely misrepresenting affected communities' perceptions of the proposed project and the scale of the cumulative impacts presented.

> Evidence

- Technical Report 4 records the first round of engagement (February–March 2025) and the first online survey (April–July 2025). With the new route only announced in October 2025 and the hubs and camp locations only announced as recently as August 2026, it is clear that the community perception data and feedback driving the social impact assessment outcomes was collated prior to the announcement of the project scale in its entirety.

> Why it matters

- Any data collected prior to the change of route (i.e. the 2025 surveys) cannot be used to infer the newly affected communities' current beliefs as their exposure to the project materially changed (they were unaffected by the prior alignment). It is highly likely that the views of the affected communities towards the project shifted with the change of route – essentially rendering all previous data obsolete.
- Any data collected prior to the announcement of the camp size and locations does not capture the community sentiment, concerns or feedback in relation to the camps and the size of the proposed workforce and is not an accurate reflection of the community perception to the project description in full.
- Communities cannot fairly participate in the process of design and development if they are not provided with the information that affects their way of life, cost of living, livelihoods and sense of community and place. Information collected prior to several key developments in the project scope is likely to misrepresent affected communities' feedback.
- The data collected from the community surveys is being used to identify potential impacts and determine mitigating actions. Community feedback and their shared lived experience is needed to best determine potential risks and cumulative impacts of the project. Without this knowledge and feedback, the potential for consequential negative impacts is heightened.

Objection 4

Risk analysis framework and processes are subjective, lacking transparency, community participation and independent oversight.

> Evidence

- The risk analysis matrix outlined in the Technical Report 4 is a basic risk matrix not suitable for this level of analysis and the scale of project proposed.

Table 2.7 Social Impact Significance Matrix

LIKELIHOOD LEVEL	1 MINIMAL	2 MINOR	3 MODERATE	4 MAJOR	5 TRANSFORMATIONAL
A Almost certain	Low	Medium	High	Very high	Very high
B Likely	Low	Medium	High	High	Very high
C Possible	Low	Low	Medium	High	High
D Unlikely	Negligible	Low	Low	Medium	High
E Very unlikely	Negligible	Negligible	Low	Medium	Medium

- Clear examples of subjective weighting of likelihood and severity of impact exist throughout the social impact assessment matrix. For example this is shown in table 6.1, where "improved access roads" for affected landholders appears to be an inflated assessment of medium potential benefits. Especially when comparing the same medium level negative ratings assigned to disruption to agricultural operations, loss of property values and relocation of landholders."
- Technical Report 4 does not provide a detailed methodology in how pre-mitigation risks and residual risks were determined. The methodology only states that "Proposed design changes, mitigation and management measures are considered in relation to how they may reduce the significance of negative social impacts, with strategies also noted that may enhance positive impacts of the project and deliver positive community outcomes and social value." (page 30)
- There is no evidence of engaging third party specialists to review the risk analysis outcomes or taking steps to validate the results with affected communities and landholders.

> Why it matters

- The lack of information about the methodology and scoring of impacts both positive and negative speaks to significant transparency issues and increases the risk of unintended blindspots, underestimation of actual impacts, devaluing of genuine community concerns and subjective results.
- Without a detailed and qualitative description of the scoring system, it is highly likely that risks have been undervalued and overinflated depending on the authors' opinion – rather than a defined and justifiable decision tree that can be explained to stakeholders in a transparent and accountable manner.
- By not undertaking a validation exercise, the social impact assessment limits itself to the opinions of the authors based on secondary data sets and community perception survey results. This closed decision-making process is highly likely to lead to miscalculated risks and misunderstood mitigations – placing affected communities and landholders at greater risk of consequential negative impacts.
- Risk Analysis requires descriptive definitions that outline what would be severe impacts, medium level impacts or low-level impacts as well as the frequency for highly likely, likely, possible, seldom. Without smart definitions that can be reviewed more objectively – there is no transparency in the outcomes of the assessment and affected communities and landholders are limited in their ability to review the project on its merits and challenge issues where necessary.

Objection 5

Soft or light touch mitigation actions are over-inflated in their ability to remedy high risk impacts that have been identified by communities. Highlighting inconsistent and subjective risk analysis throughout Technical Report 4.

> Evidence

- There is a common trend throughout the social impact assessment to significantly exaggerate the effectiveness of mitigation measures in alleviating negative risks caused by the project. As an example (but not limited to), increased stress and anxiety is classified as A/4 "Almost certain with major impacts", yet low impact, low reach mitigation measures including (1) the continuation of existing mental health services; (2) a Community Wellbeing Strategy; and (3) updating the EnergyCo Engagement Strategy (not yet defined), increased stress and anxiety is downgraded to "moderate and possible" residual risk.

> Why it matters

- The transmission lines are planned to traverse through several small towns and areas, often placing large workforce populations on small centres, straining health services, community services, education services, emergency responders. Long term structural economic barriers already exist in ensuring that small towns can access basic services including healthcare, with many small towns in NSW already experiencing a decline in service accessibility. Only committing to provide telehealth services and first aid kits inside the workforce camps is not sufficient in ensuring that local healthcare facilities can function as normal and that the community is not disrupted in accessing services. This also poses risks to the workforce itself and raises questions of duty of care.
- Mitigation measures need to the tangible, measurable and accountable to the risk profile that they aim to remedy. Mitigation measures that remain undefined and make considerable assumptions as to their ability to deliver only increase the risk of project success and unfairly place affected communities and landholders at greater risk.
- If the project proponent only plans to implement soft or light mitigation measures during the planning stage there is significant risk for unforeseen consequences and impacts that will need to be rectified in real-time, while placing added pressure on services, housing and local resources. These contingency measures would be un-costed and unplanned, leading to delays in the project cost blowouts and placing the affected communities in a vulnerable position.

Objection 6

Mitigation measures primarily propose future planning tools to be developed without any guarantees of community participation in planning, development, implementation or decision-making.

> Evidence

- Technical Report 4 sets out mitigation and management measures at a high level (for example, "develop", "implement" and "consult"), but the detail sits in plans to be prepared after approval (i.e none of these plans exist at this point in time: the Social Impact Management Plan and Community Wellbeing Strategy (SO1), Community and Stakeholder Engagement Plan (SO2), Local Industry Participation Plan (SO3), Workforce Management Plan (SO4), and the property management, biosecurity, soil and water, noise and vibration, traffic and emergency response plans. The Community Environmental Benefit Plan is "not yet determined" (p. 124).
- The monitoring framework (Table 7.2) has no targets, thresholds or corrective actions, and Technical Report 4 does not say who will review the results or whether they will be published.

> Why it matters

- Future planning tools are not tangible risk management actions that affected landholders and communities can review – highlighting transparency, accountability and trust issues.
- Local knowledge and affected community engagement can enhance planning, minimise risks and increase community buy-in and ownership.
- Without mandating plans to be part of the exhibited EIS, the community has no formal opportunity to read, comment on or challenge plans that affect their livelihoods, way of life, sense of place and community.
- The experience in the Central-West Orana REZ (Inquiry Report 65) is that commitments of this kind did not deliver the benefits promised. Without ending this practice now, there is a high risk of repeated consequential negative impacts on affected communities.
- Technical Report 4 acknowledges (p. 98) that community trust in the proponent is an issue, yet the mitigation depends on the proponent's goodwill and voluntary commitments which many community members say they do not trust. The experience of the Central-West Orana REZ is the best available test of whether such mitigation works. The NSW Legislative Council Portfolio Committee No. 4 – Regional NSW (Report 65, July 2026) found that commitments made at assessment stage were not experienced as benefits by communities. This is the same approach, by the same proponent, to the same type of project.

Objection 7

The residual ratings have been predetermined throughout the Social Assessment when the vast majority of mitigation measures listed have not been developed, designed or planned – lacking all consequential detail needed to determine if the residual risk has been reduced.

> Evidence

- Residual ratings have been developed in the Social Assessment Matrix provided in both the EIS and Social Impact Assessment. These ratings rely on plans that do not yet exist, have not been tested or consulted.
- The Social Impact Management Plan (SO1, with the Community Wellbeing Strategy), Community and Stakeholder Engagement Plan (SO2), Local Industry Participation Plan (SO3) and Workforce Management Plan (SO4) are all examples of plans to be written after approval, as are the property management, biosecurity, soil and water, noise and vibration, traffic and emergency response plans. The Community Environmental Benefit Plan (CEBP) is described as "not yet determined" (p. 124), yet benefit sharing is relied on to offset impacts.
- The monitoring framework (Table 7.2) lists indicators but no targets, thresholds or triggers for corrective action, so there is no way to know if mitigation is working or what happens if it is not.

> Why it matters

- As it currently stands the authors of the report have essentially assigned a lower risk rating to potential impacts without any detailed planning and design to justify the risk allocation. It is the equivalent of drawing a conclusion before undertaking the research and exposes the community to unacceptable risks of consequential impacts if approvals allow the project to move forward.
- The assessment was prepared by the proponent's consultant, and Technical Report 4 does not show any independent review of the pre- and post-mitigation ratings; the proponent in effect marks its own homework.
- Residual risk indicators are a key decision-making tool in determining a project's approval, if no substantive justification and detailed outline of mitigation measures are available – the ratings analysis is inaccurate, unreliable and places affected communities and landholders at greater risk.

Objection 8

Clear and consistent evidence of bias in promoting potential positive impacts of the project, while downplaying the negative impacts.

> Evidence

- Table 6.1 states that the Strategic Benefit Payment Scheme is considered a "diversification of income" with a medium level impact and likelihood of "possible". This is a gross misrepresentation of affected landholder feedback that continually communicate that the compensation payment is inadequate, meaning that this should be rated as a low positive impact at best and certainly not communicated as an "opportunity for income diversification."
- Table 6.2 shows a clear bias to promoting positive impacts to local businesses and employment opportunities – providing three positive impact areas while failing to list potential business disruption and income losses to existing businesses and industries, including agriculture, transport and tourism as well as disruptions to local supply chains. The modest opportunities for local businesses and employment are significantly over-inflated in the current assessment, especially when compared to the potential disruptions to existing, long-term businesses in the region (which has already been established in the parliamentary enquiry into the impact of Renewable Energy Zones on regional communities).
- At the same time, the project is considered to have a low residual impact on critical community concerns that experience long-term structural challenges in access to health care and access to housing – even in the community centres that are likely to experience population increases of over 20 percent (table 6.2).

> Why it matters

- Such examples can unfairly sway decision-makers in their approval processes and reduce the appetite for further investigation where needed.
- Such examples jeopardise accuracy and accountability of the social impact assessment findings. breaking down community trust and raising serious accountability questions
- This also speaks to the highly disproportionate decision-making powers and systemic weaknesses in procedural fairness that have been raised strongly by affected communities and landholders throughout the report. Many respondents (57%) do not believe their views will be considered at all in the planning process. Only 5% believe their views will be considered to a large or very large extent, underscoring a widespread perception of procedural exclusion rather than participation (also demonstrated by Appendix 1).

Objection 9

The Social Baseline of the report has several inconsistencies and errors, confusing the reader as to what information is being used in each scoring section and how information is being used to determine outcomes. This is intensified without a complete publishing of the methodology.

