Environmental Protection Authority

GOVERNMENT OF WESTERN AUSTRALIA

EPA REFERRAL FORM

Referral of a Proposal to the Environmental Protection Authority under Section 38 of the *Environmental Protection Act 1986*.

PURPOSE OF THIS FORM

Section 38 of the *Environmental Protection Act 1986* (EP Act) makes provision for the referral to the Environmental Protection Authority (EPA) of a proposal (significant proposals, strategic proposals and proposals under an assessed scheme) by a proponent, a decision making authority (DMA), or any other person.

The purpose of this form is to ensure that EPA has sufficient information about a proposal to make a decision about the nature of the proposal and whether or not the proposal should be assessed under Part IV of the EP Act. Information provided in the referral form must be brief (no more than 30 pages), sharp and succinct to achieve the purposes of this form.

This form does not prevent the referrer from providing a supplementary referral report. Should a referrer choose to submit a supplementary referral report please ensure the following.

i. Information is short, sharp and succinct.
ii. Attachments are below eight megabytes (8 MB) as they will be published on the EPA's website (exemptions apply) for public comment. To minimise file size, "flatten" maps and optimise pdf files.
iii. Cross-references are provided in the referral form to the appropriate section/s in the supplementary referral report.

This form is to be used for all proposals[1] which can be referred to the EPA under section 38 of the EP Act; i.e. referrals from: **proponents** of proposals (significant proposals, strategic proposals, derived proposals, proposals under an assessed scheme); **DMAs** (significant proposals); and **third parties** (significant proposals).

This form is divided into several sections, including; Referral requirements and Declaration; Part A - Information of the proposal and proponent; and Part B Environmental Factors. Guidance on successfully completing this form is provided throughout the form and is also available in the EPA's *Environmental Assessment Guideline for Referral of a Proposal under s38 of the EP Act (EAG 16)*.

Send completed forms to
Office of the Environmental Protection Authority
Locked Bag 10, East Perth WA 6892

or

Email: Registrar@epa.wa.gov.au

Enquiries
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Locked Bag 10, East Perth WA 6892
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[1] Please note that this form consolidates and replaces the following forms: *Referral of a Proposal by the Proponent to the EPA under section 38(1) of the EP Act*; *Referral of a Proposal by a third party to the EPA under section 38(1) of the EP Act*; and *Referral of a development proposal to the EPA by the decision making authority*.

Referral requirements and Declaration

The following section outlines the referral information required from a proponent, decision making authority and third party.

(a) Proponents

Proponents are expected to complete all sections of the form and provide GIS spatial data to enable the EPA to consider the referral. Spatial GIS data is necessary to inform the EPA's decision.

The EPA expects that a proponent will address Part B of the form as thoroughly as possible to demonstrate whether or not the EPA's objectives for environmental factors can be met.

If insufficient information is provided the EPA will request more information and processing of the referral will commence once the information is provided or the EPA decides to make a precautionary determination on the available information.

Proponent to complete before submitting form	
Completed all the questions in Part A (essential)	☒ Yes ☐ No
Completed all the questions in Part B	☒ Yes ☐ No
Completed all other applicable questions	☒ Yes ☐ No
Included Attachment 1 – any additional document(s) the proponent wishes to provide	☒ Yes ☐ No
Included Attachment 2 – confidential information (if applicable)	☒ Yes ☐ No
Enclosed an electronic copy of all referral information, including spatial data and contextual mapping but clearly separating any confidential information	☒ Yes ☐ No
Completed the Declaration	☒ Yes ☐ No
What is the type of proposal being referred? * *a referred proposal seeking to be declared a derived proposal*	☐ significant ☐ strategic ☐ derived* ☐ under an assessed scheme
Do you consider the proposal requires formal environmental impact assessment?	☐ Yes ☒ No
If yes, what level of assessment? *API = Assessment of Proponent Information* *PER = Public Environmental Review*	☐ API Category A ☐ API Category B ☐ PER

NB: The EPA may apply an Assessment on Proponent Information (API) level of assessment when the proponent has provided sufficient information about:

- the proposal;
- the proposed environmental impacts;
- the proposed management of the environmental impacts; and
- when the proposal is consistent with API criteria outlined in the *Environmental Impact Assessment (Part IV Division 1 and 2) Administrative Procedures 2012*.

If an API A formal level of assessment is considered appropriate, please refer to Environmental Assessment Guideline No. 14 *Preparation for an Assessment on Proponent Information (Category A) Environmental Review Document EAG 14* (EAG14).

Declaration

I, Lana Volkova., *(full name)* declare that I am authorised on behalf of UIL Energy Ltd (being the person responsible for the proposal) to submit this form and further declare that the information contained in this form is true and not misleading.

Signature: *Volkova*		Name (print) Lana Volkova		
Position	Senior Environmental Engineer	Organisation	UIL Energy Ltd	
Email	Lana.volkova@uilenergy.com			
Address	Level 9	1 Eagle Street		
	Brisbane		QLD	4001
Date	*09 March 2016*			

(b) Decision-making authority

The EPA expects decision-making authorities to complete applicable sections of Part A of the form and provide the proponent an opportunity to provide additional information in Part B of the form where appropriate.

Wherever possible the DMA should obtain relevant spatial information from the proponent and provide this to the EPA with the referral.

DMA to complete before submitting form	
Completed all the questions in Part A (essential)	☐ Yes ☐ No
Provided Part B to the proponent for completion	☐ Yes ☐ No
Completed all other applicable questions	☐ Yes ☐ No
Included Attachment 1 – any supporting information	☐ Yes ☐ No
Enclosed an electronic copy of all referral information, including spatial data and contextual mapping	☐ Yes ☐ No
Completed the below Declaration	☐ Yes ☐ No
Do you consider the proposal requires formal environmental impact assessment?	☐ Yes ☐ No
What is the type of proposal being referred?	☐ significant proposal ☐ significant proposal under an assessed scheme

Declaration

I, ……, *(full name)* submit this referral to the EPA for consideration of the environmental significance of its impacts.

Signature		Name (print)	
Position		Organisation	
Email			
Address	Street No.	Street Name	
	Suburb	State	Postcode
Date			

(c) Third Party

Third parties are asked to have consideration for the Significance Test outlined in Part A Section 1.5 of this form before referring a significant proposal to the EPA. The EPA will only consider proposals that are likely, if implemented, to have a significant effect on the environment.

Third parties are to provide sufficient information to clearly identify the significant proposal, the proponent, and their reasons for referring the proposal. This can be done by completing as much of Part A of the form as possible, taking into consideration the information available. Third parties may wish to fill in Part B of the form to advance their own views of the significance of the environmental impacts and the need for EPA assessment.

In most cases the EPA will seek additional information from the proponent. This will be to confirm or amend the identity of the proponent, the proposal, and to allow the proponent opportunity to provide its views on the significance of the environmental impacts and the need for EPA assessment.

Third Party to complete before submitting form	
Complete all applicable questions in Part A and B	☐ Yes ☐ No
Completed the Declaration	☐ Yes ☐ No
Do you consider the proposal requires formal environmental impact assessment?	☐ Yes ☐ No

Declaration

I, ……, *(full name)* submit this referral to the EPA for consideration of the environmental significance of its impacts.

Signature		Name (print)	
Email			
Position		Organisation	
Address	Street No.	Street Name	
	Suburb	State	Postcode
Date			

PART A: Information on the proposal and the proponent

All fields of Part A must be completed by the proponent and/or decision-making authority for this document to be processed as a referral. Third party referrers are only expected to fill in the fields they have information for.

