



How to prepare an Environmental Review Document Instructions

Environmental Protection Authority

October 2021

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As EPA documents are updated from time to time, users should consult the EPA website to ensure they have the most recent version.

Environmental Protection Authority 2021,
Instruction: How to prepare an Environmental Review Document, EPA,
Western Australia.

This document is available in alternative formats upon request.

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Purpose of these instructions

The purpose of this document is to instruct proponents to provide the necessary information to prepare an Environmental Review Document (ERD), which is required where the Environmental Protection Authority (EPA) has decided that a proponent must undertake an environmental review under section 40(2)(b) of the Environmental Protection Act 1986 (EP Act).

Purpose of an Environmental Review Document

To provide the report on the environmental review to meet the requirements of section 40(2)(b) of the EP Act. The EPA requires that proponents use the ERD template for all ERDs.

How to prepare an Environmental Review Document

ERD Template

The EPA also encourages proponents to use the ERD template for supplementary reports provided with a referral.

The template provides a structure and covers the minimum requirements for an ERD (including tables and figures).

The template can be used for significant proposals (including significant amendments), strategic proposals, proposals of a prescribed class and proposal under an assessed planning scheme.

Proposal information provided to the EPA

The EPA requires sufficient information on the proposal and the effects of the proposal on the environment to assess a proposal. The quality of information provided to the EPA in the ERD, the nature of proposal elements and likely environmental effects associated with the proposal may affect timeframes. There may be delays to indicative timeframes if adequate information is not provided in the ERD, and the EPA may also require additional information under section 40(2)(a).

Advice

Proponents may contact EPA Services, Department of Water and Environmental Regulation (DWER) if they need assistance to prepare an ERD.

Refer also to the EPA's [Administrative Procedures](#) and [Procedures Manual](#) for more information about the processes relating to ERD's.

Significant amendments ONLY

The procedures for the assessment of a significant amendment of an approved proposal are generally the same for the assessment of any new significant proposal, with additional information required about:

- The approved proposal, so the environmental effects of the significant amendment may be considered in the context of the approved proposal.
- The combined effects that implementation of the approved proposal and the significant amendment might have on the environment.
- The existing implementation conditions relating to the approved proposal and whether the proponent considers they should be inquired into. This should include consideration of whether the existing implementation conditions are adequate to ensure the proposal's ongoing elements are consistent with the EPA's environmental factor objectives.

Proponents of significant amendments should update information provided at referral and ensure consistency with the requirements outlined in the EPA's [Procedures Manual](#).

Content of an Environmental Review Document

A person who wishes to refer a proposal should provide the following information in the template provided. Proponents may request a I meeting with the EPA Services, DWER prior to submitting the Template.

Proponents are asked to: provide all information in the ERD and supporting documentation in plain English; include the appropriate level of detail to demonstrate a robust and scientifically sound assessment of the impacts on the environment from the proposal; and use consistent terminology and units, especially for study areas and proposal boundaries (see [Instructions and Template: How to identify the content of a proposal](#)).

Spatial data and figures

Provide spatial data in GIS format that is geo-referenced and conforms to the following parameters:

- Data type: closed polygons that represent the proposal boundary (development envelope) and the activity areas for all physical elements of the proposal (footprint).
- Attribution: name the development envelope and each activity area in the attribute table of the spatial data.
- Format: ESRI geodatabase or shapefile.
- Coordinate System: GDA20 (datum) (or as updated) and projected into the appropriate Map Grid of Australia (MGA) zone.

Provide maps and figures that are clear and readable, of appropriate scale, in either jpeg or pdf format and at a resolution greater than 300 ppi.

"Flatten" figures to reduce the size of the ERD.

Content of an ERD

The following information is provided to assist proponents to complete the [Template: How to prepare an Environmental Review Document](#). The following sections are aligned with the key headings in the form for ease of completion.

1. Cover page

Include: Proposal title, proponent, date, author, and assessment number.

2. Document control

Include a table at the front of the ERD with version, date and authorisation (name and signature).

If someone other than the Chief Executive Officer (CEO) (including a consultant) submits the ERD, provide evidence of authority to act on behalf of the CEO.