> Evidence

- Barry, the proposed site of Camp 3, scores zero on all three socio-economic indices and has no physical access, remoteness or vulnerability rating (Table 3.9, p. 74).
- Walcha is rated Medium for vulnerability to change, while Niangala (very low physical access) and Glenbawn (no physical access) are rated Low, although Technical Report 4 says twelve small communities have no services and 20 have very low access (p. 76).
- Technical Report 4 states the Walcha LGA population as approximately 5,971 (p. 49), the same figure it gives for Uralla (p. 44), while a later Walcha profile shows 2,475. A later table appears to give a Walcha population of 3,016 (PDF p. 292), making the baseline population used for Walcha unclear.
- There are contradictory statements within the social impact assessment such as, ""The CATI survey was implemented to obtain a representative sample from the broader community." And (2026:31): "The views of the community represented throughout the report are based on the sample of community members and stakeholders consulted as outlined in Section 2.5, and "do not necessarily represent the views of the entire community."
- Three different inconsistent views about comparing the three datasets, 2026 page 84 "Importantly, due to the changes in project alignment which were announced between the two online survey periods, some questions and responses in the survey datasets cannot be merged or directly compared", then 2026 Appendix E:1: "The CATI survey has been developed so that key questions can be compared to the outcomes of the Online Community Survey (2025 and 2026)." and finally, 2026 page 89: "Due to differences in question structure between the CATI survey/2026 online survey and 2025 online survey, direct comparison of results is limited."

> Why it matters

- While critical information outlining the methodology and scoring system remains undisclosed – it is understood that the vulnerability to change baseline is critical in determining how impacts are rated in terms of their severity. Errors and gaps in this analysis therefore pose great risk to affected communities and landholders. These errors and gaps within the analysis directly influence outcomes for communities and will likely result in significant unforeseen negative impacts.

Objection 10

Discrepancies within the community engagement survey sampling are significant and yet, while remaining unaddressed, the data collected is still used to inform the social impact findings.

> Evidence

- Technical Report 4 states that landholders had not consented to field investigations and that, where agreements are absent, investigations are not undertaken and conservative assumptions from public data are used (p. 105). The assessment is therefore least informed where impacts are most concentrated.
- Participation fell sharply. Both online surveys were self-selected, with about 532 responses in 2025 (during the time of studying views relating to a different project) but only 90 in 2026, after the corridor was announced. This drop in participation and only 90 responses out of a 250km+ project is not a representative sample size of community views to this current corridor.
- The 2026 phone (CATI) survey completed 600 interviews from 11,446 phone numbers that were attempted (therefore only 5.2% responded). Furthermore, the phone sample does not reflect the wider community demographics, with older residents aged 70–79-year-olds making up 22.7% of the sample (only 14.5% of the population) and 20–29-year-olds make up 1.7% of the survey (5.3% of the population). Younger residents are under-represented.
- In addition, only a handful of respondents were directly affected. About 24 CATI and about 13 online respondents self-identified as affected landholders. Therefore - the views of the people closest to the line carry little weight in the data when it can be considered that there were hundreds of directly impacted people (because each of the 150+ farms/ land parcels generally involved multiple residents).
- The NSW SIA guideline states that “the SIA assesses social impacts within the social locality which is defined by where people are likely to experience those impacts”. For this transmission project (transmission easements alone), 24% of the line impacts the Walcha LGA, 25% the Upper Hunter LGA, 23% the Uralla LGA, only 3.5% the Armidale LGA, 13.5% the Tamworth LGA and 11% the Muswellbrook LGA. When you add in camps and hubs for Walcha, Gundy and Uralla their percentages increase even further. This study does not proportionately measure the views of these communities for the SIA – effectively misrepresenting the views of the social locality.
- Technical Report 4 does not state the basis for the sample size, margin of error of confidence level. Fragmented across 6 LGAs, it is insufficient for any sub-group analysis.

> Why it matters

- A social impact assessment is only as good as the evidence behind it. In this survey, people living on and next to the current corridor were the least engaged, leading to assumptions from a small sample of public data is used to represent community perceptions.
- Where evidence is thin, impacts are described as “perceptions” or rated on the basis of an assumption. This makes it easier to rate impacts as lower than lived experience would suggest, and it makes the assessment impossible to test. A decision-maker cannot be confident the findings describe this route, these properties and these communities.
- Furthermore, there is a significant and statistically meaningful lower number of engaged participants in the second round of surveys and consultation period (the current route) i.e. 532 responses pertaining to a different line and only 90 online survey responses pertaining to this project. This lower number

indicates that there is not enough data on the current route's social impacts (the sample size is not large enough for its confidence intervals can be considered representative) to make decisions or determinations.

- Finally, the proportion of Walcha, Uralla and Upper Hunter people engaged is misrepresentative to the project footprint in these communities. This essentially means that feedback and perceptions of survey participants living in larger regional centres (less impacted by the project) receives greater value in determining the severity of social impacts which is not methodologically sound.
- It is evident that sentiments for the communities that are most impacted have not been adequately addressed based on the recent community survey of landowners in the Walcha LGA where landowners were asked if they were willing to host any renewables infrastructure (i.e. BESS, Transmission, Hubs, Solar or Wind). Over 508 landowners were reached out to, 28 responding in favour/ as interested, over 357 responding no interest and remaining 123 awaiting response at time of report. Results in image Appendix 2.

Objection 11

The reader is unable to determine the Vulnerability to Change Analysis methodology based on the information provided in the EIS Technical Report 4 – highlighting significant accountability and transparency concerns.

> Evidence

- Technical Report 4 states that "Based on the indicators presented in Section 2.3.2, a qualitative rating of Community Vulnerability to Change has been assigned to each locality/suburb along the project area, categorising each community as having a high, medium or low scoring of vulnerability to change. Outcomes of this analysis has then been used to provide a qualitative assessment of vulnerability to change across affected communities." The document does not provide any information on how the scoring is completed.
- The selected indicators for the Vulnerability to Change Analysis are not comprehensive to the scope of the Social Baseline – primarily using secondary economic data and remoteness in determining vulnerability to change.
- All suburbs are classed Inner or Outer Regional using the ABS classifications. This is a broad classification system that does not measure travel time to emergency care, access to other services – including education. Technical Report 4 itself says suburbs within a class "are not equal", yet still treats the class as a measure of remoteness.
- While the Physical Access Score (PAS) indicator outlined in the report is used to assess a community's access to essential services, this tool has been developed in-house by the authors and provides no additional information in methodology or peer review.
- There is no evidence of using basic public health, education or social services indicators to determine vulnerability to change.

> Why it matters

- Independent experts, key stakeholders, relevant departments, decision makers and the affected communities need to be able to understand the information used, how it is weighted and justification for vulnerability scoring – as this has several ramifications as to how impact severity and likelihoods are later determined. Without this information, relevant stakeholders, affected communities and landholders are limited in their ability to review the project analysis on its merits and ask questions of the findings where necessary and challenge the scoring it has been assigned.
- Affected communities and landholders need to understand how conclusions about their way of life, community and sense of place have been determined. Not providing this information raises several transparency and accountability concerns, leading to increasing levels of mistrust within the project assessment processes.

Objection 12

The Department of Health, Department of Communities and Justice, Department of Education, were not consulted in the development, delivery or review of findings to the EIS Social Impact Assessment.

> Evidence

- The stakeholder engagement summary does not reference any Government Departments responsible for service provision and policy development related to essential services likely to be impacted by the project.
- The data sources used to develop the social baseline and vulnerability to change analysis does not reference any Government Departments responsible for service provision and policy development related to essential services likely to be impacted by the project.

> Why it matters

- One of the promoted comparative advantages of EnergyCo is that it is a NSW Government Statutory Authority that should have the resources and access to engage line ministries and departments to deliver positive outcomes for affected communities in areas where mandates align. To not take advantage of such expertise and resources in determining the social impacts on affected communities raises significant accountability questions and shows an organizational culture that is not open to feedback or taking the necessary steps to understand the on-ground situation and coordinate to deliver lasting solutions.
- By not engaging line ministries and departments in the development of the social impact assessment, EnergyCo has placed an unnecessary technical burden on affected communities, increasing the likelihood of missed or undervalued impacts and exacerbating campaign/consultation fatigue of affected communities and landholders.

Objection 13

The Authors of the report continually use language, assumptions, generalizations and draw misleading and unethical lines between data sets to build a narrative that belittles community feedback, downplays affected community and landholder concerns and undervalues community impacts in an effort to sway the reader towards its employer's objective of proceeding with the project with as little mitigation and remediation required.

> Evidence

- Technical Report 4 continually has examples of unethical or misleading conclusions being drawn on primary data sets. For example "Attitudes towards the project are highly divided. Survey findings indicate that while a substantial proportion of respondents are supportive of, or can tolerate, the project, a minority express strong opposition."

  When looking at the primary data presented, 2026 online surveys showed that 53% of respondents "rejected" the project and 2025 online survey, 56.1% stated that they had the lowest level of acceptance on the attitude spectrum presented. These figures are not highly divided, proving that the majority of respondents expressed a strong opposition to the project.
- Another example of unethical and misleading summary statements can be seen in comparing the results of affected landholders perceptions to climate change benefits of the project. The report states that *"no project-affect landholders who responded to the CATI survey commented on the benefits of addressing climate change which may indicate a relationship between the degree of direct impact someone may experience and their perceived level of importance for broader or systemic benefit."*

  This is an example of an assumptive comment that is not supported by evidence and is used to downplay and undervalue the voice of affected landholders. There are several legitimate reasons (which were not explored) as to why a survey participant may not see the project delivering on broader benefits.
- The statement, *"In summary, community attitudes towards the project reflect conditional acceptance rather than broad social licence"* is another example of misrepresenting data. The data clearly shows a strong rejection of the project from survey participants, yet the authors continue to use language like "conditional acceptance" to meet the position of their employer (EnergyCo) - delivering a biased and inaccurate account of the survey data.
- The statement, "*The fear, stress and uncertainty causing the heightened perception of impact upon private property of the easement acquisition is understood to be greater than the impact to be realised for agricultural properties where the easement is proposed to traverse."* is another generalized/misrepresentative statement that is not supported by academic evidence or community feedback.

> Why it matters

- This speaks to the highly disproportionate decision-making powers and systemic weaknesses in procedural fairness that have been raised strongly by affected communities and landholders throughout the report. Many respondents (57%) do not believe their views will be considered at all in the planning process. Only 5% believe their views will be considered to a large or very large extent, underscoring a widespread perception of procedural exclusion rather than participation.
- If the language of reports is constantly undervaluing affected communities feedback and voice and watering-down results to promote a positive image of the project, distrust and lack of engagement in the process grows. Affected communities need to be heard and engaged in the planning process to deliver

positive results – how their feedback is discussed and reported is important in gaining a social licence for the project to proceed.

- Landholders and community members do not pretend to be engineers and doctors, but do know their businesses and farm operations. How the project is likely to affect affected landholders' lived experiences and livelihoods needs to be seen as accurate and meaningful feedback and treated as such, not washed over by broad and assumptive statements – used to solely benefit the author's employer (EnergyCo) in downplaying and undervaluing community feedback. This needs to be rectified throughout the report.

Objection 14

Authors have failed to authentically communicate the diversity and identity of the towns and areas affected - omitting important economic, environmental and social information.

> Evidence

- Using Walcha as a case-study, but not limited to – Section 3.2.3 outlines a description of the Walcha area primarily based of secondary data and ABS statistics. Refer to table 3.2.
- This section does not include any qualitative information or community feedback on what is valued in the town, how the town is growing, or what the strategic direction for the town and community is.
- The table presented does not highlight the growing tourism industry and emerging retail businesses and does not provide insights into way of life, lived experience or the community's sense of place.