1 PROPONENT AND PROPOSAL DESCRIPTION

1.1 The proponent of the proposal

Proponent and/or DMA to complete	
Name of the proponent	UIL Energy Ltd
Joint Venture parties (if applicable)	EP488, EP489 - UIL Energy Ltd 100% EP447 – UIL Energy Ltd 50% and GCC Methane 50%
Australian Company Number(s)	UIL Energy ACN/ABN 153352160/ 92153352160 GCC Methane Pty Ltd ACN 118 251 297
Postal Address *(Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State)*	GPO Box 3284 Brisbane 4001
Key proponent contact for the proposal *Please include: name; physical address; phone; and email.*	UIL Energy Ltd Lana Volkova Level 9, 1 Eagle Street, Brisbane, QLD 4000 (07) 3007 9600; (07) 3007 9608 (d) Lana.volkova@uilenergy.com
Consultant for the proposal (if applicable) *Please include: name; physical address; phone; and email.*	N/A

1.2 Proposal

Proposal is defined under the EP Act to mean a "project, plan, programme policy, operation, undertaking or development or change of land use, or amendment of any of the foregoing, but does not include scheme". Before completing this section please refer to Environmental Protection Bulletin 17 – Strategic and derived proposals (EPB 17) and Environmental Assessment Guideline for Defining the Key Characteristics of a proposal (EAG 1).

Proponent and/or DMA to complete	
Title of the proposal	**UIL Energy 2D Seismic Acquisition Survey**
What project phase is the proposal at?	☐ Scoping ☐ Feasibility ☐ Detailed design ☑ Other - approvals stage
Proposal type *More than one proposal type can be identified, however for filtering purposes it is recommended that only the primary proposal type is identified.*	☐ **Power/Energy Generation** ☐ Hydrocarbon Based – coal ☐ Hydrocarbon Based – gas ☐ Waste to energy ☐ Renewable – wind ☐ Renewable – wave

Proponent and/or DMA to complete	
	☐ Renewable – solar ☐ Renewable – geothermal ☐ **Mineral / Resource Extraction** ☐ Exploration – seismic ☐ Exploration – geotechnical ☐ Development ☑ **Oil and Gas Development** ☑ Exploration ☑ **Onshore – seismic** ☐ Onshore – geotechnical ☐ Onshore – development ☐ Offshore – seismic ☐ Offshore – geotechnical ☐ Offshore – development ☐ **Industrial Development** ☐ Processing ☐ Manufacturing ☐ Beneficiation ☐ **Land Use and Development** ☐ Residential – subdivision ☐ Residential – development ☐ Commercial – subdivision ☐ Commercial – development ☐ Industrial – subdivision ☐ Industrial – development ☐ Agricultural – subdivision ☐ Agricultural – development ☐ Tourism ☐ **Linear Infrastructure** ☐ Rail ☐ Road ☐ Power Transmission ☐ Water Distribution ☐ Gas Distribution ☐ Pipelines ☐ **Water Resource Development** ☐ Desalination ☐ Surface or Groundwater ☐ Drainage ☐ Pipelines ☐ Managed Aquifer Recharge ☐ **Marine Developments** ☐ Port ☐ Jetties ☐ Marina ☐ Canal

Proponent and/or DMA to complete	
	☐ Aquaculture ☐ Dredging *If other, please state below:* ☐ **Other** _____
Proponent and/or DMA to complete	
Description of the proposal – describe the key characteristics of the proposal in accordance with EAG 1.	The Proposal is to undertake 2D seismic acquisition within exploration permits 447, 488 and 489 in the locality of the town of Badgingarra, the Shire of Dandaragan. The Proposal is designed to acquire 264km of 2D seismic data. The Proposal includes the following key components: - preparation of seismic lines; - seismic data acquisition by generation of acoustic signal using vibroseis trucks; - rehabilitation and monitoring. The proposal will involve clearing up to 24ha of native vegetation within a Proposal area of 101,813ha. The Key Characteristics of the Proposal are defined in Section 1.2 of the Environmental Review Document, Attachment A.
Timeframe in which the proposal is to occur (including start and finish dates where applicable).	Providing key stakeholder approvals are granted, UIL Energy is planning to commence activities between March and April 2016. Should this time not become available, then the next suitable time-slot will not be until early 2017. It is expected that the Proposal will take 8 weeks to complete including mobilisation of crew, line preparation and clearing, data acquisition and rehabilitation (excluding ongoing rehabilitation monitoring).
Details of any staging of the proposal.	The on-ground component of the Proposal will be undertaken as a single stage project involving line preparation, seismic data acquisition and rehabilitation.
What is the current land use on the property, and the extent (area in hectares) of the property?	The current land use area in UIL Energy's exploration permits EP447, EP488, EP489 totals 155,200ha. The extent of the Proposal area is 101,813ha. Other current land uses within the Proposal area and approximate extent are: - Agricultural land (farm land) 75%; - National Parks and Nature Reserves 21.3%; - Unallocated Crown Land 1.9%; - Road reserves 1.8%.
Have pre-referral discussions taken place with the OEPA? If yes, please provide the case number. If a case number was not provided, please state the date of the meeting and names of attendees.	Meeting held on 21.07.2015. OEPA's attendees: Richard Sutherland, A/Manager Assessment and Compliance Division, Danielle Griffiths, Assessment and Compliance Division.
DMA (Responsible Authority) to complete	
For a proposal under an assessed scheme (as defined in section 3 of the EP	

Proponent and/or DMA to complete	
Act, applicable only to the proponent and DMA) provide details (in an attachment) as to whether: • *The environmental issues raised by the proposal were assessed in any assessment of the assessed scheme.* • *The proposal complies with the assessed scheme and any environmental conditions in the assessed scheme.*	

1.3 Strategic / derived proposals

Complete this section if the proposal being referred is a strategic proposal or you are seeking the proposal to be declared a derived proposal. Note: Only a proponent may refer a strategic proposal and seek a proposal to be declared a derived proposal.

Proponent to complete	
Is this referred proposal a strategic proposal?	☐ Yes ☒ No
Are you seeking that this proposal be declared a derived proposal?	☐ Yes ☒ No
If you are seeking that this proposal be declared a derived proposal, what is the Ministerial Statement number (MS #) of the associated strategic proposal?	MS #: _____

Location

Proponents and DMAs must provide spatial data. Please refer to EAG 1 for more detail.

