



Guide to Preparing an Environmental Scoping Document

1. Introduction

Section 6.1 of the *Environmental Impact Assessment (Part IV Division 1) Administrative Procedures 2002* (the Administrative Procedures) outlines the requirements for an environmental scoping document to be prepared by proponents where the Environmental Protection Authority (EPA) sets the level of assessment for a proposal at Public Environmental Review (PER) or Environmental Review and Management Programme (ERMP).

Where proponents expect a level of assessment of PER or ERMP to be set by the EPA, they are encouraged to prepare and submit to the EPA an environmental scoping document as part of their proposal referral. Where the EPA has set the level of assessment of PER or ERMP, the proponent is required to prepare an environmental scoping document if one has not been submitted as part of the referral.

Where the level of assessment is ERMP, the EPA requires the proponent to release the environmental scoping document for public review for at least two weeks and to modify the document in response to submissions.

The EPA will advise the proponent on its acceptance of the environmental scoping document and the included Scope of Works. This will enable the proponent to prepare the PER or ERMP, consistent with the approach and timetable agreed with the EPA.

This guide has been prepared to assist the proponent in preparing the environmental scoping document. The EPA has not prescribed the particular format of the document but the Administrative Procedures set out the minimum information to be provided in the document. Proponents should also be familiar with the EPA's generic guidelines for the preparation of a PER or ERMP, available at www.epa.wa.gov.au.

Where the proposal is or is likely to be subject to the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*, the environmental scoping document should also address requirements under that Act (refer to the Department of Environment and Water Resources website at www.environment.gov.au).

The environmental scoping document and the EPA's generic guidelines comprise the EPA-agreed project assessment guidelines.

2. Table of Contents

The following is an indicative list of headings that could be used in the environmental scoping document.

- Purpose of document
- Identification of proponent
- Summary description of the proposal
- Alternative options considered
- Basis for justifying proposal and selecting preferred option
- Regional setting of proposal
- Summary of potential environmental (including cumulative) impacts, their significance and possible management responses

- Proposed studies and investigations (Scope of Works)
- Key Environmental Factors and Principles for this proposal
- Applicable legislation
- Community and other stakeholder consultation programme
- Project and assessment schedule
- Peer review
- Study team
- References

3. Explanation of requirements for the environmental scoping document

A guide to each section of the document is explained in more detail below. It is expected to be concise and provide sufficient detail for the EPA, EPA Service Unit and other involved parties to understand the proposal, confirm the environmental issues and their significance, and to reach agreement on the scope and direction of the preparation of the PER or ERMP.

Purpose of document

This should explain why the document has been prepared (eg. required because the EPA has set a PER or ERMP, or because the proponent submits it as part of the referral).

Identification of proponent

The proponent's name, address details and nominated contact should be indicated here. If there are co-proponents, information on each and the nature of the arrangements should be indicated. If the proponent is a Joint Venture partnership, the Joint Venture partners should be identified, together with the Project Manager for the Joint Venture.

Summary description of the proposal

The type, scale and location of the proposal, along with an outline of any processes, should be briefly described. Maps at appropriate regional and local scales should be included.

Basis for justifying proposal and selecting preferred option

Describe any alternatives considered during early proposal planning (eg, locations, siting, process), and outline the criteria used to compare options and select the preferred proposal.

Regional setting of proposal

A summary description of the environment, which places the proposal in a regional biophysical and social context, should be included. The tenure of the land under and close to the proposal should be described and any gazetted leases should be shown.

Summary of potential environmental impacts, their significance and management responses

This discussion should incorporate the identification of the environmental issues/factors arising from the project and their relative significance. This will lead to the identification of the key impacts and issues that you should focus on during the proposed investigations for the PER/ERMP.

The scoping document should indicate whether the impacts relate to the biological environment, physical environment, and/or social environment and should explain any relationships between the impacts at a local, regional or cumulative level that are relevant. The proponent should address the Principles in s4A of the EP Act as part of the environmental impact assessment process.

Proponents should have preliminary discussions with DMAs and any other relevant agencies, regarding issues/factors they consider should be addressed, and any specific requirements they may have.