> Why it matters

- If the authors of the report do not genuinely understand the communities in which they are assessing, it is highly likely that the risk analysis and social vulnerability analysis has several blindspots – greatly increasing the risk of unforeseen and consequential negative impacts brought about by the project.
- Affected communities and landholders are more likely to engage and participate in the project assessment and design when their voice and feedback is evident in the assessments undertaken. Failure to capture the community voice only leads to increasing distrust and lack of engagement in the planning process and increasing local opposition to the project. As per the social surveys undertaken, "Many respondents (57%) do not believe their views will be considered at all in the planning process. Walcha respondents report the most acute loss of confidence, with 74% stating that their views will not be considered, compared with around half of respondents in other LGAs the project traverses."
- Social cohesion ensures that small regional towns thrive. If these intangible components of a community cannot be effectively captured in the assessment documentation, there is a great risk of the eroding of social cohesion throughout the planning and implementation phases - leading to long-term social impacts. There are numerous commentaries on the erosion of social cohesion in Report 62 (2025).

Objection 15

Inconsistencies in evidence between cumulative impacts and sector specific impacts throughout the social evaluation and assessment of Technical Report 4.

> Evidence

- Within the Cumulative Impacts section of Technical Report 4, it clearly highlights that there are high risks to suburbs or localities with multiple pipeline projects and concentrated workforces – particularly in accessing basic services and housing. Suburbs and localities named include, Kentucky, Walcha, Uralla, Muswellbrook, Scone, Timor, Waverly, Muscle Creek, and Hebden.
- As an example, but not limited to, suburbs/localities Kentucky and Walcha are likely to experience "heightened levels of social impact due to their medium levels of community vulnerability and the proposed presence of compounding project activities." Stating that there will be "a concentrated but prolonged period of workforce presence in Walcha in the early 2030s, with clear implications for local housing capacity, services and community infrastructure." (page 165). However, when reviewing concerns on housing and access to services in the Social Impact Assessment Table 6.2. the residual risk is considered low.

> Why it matters

- As per the cumulative assessment, "distribution of workforce demand has important social implications, including variable pressure on housing and accommodation markets, health and community services, local roads and amenities, and community cohesion. The larger service centres are better positioned to absorb short-term peaks due to greater service and housing capacity, whereas smaller townships are more vulnerable to sustained cumulative pressures, particularly where elevated workforce levels persist over several years." Yet when the risk analysis has been conducted it has assessed the risk based on the total project coverage area, failing to account for the specific impacts individual communities will experience.
- EnergyCo's alignment for the transmission corridor disproportionately impacts vulnerable communities – particularly when considering the location of multiple generation projects proposed within the portal. Greater consideration of vulnerable populations and the affected communities' capacity to cope with multiple projects is needed.
- The cumulative impact section clearly outlines that there is a disproportionate and significant impact to housing, health and community services, local roads and amenities, as well as community cohesion affecting the most vulnerable communities – which has been vastly downplayed by the authors of Technical Report 4 in the relevant sections. This shows that the transmission project needs to be assessed within the bigger picture of the Energy Zone. Failure to effectively engage affected communities and landholders on the scale of the potential impacts within the Region allows for a significant misrepresentation of data and an under-representation of consequential impacts, which is most favourable towards the project proponent. Each section of the Technical Report 4 should better acknowledge the cumulative impacts of all projects and detail the expected impacts on specific social locations.
- It is also worth noting that, coordination and timing of project rollouts was previously used as a key mitigation against negative impacts to housing, health and community services, local roads and amenities, and community cohesion. However, based on the projected timeframes and workflows presented in the cumulative projects section – operational coordination between projects would have minimal (if any) influence in reducing the negative impacts of cumulative projects in the affected communities – particularly those most vulnerable to change.

3 | Requests

We request the following steps be taken to ensure that the EIS Technical Report 4: Social Impact Assessment is fit for purpose, effectively reflects community feedback and outlines clear risk analysis of potential impacts and mitigations specific to each affected community. No approval of the EIS Technical Report 4: Social Impact Assessment could be granted without the following:

1. Remove first-route data. List every data set, survey result, quote and finding drawn from investigations of the first route, and remove each from the assessment of the current route unless it is shown, with reasons for each, to remain valid. (Objections 2, 3, 9)
2. Redo community engagement surveys on the current corridor, with proper targeting of affected populations and full disclosure of the scale of the project, including the camps and hubs. Survey development and implementation should involve the community, and include targeted questions on project-specific components. (Objections 1, 2, 3, 10)
3. Engage independent experts to design, implement and review the community surveys and qualitative data, and to oversee the development and findings of the vulnerability to change analysis and social baseline methodology, so that the baseline is transparent and accountable. (Objections 4, 10, 11)
4. Publish full survey and sampling details: the survey instruments, CATI script and ethics documentation, the call-disposition breakdown, the basis for the sample size and its allocation across LGAs, how self-selection, age skew and non-response were corrected, and how many directly affected landholders took part. (Objection 10)
5. Assess the social impacts of the workforce camps themselves, not only as a mitigation for housing pressure, with community participation in their siting, design and operation. (Objection 1)
6. Correct and revise the social baseline of each community, including the Walcha population figures, the missing ratings for Barry (Camp 3), the Niangala and Glenbawn ratings, and the contradictory statements about the CATI sample and the comparability of datasets. The revised baseline should describe each social locality using qualitative data and community feedback, capturing intangible strengths and the diversity of each community. (Objections 9, 14)
7. Revise the vulnerability to change analysis to use standard, holistic indicators of access to services (including health, education and community services, and travel time to emergency care) and the capacities of local economies. Remove the in-house Physical Access Score and replace it with standard indicators. (Objection 11)
8. Provide the full methodology for the social baseline, vulnerability to change, and pre-mitigation and residual risk ratings, including the indicators, weighting and scoring systems, and detailed descriptions of frequency and severity. (Objections 4, 9, 11)
9. Revise the risk analysis methodology so that it is location specific and reduces assumption, bias and subjectivity, and engage affected communities and landholders in the rating process to validate the results. (Objections 4, 5)
10. Commission an independent review of the likelihood, magnitude and residual ratings, publish the results, and correct any ratings found to overstate benefits or the effectiveness of mitigation (for example the Strategic Benefit Payment Scheme, improved access roads and the Table 6.2 impacts). (Objections 4, 5, 7, 8)
11. Show any rating that depends on a plan not yet written as its pre-mitigation rating until the plan is provided and tested. (Objection 7)

12. Exhibit draft versions of every plan relied on as mitigation (including the SIM Plan, Community Wellbeing Strategy, CSEP, LIPP, Workforce Management Plan and the property, biosecurity, water, noise, traffic and emergency response plans) before the project is determined. Each should set out key strategies, timelines, budgets, responsible parties, measurable targets, thresholds and corrective actions, the skills and qualifications of personnel relied on, the processes for development, approval and implementation, and the mechanisms for community engagement, review and feedback. (Objections 5, 6, 7)
13. Engage the relevant NSW Government departments, including Health, Communities and Justice, and Education, in the assessment and review. This will reduce the consultation burden on communities, reduce unforeseen impacts and improve the success of mitigation measures. (Objection 12)
14. Revise the report to show how cumulative impacts are factored into the overall risk analysis in section 6 of Technical Report 4 and the EIS, so that project-level ratings are consistent with the cumulative assessment, and set out how cumulative impacts will be managed with the responsible service agencies. (Objection 15)
15. Remove generalised language, broad assumptions and misleading summary statements, and ensure all technical information is properly referenced. Revise statements that dilute or downplay community feedback (including "conditional acceptance", "highly divided" and "perceptions") so that they accurately reflect the primary data. (Objections 8, 13)
16. Re-exhibit the corrected and independently reviewed Social Impact Assessment and EIS for public comment before determination, and confirm how the SEARs requirements listed in section 2 are met or require the EIS to be amended. (Section 2 and all objections)
17. Answer the questions in section 5.

4 | Questions Requiring Further Response

While the objections above clearly highlight the need for the social impacts assessment to be re-done there are some further questions that need addressing specifically also below. Please also see Appendix 3 with expert report into the methodological issues raised by the Valley Alliance Group (also submitted as an independent submission by Valley Alliance). Questions are numbered for ease of response.

1. Where in the EIS is the engagement shown to be consistent with the Undertaking Engagement Guide for State Significant Projects (DPIE, November 2021)? Which community groups were consulted in preparing the assessment, and why were the groups in Appendix 1 not contacted directly by the authors of the social impact assessment?
2. Where does the EIS explain how the project design was amended in response to community issues (including the corridor change), and, where no change was made, why not?
3. Which of the SEARs requirements listed in section 2 does the Department consider are satisfied, and on what basis, given the objections raised? Will the Department require the EIS to be amended and re-exhibited if the social impact material does not meet the SEARs?
4. Which NSW Government departments responsible for essential services (including Health, Communities and Justice, and Education) were consulted in developing, delivering or reviewing the social impact assessment? If none, why not, and will they be engaged before the project is determined?

5. Which data, survey results, interview material, quotes and ratings in TR4 and the EIS were collected during investigations of the first route, and where is each identified? Which findings, ratings and survey results rely on data collected before the route change, and how was that data adjusted or excluded?
6. What steps were taken to confirm that data from the first route is valid for the revised route, and what was the result for each topic?
7. TR4 says responses across the two online surveys cannot be merged or directly compared. Why then are 2025 responses used to describe the current alignment (for example in the combined summary of "community values"), and where is this shown?
8. By how many kilometres, and in which direction, did the corridor move? Which communities, properties and households moved in or out of the study area, and which are now on the revised route but were not engaged or surveyed on it?
9. Will EnergyCo remove first-route data from the assessment, re-run the impact ratings using data collected on the revised route, and re-exhibit the corrected assessment so the community can review it?
10. Why were the locations and size of the workforce camps and hubs not disclosed before most community engagement took place, and how can the assessment reflect community views on camps that residents had not been told about?
11. Where does TR4 assess the social impacts of the workforce camps themselves (safety, traffic, water supply, local services and neighbouring landholders), rather than treating them only as a mitigation for housing pressure? What role will the community have in the siting, design and operation of the camps?
12. The online survey instruments are not included in the reports. Please provide them, together with the CATI script and the ethics approval documentation.
13. How many directly affected landholders (not self-identified) took part in the survey and engagement, out of how many on the current corridor? Why were only about 24 CATI and 13 online respondents self-identified as affected?
14. What is the basis for the CATI sample size of 600, including the margin of error and confidence level? How was the sample allocated across the six LGAs compared with the share of the line each LGA hosts, and was any sub-group analysis possible?
15. What was done to correct for the self-selected online samples, the age skew in the CATI sample, and the 34% decline rate? Were results weighted, and if so, how?
16. What was the breakdown of refusals, non-contacts and ineligible numbers among the more than 10,000 numbers that did not result in an interview? Please provide the full call-disposition table.
17. Where landholders declined access, which topics were assessed using only public data, and how was the assumed rating tested against community evidence?
18. Will EnergyCo commit to a further round of social research on the current corridor, designed and overseen independently and with community input, before the EIS is determined?
19. What is the correct population of the Walcha LGA and of each community near the camps and hubs, and which of the figures in TR4 (5,971, 3,016 and 2,475) is used in the ratings?
20. Why does Barry, the proposed site of Camp 3, have no vulnerability, remoteness or access rating, and how does this affect the rating of impacts at Camp 3?

21. Why are Niangala (very low physical access) and Glenbawn (no physical access) rated Low for vulnerability when TR4 says 20 small communities have very low access and twelve have no services?

22. Please provide the method, indicators and weights used to calculate vulnerability to change, and a corrected table. Why was an in-house Physical Access Score used, has it been peer reviewed, and why are public health, education and social services indicators not used?

23. Was travel time to emergency health care measured for each community? If not, why is the Inner/Outer Regional classification treated as sufficient?