Proponent, DMA and Third Party to complete	
Name of the Local Government Authority in which the proposal is located.	Shire of Dandaragan Shire of Coorow
Location: a) street address; lot number; suburb; and nearest road intersection; or b) if remote the nearest town; and distance and direction from that town to the proposal site.	The nearest town is Badgingarra. The proposal comes to within 15km to the south, 30km to the north and 15km to the west of the town of Badgingarra.
Have maps and figures been included with the referral (consistent with EAG 1 where appropriate)? *The types of maps and figures which need to be provided (depending on the nature of the proposal) include:* • *maps showing the regional location and context of the proposal; and* • *figures illustrating the proposal elements.*	☒ Yes ☐ No Attachment G: Figure 1 – Regional location and the Proposal area; Figure 2 – Conceptual design of the Proposal, Figure 3 –Tenure and land use
Proponent and DMA to complete	
Have electronic copies of spatial data been included with the referral? ***NB:*** *Electronic spatial (GIS or CAD) data, geo-referenced and conforming to the following parameters:* • *GIS: polygons representing all activities and named;* • *CAD: simple closed polygons representing all activities and named;* • *datum: GDA94;* • *projection: Geographic (latitude/longitude) or Map Grid of Australia (MGA);* • *format: ESRI geodatabase or shapefile, MapInfo Interchange Format, Microstation or AutoCAD..*	☒ Yes ☐ No UIL Energy Permits *shp (ESRI) The Proposal Area *shp (ESRI) The Proposal Layout *shp (ESRI)

1.4 Significance test and environmental factors

Proponent, DMA and Third Party to complete	
What are the likely significant environmental factors for this proposal?	☐ Benthic Communities and Habitat ☐ Coastal Processes ☐ Marine Environmental Quality ☐ Marine Fauna ☒ Flora and Vegetation ☐ Landforms ☐ Subterranean Fauna ☐ Terrestrial Environmental Quality ☒ Terrestrial Fauna ☐ Hydrological Processes ☐ Inland Waters Environmental Quality ☐ Air Quality & Atmospheric Gases ☐ Amenity ☐ Heritage

Proponent, DMA and Third Party to complete	
	☐ Human Health ☐ Offsets ☒ Rehabilitation and Decommissioning
Having regard to the Significance Test (refer to Section 7 of the *EIA Administrative Procedures 2012*) in what ways do you consider the proposal may have a significant effect on the environment and warrant referral to the EPA?	The Proposal may temporarily impact declared Environmentally Sensitive Areas. Environmental values to be temporarily impacted include native vegetation associated with the Badgingarra National Park which is listed as a class "A" reserve and Wongonderrah Nature Reserve which is listed as a class "C" reserve and potential foraging habitat for Carnaby's Black Cockatoo. UIL Energy has carried out a comprehensive environmental risk assessment to identify and assess the potential impacts of the Proposal on the environmental values through vegetation clearing. UIL Energy has considered 10 aspects of the significant test and concluded that the Proposal is unlikely to have a significant impact on the environment due to: - the temporary nature of the disturbance, short-term activities followed by rehabilitation of cleared areas and monitoring of rehabilitation success is not expected to lead to any significant long-term effects on identified environmental values. - UIL Energy commits to limit clearing to a maximum of 14.4ha within conservation reserve areas. - the scale (sparse grid spacing, discrete linear segments of cleared lines) and the extent of the impacts through vegetation clearing are extremely small and are unlikely to affect identified values of the environment. - the proposed clearing method (mulching) allows vegetation to recover in a relatively short timeframe (three wet seasons), as a consequence, the residual impact is highly unlikely to be significant; - cumulative impact with other projects is not expected to be significant given the temporary nature of the disturbance; - the mulching of vegetation has been adopted as best practice in the Perth Basin for seismic acquisition in preference to broad scale clearing. There is also strong evidence that native vegetation is able to recover within three wet seasons - the potential environmental impacts from native vegetation clearing for petroleum activities is appropriately regulated under the Part V (Clearing provisions) of the EP Act and an environmental plan subject to the PGER Act 1967. - avoidance and minimisation are the primary environmental performance objectives for the proposal with appropriate mitigation measures and management practices in place to ensure impacts to environmental values are minimised to as low as is reasonably practicable.

1.5 Confidential information

All information will be made publically available unless authorised for exemption under the EP Act or subject to the Freedom of Information Act 1992.

Proponent to complete	
Does the proponent request that the EPA treat any part of the referral information as confidential? *Ensure all confidential information is provided in a separate attachment in hard copy.*	☒ Yes ☐ No Appendix D-E-F-G of the Attachment C Attachment D – Initial Offset Proposal (until finalised) Attachment F – Justification letter

2 REGULATORY CONSIDERATIONS

This section applies to the Local, State and Commonwealth regulatory considerations for the referred proposal.

2.1 Government approvals

2.1.1 State or Local Government approvals

DMA to complete	
What approval(s) is (are) required from you as a decision-making authority?	
Is rezoning of any land required before the proposal can be implemented? If yes, please provide details.	☐ Yes ☐ No

2.1.2 Regulation of aspects of the proposal

Complete the following to the extent possible.

Proponent to complete	
Do you have legal access required for the implementation of all aspects of the proposal? *If yes, provide details of legal access authorisations / agreements / tenure.* *If no, what authorisations / agreements / tenure is required and from whom?*	☒ Yes ☐ No Petroleum exploration permits EP488 and EP489 granted on 28/05/2014 under the PGER Act 1967 for a period of six years. Heritage Protection Agreement (UIL Energy and Yued People) for EP488, EP489 dated 27/08/2013. Petroleum exploration permit renewal EP447 granted on 23/08/2013 under the PGER Act 1967 for a period of five years. UIL Energy holds 50% interest in EP447. Heritage Protection Agreement (UIL Energy and Yued People) for EP447 dated 23/09/2014

Outline both the existing approvals and approvals that will be / are being sought as a part of this proposal.

Proponent to complete			
Aspects* of the proposal	Type of approval	Legislation regulating this activity	Which State agency /entity regulate this activity?
Petroleum Exploration	Petroleum Exploration permits EP488, EP447, EP489	PGER Act 1967	DMP
Clearing of native vegetation	Referral under the EPBC Act Referral under the EP Act	s. 18 of the EPBC Act s. 38 of the EP Act	The Department of the Environment and the OEPA under Commonwealth – WA Bilateral Agreement
Clearing of native vegetation	Native Vegetation Clearing Permit	EP Act 1986 – Part V	DMP
Seismic acquisition	Permit to Enter a Reserve	PGER Act 1967 – Section 15A	DMP and DPAW
Operations	Environmental Plan Safety Management Plan	PGER Act 1967	DMP

**e.g. mining, processing, dredging*

2.1.3 Commonwealth Government *Environment Protection and Biodiversity Conservation Act 1999* approvals

Refer to the assessment bilateral agreement between the Commonwealth of Australia and the State of Western Australia for assistance on this section.

Proponent to complete	
1. Does the proposal involve an action that may be or is a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)?	☒ Yes ☐ No *If no continue to Part A section 2.1.4.*
2. What is the status of the decision on whether or not the action is a controlled action?	☐ Proposal not yet referred ☒ Proposal referred, awaiting decision ☐ Assessed – controlled action ☐ Assessed – not a controlled action
3. If the action has been referred, when was it referred and what is the reference number (Ref #)?	Date: 28 August 2015 Ref #: *2015/7554*
4. If the action has been assessed, provide the decision in an attachment. Has an attachment been provided?	☐ Yes ☐ No
5. Do you request this proposal to be assessed under the bilateral agreement?	☒ Yes ☐ No

Complete the following to the extent possible for the Public Comment of EPBC Act referral documentation.