3. Invitation to make a submission

Delete if public review of the ERD is not required.

Print the invitation on different coloured paper.

4. Scoping - required work

Complete the Template ERD and Scoping Checklist Table and provide section references and page numbers where the ERD adequately addresses the work required in the ERD, including any specific work that was identified as being required in the ESD.

Note: The Scoping Checklist Table is not required where a proponent applies the [Template: How to prepare an Environmental Review Document](#) to provide an environmental report as a supplementary report with referral.

5. Executive summary

Complete Template Tables 1 – 3.

Provide any other details relevant. Note: a 2 – 5-page limit is preferred.

Proposal

1. Proposal content

Include the Proposal content document included with the referral (or a consolidated updated Proposal content document if the EPA has approved an amendment to a referred proposal under s. 38C and/or amendment of a proposal during assessment under s. 43A).

Provide a map (Template Figure 1) of the proposal clearly outlining the proposed development envelope.

Include proposal location – show where the proposal is located within WA and the region and include local and regional context information; other developments in the area, National Parks and RAMSAR wetlands, for example.

Note: Any proposed amendments to the proposal will require approval by the EPA under s43A. Amendments to the proposal cannot be made in the ERD itself. Proponent information government agencies).

For significant amendments only: Include information about the approved proposal, so the environmental effects of the significant amendment may be considered in the context of the approved proposal.

2. Proposal alternatives

To the extent reasonably practicable, describe any feasible alternatives to the proposal, including a comparative description of the environmental impacts of each alternative, and sufficient detail to make it clear why any alternative is preferred to another.

When describing alternatives, consider:

- whether this proposal is needed
- other technologies or options
- location options
- whether there are proposal alternatives which are likely to have a reduced environmental impact
- why any alternatives were not feasible
- a comparative description of the likely environmental impacts of any feasible alternate proposals, including compared to the proposal being assessed.

3. Local and regional context

Discuss how the proposal fits within the region in relation to other developments, the existing environment, and environmental assets such as conservation reserves and RAMSAR wetlands.

Include local and regional context in proposal location figure.

Legislative context

1. Environmental impact assessment process

Discuss key legislative requirements relating to the proposal, including:

- Part IV of the Environmental Protection Act 1986
- Section 45 (Bilateral Agreement) or s. 87 (Accredited assessment) of the Environment Protection and Biodiversity Conservation Act 1999
- State Agreement.

2. Other approvals and regulation

Provide information on decision-making authorities, their statutory decision-making processes, and other approvals, including any updates from the referral, if required (Template Table 4: Other approvals).

Provide a brief description of the land tenure including existing zoning, tenements and/or lease types. Specify if the proponent has legal access to the land.

Stakeholder engagement

1. Key stakeholders

List the key stakeholders for the proposal.

2. Stakeholder engagement process

Discuss the process for stakeholder engagement for the proposal, including ongoing consultation. Include:

3. Stakeholder consultation outcomes

Include outcomes of consultation with stakeholders and a detailed response to issues raised by them (or reference the section in the ERD where they are addressed) (Template Table 5). Identify who was consulted, summary of discussions, key issues / matters raised, outcomes and whether matters raised were resolved or outstanding

Do not include generic outcomes of discussions with decision making authorities – do include specific outcomes.

Justify if consultation has not been undertaken

Object and principles of the EP Act

Complete Template Table 6 showing how the EP Act object and principles have been considered in relation to the proposal.

Environmental factors and objectives

Provide the following information on key environmental factor/s

1. EPA Environmental factor/s and objective/s

State the Key environmental Factor/s and Objective/s (see the EPA's [Statement of environmental principles, factors, objectives and aims of EIA](#)).

Note: the EPA only expects key environmental factors to be addressed, as identified in the Chair's determination and the ESD, unless new environmental issues have emerged during the assessment.

2. Relevant policy and guidance

Complete Template Table 7 for the list of relevant EPA policy and guidance for this factor (see the EPA's [Framework for environmental considerations in EIA](#)). Include other State or Commonwealth policy or guidance, if relevant.

In the appropriate sections of the report, discuss the application of the relevant policy, guidance and legislation and provide justification if it is not followed.