24. TR4 makes contradictory statements about the CATI sample ("representative" against "do not necessarily represent the views of the entire community") and about whether the datasets can be compared (see TR4 pp. 31, 84 and 89 and Appendix E). Which statements reflect how the data was actually used, and will the report be corrected?

25. Why do the community profiles (for example Walcha in Section 3.2.3) rely mainly on secondary data, without community views on what is valued, how the town is growing, or its tourism and retail economy? Will the baseline be revised with community input?

26. Please provide the full method used to determine pre-mitigation and residual ratings, including definitions of likelihood and severity and any weighting. Why was a basic risk matrix used for a project of this scale?

27. Has any independent party reviewed the likelihood and magnitude ratings, or were they validated with affected communities and landholders? If not, will the Department commission an independent review and require community validation?

28. On what basis were "improved access roads" and the Strategic Benefit Payment Scheme (as "diversification of income") rated as medium benefits, given landholder feedback that compensation is inadequate?

29. Why does Table 6.2 list three positive impacts for local business and employment, but no negative impacts for existing businesses (including agriculture, transport and tourism)?

30. For each of the 13 negative impacts that remain after mitigation, which specific mitigation measure supports the residual rating, and what evidence shows that the measure works? For example, why is increased stress and anxiety rated A/4 before mitigation but low after?

31. Which residual ratings depend on a plan that has not yet been written, and what would those ratings be without it?

32. Why is the residual impact on access to health care and housing rated low in communities expected to see population increases of over 20%?

33. TR4's cumulative assessment identifies high risks for places such as Kentucky, Walcha, Uralla and Muswellbrook. Why are the project-level ratings for these places not higher, and how are cumulative impacts factored into the overall risk analysis in section 6? What specific plans, developed with the responsible service agencies, will manage cumulative impacts?

34. Coordination and timing of project rollouts was previously relied on as a mitigation. Given the overlapping timeframes in the cumulative assessment, how can it still be relied on?

35. Why are the SIM Plan, Community Wellbeing Strategy, CSEP, LIPP and Workforce Management Plan not provided in draft with the EIS? Will the Department require draft plans to be exhibited, with a genuine opportunity for the community to comment, before determination? If not, how will the community have a say?
36. For each mitigation measure, what are the specific action, timeframe, budget, responsible party, target and consequence if the target is missed? What are the targets, thresholds and corrective actions for each measure in Table 7.2, and who enforces them?
37. Who will monitor and report on the effectiveness of each measure, will reports be public, and will the community be involved in reviewing them?
38. Will the Department make approval conditional on the plans being approved by an independent party, and will the community be consulted on them?
39. What funding, and from what source, has been committed to deliver the Community Environmental Benefit Plan, and when will its content be determined?
40. What lessons from the Central-West Orana REZ, including the findings of Inquiry Report 65 and its recommendation that social impact assessments be independently verified, have been applied here, and where is this shown in the ratings?
41. TR4 describes community attitudes as "conditional acceptance" and "highly divided", while its own data records 53% rejection in the 2026 online survey and 56.1% at the lowest level of acceptance in 2025. What is the basis for this description, and will it be corrected?
42. What evidence supports the statements that fear and stress about easement acquisition are greater than the impact to be realised, and that no project-affected landholders commented on the benefits of addressing climate change? Will these statements be substantiated or removed?

5 | Objections Summary List – Quick Reference

1. We object to the social impact assessment on the following grounds (see full details above in report):
2. The EIS Social Impact Assessment SEARS requirement *"An assessment of the social impacts in accordance with Social Impact Assessment Guideline and consideration of the need for construction workforce accommodation"* has not been sufficiently met as the social evaluation and assessment of the camps has not taken place.
3. The survey data used to inform the Social Impact Assessment has not been consistently targeted to affected communities – as surveys were conducted prior to the announcement of the line assessed within the EIS. This is likely to have misrepresented affected community concerns and influenced the risk analysis component of Technical Report 4.
4. The survey data used to inform the Social Impact Assessment has been collected prior to the full scope of the proposed project being announced – likely misrepresenting affected communities' perceptions of the proposed project and the scale of the cumulative impacts presented.
5. Risk analysis framework and processes are subjective, lacking transparency, community participation and independent oversight.

6. Soft or light touch mitigation actions are over-inflated in their ability to remedy high risk impacts that have been identified by communities. Highlighting inconsistent and subjective risk analysis throughout Technical Report 4.
7. Mitigation measures primarily propose future planning tools to be developed without any guarantees of community participation in planning, development, implementation or decision-making.
8. The residual ratings have been predetermined throughout the Social Assessment when the vast majority of mitigation measures listed have not been developed, designed or planned – lacking all consequential detail needed to determine if the residual risk has been reduced.
9. Clear and consistent evidence of bias in promoting potential positive impacts of the project, while downplaying the negative impacts.
10. The Social Baseline of the report has several inconsistencies and errors, confusing the reader as to what information is being used in each scoring section and how information is being used to determine outcomes. This is intensified without a complete publishing of the methodology.
11. Discrepancies within the community engagement survey sampling are significant and yet, while remaining unaddressed, the data collected is still used to inform the social impact findings.
12. The reader is unable to determine the Vulnerability to Change Analysis methodology based on the information provided in the EIS Technical Report 4 – highlighting significant accountability and transparency concerns.
13. The Department of Health, Department of Communities and Justice, Department of Education, were not consulted in the development, delivery or review of findings to the EIS Social Impact Assessment.
14. The Authors of the report continually use language, assumptions, generalizations and draw misleading and unethical lines between data sets to build a narrative that belittles community feedback, downplays affected community and landholder concerns and undervalues community impacts in an effort to sway the reader towards its employer's objective of proceeding with the project with as little mitigation and remediation required.
15. Authors have failed to authentically communicate the diversity and identity of the towns and areas affected - omitting important economic, environmental and social information.
16. Inconsistencies in evidence between cumulative impacts and sector specific impacts throughout the social evaluation and assessment of Technical Report 4.

Appendix 1
media release from local community groups

MEDIA RELEASE

FOR IMMEDIATE RELEASE

25 MAY 2026

Communities call on Premier Chris Minns to intervene after consultation descends into Trespass Allegations, Police Reports and Claims of Misconduct

NEW ENGLAND AND UPPER HUNTER, NSW - Community groups, residents and landholders from the Upper Hunter and New England regions have called on Premier Chris Minns to personally intervene in the New England Renewable Energy Zone (REZ) rollout following a series of allegations involving EnergyCo's consultation process under Minister Penny Sharpe.

The body says the Minns Government has allowed the consultation process to deteriorate to the point where communities are alleging trespass on private property, misleading conduct by contractors, failures in community engagement, omissions in environmental documentation and incidents resulting in police reports being filed.

Community representatives say responsibility now sits directly with Premier Minns and his Government, and are demanding he personally meet with affected landholders, suspend the current consultation process and commit to an independent review of how the REZ is being managed across the region.

Effective immediately, the body has suspended all participation in EnergyCo's New England REZ consultation process. The groups say that unless Premier Minns intervenes directly and commits to reforms by 18/6/26 , they will permanently withdraw all cooperation and engagement with the process.

The body says confidence in EnergyCo and the consultation framework overseen by Minister Sharpe has collapsed, with many residents believing the process is focused on progressing predetermined outcomes rather than genuine community consultation.

Among the specific incidents cited by the body are:

- **Unauthorised Entry & Police Involvement**
  EnergyCo representatives or contractors entered private property without permission, resulting in landholders ordering them off the premises and a police report subsequently being filed.
- **Misrepresentation**
  Contractors allegedly misrepresented their identities and objectives when questioned by local residents.
- **Official Misconduct and Dismissal**
  An EnergyCo employee was recently dismissed following an incident in a regional café, where they were reportedly overhead making disparaging remarks about local residents and the organisation responsible for community engagement.
- **Community Distress**
  A Walcha resident was approached regarding a proposed transmission corridor on their land without prior warning or engagement, causing significant distress.
- **Environmental Omissions**
  Government documentation allegedly omitted critical endangered species information during inter-agency consultation, which was only rectified after concerns were raised by Forestry NSW staff.
- **Predetermined Outcomes**
  Senior project representatives allegedly stated the REZ would proceed "no matter what" and that the project footprint would be expanded, reinforcing local concerns the consultation was merely a rubber-stamping exercise.

CONT OVER >

WALCHA HIGH COUNTRY GUARDIANS

PROTECT THE VALLEY UPPER HUNTER

Voice for Walcha

Rouchel Brook ACTION GROUP

ReD 4NE

Friends of Kentucky Action Group

Salisbury Plains ACTION GROUP

BATTING FOR BOORLONG ACTION GROUP

VALLEY ALLIANCE
Our Homes, Land, Community & Future

DUNGOWAN CREEK ALLIANCE

MEDIA RELEASE - QUOTES

25 MAY 2026

Federal Member for New England Barnaby Joyce said Chris Minns promised regional communities would be partners in this transition. "Instead, people are reporting contractors entering farms without permission, police reports being filed, and a consultation process that many locals believe was decided before it even began," Mr Joyce said. "When officials are allegedly mocking the very communities they are meant to engage with, the Premier cannot wash his hands of it. This process is happening under his Government and under his Minister's watch."

Member for Northern Tablelands Brendan Moylan said more than 20,000 people backed the ePetition opposing the new transmission corridor, yet the Minns Government continues to ignore affected landholders. "EnergyCo has repeatedly failed to properly engage with communities during the renewable energy rollout," Mr Moylan said. "Landholders deserve genuine consultation, not press releases and bureaucratic spin."

NSW Shadow Minister for Energy James Griffin said the Minns Labor Government spend a lot of time talking about community benefits, but they won't even meet with the communities they're impacting the most. "The energy industry has made it clear they need the Minns Labor Government to do more than issue press releases and pose for photo opportunities to build social licence in regional communities," Mr Griffin said.

The body spokesperson Damien Timbs said local families have given thousands of hours to this process in good faith, only to see their goodwill abused. "We will not continue participating in a process that asks communities to provide legitimacy while their concerns are ignored," Mr Timbs said. "This is a line in the sand. It is unacceptable that decisions affecting New England families are being driven by an organisation with diminishing community trust and little genuine local representation."