Proponent to complete	
6. Have you invited the public to comment on your referral documentation?	☒ Yes ☐ No
7. How was the invitation published?	☐ newspaper ☒ website
8. Did the invitation include all of the following?	
(a) brief description of the action	☒ Yes ☐ No
(b) the name of the action	☒ Yes ☐ No
(c) the name of the proponent	☒ Yes ☐ No
(d) the location of the action	☒ Yes ☐ No
(e) the matters of national environmental significance that will be or are likely to be significantly impacted	☒ Yes ☐ No
(f) how the relevant documents may be obtained	☒ Yes ☐ No
(g) the deadline for public comments	☒ Yes ☐ No

Proponent to complete	
(h) available for public comment for 14 calendar days	☒ Yes ☐ No
(i) the likely impacts on matters of national environmental significance	☒ Yes ☐ No
(j) any feasible alternatives to the proposed action	☒ Yes ☐ No
(k) possible mitigation measures	☒ Yes ☐ No
9. Were any submissions received during the public comment period?	☐ Yes ☒ No
10. Have public submissions been addressed? If yes provide attachment.	☐ Yes ☐ No

2.1.4 Other Commonwealth Government Approvals

Proponent, DMA and Third Party to complete			
Is approval required from other Commonwealth Government/s for any part of the proposal?		☐ Yes ☒ No *If yes, please complete the table below.*	
Agency / Authority	Approval required	Application lodged?	Agency / Local Authority contact(s) for proposal
		☐ Yes ☐ No	
		☐ Yes ☐ No	

3. SUPPORTING INFORMATION

Please attach copies of any relevant information on the proposal, supporting evidence and / or existing environmental surveys, studies or monitoring information undertaken and list the documents below.

Proponent, DMA and Third Party to complete			
1	UIL Energy 2D seismic survey – Desktop Study.	UIL Energy	The preliminary desktop assessment to identify environmental values, sensitivities, quality and extent within the project area. Summary of the UIL Desktop Study is provided as **Attachment B** to the Environmental Review Document.
2	On-ground Ecological Assessment Report	Astron Environmental Services	On-ground ecological (flora/fauna) survey to investigate and assess baseline conditions of environmental values within the proposed disturbance. The Report is provided as **Attachment C**.
3	UIL Energy Environmental Review Document	UIL Energy	The document supports the Proposal referral application in accordance with EPA's Environmental Assessment Guidelines No.1 Defining the Key Characteristics of a Proposal (May 2012) and No.14 Preparation of an API-A Environmental Review Document (January 2015) and provided as **Attachment A**.
4	Offsets – Initial proposal	UIL Energy	UIL proposal to offset environmental impacts caused by temporary clearing of native vegetation, provided as **Attachment D**
5	EPBC MNES Draft for Public Comment	UIL Energy	Extract from UIL Environmental Review Document, section 6 – EPBC MNES for public comment, **Attachment E**
6	Justification Letter	UIL Energy	Letter to justify proposed 2D seismic survey layout and acquisition methodology, **Attachment F** (commercial in confidence).

PART B: ENVIRONMENTAL FACTORS

The purpose of Part B is to assist the EPA to determine the significance of the likely environmental impacts of the proposal in accordance with the EPA's *Environmental Assessment Guideline for Environmental factors and objectives* (EAG 8) and *Environmental Assessment Guideline for Application of a significant framework in the EIA process* (EAG 9). Referrers completing Part B should refer closely to EAG 8 and EAG 9.

The EPA has prepared *Referral of a Proposal under s38 of the EP Act EAG No.16 - Appendix A* (Appendix A) to assist in identifying factors and completing the below table. Further guidance can be found in the guidance and policy documents cited in Appendix A under each factor.

How to complete Part B
For each environmental factor, that is likely to be significantly impacted by the implementation of the proposal, make a copy of the table below and insert a summary of the relevant information relating to the proposal. The table can be broken down into more than one table per factor, if the need arises. For example the hydrological processes factor can be presented in two separate tables, one for surface water and one for groundwater, or similarly one for construction and one for operations.

For complex proposals a supplementary referral report can be provided in addition to the referral form. If this option is chosen the table must still be completed (summaries are acceptable) to assist the Office of the EPA with statistical reporting and filtering proposals for processing.

Proponents expecting an API level of assessment must provide information in accordance with the EPA's *Environmental Assessment Guideline for Preparation of an API-A environmental review document* (EAG 14).

For each of the significant environmental factors, complete the following table (Questions 1 – 10).

KEY FACTOR – FLORA AND VEGETATION		
1	Factor, *as defined in EAG 8*	Flora and vegetation
2	EPA Objective, *as defined in EAG 8*	To maintain representation, diversity, viability and ecological function at the species, population and community level
3	Guidance - what established policies, guidelines, and standards apply to this factor in relation to the proposal?	Environmental Protection Authority (EPA) Position Statement No. 3, *Terrestrial Biological Surveys as an Element of Biodiversity Protection* (EPA 2002). EPA Guidance Statement No. 51, *Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia* (EPA 2004a). The Environmental Protection (Clearing of Native Vegetation) Regulations 2004. DER Guide 6 – A guide to native vegetation clearing processes under the assessment bilateral agreement 2014; DER Guide to preparing revegetation plans for clearing permits, 2013 Schedule of Onshore Petroleum Exploration and Production Requirements 1991 (as amended May 2010).
4	Consultation - outline the need for consultation and the outcomes of any consultation in relation to the potential environmental impacts, including: • *Anticipated level of public interest in the impact;*	UIL Energy has consulted with the DMP regarding the proposed layout overlapping conservation areas. UIL Energy has consulted with the DPaW regarding timeframe for on-ground ecological survey and proposed mitigation measures to avoid protected vegetation. UIL Energy has consulted with Astron Environmental Services regarding preliminary advice on existing environment and a level of ecological flora/fauna surveys.

KEY FACTOR – FLORA AND VEGETATION		
	• *consultation with regulatory agencies; and* • *consultation with community.*	UIL Energy has consulted with relevant landholders to obtain land access for the on-ground ecological survey. Access was granted, sensitive areas were avoided. UIL Energy has also been consulting with the local indigenous group, the Yued People, who have a Native Title claim over the proposed action area and their representatives, the South West Aboriginal Land and Sea Council, since 2013. UIL's EPBC Act referral application was released on the DotE website for 14 days public consultation. No submissions were received. Stakeholder consultation will also be required under the Part IV (this referral) or Part V (Clearing Permit) of the EP Act 1986. Consultations with DPAW, OEPA and DMP will be required to identify potential environmental offsets to counterbalance any significant residual impacts associated with the Proposal.
5	Baseline information - describe the relevant characteristics of the receiving environment. *This may include: regional context; known environmental values, current quality, sensitivity to impact, and current level of cumulative impacts.*	Current land uses within the Proposal area consist of 75% of cleared farm land, 21.3% state conservation land, 1.9% unallocated crown land and 1.8% road reserves and other linear infrastructure. A desktop assessment (Attachment B) identified the Proposal area as having a total of 116 protected flora species and eight protected fauna species. DRF and Priority flora species are mostly located within declared conservation areas. No Threatened and Priority Ecological communities were identified within the Proposal area. The Proposal area also consists of potential foraging habitat for Carnaby's Black Cockatoo. The EPBC Protected Matters Database search identified a total of 10 introduced (exotic) taxa recorded as weeds of national significance (WoNS). In addition, one site in the eastern part of the Proposal area is declared as a dieback disease area. For more details refer to *Attachment B – UIL 2D SS Desktop Study (Existing Environment)*. During the on-ground botanical assessment no threatened flora species and declared rare flora species were recorded within the proposed disturbance area. No threatened and priority ecological communities (TEC/PEC) were recorded within the proposed disturbance area. Fifteen listed priority (P1-P4) flora species were identified within the proposed disturbance area. Five introduced flora species (weeds) were recorded in the survey area. Weeds density and diversity was minimal and mostly recorded along existing tracks and within road reserves. Four broad vegetation types were identified within proposed disturbance area: *Banksia* woodland/shrubland, sparse eucalypt woodland, dampland and low heath. Signs of dieback disease were observed within Wongonderrah Reserve and on some private properties. For more details refer to *Attachment C – Astron's On-ground Ecological Assessment Report*. **Current cumulative impacts**: The Proposal occurs in the recognised "agricultural area" where significant clearing of native vegetation has already occurred and has led to a reduction in biodiversity. The Proposal is adjacent to Coojarloo mining lease that will continue to expand outside of the Proposal area predominantly to the south-east.
6	Impact assessment - describe the potential impact/s that may occur to the environmental factor as a result of implementing the proposal.	The Proposal requires clearing of 24ha of vegetation, based on 4.5m seismic line width. Of this, up to 14ha is proposed within declared Environmentally Sensitive Areas (the Badgingarra National Park and Wongonderrah Nature Reserve). The clearing may result in a temporary reduction in native vegetation including priority flora species and the introduction or spread of weeds or dieback disease.
7	Mitigation measures - what measures are proposed to mitigate the potential	**Avoidance**: The Proposal has been designed to reduce the disturbance footprint by utilising, as much as possible, existing cleared areas such as