Note: The EPA expects that proponents will describe how they have considered the relevant policy and guidance, both State and Commonwealth, and reference it throughout the ERD to demonstrate it has been given adequate consideration.

3. Receiving environment

Provide a description of the existing environmental values (including matters of national environmental significance (MNES) if relevant), referencing the sources and accuracy of this information.

Identify and summarise studies and survey efforts undertaken for the proposal.

- Provide dates and timing of the studies and surveys.
- Discuss whether surveys are consistent with EPA guidance and if not, justify, and provide information to substantiate why the surveys are adequate and reasonable for the assessment of the proposal.
- If studies or surveys recommend further work be undertaken, state whether these recommendations are supported and if not, justify why not.

Define the region as it relates to the factor.

Provide sufficient maps (Template Figure 2) showing the proposal in the local and regional context. Overlay maps with the proposal development and clearly identify local and regional environmental values relating to the factor.

4. Potential environmental impacts

Quantify the potential impacts (direct, indirect, and cumulative) on the environmental values (including MNES if relevant) for this factor in a local and regional context, using actual data and predictions.

Include tables and other information showing impacts (in absolute and relative (%) terms) as follows:

- Known extent of the existing environmental value in both a local and regional context
- Direct impact of this proposal to the existing environmental value

- Indirect impact of this proposal to the existing environmental value
- Total of the direct and indirect impact of this proposal to the existing environmental value
- Total (direct and indirect) impact of other proposals to the environmental value
- cumulative environmental effects - (see [Statement of environmental principles, factors and objectives, and aims of EIA](#)).

Include impacts in all areas which may be affected by the implementation of the proposal; for example, if an indicative footprint has been proposed in order to seek flexibility in locating the proposal footprint during implementation, include consideration of impacts in all areas which may be subject to a final footprint, not just impacts within the indicative footprint.

Provide a map (Template Figure 3) showing the extent of the environmental value (including MNES if relevant) overlaid by the development envelope and the direct and indirect impacts.

5. Mitigation

Apply the appropriate mitigation hierarchy, as defined in the Statement of environmental principles, factors objectives and aims of EIA.

Outline proposed avoidance measures.

Describe any proposed minimisation measures.

- A description of any measures proposed to be implemented to minimise the impacts of the proposal on the environment must be included.
- A description of whether the proposed measures are industry standard and best practice, and the degree of certainty about their effectiveness.
- Note that the EPA's preference is for proposal impacts to be controlled by outcome-based conditions, rather than objectives-based Environmental Management Plans (EMPs) which include mitigation measures by way of management actions and targets.
- Objectives-based EMPs which include management actions to describe minimisation measures should therefore not be part of the ERD unless outcomes-based conditions are not practical, or where a management response matter is novel and so detailed explanation of how the impact will be managed is required. In these cases, the ERD should explain why the objectives-based EMP is being included.
- The EPA will also consider information about minimisation measures in an objectives-based management plan if minimisation measures are required to be contained in a plan by another decision-making authority for other proposal approvals.
- Any EMPs which are included must be prepared in accordance with *the Instruction and template: How to prepare Part IV Environmental Management Plans*

A description of how rehabilitation measures are proposed to be implemented to minimise the impacts of the proposal on the environment, and the likely environmental outcomes of this.

Discuss whether another statutory decision-making process can mitigate the potential environmental impacts of the proposal on the environment. If yes, provide reasons, including how, in relation to the specific potential impacts of the Proposal, and whether the EPA's objectives for relevant environmental factors are likely to be met through the decision-making processes. For further details on the matters the EPA may consider, see the Interim Guidance for taking decision-making processes into account in EIA.

6. Assessment and significance of residual impact

Identify whether there are any residual impacts after application of the avoidance and minimisation elements of the mitigation hierarchy and whether these are significant.

Assess the significance of the impacts (direct, indirect, and cumulative) of the proposal on the environmental factor in a local and regional context. For guidance on what the EPA may have regard to in its consideration of 'significance' refer to the [Statement of environmental principles, factors objectives and aims of EIA](#).