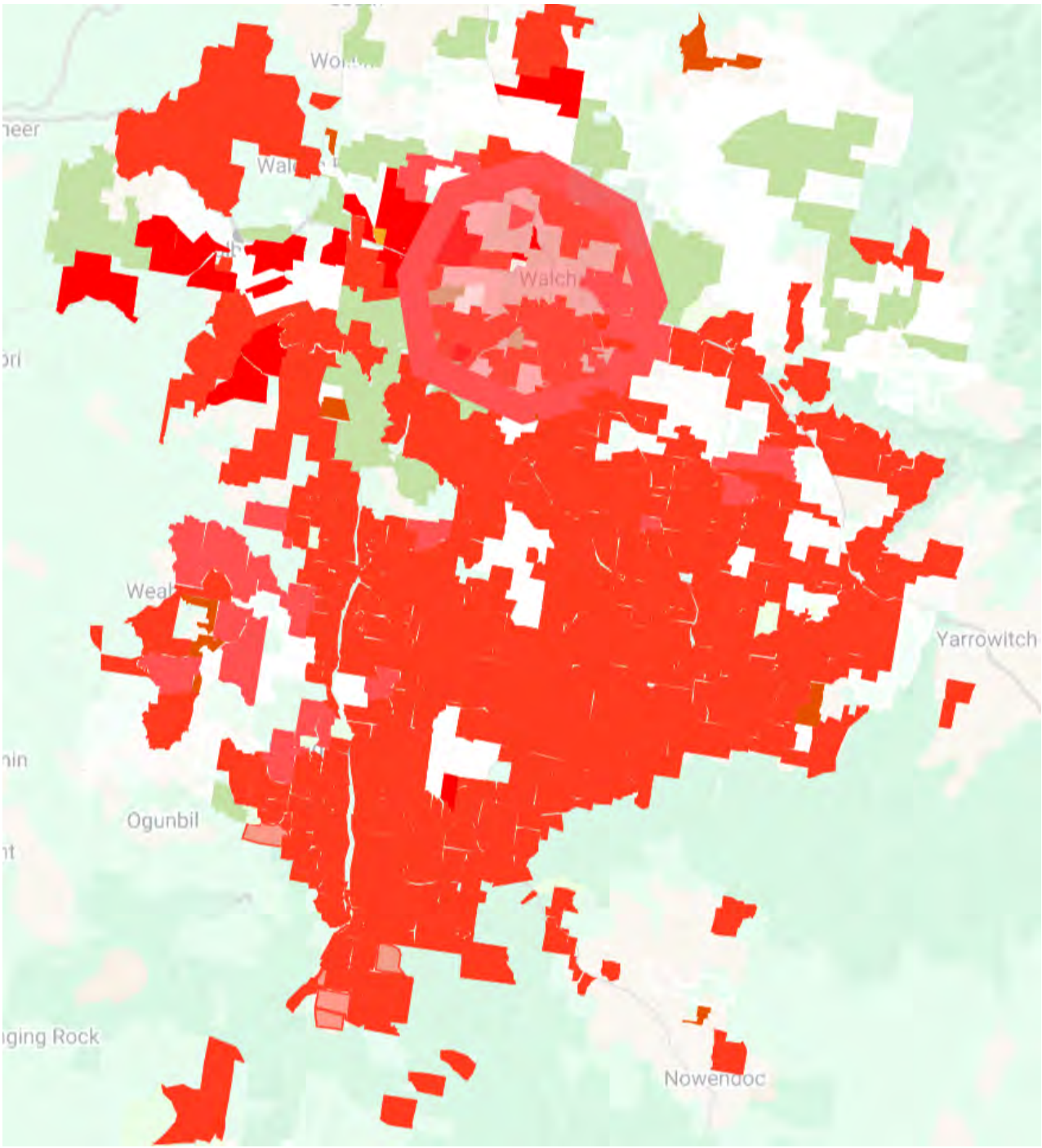
END

MEDIA CONTACT

Anna Young
0401 362 120
anna.thew@hotmail.com

Photos and footage available on request.

Appendix 2
Map from Walcha LGA – landowner response to interest in hosting renewables



Comment: Information volunteered by landholders in the Walcha LGA.
Red indicates no interest in hosting projects, Green indicates interest, White indicates that they are not prepared to comment.

Appendix 3
Valley Alliance – Social Impact Assessment Expert Report

Attached over

VALLEY ALLIANCE
Our Homes, Land, Community & Future

SUBMISSION IN RESPONSE TO THE ENVIRONMENTAL IMPACT STATEMENT

New England REZ Network Infrastructure Project

Application No.: SSI-74175972
EPBC ID No.: 2025/10405
Assessment Type: State Significant Infrastructure
Development Type: Electricity supply
LGA: Muswellbrook Shire
Exhibition Period: 15 October 2026 – 12 November 2026

Author: Dr Merryl Yan, PhD[1]. Committee member, Valley Alliance Inc.

Summary

This submission critiques the methodology of the Social Impact Assessment (SIA) for the New England REZ Network Infrastructure Project. It does not dispute the SIA's findings; it demonstrates that the findings are not supported by valid data. The SIA's primary data collection fails on five independent grounds, comprising more than twenty specific methodological and ethical breaches detailed below: no independent ethics review was conducted; informed consent was not obtained; the sampling methods preclude any statistical inference; data from no-longer-affected areas is included without valid justification; and no standardised instrument was used to measure the distress the SIA reports. The governing instruments — the NHMRC National Statement, the IAIA Guidance, and the NSW SIA Guideline — are breached. The proponent has no valid primary data on which to base its assessment of community-level social impact.

Summary Table

#	Failure	Governing Instrument	Consequence
1	No independent ethics/governance review	NHMRC (2025:8,9); IAIA Principle 15 (2025:33)	Data collection ethically unsound; findings compromised
2	Informed consent not obtained (no complaints procedure, no risk disclosure, no alternatives disclosed, non-participation potentially construed as non-objection)	NHMRC Chapter 2.2 (2025:17–19); IAIA Principles 2, 4 (2025:32); NSW SIA Guideline (2026:37)	Data collection invalid; consent not informed
3	Convenience/self-selected samples (online survey, CATI quotas, unconsented group consultations) preclude statistical inference	NSW SIA Guideline (2026:31); basic survey methodology	All quantitative findings and confidence intervals invalid
4a	Data from no-longer-affected area included without justification	Research integrity; NSW SIA Guideline (2026:31)	Potential dilution of reported impacts; analysis invalid

[1] Appendix 1 Biography

4b	One response per household suppresses intra-household diversity	NSW SIA Guideline (2026:31)	Under-represents affected views; cannot assess intra-household conflict
5	No standardised distress instrument (K10) used despite reporting on distress and despite explicit recommendation	Research validity; ABS standards	Distress findings unvalidatable, unreplicable, incomparable

This submission pertains to the Social Impact Assessment component of the Environmental Impact Statement, with a specific focus on the Methodology.

Methodology Critique: Ethical and Sampling Failures

The Social Impact Assessment's (SIA) data collection methodology is assessed here against three governing instruments:

1. the NHMRC National Statement on Ethical Conduct in Human Research (2023, as updated 2025) (National Statement);
2. the IAIA Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects (2025) (IAIA Guidance); and
3. the NSW Social Impact Assessment Guideline (2026).

The critique identifies five material methodological failures that, in combination, render the SIA's quantitative findings unreliable and its qualitative findings ethically unsound. Consequently, the proponent has no valid primary data on which to make statements regarding community-level impact or to develop targeted mitigation strategies.

Note that although the SIA was conducted by Umwelt, as a private consultancy commissioned by EnergyCo, this commercial relationship does not *ipso facto* place the data collection outside the scope of the NHMRC National Statement, which expressly applies to human research undertaken by 'governments, industry, private individuals, organisations or networks of organisations' (National Statement 2025: 7), nor outside the IAIA Guidance, which is specifically directed at 'SIA Practitioners/Consultants' and 'Project Developers/Proponents (private sector or government)' (IAIA 2025: i,6).

1. Absence of Ethics and Governance Review

Governing requirement:

- NHMRC National Statement: "A judgement that a human research proposal meets the requirements of the National Statement and is ethically acceptable must be made before research can begin." (2025: 7)

- NHMRC National Statement: A key component of a research governance framework is the requirement that human research must undergo ethics review in accordance with the requirements of this National Statement. “Research with a greater than low level of risk (as defined in Chapter 2.1) must be reviewed by a Human Research Ethics Committee (HREC)…approval must be obtained prior to the commencement of the research… Retrospective ethics approval is not supported by the National Statement" (2025: 8,9,84,103)
- IAIA Guidance Ethical Principle 1 (Respect for participants): "Part of this respect is implied by the terminology of 'participant' (rather than 'respondent' or 'subject'). An important dimension of this respect relates to ensuring the protection of persons with diminished autonomy and those who are marginalised or vulnerable." (2025: 32)
- IAIA Guidance, Ethical Principle 15 (Ethical governance): requires that there be an "ethical governance mechanism. Typically this implies that there should be a committee or other facility that can … review research protocols prior to the research taking place, oversee and/or monitor research activities, provide advice to practitioners and participants, and make judgements in relation to complaints. A professional association such as IAIA may be able to provide such a mechanism, alternatively this could be negotiated in conjunction with the impacted community or with a local authority (local, regional or national government), or a local university, etc." (2025: 33)

Critique:

The SIA involved the collection of primary data from members of the community — through surveys, interviews, meetings, community information sessions, Computer Assisted Telephone Interviews (CATI), and diverse stakeholder consultations — concerning a project with significant social, economic, and psychological implications for participants (forced proximity to dual HVTL, potential property devaluation, community division, and health-related distress). This is not "low risk" research.

No reference in the SIA can be found to a HREC or equivalent independent ethics and governance committee as having reviewed:

- the research protocol
- the informed consent process, or lack thereof
- the risk–benefit analysis for participants
- the data collection methodology and specific instruments

- the grievance/complaints mechanism

The SIA was commissioned by the proponent and conducted by the proponent's consultant. There is no evidence of any independent ethical oversight. This is a fundamental breach of the NHMRC National Statement, which requires that research projects involving humans, greater than low risk, must be reviewed by a Human Research Ethics Committee (HREC) and "a judgement that a human research proposal meets the requirements of the National Statement and is ethically acceptable must be made before research can begin and before full funding for the proposal is released." (2025: 8,9). It also breaches the IAIA Guidance Ethical Principle 15 (2025: 33).

Having meetings with DPHI "to obtain feedback on the SIA approach" (SIA 2026: 31), or seeking input from the National Practice Lead (Dr Sheridan Coakes), as suggested to a Valley Alliance Committee member in a meeting 4.3.2025, does not constitute independent ethical review.

Consequence: Without independent ethical review, there is no assurance that the research design minimised harm to participants, that the risk–benefit ratio was appropriate, that participants' rights were protected or that the data collection methodology was valid. The entire data collection exercise is ethically unsound, and any findings derived from it are methodologically compromised.

2. Failure of Informed Consent

Governing requirements:

- NHMRC National Statement Chapter 2.2 (General requirements for consent), paragraphs 2.2.2, 2.2.4, 2.2.6, and 2.2.20, (2025: 17–19)
- IAIA Guidance Ethical Principles 2 (Informed consent), 4 (Voluntary participation), and 15 (Ethical governance), (2025: 32,33)
- NSW SIA Guideline "Community Engagement"; "Authors and declarations" (2026: 31–38)

The data collection for this SIA — online survey, information sessions, community meetings and consultations conducted between 2023 and 2025 — cannot be characterised as having been conducted with informed consent. The failure is not partial or procedural; it is structural. Between 2025 and 2026 data collection following the alignment change continued without meaningful informed consent. The following five sub-points are set out in sequence because each is independently sufficient to establish the breach, and together they demonstrate that the consent framework was not merely incomplete but absent.

2.1 Community members unaware of data collection

The SIA states that "Quantitative and qualitative information collected through all engagement mechanisms have been collated, coded and analysed" (2026: 23). This data collection commenced in 2023 (SIA 2026: 22) and to the direct knowledge of Valley Alliance, and its networks, those community members who attended events between 2023 and 2026, including community information sessions, semi-structured interviews, and diverse meetings, did not know that data were being collected—they were not clearly advised that their comments would be recorded, analysed, and reported in a regulatory document that determines whether a project proceeds over their land.

By definition, a participant who does not know that data is being collected cannot provide informed consent — and was in fact never asked to do so. The IAIA Guidance is explicit that consent requires "sufficient information and an adequate understanding of the SIA research and the consequences of their participation" (Principle 2, 2025:32). No such understanding was possible where the very fact of data collection was undisclosed.

2.2 Participant Ethics Information Sheet not provided during consultations

The SIA includes a Participant Ethics Information Sheet as Appendix B. This document was not handed out, distributed, or otherwise quoted from or referenced at any point during the 2023–2025 consultation period. It was not included in any information pack, website, or verbal briefing provided to participants. Similarly, it was not made available to community members prior to any consultation in the second round of data collection, between 2025 and 2026.

