

20 July 2025

Leanne Thompson
Manager EIA Strategic Advice, Office of the EPA
Department of Water and Environmental Regulation
[REDACTED]

cc Melissa Lamb
[REDACTED]



Environment Institute
of Australia and
New Zealand Inc.

Dear Leanne

RE: Draft Environmental Impact Assessment Practice Guide Consultation

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 Draft Environmental Impact Assessment Practice Guide Assessment of Proposals in WA under Part IV of the *Environmental Protection Act 1986*.

The Institute 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 WA Division currently has approximately 278 members, while the Institute has more than 2511 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, consultancies and the community.

Again, we thank the Office of the EPA for this opportunity to provide feedback.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B Bastow'.

Belinda Bastow
President
EIANZ – WA Division

1 Introduction

1.1. Role of the EIANZ

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

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

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 rigour of the documents. One way 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 Draft Environmental Impact Assessment Practice Guide Assessment of Proposals in WA under Part IV of the Environmental Protection Act 1986

Consultation Questions	Response
Does the Draft Practice Guide reduce duplication and streamline assessment processes?	<p>To some extent the combining of the Environmental Impact Assessment (Part IV Divisions 1 and 2) Administrative Procedures 2024 and Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual does remove duplication. EIANZ notes that there is some duplication within the document creating some confusion. If this document is intended to be used by Industry, the community and EPA Support Staff, EIANZ believe a less technical version is required.</p> <p>Our members found the simplified assessment process flow diagrams, definition of key terms and terminology useful.</p> <p>It could be further enhanced by including checklist and case studies similar to those include in the Consultation information.</p>
Is there anything that was in the Administrative Procedures or Procedures Manual that was of value and is not in the Draft Practice Guide, the EP Act or EPA Instructions?	<p>Templates - the Guide's does not include templates and forms previously part of the Procedures Manual.</p> <p>Timeframes - Administrative Procedures set out indicative timeframes for each stage of the assessment process, including through</p>

	<p>flow diagrams, these are not in the draft guide.</p> <p><i>Administrative Procedures</i> set out a step-by-step approach for key elements of the process, which have not been included in the Guide. The EPA should set timeframes for elements of the process that are under its own control (for instance on seeking information from technical experts, or the EPA providing public comments it has received to proponents).</p>
Does the Draft Practice Guide result in a robust process for assessing environmental impacts?	EIANZ believes that the consolidation of the Administrative Procedures and Procedures Manual will assist in improving the process of impact assessment; however, this could be undermined if awareness and cultural changes are not made by proponents and DWER Support staff.
Are there areas where more efficient processes can be applied?	<p>Addition of a Project Assessment Plan (PAP) similar to those used by DCCEEW for PERs outlining key steps and responsibilities during the referral / assessment process for those projects requiring ESD / Public Review.</p> <p>Environment Online platforms have significant room for improvement; they have a complex interface and have ongoing technical issues.</p> <p>Mandatory release of biological and biophysical spatial data through Environmental Online rather than IBSA or IMSA.</p>
The draft Practice Guide removes the current level of assessment options (Public Environmental Review and variations of Assessment on Referral Information) and focuses on setting the level of assessment based on the three decisions that EPA need to make about the assessment process, i.e. the requirement for additional information, the form of that information and public review requirements. What benefits or issues do you see for your future proposals, is there any parts of this change that you feel need further clarification to assist with this change?	<p>EIANZ supports the simpler approach, and the inclusion of PURI is sound. It would assist if the assessment level was presented in a diagram.</p> <p>EIANZ believes inclusion in the draft Guide of the submission of a draft Environmental Review Document (ERD) with referral, rather than a Referral Supporting Document helps reduce re-work.</p> <p>More clarity around the types / level of information for each process and more information around how the three levels are differentiate in plain English.</p>
Is the information on the processes and expectations around Requests for Further Information (RFIs) including parameters and limits for issuing RFIs, clear?	Is there a limit on the number of RFIs that can be issued? Noting the draft document states 'mostly one RFI'; however, experience is that it's more than one, especially if coming from different branches (i.e. TEB/ MEB / Spatial data team) and / or DMAs and if RFI can be collated as one vs multiple smaller RFIs to reduce cost pressures and unknowns with

	<p>multiple requests particularly from different branches within DWER EPA Services?</p> <p>Good to see clarity around the timing required for 1) Proponents to respond (unless additional studies / survey work is required).</p> <p>However some more clarity is around if / when assessment documents (i.e. referral supporting document or ERD) need to be updated to reflect response to RFI or whether just the RFI response table is sufficient</p>
Do any areas need further explanation in the Practice Guide?	<p>Environment Online? How is this going to be paired with the EIA Practice Guide?</p> <p>"Proportionate" use in ESD paragraph – How will this be determined?</p> <p>There are instances in the Guide where the language is uncertainty, such as the use of the word 'usually'. It is suggested that these should be tightened to ensure that proponents and assessors have a clear understanding of procedure.</p> <p>Some sections are very subjective, EIANZ understands it is different for different projects. But at the moment different assessment officers give different responses/ requirements. Some industry related examples could assist? Or principles?</p> <p>Some aspects would benefit from greater clarity such as cumulative impacts assessment, and clearer criteria for evaluating social surroundings.</p>

3 Conclusion

The EIANZ WA Division is pleased to make comments on the Draft Environmental Impact Assessment Practice Guide Consultation. Please consider our feedback as the guide is finalised.

EIANZ supports the Practice Guide as a document that can be easily updated and reissued promptly as issues arise. We believe that this highly technical document should be accompanied by a version more suitable for proponents and the community new to the WA EIA process.

If you have any further queries regarding the above matters, please contact Belinda Bastow, President EIANZ WA Division, on [REDACTED]