KEY FACTOR – FLORA AND VEGETATION		
	environmental impacts? The following should be addressed: • *Avoidance - avoiding the adverse environmental impact altogether;* • *Minimisation - limiting the degree or magnitude of the adverse impact;* • *Rehabilitate – restoring the maximum environmental value that is reasonably practicable; and* • *Offsets – actions that provide environmental benefits to counterbalance significant residual environmental impacts or risks of a project or activity.*	firebreaks, fence lines, access tracks and traverse farm land. This accounts for 80% or 212 linear km of the Proposal footprint. Only 20% or 54 linear km of the proposed layout requires clearing of vegetation to allow access for seismic trucks. UIL has also modified the seismic survey methodology to remove up-holes from the seismic survey program, totally eliminating impacts associated with drilling activities. An on-ground botanical survey was undertaken to provide baseline information, quantify ecological values, confirm vegetation conditions on existing tracks and previously disturbed areas where seismic lines were relocated to minimise clearing footprint, and ensure that no threatened flora species were located within established alignments by deviating/adjusting alignments to avoiding identified locations of threatened flora/fauna species, mature trees and potential breeding habitat for conservation significant fauna. Differential GPS (DGPS) instruments were used to achieve high accuracy in recording the search areas and in the location of identified conservation significant flora species. **Minimisation**: UIL Energy has considered a low-impact seismic (LIS) method for operations within high ecological value areas. To minimise the clearing footprint, UIL is proposing to reduce the width of seismic lines to a maximum of 4.5m or just wide enough to accommodate seismic trucks in comparison with 6m in conventional seismic methods. The actual width will depend on factors such as terrain, vegetation cover, density of vegetation, valued ecosystem components and safety. In reality 3.6m will, in most cases, be sufficient - reducing the overall clearing footprint by a further 20%. UIL Energy has selected “mulching” as an option to mitigate potential impacts from clearing of native vegetation. This method involves cutting vegetation above ground only and mulching greenstock with immediate replacement of mulch in-situ. This technique was accepted as best practice in recent 3D seismic surveys carried out by Norwest Energy and Warrego Energy in the Perth Basin. Where practical, vegetation will be rolled flat. Areas proposed for clearing will be clearly marked or GPS navigated equipment will be used to prevent accidental clearing. Activities will be carried in the dry weather to minimise chance of weeds and dieback disease spread. Clean down procedures will be in place to minimise spread of weeds and dieback disease. Vehicles, machinery, equipment and PPE will be cleaned down on established clean-up stations on entry and exit of dieback disease areas. Personnel will be inducted on requirements for vehicles, PPE and clean down equipment. To minimise overall impacts associated with the Proposal, all activities will be undertaken in accordance with an activity specific Environmental Plan subject to the Department of Mines and Petroleum approval under the PGER Act 1967. **Rehabilitation**: Disturbed areas will be rehabilitated immediately after completion of the survey. Rehabilitation will be subject to the previous land use conditions. The proposed mulching method stabilises the environment for roots and seeds and promotes re-growth. It is expected that disturbed areas will be rehabilitated quickly with a high rate of vegetation re-growth in a relatively short time - three wet seasons. For more details refer to Section 2.2.4 of the ERD.

KEY FACTOR – FLORA AND VEGETATION		
		Offsets: Considering the temporary nature and limited extent of disturbance with proposed mitigation measures in place, UIL Energy believes that residual environmental impacts through vegetation clearing is unlikely to be significant. UIL Energy is currently investigating environmental offsets to counterbalance any significant residual impacts associated with the Proposal. UIL Energy's initial offset proposal is discussed in details in Attachment D to the ERD.
8	Residual impacts – review the residual impacts against the EPA objectives. *It is understood that the extent of any significant residual impacts may be hard to quantify at the referral stage. Referrers are asked to provide, as far as practicable, a discussion on the likely residual impacts and form a conclusion on whether the EPA's objective for this factor would be met if residual impacts remain. This will require:* • *quantifying the predicted impacts (extent, duration, etc.) acknowledging any uncertainty in predictions;* • *putting the impacts into a regional or local context, incorporating knowable cumulative impacts; and* • *comparison against any established environmental policies, guidelines, and standards.*	It is proposed to clear no more than 24ha. This is approximately 0.02% of the Proposal area - which is approximately 101,813ha. Of this, up to 14ha is proposed within the Badgingarra National Park and Wongonderrah Nature Reserve which is 0.08% of the total Parks and Wildlife managed conservation land extent - which is approximately 22,466ha within the Proposal area. In view of the temporary nature, limited extent of the disturbance and proposed mitigation measures, UIL Energy considers the impacts of the Proposal can be managed to meet the EPA's objectives and that the residual impacts of implementation of the proposal are unlikely be significant – primarily due to: - relatively small and sparse area of temporary disturbance proposed within Environmentally Sensitive Areas; - life of the Proposal is approximately 8 weeks (subject to weather conditions), including line preparation, clearing of vegetation, seismic data acquisition and immediate rehabilitation; - proposed clearing will be undertaken in discrete linear segments with spacing between lines varying from 2km to 9km; - proposed clearing will avoid tall and mature trees - maximum height of cleared vegetation will be 1.5m and as a result revegetation is expected to occur relatively quickly; - the time lag associated with rehabilitation is unlikely to be significant – rehabilitation and regrowth will commence immediately following clearing; - the area of vegetation that is proposed for clearing is not an isolated remnant vegetation area due to it being surrounded by similar vegetation which covers an area of about 22,466ha; - considering the proposed clearing methods together with rehabilitation and monitoring in place it is expected that 70-80% of vegetation recovery (re-growth) will occur within three wet seasons anticipating. However, the rate of regeneration may be impacted by environmental conditions such as drought or bushfire.
9	EPA's Objective – from your perspective and based on your review, which option applies to the proposal in relation to this factor? *Refer to EAG 9*	☒ *meets the EPA's objective* ☐ *may meet the EPA's objective* ☐ *is unlikely to meet the EPA's objective*
10	Describe any assumptions critical to your conclusion (in Question 9). *e.g. particular mitigation measures or regulatory conditions.*	Force majeure events such as drought or fire can be critical to meet the EPA's objective for this factor in timely manner. UIL Energy considers that there are no other assumptions that would be critical to meeting the EPA's objective. The following factors are considered to be particularly relevant in this regard: - proposed mitigation measures such as avoidance of threatened flora/fauna species and appropriate clearing methods will reduce potential impacts to ALARP; - rehabilitation and at least 5 years monitoring will ensure that the land is rehabilitated to its previous land use and conditions; - proposed mitigation measures and management practices (e.g. clearing methods) have been adopted as a best practice by

KEY FACTOR – FLORA AND VEGETATION		
		exploration companies for recent seismic acquisitions in the Perth Basin.