Assess impacts in all areas which may be affected by the implementation of the proposal. (If a development envelope has been proposed to provide flexibility as to the location of the ultimate proposal footprint, the assessment must be carried out for environmental impacts in all areas within the relevant development envelope where development may proceed, not just within, for example, any indicative proposal footprint).

Discuss any significant residual impacts that remain and identify if any offsets are proposed. Provide a summary of how the proposed offset will counterbalance the significant residual impact for the relevant factor. Note: Discuss detailed assessment of offsets in section 7).

For significant amendments only: Include information about the combined effects that implementation of the approved proposal and the significant amendment might have on the environment.

7. Environmental outcomes

Identify the environmental outcomes proposed as a result of the implementation of the proposal. See [Interim Guidance: Outcomes and outcomes-based conditions](#) for guidance.

Discuss whether the proposed environmental outcomes are consistent with the EPA's objectives for environmental factors.

Discuss whether and how a proposed environmental outcome can be assured by any of the following:

- Another statutory decision-making process which can mitigate the specific potential impacts of the proposal on the environment to be consistent with the EPA's factor objectives
- Limit on the extent of the proposal
- Outcome-based conditions
- Objectives-based environmental management plan conditions (including explanation of why outcome-based conditions are not practical)
- Prescriptive conditions (see the Procedures Manual for detail on the EPA's environmental condition models).

Propose outcome-based condition/s (and other conditions, where relevant) for consideration by the EPA (optional).

Describe the proposed monitoring of any proposed environmental outcomes:

- Describe baseline environmental condition and proposed indicators, response actions, reporting and adaptive management approaches in relation to proposed environmental outcomes.
- This may be included in an outcomes-based Environmental Management Plan. It should include indicators, trigger criteria, threshold criteria, trigger level actions and threshold contingency actions consistent with the: EPA's [Instruction and template: How to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans](#)
- Where practical, proposed monitoring for specific environmental factors can be provided in the

same outcomes-based Environmental Management Plan.

For significant amendments only: Include information about the existing implementation conditions relating to the approved proposal and whether the proponent considers they should be inquired into. This should include consideration of whether the existing implementation conditions are adequate to ensure the proposal's ongoing elements are consistent with the EPA's environmental factor objectives.

Other environmental factors or matters

Discuss other environmental factors or matters against the EPA's objectives/s for environmental factors where identified:

- in the ESD and/or
- during stakeholder engagement.

Other environmental factors or matters may be summarised in a tabular format.

Offsets

Refer to the relevant guidance for further information on offsets:

- [Statement of environmental principles, factors, objectives and aims of EIA](#)
- Environmental factors: WA Environmental offsets policy and WA environmental offset guidelines.
- Greenhouse Gas Emissions factor: State Emissions Policy and [Environmental Factor Guideline – Greenhouse Gas Emissions](#).

Offsets are not appropriate for all proposals. They should usually only be considered as the final step in the mitigation hierarchy, and only for significant residual impacts for environmental factors.

Proponents must provide sufficient evidence about and assess whether (and how) an offset is likely to counter-balance a significant residual impact. Conclusions about this cannot be based on assumptions or conjecture. Identify and quantify the significant residual impacts and proposed offsets, including completing the offset template (an example is in Appendix 1 of the WA Offsets Guidelines) and the [residual impact significance model table](#) (an example is on Page 11 of the WA Environmental Offsets Guideline).

Provide details of the proposed offset including but not limited to:

- objectives and outcomes
- description of actions to be undertaken
- specific and measurable success criteria
- timelines and milestones
- monitoring to assess offset implementation
- reporting details and timing
- financial arrangements
- risks and contingency measures
- governance arrangements including responsibilities and legal obligations.

Provide evidence of consultation on offset with relevant stakeholders.

Assess whether and how the proposed offset will counterbalance the significant residual impact.

Demonstrate consideration of the six Principles outlined in the WA Environmental Offsets Policy and WA Environmental Offset Guideline.

Outline how the offset aligns with relevant plans and policies, such as recovery plans.

Evidence that supports the success or viability of the offset (include as an appendix where required).