Proposed studies and investigations

A Scope of Works setting out the proposed environmental surveys/investigations to be carried out as part of the EIA for preparation of the PER/ERMP should be provided. A description of any previously carried out surveys and their suitability for this proposal should be given. The surveys/investigations should be clearly linked to the environmental issues/factors identified, and be aimed at demonstrating that:

- a. best practicable measures have been taken in planning and designing the proposal in accordance with the hierarchy of impact minimisation;
- b. unavoidable impacts should be assessed for their environmental acceptability, taking into account cumulative impacts which have already occurred in the region;
- c. the Principles of Environmental Protection have been addressed by the proposal; and
- d. environmentally beneficial activities must be undertaken to counterbalance adverse environmental impacts.

Key Environmental Factors and Principles for this proposal

Following from discussion on the identification of key environmental issues/factors and the outline of the scope of studies and investigations to be undertaken, a summary table relating environmental issues/factors with scope of investigations should be presented. An example of this table is provided in Appendix 1.

The *Environmental Protection Act 1986* (EP Act) requires the EPA to report on key factors. This approach may result in inappropriate fragmentation of common or cumulative impacts. As a result, the EPA has often combined several factors which have clear relationships into environmental issues, or broadly interpreted a single factor to encompass a range of related impacts. Where this occurs, it is important that the factors are still identified.

This process of the identification of key issues/factors should include consultation with the public, local government and government agencies.

The EPA maintains a publicly available database of generic EIA environmental factors, and associated EPA environmental objectives, as a guide to proponents for preparing their environmental scoping documents for PERs or ERMPs. This database of environmental factors and objectives is available at www.epa.wa.gov.au.

In addition, the EPA has published a series of Position Statements and associated Guidance for the Assessment of Environmental Factors (available at www.epa.wa.gov.au) which provides an indication of the EPA's views on matters of environmental importance and expectations about how to address specific factors. Proponents should ensure that they are aware of and utilise the information in these documents.

The summary table, supported by the remainder of the environmental scoping document, will be the agreed guidelines for the environmental assessment of the proposal by the EPA.

While the environmental scoping document should be comprehensive in identifying key environmental issues/factors, additional issues/factors may arise during the consultation programme and environmental investigations. Where this occurs, include these in the final table submitted to the EPA in the PER/ERMP.

Applicable legislation

Identify the key legislation (including Commonwealth if appropriate) to which the proposal will be subject.

Community and other stakeholder consultation programme

Describe the process to be used to consult with the community, government agencies, local government and other key stakeholders and list the stakeholders that have been identified for inclusion in the consultation process. Where consultation has already commenced, this should also be explained.

Project and assessment schedule

The document should include a proposed timetable for the assessment process, including the following stages:

- undertaking environmental surveys/investigations;
- consultation programme, peer review (if relevant);
- submission of draft PER/ERMP document to the EPA Service Unit;
- public review of PER/ERMP;

- proponent's response to submissions;
- EPA assessment and report;
- two week appeal period on EPA's report and recommendations; and
- Minister considers EPA report.

Peer Review

The EPA encourages proponents to incorporate a peer review process within the project definition and assessment phase. Where this is planned, a list of the people proposed to provide peer review of findings and conclusions of the environment surveys/investigations should be provided.

Study team

The members of the study team, including those from proponents and their consultants, should be listed and their expertise and roles briefly outlined.

References

A list of documents and studies used to prepare the Environmental Scoping document, and other key studies or documents that are to be used during the preparation of the PER or ERMP should be provided.

4. Table relating environmental factors and Principles to the scope of investigations

Appendix 1 provides an example of how to develop the table and identify relationships between EIA Principles, environmental factors, environmental objectives, investigations and consultations to be carried out to determine how the predicted impact will be avoided, managed to acceptable levels, or counter-balanced.

Appendix 1

Example of table relating environmental factors and Principles to the scope of investigations

