

21 September 2022

WA Environmental Protection Authority
8 Davidson Terrace
Joondalup, Western Australia, 6027



Environment Institute
of Australia and
New Zealand Inc.

Re: Submission on the revised Environmental Factor Guideline – Greenhouse Gas Emissions

The Environment Institute of Australia and New Zealand (EIANZ) Western Australia Division (EIANZ-WA) is pleased to provide feedback on revised draft Environmental Factor Guideline – Greenhouse Gas (GHG) Emissions ("the revised draft guideline").

EIANZ is a not-for-profit, professional association for environmental practitioners. The Institute promotes independent and interdisciplinary discussion on environmental issues and advocates good practice environmental management delivered by competent and ethical environmental practitioners.

We forward this submission on behalf of EIANZ-WA members. Currently, we have 215 members in WA while across Australia and New Zealand we have over 2,170 members. Our members come from a range of technical disciplines including environmental specialists working in government, industry and the community, certified environmental practitioners (CEnVP), ecological consultants, environmental advocates, heritage consultants, researchers, and natural resources advisors.

We support, in principle, the approach taken in setting out the revised draft guideline and the objective *to minimise the risk of environmental harm associated with climate change by reducing greenhouse gas emissions as far as practicable*. We provide the following feedback on the revised draft guideline for your consideration:

Scope Triggers

EIANZ supports the inclusion of both Scope 1 and Scope 2 trigger, however we feel that there is merit in a combined Scope 1 and 2 trigger which ensure Project with combined emission that exceed 100,000 tonnes CO₂-e are also required to develop emission reduction strategies, while also better aligns with Australia's 2030 emission reduction targets.

Splitting referrals

The revised draft guideline states that "Proposals should not be split into separate referrals to avoid consideration of GHG emissions". There is potential for conflict between the EPA and proponents regarding what should be included in a referral. Including this statement without any clarification by the EPA may lead to disputes between EPA and the proponent about whether referrals should be combined or can be separate.

The previous point regarding definition of facility vs proposal would help to clarify this. Often, a proponent would consider separate facilities to be separate proposals e.g. they may be inter-related, but if they are geographically separate then operationally they will also be separate and have separate approvals, staff and possibly schedules, etc. When these facilities are "split" into separate proposals, it is not necessarily for the purpose of avoiding consideration of GHG emissions, but rather to ensure approvals received align with the geographic boundaries of the facilities.

Cumulative impacts

Consideration of cumulative GHG emissions has not been raised in the draft guidance. EIANZ suggests that a review of cumulative impacts be required, and it being explicitly described within this guidance. It would be useful to include something explicit in the guidelines about consideration of cumulative impacts and how the EPA will assess this aspect.

Best practice measures

EIANZ supports that the requirement for Proponents to applying best practice design and operations which will generally be subject to peer review for Scope 1 emission, we do feel that this requirement should also be extended to Scope 2 emissions, particularly when Scope 2 emission are generated by new facilitate being established concurrently or in support of a new Project.

We trust that this feedback has been helpful. EIANZ would welcome the opportunity to provide a representative to contribute to the DWER offsets working group.

Yours sincerely

A handwritten signature in black ink that reads "BBastow". The signature is written in a cursive style with a large, sweeping flourish over the "B" and "astow".

Belinda Bastow
President
EIANZ – WA Division



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of Australia and
New Zealand Inc.

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ, the Institute) is a professional association for environmental practitioners. 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.

The Western Australian (WA) Division currently has approximately 215 members while EIANZ has over 2170 members. Our members come from a range of technical disciplines and industries and include environmental consultants, ecologists, advocates, managers, and impact specialists working in government, industry and the community.

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, Land Rehabilitation and Contaminated Lands.

The EIANZ is an advocate for environmental assessment, management 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.