For proposals within the Pilbara region also provide an Impact Reconciliation Procedure, including the relevant spatial data, prepared in accordance with [Instructions: Preparing Impact Reconciliation Procedures and Impact Reconciliation Reports](#) (or any subsequent revisions).

Matters of National Environmental Significance

If the EPA is assessing the proposal under the assessment Bilateral Agreement (or as an accredited assessment), this section is required. [Include the following:

- List the controlled action provisions.
- List the relevant policy and guidance for the MNES.
- Provide a summary of the existing environmental value(s) that relate to the MNES.
- Summarise the potential impacts (direct, indirect, and cumulative) on the MNES.
- Provide relevant tables and maps (Template Figure 5).
- Summarise the assessment on the relevant environmental factor/s to determine the level of significance of the impact on the MNES. Include how the mitigation hierarchy has been applied.
- Summarise any proposed mitigation.
- Summarise whether offsets are required in relation to the MNES and if so, provide details of the proposed offset and how the offset addresses the EPBC Act Environmental Offset Policy.

Holistic impact assessment

Where the combination of the environmental effect of two or more environmental factors or values has the potential to result in a significant impact, provide a holistic impact assessment of the proposal on the environment, applying the EPA's principles and the EPA's objectives for environmental factors:

- Outline the connections and interactions between environmental factors or values that in combination have the potential to have a significant effect on the environment.
- Provide a diagram of the links between environmental factors or values.
- Summarise the potential combined environmental effects.
- Summarise any additional mitigation measures proposed to mitigate combined environmental effects.
- Summarise any significant residual combined environmental effects.
- Summarise proposed additional environmental outcomes for the proposal on the environment as a whole, and (optional) any proposed conditions for consideration by the EPA.

Provide a summary of the environmental effect of the proposal on the environment as a whole (as distinct from a summary of the effect for each individual environmental factor or environmental value).

Cumulative environmental impact assessment

Provide a cumulative environmental impact assessment of the proposal. Cumulative environmental impacts are the successive, incremental and interactive impacts on the environment of a proposal with one or more past, present and reasonably foreseeable future activities. Refer to the EPA's [Procedures Manual](#) for further information on reasonably foreseeable future activities.

A summary of cumulative impact assessment can be provided in this section if it has been completed as part of the potential and residual environmental impacts assessment above.

Additional information

1. References

Use a recognised referencing style and a consistent format when referencing material in the ERD; For example, Smith 1995 or Smith 1995; Jones and Sampson 1996.

List references in alphabetical order.

Include relevant policy and guidance.

2. Appendices

Include all supporting documents, such as studies, investigations, and reports, used to prepare the ERD.

Where supporting documents are publicly available at no cost, a hyperlink to the document may be used in place of a hard copy; for example, a Ministerial statement.

3. Disclaimers

Any disclaimers included in the ERD should not prevent the EPA from using the ERD for its assessment. This includes providing copies to decision-making authorities and other agencies, and members of the public, and using and reproducing information to prepare the EPA's assessment report.

4. Index of Biodiversity Surveys for Assessments (IBSA) and Index of Marine Surveys for Assessments (IMSA)

IBSA and IMSA are mechanisms by which all terrestrial biodiversity survey and marine survey information collected for environmental impact assessment under the EP Act will be captured and integrated into a consolidated, indexed and publicly available repository. IBSA and IMSA are administered by DWER on behalf of itself, the EPA and the Department of Mines, Industry Regulation and Safety.

Each time a terrestrial biodiversity survey report or marine survey report is submitted (at any point in the assessment and compliance process under Part IV of the EP Act) an IBSA or IMSA data package should be provided.

The IBSA data package should be submitted via the online IBSA Submissions portal in accordance with the [Instruction and templates: IBSA Data Packages](#). The IMSA data package should be provided in accordance with the [Instruction, template and form: IMSA Data Package](#).

Submitting an ERD

Ensure that all required information in the [Template: How to prepare an Environmental Review Document](#) is provided with your request to the EPA Services of the Department of Water and Environmental Regulation (DWER). It is preferred that ERDs are emailed. Postal submissions will be accepted.

Submissions

Email: registrar@dwer.wa.gov.au OR EPA Services
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General Enquiries

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