Environmental Factor	Relevant Area	Environmental Objective	Potential Impacts	Additional investigations	Potential management
Biophysical					
Vegetation	Within the XXX Bioregion, within which the proposal is located	To maintain the abundance, diversity, geographic distribution and productivity of flora at species and ecosystem levels through the avoidance or management of adverse impacts and improvement in knowledge.	Clearing of XX ha of vegetation comprising the following vegetation association: <ul style="list-style-type: none"> • ; And the loss of the following protected species and threatened ecological communities (TEC): <ul style="list-style-type: none"> • . 	Determine the historical and current extent of the affected vegetation associations to determine the proportion affected by the proposal. Identify the scale of the potential loss of protected species and TEC's, in absolute and relative terms	Investigate means to either avoid loss through changes in project design or to facilitate other means of protection
Fauna (Stygofauna)	Project site of XX ha and zone of hydrological influence	To maintain the abundance, diversity, geographic distribution and productivity of fauna at species and ecosystem levels through the avoidance or management of adverse impacts and improvement in knowledge.	Stygofauna are known to be present within the unconfined aquifer of the coastal plain, upon which the project is located. Dewatering will be required during the construction of foundations but this will be for a limited time.	Investigate the presence of stygofauna within the portion of the aquifer likely to be affected by dewatering.	Determine if dewatering can be eliminated, reduced in duration or confine the zone of influence of dewatering. Also investigate the option of reinjecting dewater fluid into the aquifer down gradient of the proposal.
Pollution Management					
Groundwater quality	Groundwater within the zone of hydrological influence	To ensure that emissions do not adversely affect the environment or health, welfare and amenity of people and nearby land uses by meeting statutory requirements and acceptable standards	Unconfined groundwater in the area has >7000 mg/L total dissolved solids, and is unsuitable for potable supplies. Project water supplies will be drawn from a deeper aquifer for potable purposes, while construction requirements will be met from an on-site bore into the unconfined aquifer.	Additional information on the extent of hydrological influence from the site. Monitoring of the target aquifers to provide more detailed quality parameters, particularly related to stygofauna.	Ensure that on-site contaminants are fully contained to avoid potential adverse affects on groundwater quality.
Waste disposal	Project site	To ensure that liquid and solid wastes do not affect groundwater or surface water quality, nor lead to soil contamination.	Spillages could pollute surface or ground waters or cause soil contamination. Faunal habitats could be adversely impacted.	Investigate recycle opportunities to minimise waste disposal requirements. Identification of an approved waste disposal site. Determine effluent standards required to protect groundwater quality objectives.	Safe storage of chemicals and wastes on-site in compliance with appropriate regulations. Establish WWTP for sewage from construction and operational stages. Solid wastes will be removed to a licenced facility.

Social Surroundings					
Aboriginal heritage	Project site	To ensure that changes to the biophysical environment resulting from the proposal do not adversely affect historical and cultural associations within the area and comply with relevant heritage legislation.	No Aboriginal sites are registered within the project location.	A consultant will undertake consultation with Aboriginal people and on-site surveys as appropriate to locate any sites.	Any identified sites will be registered and will be avoided where possible. Provisions of the Aboriginal Heritage Act will be complied with.

Principle	Relevant Yes/No	If yes, consideration
<p><i>1. The precautionary principle</i></p> <p>Where there are threats of serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.</p> <p>In application of this precautionary principle, decisions should be guided by –</p> <p>(a) careful evaluation to avoid, where practicable, serious or irreversible damage to the environment; and</p> <p>(b) an assessment of the risk – weighted consequences of various options.</p>	No	Investigations required to provide sufficient information to address potential environmental impacts.
<p><i>2. The principle of intergenerational equity</i></p> <p>The present generation should ensure that the health, diversity and productivity of the environment is maintained and enhanced for the benefit of future generations.</p>	Yes	See 3. Information on long-term emissions, greenhouse gas emissions, with respect to Guidance Statement No. 12.
<p><i>3. The principle of the conservation of biological diversity and ecological integrity</i></p> <p>Conservation of biological diversity and ecological integrity should be a fundamental consideration.</p>	Yes	Flora and fauna surveys to be undertaken. DRF, TECs etc. to be checked. Quantity of vegetation loss.
<p><i>4. Principles relating to improved valuation, pricing and incentive mechanisms</i></p> <p>(1) Environmental factors should be included in the valuation of assets and services.</p> <p>(2) The polluter pays principles – those who generate pollution and waste should bear the cost of containment, avoidance and abatement.</p> <p>(3) The users of goods and services should pay prices based on the full life cycle costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste.</p> <p>(4) Environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structure, including market mechanisms, which enable those best placed to maximise benefits and/or minimise costs to develop their own solution and responses to environmental problems.</p>	No	
<p><i>5. The principle of waste minimisation</i></p> <p>All reasonable and practicable measures should be taken to minimise the generation of waste and its discharge into the environment.</p>	Yes	To be addressed in EMP.