POTENTIAL KEY FACTOR – TERRESTRIAL FAUNA		
1	Factor, *as defined in EAG 8*	Terrestrial Fauna
2	EPA Objective, *as defined in EAG 8*	To maintain representation, diversity, viability and ecological function at the species, population and assemblage level
3	Guidance - what established policies, guidelines, and standards apply to this factor in relation to the proposal?	*Survey guidelines for Australia's threatened mammals: Guidelines for detecting mammals listed as threatened under the EPBC Act 1999*, DotE, 2011. *Survey guidelines for Australia's threatened reptiles*, DotE, 2011. *EPBC Act 1999 referral guidelines for three threatened black cockatoo species: Carnaby's cockatoo, Baudin's cockatoo and Forest red-tailed black cockatoo*, DotE 2012. *Terrestrial Fauna Surveys for Environmental Impact Assessment in Western Australia, Guidance Statement 56*, EPA, 2004. *Technical Guide Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment* (EPA/DPaW 2010). *Carnaby's Cockatoo Recovery Plan*, Western Australian Wildlife Management Program No. 52, DPAW, 2013. *Western Spiny-tailed Skink (Egernia stokesii) Recovery Plan*, Western Australia Department of Environment and Conservation, 2012.
4	Consultation - outline the need for consultation and the outcomes of any consultation in relation to the potential environmental impacts, including: • *anticipated level of public interest in the impact;* • *consultation with regulatory agencies; and* • *consultation with community.*	UIL Energy has consulted with the DPaW regarding timeframe for on-ground fauna survey and relevant environmental aspects. UIL Energy has consulted with Astron Environmental Services regarding preliminary advice on existing environment and a level of fauna surveys. UIL Energy has consulted with relevant landholders to obtain land access for the on-ground ecological survey. Access was granted, sensitive areas were avoided. UIL's EPBC Act referral application was released on the DotE website for 14 days public consultation. No submissions were received. Stakeholder consultation will be also required under the Part IV or Part V of the EP Act 1986. Consultations with DPAW, OEPA and DMP will be required to identify potential environmental offsets to counterbalance any significant residual impacts associated with the Proposal.
5	Baseline information - describe the relevant characteristics of the receiving environment. *This may include: regional context; known environmental values, current quality, sensitivity to impact, and current level of cumulative impacts.*	Thirteen conservation significant species were identified in the desktop assessment (UIL Energy Ltd 2015). Of these, one species, Baudin Island spiny-tailed skink (*Ergenia stokesii aethiops*) is a synonym for the western spiny-tailed skink and is no longer used (OEPA advice, 2015). Three other previously listed species: white-bellied sea-eagle (*Haliaeetus leucogaster*), carpet python (*Morelia spilota imbricata*) and woma python (*Aspidites ramsayi*) are no longer listed as conservation significant under the EPBC Act and/or WC Act. Of the remaining nine conservation significant species, two – malleefowl (*Leipoa ocellata*) and chuditch (*Dasyurus geoffroii*) - were considered to be of moderate likelihood and seven were considered to be low likelihood of occurring within the Proposal area. Following the field survey, the western spiny-tailed skink (*Egernia stokesii badia*) was considered unlikely to occur within the survey area as no suitable habitat was recorded. Overall, sixty-nine fauna species were recorded during the fauna

POTENTIAL KEY FACTOR – TERRESTRIAL FAUNA		
		survey including one amphibian species, 15 reptile species, 46 bird species (including two conservation significant and one introduced species) and seven mammal species (including one conservation significant and three introduced species). These species were identified either by sight or indirect evidence, such as calls and scats. Four fauna habitat types were identified during the field survey: *Banksia* woodland/shrubland, sparse eucalypt woodland, dampland and low heath. The Banksia woodland/shrubland, sparse eucalypt woodland and low heath habitats would be considered suitable Carnaby's black cockatoo foraging habitat.
6	Impact assessment - describe the potential impact/s that may occur to the environmental factor as a result of implementing the proposal.	Direct impacts on fauna species may include death or injury of fauna during clearing of vegetation and as a result of collisions with motor vehicles. Vibration and noise from vehicles may disturb fauna impacting their feeding habits. It is unlikely that the Proposal will result in direct loss of any individuals or decrease in size of population. However, the Proposal has the potential to affect fauna habitat through vegetation clearing. This may result in the following impacts: - temporary reduction in potential foraging habitat for Carnaby's Black Cockatoo as approximately 97% of proposed clearing footprint contains potential foraging habitat, however the clearing footprint represents 0.1% of potential foraging resources contained within the Proposal area; - increased feral fauna predation and competition for resources as a result of increased accessibility and use of linear pathways.
7	Mitigation measures - what measures are proposed to mitigate the potential environmental impacts? The following should be addressed: • *Avoidance - avoiding the adverse environmental impact altogether;* • *Minimisation - limiting the degree or magnitude of the adverse impact;* • *Rehabilitate – restoring the maximum environmental value that is reasonably practicable; and* • *Offsets – actions that provide environmental benefits to counterbalance significant residual environmental impacts or risks of a project or activity.*	**Avoidance** The on-ground fauna assessment was conducted to assess and quantify values of fauna species and associated habitats. The fauna assessment was aimed to avoid protected fauna habitats within the proposed alignments. No suitable breeding/ roosting habitat of protected fauna species were detected or recorded during the survey within the proposed alignments. The Proposal is scheduled between February and April avoiding breeding cycles of fauna species. Low speed limits will be in place to prevent collisions with fauna. Clearing will be undertaken in discrete linear segments allowing 2-9km spacing between lines and less than 4.5m width to prevent fragmentation of fauna habitat. **Minimisation** Slow moving fauna encountered during clearing activities will be allowed to make their own way from the area. Feeding of fauna, hunting or keeping animals will be prohibited. Appropriate clearing methods will be used to retain vegetation rootstock and seeds in-situ and mulching to facilitate rehabilitation and reduce time lag for recovery of vegetation. The reduction in habitat will be temporary and low in overall percentage of the available habitat. Field personnel will be inducted on potential areas of protected fauna species and its habitat and instructed on what to do if they accidently hit or injure wildlife. Waste management measures will be implemented to prevent attraction of feral fauna species (there will be no littering especially food scraps, no on-site waste storage, no on-site camping). Increased predations, from alteration of feral fauna habitat, will be mitigated by supplementing the DPAW's Western Shield fox baiting program in the area. This will be achieved through consultation with the DPaW and DMP.