The SIA falsely reports that considerations of the ethical guidance for research with humans “have been communicated to community participants through the Participant Ethics Information Sheet (see Appendix B) prior to commencing the targeted SIA engagement activities…” (SIA 2026: 13). Valley Alliance can testify that this unequivocally did not occur in any of the 2023-2025 stakeholder engagement activities. Other community representative groups would be able to testify similarly regarding 2025-2026 engagement activities.

The document's provenance raises further evidence. The file attached as Appendix C to the SIA carries the footer:

"Appendix B 22962_Appendix B_Social Baseline Dataset_Final.docx"

And all subsequent Appendices (except Appendix F) have footer labels out of sync with their recorded Appendix number. The Participant Ethics Information Sheet itself carries no Appendix label in its footer. This footer evidence is consistent with the Information Sheet being appended after the fact to satisfy a compliance requirement, rather than being an

integral part of the data collection process. Its presence in the SIA does not cure the fact that it was never operationalised during the period in which data was actually collected.

When a member of the Valley Alliance committee met with Umwelt/EnergyCo on 4.3.2025 to discuss SIA data collection methodology, and asked for a copy of the Participant Information Sheet, not only was there no Sheet available, the representatives of Umwelt and EnergyCo appeared not to have a professional understanding of such a document or its requirement in legitimate social research.

The National Statement (2025: 14–20) and IAIA Guidance (2025: 4,34) are explicit that free, prior, informed consent to data collection must be obtained. That consent requires an Information Sheet to be delivered to prospective participants in hard copy or verbally. Informed consent is also implicit in the NSW SIA Guidelines (2026: 37 footnote 7).

2.3 Risks of participation not disclosed; non-participation potentially construed as non-objection

The risks of participating in the data collection were never disclosed — either in the Information Sheet (which was not distributed) or verbally by any member of the EnergyCo/Umwelt team.

"Risk can be associated with the conduct of research or the proposed outcomes of the research"—the National Statement is clear that where there is a risk that participation in the research may cause psychological harm (including distress and anger) and social harm (including damage to social networks or relationships with others) along with impacts on social cohesion and property values, this must be considered as part of the risk assessment for ethical approval, and risks must be disclosed to potential participants (2025:13–15).

Further, at a meeting on 4 March 2025 with a Valley Alliance Committee member, EnergyCo/Umwelt suggested that non-participation in stakeholder engagement may be inferred to indicate non-objection.

This position is the antithesis of the ethical framework. The National Statement requires that participants understand that non-participation carries no consequence (paragraphs 2.2.6, 2.2.9, 2025: 17,18). Construing silence potentially as non-objection to a project — is a form of coercion by implication: it places the burden on affected people to actively and vocally object or risk being characterised as supportive. The IAIA Guidance (Principle 4) requires that "participation must be voluntary and not subject to any coercion" (2025:32). A process in which silence may potentially be read as approval is coercive by design.

It should be noted that community members could not raise issues of which they were unaware, and relied on EnergyCo and Umwelt to alert them to what they would have needed to know to make an accurate assessment of whether it was in their interests to participate. (See 2.5 below.)

2.4 Complaints/grievance procedure not disclosed

Participants were not made aware of any mechanism through which they could lodge a complaint about the data collection process, the handling of their responses, or the project's social impacts. The IAIA Guidance (Principles 15,16, 2025: 33) identifies "the provision of grievance procedures" as a core component of ethical governance. The NHMRC National Statement (paragraph 2.2.6, 2025:18) requires that participants be informed of how to make a complaint about the research. Neither requirement was met.

2.5 Alternatives not disclosed — specifically undergrounding

Informed consent requires that participants understand the full context of what they are being asked to comment on. For a project that will physically alter the landscape, restrict land use, and potentially affect property values for decades, this necessarily includes an understanding of what alternatives may exist and their relative implications.

Community members were never apprised of:

- the availability of undergrounding as a design alternative to overhead HVTL
- that the cost of undergrounding is the subject of active dispute, with independent estimates (e.g., Amplitude, 2023) suggesting costs as low as 1.5–2 times the overhead option, and that DC cable costs are trending downward while overhead costs are trending upward (AEMO Transmission Cost Database, 2025)
- that landholders under an undergrounding arrangement would receive substantially higher annual payments than those with overhead HVTL[2]
- that with undergrounding, visual amenity, stock access, and crop usage would not carry the same significant constraints as overhead HVTL

Valley Alliance drew this information to EnergyCo/Umwelt's attention. It was not relayed to the broader community.

At a Nundle community consultation on 4 November 2025, a community member specifically raised undergrounding with Mr Julian Watson, Deputy Project Director of the New England REZ. Mr Watson rejected the option, citing the 2023 NSW Upper House Inquiry as finding it "too challenging from a cost and delivery perspective." When asked whether EnergyCo had conducted a current cost comparison specific to this project, Mr Watson stated: "Have we done a full cost comparison of undergrounding to this [aboveground HVTL]? No." Asked whether one would be undertaken, he replied, "It's unlikely." When asked on what basis he could then assert that undergrounding would cost more, he replied: "Because undergrounding is considerably more expensive."

The data collection was not neutral research; it was specifically designed to elicit community views on a particular project design (overhead HVTL). For those views to be informed in any meaningful sense — and for the SIA to validly claim to represent "community views" — the community needed to know that a materially different design option (undergrounding) existed, with potentially superior cost-benefit, land-use, and amenity outcomes for landholders. It did not. Participants were therefore asked to form and express views in a

[2] Syncline Energy, as reported by ABC News (21 March 2025), offers landowners approximately $40,000 per year per kilometre for underground HVDC cable, with no stated time limit, in addition to a Community Trust stake in the project. Compare with the NSW SBP: $10,000/km/year for 20 years only.

contextually incomplete frame, and the data cannot be characterised as informed community input on the project. The IAIA Guidance requires "full disclosure by project developers of their plans" and that "each community has enough information and capacity to have a reasonable understanding of what those plans will likely mean for them, including of the social impacts they will experience" (2025: v, 17). Although this language appears in the FPIC section, the Guidance explicitly states that FPIC principles apply to "all communities (non-Indigenous as well as Indigenous)" and that it is "international best practice" to accord all communities the power to provide or withhold broad-based consent (2025: 17).

The SIA's reliance on data collected under these limitations, to characterise the nature and extent of community objection, is methodologically unsound. A community that does not know an alternative exists cannot give a "reasoned response" to the plan as presented.

Consequence:

Taken together, these five failures mean that the data collection for this SIA was conducted without a functioning informed consent framework. The SIA characterises its engagement as —providing opportunities for involvement throughout the assessment process (2026:22, 23). Opportunity to participate is not the same as informed consent. The SIA uses the language of 'involvement' as a substitute for the language of 'consent' — a lower ethical threshold that it does not meet. The IAIA Guidance (Principle 2, 2025: 32) makes clear that the test is not whether a signed consent form exists, but whether the practitioner can establish that the interview (or other form of community engagement) was conducted in the spirit of free, prior and informed consent; that the participants were fully informed about the data collection; and that the participants were aware of their rights in relation to their involvement in the research (2025: v,4). None of these conditions can be established here. The qualitative data is ethically tainted; its use as a basis for impact identification and significance rating is methodologically unsound.

3. Sampling Methodology: Bias, Response Rates and Unconsented Inclusion

Governing requirements:

- NSW SIA Guideline: "Collect qualitative and quantitative data, evidence and insights for scoping social impacts in ways that ensure both diversity and representativeness of views." (2026: 31)
- IAIA Guidance Ethical Principles 17, 18 (Appropriateness of Research Methodology; Full reporting of Methods): data collection methods must be appropriate to the research questions and methods used fully reported, including instruments, limitations should be transparently acknowledged (2025: 33,64).

- Basic principles of survey methodology: for statistical inference, the sample must be probability-based. Convenience and self-selected samples do not permit statistical inference or claims of representativeness.
- IAIA Guidance Principle 2 (Informed consent): participation requires "sufficient information and an adequate understanding of the SIA research and the consequences of their participation" (2025: 32).
- NHMRC National Statement Chapter 2.2: consent requires participants to be informed of "the purpose, methods, demands, risks and potential benefits of the research" (2025: 17).

3.1 Online surveys: selection bias and incomparability

What the SIA says (2026: Appendix F: 2):

> "Disadvantages of an online survey method relate largely to sampling bias, that is the method may exclude those without internet access or digital literacy… representativeness may also be a significant issue given that such survey methods rely on self selection (respondents are those who choose to respond) which can result in skewed survey samples."

What the SIA says (2026: p. 84):

> "Importantly, due to the changes in project alignment which were announced between the two online survey periods, some questions and responses in the survey datasets cannot be merged or directly compared."

What the SIA says (2026: Appendix F: 2):

"In completing the survey, respondents also referred to the development/proposed development of other renewable energy projects occurring both within and outside of the New England Renewable Energy Zone. While awareness of the current Project was top of mind for many respondents, other respondents may have been less able to differentiate between other renewable energy projects in their respective localities."

What the SIA says (2026: Appendix F: 2):

"Social impact assessment is grounded in the understanding that social impacts are experienced subjectively, and therefore must be interpreted through the perceptions of affected individuals and communities."

Critique:

The SIA acknowledges, in its own text, that the online survey produces "skewed survey samples," that the two datasets "cannot be merged or directly compared," and that respondents "may have been less able to differentiate" this project from other REZ projects. It then uses this data as a primary basis for characterising community views.

3.1.1 Self-selection bias is acknowledged but unaddressed

The SIA identifies the mitigation as "wide communication of the survey through diverse channels" (SIA 2026 Appendix F: 2). It does not report what channels were used, what the response rate was, or what proportion of the affected population was reached. The sample is representative of "those who chose to respond" — not the affected population.

3.1.2 The datasets cannot be compared — yet are presented together

The SIA presents findings from both surveys (and the CATI) as a unified summary of "community values" (e.g., Figure 4.1, 2026: 85). It admits that "the 2025 online survey reflected a relatively greater diversity of community values compared to the 2026 online survey. This is likely due to the differing data collection methods for the question" (2026: 84). If the datasets cannot be compared, the SIA cannot use them jointly to demonstrate trends, consistency, or the nature and extent of community attitudes.

The SIA's stated justification for combining the datasets — that 'the two rounds of engagement have ensured the SIA reflects both the evolving project design and current community and stakeholder perspectives' (2026: 22,23) — is refuted in Section 4.1 below.

3.1.3 Respondents may not have been commenting on this project

The SIA does not report what proportion of responses were attributable to this project versus others, and provides no mechanism for separating them. The data's validity as a measure of views on *this* project is compromised.

3.1.4 The SIA's own epistemological premise is not met

The SIA states that social impacts "must be interpreted through the perceptions of affected individuals and communities." If the sample is self-selected, cannot be merged across periods, and may include responses about other projects, the SIA does not have the perceptions of the affected community — it has the perceptions of a self-selected, potentially confused subset.

Consequence:

The online survey data cannot support the SIA's characterisation of community views. The SIA effectively acknowledges the data is unreliable, then uses it as though it is not.

3.2 CATI — "Quota" Sampling and Comparability

What the SIA says (2026: 25):

> "The CATI survey was implemented to obtain a representative sample from the broader community."

What the SIA says (2026:31):

> "The views of the community represented throughout the report are based on the sample of community members and stakeholders consulted as outlined in Section 2.5, and do not necessarily represent the views of the entire community."

