

EPA Technical Guidance feedback

WA Division EIANZ



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Via email: Naomi.O'Hara@dwer.wa.gov.au

Dear Naomi,

Re: REVIEW OF THE EPA'S GUIDELINES AND PROCEDURES FRAMEWORK

The Environment Institute of Australia and New Zealand (EIANZ) (the Institute) Western Australia (WA) Division (the Division) is pleased to have this opportunity to provide comments on the "Documents to support EIA" stream of the EPA's Guidelines and Procedures framework. The Institute acknowledges the efforts being made by the DWER EPA Strategy & Guidance Unit to provide a simplified policy framework for Environmental Impact Assessment (EIA), with a clear link to the principles and objectives of the Environmental Protection Act 1986.

The EIANZ is the leading professional body in Australia and New Zealand for environmental practitioners, and promotes independent and interdisciplinary discourse on environmental issues. On all issues and all projects, the Institute advocates good practice environmental management delivered by competent and ethical environmental practitioners.

We forward this submission on behalf of the WA EIANZ members. The Division currently has approximately 140 members while the Institute has over 1400 members across Australia in a range of technical disciplines including certified environmental practitioners (CEnVP), ecological consultants, environmental advocates and environmental impact specialists working in government, industry and the community.

Again, we thank the EPA for the opportunity to be engaged in its review of "Documents to support EIA" stream of the Guidelines and Procedures framework used in EIA in Western Australia.

Regards,

A handwritten signature in black ink that reads "Bastow".

Belinda Bastow
President, EIANZ (WA Division)
on behalf of the WA Division Committee and WA Members

1. INTRODUCTION

1.1 Background

The EIANZ WA Division is pleased to make comments on the on the “Documents to support EIA” stream of the EPAs Guidelines and Procedures framework.

EIANZ considers that the simplified policy framework is important to provide a clear link to the principles and objectives of the Environmental Protection Act 1986. In addition, the new framework has streamlined several “types” of instruments of similar purposes, objectives and outcomes, and has resulted in more concise, coherent policy framework. The EIANZ endorses review of the “Documents to support EIA” in order to evaluate the effectiveness of regulatory framework reform to improve engagement with EIA for proponents, environmental consultants or practitioners, community organisations and the general public.

EIANZ have engaged practitioners and technical experts to provide valuable feedback on the reform of guidelines and procedures regulatory framework for EIA in Western Australia.

1.2 Role of the EIANZ

The EIANZ, as the leading membership based professional organisation for environmental practitioners in Australia and New Zealand, is an advocate for good practice environmental management. The Institute supports environmental practitioners and promotes independent and interdisciplinary discussion on environmental issues. The Institute also advocates environmental knowledge and awareness, advancing ethical and competent good practice environmental management.

A Certified Environmental Practitioner Scheme (www.cenvp.org) is also in place to assess and certify competent experienced environmental practitioners working in government, industry and the community. This includes specialist competencies such as Impact Assessment, Ecology and Contaminated Lands.

The EIANZ is an advocate for environmental assessment and monitoring investigations and reports being certified by suitably qualified and experienced persons for the completeness and scientific rigor of the documents. One of the ways of recognising a suitably qualified practitioner is through their membership of, and certification by, an organisation that holds practitioners accountable to a code of ethics and professional conduct, such as the EIANZ.

The EIANZ is a not-for-profit, charitable organisation incorporated in Victoria, and a registerable Australian body under the *Corporation Act 2001* (Cwlth), allowing it to operate in all Australian jurisdictions.

2. GENERAL FEEDBACK ON GUIDELINES AND PROCEDURES FRAMEWORK

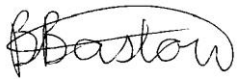
Observation 1: EIANZ is supportive of the new guidelines and procedures framework which is divided into two categories under ‘Documents to support EIA’: one for the processes and procedures of EIA, and one for dealing with substantive environment considerations in EIA. The new streamlined framework presents documents in a more logical structure, hierarchical manner, is easily navigable, and readily distinguishes documents used for assessment procedures (i.e. Part IV Divisions 1 and 2)

that the EPA administers, from environmental considerations (i.e. principles, factors and associated objectives) which form the basis for assessing whether impact to the environment is acceptable.

Observation 2: The EPA consultation hub now provides greater transparency during the assessment process, and opportunities for public participation of EIA in Western Australia. “We asked, You Said, We Did” provides timely feedback on public interest about the environmental effects of recently consulted proposals.

Observation 3: There appears to have been a change to the EPA’s approach when no community feedback is obtained during the referral consultation period. Over the last 12-months there has been two occasions where a referred project did not receive public feedback on the level of assessment. It appears the EPA has interpreted this as no public concern about the development and thus chosen not to release the Environmental Review for public comments. The EIANZ believes that the lack of public feedback could be linked more to a lack of awareness that feedback is being sort or short time frames (7-days), rather than a lack of interest. For example, remote communities and traditional owners whom have had limited knowledge of a project, as a result of low level engagement by the developer, are at a disadvantage and may miss the submission deadline. EIANZ encourages the EPA to be mindful of this fact and encourages them to consider how it might address this factor for projects that are of interest to Traditional Owners and Native Title Holders.

Regards,



Belinda Bastow
President, EIANZ (WA Division)
on behalf of the WA Division Committee and WA Members



Environment Institute
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