POTENTIAL KEY FACTOR – TERRESTRIAL FAUNA		
		Rehabilitation Injured animals will be transferred to a local wildlife facility. Where required piled woody debris, logs and rocks will be re-spread immediately following completion of the survey. In regards to fauna habitat, cleared and disturbed areas will be rehabilitated immediately after completion of the seismic survey. Rehabilitation will be subject to previous land use conditions. Rehabilitation success will be monitored for at least 5 years. **Offsets** No direct long-term impacts and significant residual impacts on protected fauna species or populations are expected. Therefore, no requirement for offsets is anticipated for this factor. It is more appropriate to consider indirect impacts through clearing of vegetation associated with fauna habitat. UIL Energy is currently investigating provision of environmental offsets.
8	Residual impacts – review the residual impacts against the EPA objectives. *It is understood that the extent of any significant residual impacts may be hard to quantify at the referral stage. Referrers are asked to provide, as far as practicable, a discussion on the likely residual impacts and form a conclusion on whether the EPA's objective for this factor would be met if residual impacts remain. This will require:* • *quantifying the predicted impacts (extent, duration, etc.) acknowledging any uncertainty in predictions;* • *putting the impacts into a regional or local context, incorporating knowable cumulative impacts; and* • *comparison against any established environmental policies, guidelines, and standards.*	Due to the mobile and widely distributed nature of the fauna species, disturbance to fauna species will be temporary and mostly limited to machinery and vehicle movements; therefore, it is unlikely that the Proposal will result in any residual impact on fauna species or populations. It is more appropriate to consider indirect impacts through clearing of native vegetation associated with foraging habitat for endangered fauna species. In this aspect, the reduction in habitat will be temporary and low in overall percentage of the available habitat. Appropriate clearing methods (mulching) will be used to facilitate rehabilitation. This technique was accepted as best practice in recent 3D seismic surveys carried out by Norwest Energy and Warrego Energy in the Perth Basin. There is also evidence that the proposed "mulching" method results in a high rate of vegetation re-growth in a relatively short time. It is expected that 70-80% of vegetation recovery will occur within three wet seasons, with restoration of full ecosystem functions within five years.
9	EPA's Objective – from your perspective and based on your review, which option applies to the proposal in relation to this factor? *Refer to EAG 9*	☒ *meets the EPA's objective* ☐ *may meet the EPA's objective* ☐ *is unlikely to meet the EPA's objective*
10	Describe any assumptions critical to your conclusion (in Question 9). *e.g. particular mitigation measures or regulatory conditions.*	Force majeure events such as drought or fire can be critical to meet the EPA's objective for this factor in timely manner.

INTEGRATING FACTOR – REHABILITATION AND DECOMMISSIONING		
1	Factor, *as defined in EAG 8*	Rehabilitation and decommissioning
2	EPA Objective, *as defined in EAG 8*	To ensure that premises are closed, decommissioned and rehabilitated in an ecologically sustainable manner.
3	Guidance - what established policies, guidelines, and standards apply to this factor in relation to the proposal?	EPA Guidance Statement No. 6 Rehabilitation of Terrestrial Ecosystems (EPA, 2006a); Schedule of Onshore Petroleum Exploration and Production Requirements 1991 (as amended May 2010).
4	Consultation - outline the need for consultation and the outcomes of any consultation in relation to the potential environmental impacts, including: • *anticipated level of public interest in the impact;* • *consultation with regulatory agencies; and* • *consultation with community.*	Clearing is proposed within Environmentally Sensitive Areas that are managed by the DPAW and unallocated crown land that is managed by the DMP. Consultations will be required with these agencies in regards to proposed rehabilitation strategies. Where clearing is proposed on crown land or freehold land, consultations with relevant landowners/leaseholders will be required as part of the Land Access Compensation Agreement process.
5	Baseline information - describe the relevant characteristics of the receiving environment. *This may include: regional context; known environmental values, current quality, sensitivity to impact, and current level of cumulative impacts.*	Up to 24ha of cleared area will require rehabilitation. This includes the following impacted environmental values: • approx.14ha within Environmentally Sensitive Areas associated with the Badgingarra National Park and Wongonderrah Nature Reserve; and • approx. 23.5ha of suitable foraging habitat for Carnaby's Black Cockatoo. This includes 14ha described above. The identified EPBC Act MNES and the State protected environmental values overlap within the Proposal area.
6	Impact assessment - describe the potential impact/s that may occur to the environmental factor as a result of implementing the proposal.	A failure to successfully rehabilitate cleared areas may result in the following potential impacts: - loss or degradation of priority flora species and associated habitat; - loss or degradation of potential foraging habitat for Carnaby's Black Cockatoo; - introduction of weeds, plant diseases and feral animals.
7	Mitigation measures - what measures are proposed to mitigate the potential environmental impacts? The following should be addressed: • *Avoidance - avoiding the adverse environmental impact altogether;* • *Minimisation - limiting the degree or magnitude of the adverse impact;* • *Rehabilitate – restoring the maximum environmental value that is reasonably practicable; and* • *Offsets – actions that provide environmental benefits to counterbalance*	UIL Energy is obliged, under the petroleum exploration permit requirements, to restore and rehabilitate all damage in a manner consistent with current standards and without unacceptable liability to the State. The following mitigation measures will be implemented to maximise rehabilitation success: - a flora/vegetation survey and fauna assessment was undertaken to provide baseline information and quantify environmental values; - using appropriate clearing methods to retain vegetation rootstock and seeds in-situ and mulching to facilitate rehabilitation; - mulched material will be re-spread immediately at its point of origin with excess to be stored in windrows and re-spread immediately following completion of the survey. Mulched material will become composted within 6-12 months introducing nutrients to soil to facilitate regrowth; - all clean-down points will be removed, contaminated material will be disposed of appropriately;

INTEGRATING FACTOR – REHABILITATION AND DECOMMISSIONING		
	significant residual environmental impacts or risks of a project or activity.	- temporary access tracks will be closed to prevent unauthorised third party access (i.e. the verges of public tracks will be reinstated to conceal the point at which seismic vehicles have crossed); - rehabilitation completion criteria will be established in consultation with relevant stakeholders; - rehabilitation progress will be monitored for at least 5 years to ensure rehabilitation completion criteria are met.
8	Residual impacts – review the residual impacts against the EPA objectives. *It is understood that the extent of any significant residual impacts may be hard to quantify at the referral stage. Referrers are asked to provide, as far as practicable, a discussion on the likely residual impacts and form a conclusion on whether the EPA's objective for this factor would be met if residual impacts remain. This will require:* • *quantifying the predicted impacts (extent, duration, etc.) acknowledging any uncertainty in predictions;* • *putting the impacts into a regional or local context, incorporating knowable cumulative impacts; and* • *comparison against any established environmental policies, guidelines, and standards.*	All cleared areas will be rehabilitated to the previous land use conditions. Considering the proposed clearing methods together with rehabilitation practices and environmental conditions of the area, it is expected that 70-80% of vegetation recovery (re-growth) will occur within three wet seasons, with restoration of full ecosystem functions within five years. Residual impacts resulting from rehabilitation may include: - partial recovery of vegetation due to changes in weather conditions or from inappropriate closure of disturbed areas leading to unauthorised third party access; - longer period for recovery due to drought or fire. Since the proposed rehabilitation practices have been adopted as a best practice by exploration companies for seismic activities (Norwest Energy 3D seismic acquisition 2015 and Warrego Energy 3D seismic acquisition 2015) in the Perth Basin and given the limited extent of the disturbance, the residual impacts resulting from rehabilitation is unlikely to be significant.
9	EPA's Objective – from your perspective and based on your review, which option applies to the proposal in relation to this factor? *Refer to EAG 9*	☒ *meets the EPA's objective* ☐ *may meet the EPA's objective* ☐ *is unlikely to meet the EPA's objective*
10	Describe any assumptions critical to your conclusion (in Question 9). *e.g. particular mitigation measures or regulatory conditions.*	Force majeure events such as drought or fire can be critical to meet the EPA's objective for this factor in timely manner.