What the SIA says about method (2026: Appendix E: 3):

"Working with quotas for each LGA and a data set of geocoded telephone numbers, researchers from the Taverner Research team will conduct calls with residents in the LGA. Researchers will undertake the survey with willing participants over the phone, reading the questions and recording their answers. Once an LGA quota is reached, no more residents in the given LGA will be contacted."

What the SIA says about the CATI's purpose (2026: Appendix E: 2):

"Based on this, the CATI survey seeks to:

- Compare outcomes from the CATI survey and the Online Community Survey. This would allow the SIA to differentiate outcomes between those directly affected by the Project and the broader community.
- The nature of a CATI survey will also enable the comparison between a random sample and an opt in methodology (the Community Survey)……
- It is expected that the CATI survey may capture more of the 'silent majority' who may be more neutral and moderate in their views and perceptions of the Project."

What the SIA says about statistical treatment (2026: Appendix E: 2–3):

"The survey will target 600 households within the LGA's hosting Project infrastructure and will ensure that appropriate confidence levels and intervals are determined…Confidence Interval (±3)….working with quotas for each LGA and a data set of geocoded telephone numbers…"

The sequence of events:

Event	Date (pertinent information)
2025 online survey	April–July 2025 (under the March 2024 alignment)
New 3 km corridor announced	2 October 2025
CATI conducted	March–April 2026 (3 km corridor known; 1 km not yet finalised)
1 km corridor announced	1 May 2026
2026 online survey	April–May 2026 (straddles the 1 km announcement)

The numbers: 11,446 calls; 600 interviews. Response rate: **5.2%**.

Critique:

The SIA simultaneously asserts and disclaims representativeness. Page 25: "representative sample." Page 31: "do not necessarily represent the views of the entire community."

Appendix E:2: "random sample." Three pages, three characterisations of the same dataset. The p. 31 disclaimer is a liability hedge; the p. 25 and Appendix E:2 claims are the assertions on which the findings rest. If the p. 31 disclaimer is correct, the other claims are false.

The stated purpose is not achievable by the method, and in part was logically impossible at the time of data collection:

- **"Differentiate outcomes between those directly affected and the broader community."** The CATI was conducted before the 1 km corridor was finalised. The instrument identifies "high impact areas" by **suburb only**, not by exact property or parcel. At the time of interview, it was not possible to identify whether a respondent was "directly affected by the Project" in the sense of being within the final corridor. The stated purpose was unachievable at the point of data collection. Post-hoc matching to the final corridor is not described in the SIA, and even if performed would not constitute a valid affected-community sample, because respondents were never selected on the basis of being affected.
- **"Comparison between a random sample and an opt-in methodology."** The CATI is not a random sample — it is a convenience sample (see below). Furthermore, identical questions were not asked across the CATI and the online surveys. A valid cross-method comparison requires the same constructs measured with the same (or validated equivalent) questions. The SIA is comparing different things measured two ways.
- **"Capture more of the 'silent majority.'"** At a 5.2% response rate, with "willing participants" as the inclusion criterion, the CATI is capturing the opposite of the silent majority. The 600 respondents are those who answered the phone, were available, and chose to engage. The "silent majority" is the 10,846 who did not respond.

The method fails at every stage of the sampling chain:

3.2.1 The frame does not support the inferences drawn from it

The frame — "residents in the LGA" — is appropriate for capturing the broader community as a comparison benchmark. But the SIA uses the data to differentiate affected from unaffected respondents, which the frame cannot do (suburb-level identification only). CATI data were attributed to the broader community even though 4% self-identified as project-affected landholders (2026: 27), without explanation of how this was methodologically handled. The SIA also compares CATI results with online survey results (targeting the affected community) despite non-identical questions. A general-community dataset with a different question set cannot be validly compared to an affected-community dataset.

3.2.2 "Willing participants" and the stop rule produce a convenience sample

There is no randomisation step described. "Once an LGA quota is reached, no more residents in the given LGA will be contacted" means the sample is determined entirely by call-list order and the willingness of early-called respondents. The 600 are the first 600 people who answered, were in the LGA being called, and were "willing." This is a convenience sample truncated at an arbitrary point, biased toward those who are at home, who answer unknown numbers, and who have time to complete a survey.

3.2.3 The sample size is arbitrary

600 is not derived from a power calculation, margin-of-error target, or confidence-level specification. Fragmented across 6 LGAs, it is insufficient for any sub-group analysis.

3.2.4 LGA quota allocation is not proportional

The allocation was by quota, not in proportion to population or corridor exposure. Some LGAs are over-represented; others under-represented, independent of actual exposure.

3.2.5 The 5.2% response rate makes non-response bias dominant

10,846 of 11,446 did not participate — below even the expected 10% for modern phone surveys. No information on non-respondent characteristics, no weighting adjustment, no sensitivity analysis. Only a "34% survey decline rate" is noted (2026: 25). Non-response bias is not a risk here; it is the dominant feature of the dataset.

3.2.6 Confidence intervals are methodologically invalid

Probability statistics cannot be applied to a non-probability sample. Any confidence intervals, margins of error, or population-level claims derived from the CATI data are invalid.

3.2.7 "Comparison" with the online surveys is not validation

Comparing non-probability samples with different question sets does not validate either. The claim that "social impact themes (positive and negative) that have emerged through the process… have been validated through triangulation of data sources and methods" (2026: 30) is not supported by the methodology used.

3.2.8 The 2025 online survey dataset is temporally contaminated

Some 2025 respondents were unaffected by the original alignment but became affected by the revised alignment (2 October 2025). The SIA acknowledges that "some questions and responses in the survey datasets cannot be merged or directly compared" (p. 84). Yet 2025 responses are included in the SIA's characterisation of community views on the current project, both in the cumulation of views and in comparisons with CATI data. Given that an unknown proportion of 2025 respondents may have materially changed their views following the alignment change, this is a category error—the 2025 data reflect views on a project configuration that no longer exists.

Consequence:

It is not possible to survey a population about a project whose final alignment has not yet been determined and then claim to have differentiated the affected from the unaffected. The CATI data is descriptive of the views of the first 600 willing respondents across 6 LGAs, interviewed before the final corridor was determined, using suburb-level identifiers, with questions that do not precisely match the online survey instruments. This is not "a representative sample from the broader community," not a "random sample," and not a valid benchmark for comparison with data from the affected community.

3.3 Group consultations — unconsented data collection

In various group consultations and community information sessions, participants were unaware that data was being collected for the SIA. This is a direct breach of:

- NHMRC National Statement (general requirements for consent) (2025: 17–19)
- IAIA Ethical Principle 2 (informed consent) (2025: 32)
- IAIA Ethical Principle 3 (specific permission for recording) (2025: 32)
- IAIA Ethical Principle 9 (no use of deception) (2025: 32)

By way of specific example: Valley Alliance committee members can give direct evidence of photographic recording of participants at community information sessions, without permission. Umwelt practitioners attended CRG meetings without expressly detailing their intended data collection, explaining the legal/ethical constraints, or requesting consent. In community information sessions, semi-structured interviews, and other SIA engagement mechanisms, participants were not generally advised that data collection was occurring or of the legal/ethical requirements incumbent on the researchers in relation to free, prior and informed consent to participation .

This constitutes unconsented data collection. The data is ethically tainted and methodologically unsound.

Combined consequence (Section 3):

The three data collection methods fail on both ethical and methodological grounds, and the failures compound.

Ethically, the data collection was conducted without a functioning informed consent framework. The qualitative data cannot be characterised as informed community input.

Methodologically, none of the three surveys produces a sample from which valid statistical inference can be drawn. The SIA's quantitative findings — response rates, percentages,

confidence intervals, and population-level claims as applied to the CATI data — are methodologically invalid. The SIA's quantitative findings are unreliable; its qualitative findings are ethically unsound. The proponent has no valid primary data on which to make statements regarding community-level impact or to develop targeted mitigation strategies.

4. Data Inclusions and Exclusions

Governing requirements:

- NSW SIA Guideline: “The SIA assesses social impacts within the social locality which is defined by where people are likely to experience those impacts” (2026: 16). Data must be relevant to the defined social locality and the details of the project. “Primary data should be grounded in people’s reports of their actual experiences, views, and perceptions, and informed by details of the project” (2026: 19,20).
- NSW SIA Guideline (Transparent principle): "Explains, justifies and makes available information, methods and assumptions so that people can see how their input has been considered." (2026: 8)
- Basic research integrity: data must be relevant to the research question. Including data from outside the study area, or excluding data from within it, without justification, undermines the validity of the assessment.
- Basic research integrity: survey instruments must be made available to enable independent verification of comparability claims.

4.1 Inclusion of data from areas no longer affected by changed HVTL corridor

The HVTL corridor was moved during the project's development (2 October 2025), removing it from one area and placing it through another (with a smaller, more immediately affected population). Despite this change, a significant volume of data collected from the previously-affected area is included in the SIA.

Specifically, the SIA states that households in Walcha — not affected by the then-current alignment — participated in the 2025 online survey (2026: Appendix F: 3). Their 2025 data is included in the SIA's characterisation of community views. However, it is not valid to include their 2025 data as a measure of views on the *current* project, because:

- Their exposure to the project has materially changed (they were unaffected under the 2024 alignment; they may be affected under the revised alignment, or vice versa).
- Their views, expressed in 2025, were formed in a different project context and cannot be assumed to reflect their views on the current alignment.

Similarly, data from households around the original alignment may have materially changed their views when they were no longer affected. Their 2025 responses reflect a project that no longer exists in the form they described.

The SIA does not address this. It does not:

- Identify which respondents are in the current corridor versus the old corridor
- Report whether views changed between the two alignments
- Explain why data from no-longer-affected respondents is included
- Separate the two datasets in the analysis

The consequence is a dilution effect. Adding data from a larger, no-longer-affected population inflates the sample size and can reduce the intensity of reported impacts. If the no-longer-affected population reported lower distress or lower opposition, including them lowers the average and makes the project appear less impactful than it is on the actually-affected population. Conversely, if the old-corridor population reported high opposition, including them inflates the apparent level of community objection to the current alignment.

The SIA attempts to justify the inclusion of data from both alignment periods:

> "The two rounds of engagement has ensured that the SIA is reflective of both the evolving project design and current community and stakeholder perspectives, whilst

> also providing opportunity for involvement throughout the assessment process." (2026:22)
>
> "All inputs received across the two rounds of engagement were considered in the assessment. The two rounds of engagement have ensured the SIA reflects both the evolving project design and current community and stakeholder perspectives, whilst also providing opportunities for involvement throughout the assessment process." (2026:23)

This justification is unsound for three reasons:

First, "reflective of the evolving project design" is not the same as "reflective of current community perspectives on the current design." A respondent who completed the 2025 survey under the original alignment expressed views on a project configuration that no longer exists. Their 2025 response is not a view on the *current* design; it is a view on a *previous* design. Including it as evidence of "current community perspectives" conflates the two.

Second, the SIA's own admission on p. 84 — that "some questions and responses in the survey datasets cannot be merged or directly compared" — directly contradicts the p. 22/23 claim that the two rounds "ensured the SIA reflects both the evolving project design and current community perspectives." If the datasets cannot be merged, the SIA cannot claim that the combined result "reflects" a single, coherent picture of community views on the current project.

Third, "providing opportunity for involvement throughout the assessment process" is a statement about *access*, not about *data validity*. The fact that community members had the opportunity to engage in two rounds does not cure the methodological problem that the first round's data was collected under a different project configuration. Opportunity to participate is not the same as the data being fit for purpose.

An accurate baseline was available. The ABS collects population data to mesh block level. The consultants could have requested the ABS to identify the exact number of people affected within a defined radius of the finalised HVTL, giving an accurate baseline population against which to measure response rates and characterise the affected community. This was not done.