INTEGRATING FACTOR – OFFSETS		
1	Factor, *as defined in EAG 8*	Offsets
2	EPA Objective, *as defined in EAG 8*	To counterbalance any significant residual environmental impacts or uncertainty through the application of offsets
3	Guidance - what established policies, guidelines, and standards apply to this factor in relation to the proposal?	WA Environmental Offsets Policy 2011; WA Environmental Offsets Guidelines 2014; Environmental Protection Bulletin No.1 – Environmental Offsets 2014;

INTEGRATING FACTOR – OFFSETS		
		Part V of the Environmental Protection Act 1986; The EPBC Act Environmental Offsets Policy 2007; Offsets Assessment Guide under the EPBC Act; Clearing of Native Vegetation Offsets Procedure under the EP Act 1986, 2014.
4	Consultation - outline the need for consultation and the outcomes of any consultation in relation to the potential environmental impacts, including: • *anticipated level of public interest in the impact;* • *consultation with regulatory agencies; and* • *consultation with community.*	Where clearing of native vegetation occurs on crown land declared or managed for the purpose of conservation or unallocated crown land UIL Energy will consult the OEPA, the DPaW and the DMP to justify any offset and quantify that offset.
5	Baseline information - describe the relevant characteristics of the receiving environment. *This may include: regional context; known environmental values, current quality, sensitivity to impact, and current level of cumulative impacts.*	Up to 24ha of native vegetation will require temporary clearing within the Proposal area. Up to 14ha of this clearance is proposed within the Badgingarra National Park and Wongonderrah Nature Reserve. This will result in 0.08% temporary reduction of vegetation associated with Parks and Wildlife managed conservation significant lands located within the Proposal area. Environmental values of the proposed temporary clearing include: - 14ha of native vegetation and priority flora species within ESAs namely the Badgingarra National Park and Wongonderrah Nature Reserve; - 97% (or 23.5ha) of the proposed clearing footprint is associated with potential foraging habitat for Carnaby's Black Cockatoo however the clearing footprint represents 0.1% of potential foraging resources contained within the Proposal area. This includes 14ha described above. Details are provided in Table 5.2-1: Assessment of key environmental factors, Environmental Review Document, Attachment A.
6	Impact assessment - describe the potential impact/s that may occur to the environmental factor as a result of implementing the proposal.	At this stage of assessment potential impacts associated with the Proposal have been identified as temporary localised impacts on areas managed for the purpose of conservation and environmental values associated within these areas (the Badgingarra National Park, Wongonderrah Nature Reserve) and potential habitat for Carnaby's Black Cockatoo.
7	Mitigation measures - what measures are proposed to mitigate the potential environmental impacts? The following should be addressed: • *Avoidance - avoiding the adverse environmental impact altogether;* • *Minimisation - limiting the degree or magnitude of the adverse impact;* • *Rehabilitate – restoring the maximum environmental value that is reasonably practicable; and*	UIL Energy is obliged, under the petroleum exploration permit requirements, to restore, rehabilitate or compensate all damage resulting from exploration activities in a manner consistent with current standards and without unacceptable liability to the State. It should also be noted that the proposed clearing footprint is based on a maximum 4.5m seismic line width. In reality a 3.6m cleared width should be adequate in most circumstances - reducing the overall clearing footprint by up to 20%. Disturbed areas will be rehabilitated expecting 70-80% of vegetation recovery (re-growth) to occur within three wet seasons and restoration of full ecosystem functions within five years. Proposed rehabilitation practices have been adopted for similar activities in the Perth Basin demonstrating a quicker regeneration of vegetation in comparison to broad scale clearing.

INTEGRATING FACTOR – OFFSETS		
	• *Offsets – actions that provide environmental benefits to counterbalance significant residual environmental impacts or risks of a project or activity.*	
8	Residual impacts – review the residual impacts against the EPA objectives. *It is understood that the extent of any significant residual impacts may be hard to quantify at the referral stage. Referrers are asked to provide, as far as practicable, a discussion on the likely residual impacts and form a conclusion on whether the EPA's objective for this factor would be met if residual impacts remain. This will require:* • *quantifying the predicted impacts (extent, duration, etc.) acknowledging any uncertainty in predictions;* • *putting the impacts into a regional or local context, incorporating knowable cumulative impacts; and* • *comparison against any established environmental policies, guidelines, and standards.*	Requirements for environmental offset are described: - through the provision of a clearing permit under Part V of the EP Act to offset significant residual impacts to environmental values protected under the State jurisdiction; and - under the EPBC Act for MNES provided the Proposal is likely to have significant impacts on MNES and where there are values that do not overlap with the State values. Given the temporary nature of the clearing and proposed mitigation measures and management control, UIL Energy considers that the Proposal is unlikely to result in any significant adverse residual environmental impacts. The regrowth of vegetation is expected within three wet seasons and restoration of ecosystem functions within five years. To counterbalance uncertainties associated with rehabilitation success (eg. rehabilitation not fully established within 5 years), UIL Energy commits to offset any significant residual impacts and proposes to negotiate a financial assurance that will be equivalent to impacted environmental values. The quantification of offsets will reflect principle 3 of the WA Environmental Offset Policy 2011 as such to be relevant and proportionate to the significance of the environmental value being impacted and use the EPBC Act offset calculator as a guide. However, the EPBC Act offset calculator does not reflect the temporary nature of the proposal, discrete extent of proposed clearing, the proposed clearing above ground only and immediate rehabilitation. UIL Energy is currently investigating options for environmental offsets. Initial thoughts on offsets have focused on monetary contribution to a fund for the purpose of undertaking agreed offset actions. An initial offset proposal is provided as Attachment D to the ERD. The initial offset proposal was developed in accordance with accordance with WA and Australian Government guidelines to address any significant residual impacts to environmental values associated with the Proposal The final proposal will include inputs from consultations with State and Australian Government agencies (DOtE, DMP, DER, DPaW) and relevant stakeholders and finalised offsets. At this stage, UIL Energy considers that the Proposal can be managed to meet the EPA's objectives for this factor provided UIL Energy commits to offset any significant residual impacts remaining after rehabilitation.
9	EPA's Objective – from your perspective and based on your review, which option applies to the proposal in relation to this factor? *Refer to EAG 9*	☒ *meets the EPA's objective* ☐ *may meet the EPA's objective* ☐ *is unlikely to meet the EPA's objective*
10	Describe any assumptions critical to your conclusion (in Question 9). *e.g. particular mitigation measures or regulatory conditions.*	Provision of environmental offsets under the EP Act and under the EPBC Act.

In circumstances where there was some uncertainty on the level of significance of a particular factor it is recommended that a brief summary (no longer than 1 - 2 paragraphs) is provided on the steps taken to determine why a factor was not considered to be significant.

The following environmental factors were not considered to be significant due to the Proposal will not directly or indirectly interact or has a low level of interaction with these factors during the Proposal life:

- Landforms,
- Terrestrial Environmental Quality,
- Subterranean Fauna,
- Hydrological processes,
- Inland Waters Environmental Quality,
- Air Quality,
- Human health and Heritage.