This is a material methodological failure.

4.2 One response per household in the CATI

The CATI was limited to one response per household. This is a significant methodological limitation for a project that is, by its own admission, divisive within households. Different members of the same household may have different landholdings, different proximity to the corridor, different economic dependencies on the affected land, and genuinely different views.

By restricting the CATI to one respondent per household, the SIA:

- Suppresses intra-household diversity of views
- Cannot identify or report the range of perspectives within affected households
- Potentially under-represents the views of household members who were not selected
- Cannot assess whether the project is creating intra-household conflict — which is itself a social impact

The NSW SIA Guideline requires data collection that "ensures both diversity and representativeness of views" (2026: 31). A one-response-per-household design is inconsistent with this requirement for a project with the social complexity of a >200 km HVTL across rural communities.

4.3 The SIA's contradictory positions on data comparability

The SIA takes three mutually inconsistent positions on whether its three datasets (2025 online survey, 2026 online survey, CATI) can be compared:

Position 1 — They cannot be compared (2026: 84):

> "Importantly, due to the changes in project alignment which were announced between the two online survey periods, some questions and responses in the survey datasets cannot be merged or directly compared."

Position 2 — They can be compared (2026: Appendix E: 1):

"The CATI survey has been developed so that key questions can be compared to the outcomes of the Online Community Survey (2025 and 2026)."

Position 3 — Comparison is limited (2026: 89):

"Due to differences in question structure between the CATI survey/2026 online survey and 2025 online survey, direct comparison of results is limited."

These three positions cannot all be true. If the datasets "cannot be merged or directly compared" (Position 1), they cannot also be designed "so that key questions can be

compared" (Position 2). If "direct comparison of results is limited" (Position 3), the extent and nature of that limitation must be specified.

Yet the SIA proceeds to compare and merge all three datasets throughout Chapter 4, for example:

- Figure 4.1 (p.85) combines data from all three datasets in a single figure
- Pages 86–87 compare attitudes to renewable energy across the datasets
- Page 87 compares attitudes to the project across the datasets
- Figure 4.3 (p.88) compares the 2026 online survey with the CATI for overall attitude to New England REZ network infrastructure project
- Figure 4.5 (p.90) compares the 2026 online survey with CATI data for negative impacts of the project

The SIA acknowledges on p.89 that "direct comparison of results is limited" — and then does it anyway in Figures 4.5 and 4.6, without specifying which questions are comparable, which are not, or on what basis the comparison is valid.

No detailed table comparing the questions across the three instruments is provided. The reader cannot verify which questions are identical, which are different, or which comparisons in Chapter 4 are methodologically valid. The SIA's own admission that "differences in question structure" limit comparison (p.89) is not operationalised: there is no mapping of which specific questions can and cannot be compared, and no explanation of how the SIA determined that the comparisons in Figures 4.1, 4.5, and 4.6 etc. are valid despite those differences.

4.4 The online survey instruments are not included in the SIA

The CATI survey instrument is included in the SIA as Appendix E. The 2025 and 2026 online survey instruments are not included.

This is a transparency failure. Without the instruments, it is impossible for a reader, assessor, or independent reviewer to:

- Verify which questions are identical across the three datasets
- Assess the SIA's claim that "key questions can be compared" (Appendix E: 1)
- Determine the extent of the "differences in question structure" the SIA acknowledges (p. 89)
- Evaluate whether the comparisons in Chapter 4 are valid

A Valley Alliance community member obtained a copy of the 2025 online survey (questions 17–34) and notes that it appears substantially different from the CATI instrument. However, a full comparison cannot be made because the SIA does not provide the online survey instruments for independent verification.

The NSW SIA Guideline's transparency principle requires that "information, methods and assumptions" be made available "so that people can see how their input has been considered" (2026:8). The survey instruments are part of the method. Their absence from the SIA prevents any independent verification of the comparability claims on which Chapter 4's findings rest.

4.5 Figure 4.6 introduces categories not captured by the CATI instrument

SIA Figure 4.6 (p.91) reports negative impacts of the project from CATI data, comparing three categories: "project affected landholders," "proximal landholders," and "the broader community."

The CATI survey instrument (Appendix E) does not appear to include a specific question aimed at determining which of these categories a respondent falls into. The instrument identifies "high impact areas" by suburb only (as noted in Section 3.2 above), and the CATI was conducted before the final corridor was determined. It is not explained in the SIA how respondents were classified into these three categories, what criteria were used, or whether the classification was made at the point of data collection or applied post-hoc.

If the classification was applied post-hoc (i.e., after the final corridor was known), the SIA must describe the method, the spatial data used, and the limitations of matching suburb-level identifiers to a finalised corridor. If it was not applied post-hoc, the categories in Figure 4.6 are not supported by the data collected.

4.6 The 532-to-90 response drop is unexplained

The 2025 online survey received 532 responses; the 2026 online survey received 90 responses (2026: 26). This is an 83% decline in responses between the two survey periods.

The SIA attributes the difference in "diversity of community values" between the two surveys to "differing data collection methods for the question" (2026: 84). It does not address the response volume difference. A drop from 532 to 90 is not a minor fluctuation; it is a near-total collapse in participation. The SIA does not:

- Explain why the 2026 survey received so few responses
- Assess whether the 90 respondents are a meaningful sample of the affected population

- Address whether the 2026 survey's findings can be generalised to the affected community

The SIA presents both datasets as equally valid inputs to Chapter 4's analysis. A dataset with 90 responses from an opt-in survey cannot carry the same evidentiary weight as one with 532, and the SIA does not acknowledge or adjust for this disparity.

Consequence:

The SIA's treatment of its own data is characterised by a pattern: it acknowledges limitations, then proceeds to use the data as though the limitations do not exist. The datasets "cannot be merged or directly compared" (p.84) — yet are merged in Figure 4.1. "Direct comparison of results is limited" (p.89) — yet Figures 4.5 and 4.6 compare them. The online survey instruments are not provided — yet comparability is claimed (Appendix E:1). Data from no-longer-affected areas is included without explanation. Categories are reported in Figure 4.6 that the CATI instrument does not appear to capture.

5. Failure to Use the Kessler-10 (K10)

Governing requirement:

- The SIA reports on distress as a social impact of the project (2026: 117,176,179, Appendix F Survey Results: 33)
- The Kessler Psychological Distress Scale-10 (K10) is the standardised, validated, and widely used instrument for measuring non-specific psychological distress in population surveys. It is:
    - Used in the Australian National Health Survey (ABS) as the standard measure of psychological distress
    - Validated for the Australian population (Kessler & Mroczek, 1992; Australian norms available from ABS)
    - Free to use in research (no licensing required)
    - Administered in approximately 5 minutes
    - Available in 27+ languages
    - The de facto standard in Australian population health and social research for measuring distress

Critique:

The SIA reports on distress at multiple points (2026:117, 176, 179) and cites the National Rural Health Alliance (2021) *Mental Health in Rural and Remote Australia* in support of the proposition that rural communities experience elevated psychological distress higher than

that which is self-reported (SIA 2026:179). Yet the SIA does not use the K10 — the standardised instrument that underpins the very data the NRHA fact sheet reports — to measure distress in the affected population. The citation identifies the problem; the methodology fails to address it. Distress is a specific, measurable construct — but rather than using the K10, or any other standardised instrument, distress is apparently captured through unstandardised, open-ended, or ad-hoc questions (or through qualitative reporting only).

This is a material methodological failure for the following reasons:

1. **No validity.** Without a validated instrument, the SIA cannot demonstrate that it is measuring "distress" in a consistent, reliable, or comparable way. The construct is undefined and inoperable.
2. **No reliability.** Without a standardised instrument, the measurement is not replicable. Another researcher could not reproduce the SIA's distress findings using the same method.
3. **No comparability.** Without the K10 (or equivalent), the SIA's distress findings cannot be compared to:
    - Australian population norms (ABS National Health Survey)
    - Other infrastructure project SIAs
    - Clinical thresholds (the K10 has established cut-offs for mild, moderate, high, and very high distress)
    - Pre- and post-construction baselines
4. **No sensitivity.** Ad-hoc questions are less sensitive to changes in distress than a validated scale. The SIA may be under-detecting the true level of distress in the affected population.
5. **The instrument was available and recommended.** The K10 is free, publicly available, and was specifically recommended to the SIA team by a community member with social research experience more than a year before the EIS was finalised. The SIA team's failure to adopt this recommendation — without documented justification — is not merely a methodological oversight; it is a failure to respond to reasonable, expert input during the assessment process.

Consequence: The SIA's findings on distress are methodologically unsound. They cannot be validated, replicated, or compared to established norms.

Requested Remedial Actions

1. Require independent ethical review of the SIA's data collection methodology by an HREC or equivalent body (independent of the consultant and EnergyCo), with a written determination on whether the research met the requirements of the NHMRC National Statement.
2. Require the SIA to re-characterise all quantitative findings as descriptive (non-probability) data, with explicit statements that no statistical inference (confidence intervals, margins of error, population-level generalisations) can be drawn from the online survey or CATI data.
3. Require the SIA to exclude all data collected from areas no longer affected by the moved HVTL corridor, or to present it in a clearly separate section with a documented justification for its inclusion.
4. Require the SIA to re-collect psychological distress data using the K10 (or an equivalent validated, standardised instrument) and re-report the findings with comparison to Australian population norms.
5. Require the SIA to document the informed consent process in full, including: what information was provided to participants, what was not provided, and how the proponent/consultant determined that consent was "informed." Provide evidence of the specific and verifiable delivery of the “Participant Ethics Information Sheet” at all stakeholder engagements.
6. Require the SIA to provide the 2025 and 2026 online survey instruments in the appendices, and a detailed table mapping which questions are identical across instruments and which comparisons in Chapter 4 are therefore valid.
7. Require the SIA to explain how respondents were classified into the categories in Figure 4.6, and to address the 532-to-90 response drop and its implications for the validity of the 2026 survey findings.
8. Require a Social Impact Management Plan that includes a post-construction social impact monitoring programme using the K10 at 2 and 5 years post-construction, with results reported to DPHI.

References

Amplitude Consultants, *HumeLink Undergrounding – Review of Transgrid Report and Costing of HVDC Alternatives*, Rev 3, 3 October 2023.

AEMO, *Transmission Cost Database Update*, May 2025.

Kessler, R.C. & Mroczek, D.F. (1992). Measuring overall psychological distress: The General Health Depression (GHQ-12). *Psychological Medicine*, 22(2), 483–490.

National Rural Health Alliance, *Mental Health in Rural and Remote Australia*, 2021.

NHMRC, *National Statement on Ethical Conduct in Human Research*, 2025 (updated from 2007).

IAIA, *Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects*, 2025.

NSW Department of Planning, Housing and Infrastructure, *Social Impact Assessment Guideline*, 2026.

Appendix 1

Author Biography

Dr. Merryl Uebel-Yan (retired)

Roles at AIHW: Senior analyst · Data collection manager · Author · Peer reviewer · Professional adviser on academic research

Key publications:

- Co-author, *Australia's health* and *Australia's welfare* — the AIHW's flagship national publications
- Author of reports on functioning and disability, adoptions, child protection, and Indigenous people with disability

Other AIHW work:

- Review and development of Cultural and Linguistic Diversity measures in aged care
- Ad hoc government-funded research projects

Pre-AIHW:

- Contract research for the NSW component of the database underpinning the Health Direct helpline
- Early career in law enforcement as a researcher and analyst — the former National Crime Authority, the Stewart Royal Commission, and the AFP (performance monitoring),

Qualifications: PhD in Information Science

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha