

# Approvals proposal pathway



Environment  
Protection  
Authority Victoria

Publication 1560.2\* June 2017

\*This replaces publication 1560.1 issued August 2015

Guideline

## Contents

Contents .....	1
Statement of purpose .....	2
Legal status.....	2
Contacting EPA .....	2
The approvals process .....	2
Approvals proposal pathway form: How to complete sections 1 to 3 .....	6
1. Proposal.....	6
1.1 General information.....	6
1.2 Primary contact details.....	6
1.3 Works details.....	6
1.4 Scheduled premises category .....	6
1.5 Describe what you are planning to do .....	6
1.6 Documents to be included.....	6
2. Key questions .....	7
2.1 What changes in emissions, discharge or other impacts to the environment do you expect as a result of the proposal?..	7
2.2 Please explain why your proposal and its inherent changes should be considered best practice. ....	7
2.3 Please explain how your proposal will incorporate waste minimisation principles and how you have sought to minimise impact on the environment .....	7
2.4 If waste is handled, generated or stored on the premises, please describe the nature of this waste, the expected quantities and management of these waste streams. ....	7
2.5 Is the proposal related to technology development? .....	8
2.6 Will there be changes to your current licence? .....	8
2.7 Are there special circumstances that apply? For example is there other legislation related to the project or other approvals that are still pending?.....	8
3. Stakeholder/third-party interest in the proposal .....	8
3.1 Identifying potential stakeholders .....	9
3.2 Description of engagement .....	9
3.3 Response.....	9
Important documents .....	10
Appendices .....	11
1. Scheduled premises categories .....	11
Scheduled premises summary.....	11
2. Class 3 indicators: Schedule A – State Environment Protection Policy (Air Quality Management) .....	12
3. Stakeholder analysis table .....	13
4. Stakeholder risk assessment.....	15
5. Consultation template .....	17
6. Advertising for works approvals – proposal phase .....	19



# Approvals proposal pathway

## Statement of purpose

This guideline will assist approval applicants to complete the approvals proposal pathway form. Approval applicants are encouraged to use this document to understand the process related to the form and the framework for the determination of the appropriate pathway for your proposal by EPA.

These guidelines provide information about:

- the approvals proposal pathway process
- the pathway decision framework
- where to find further information.

## Legal status

This guideline provides assistance with the approval pathway selection/proposal stage, which is not a statutory process. If an applicant does not complete the form and provide all available supporting documents EPA cannot determine a suitable pathway, and therefore may not accept an application.

## Contacting EPA

If you have any questions at any stage of the approvals process, please contact EPA.

Email: [approvals.applications@epa.vic.gov.au](mailto:approvals.applications@epa.vic.gov.au)

Phone: 1300 372 842 (1300 EPA VIC)

This document has been created in consultation with EPA staff members and stakeholders.

Table 1. Key terms used in this document

Term	Definition
The Act	The <i>Environment Protection Act 1970</i> (The Act) provides a legal framework to protect the environment in the State of Victoria. The Act applies to emissions: as noise, to air, to water and to land in Victoria, the territorial sea along the Victorian coast and to the discharge of waste to the Murray River from any premises in Victoria.
Scheduled premises	Scheduled premises are defined in: Environment Protection (Scheduled Premises) Regulations 2017 in column 2 of the table in schedule 1 or the summarised version found in this document in Appendix 1.
Environmental impact	The Act defines 'environment' as the physical factors of the surroundings of human beings including the land, waters, atmosphere, climate, sound, odours, tastes, the biological factors of animal and plants and the social factor of aesthetics. Environmental impact is a change or effect on the environment as a result of a proposed project.

## The approvals process

The approvals proposal pathway form is the first step towards gaining an approval from EPA. The information you provide in this form allows EPA to determine what level of assessment is required for your development proposal and the most appropriate approval pathway. The different approval pathways include: no approval required; general exemption; exemption under the Act; research, development and demonstration (RD&D); licence amendment; fast track works approval and standard works approval. If you would like to apply for an approval not listed here, please consult EPA's website at [www.epa.vic.gov.au](http://www.epa.vic.gov.au).

The proposal pathway may change if EPA detects discrepancies in the information provided, discovers risks that were not previously realised or where significant stakeholder concerns are identified. EPA will inform applicants when there is a need for more information.

# Approvals proposal pathway

Table 2. Summary of pathways, where to find more information and what type of proposal falls under each pathway

Pathways	Definition
No approval required	The pathway no approval required is for when the proposal is not regulated by current legislation and therefore does not need approval. An example of this would be when the premises are not scheduled premises.
General exemptions	General exemption is when scheduled premises are exempt from requiring works approval because of conditions found in Environment Protection (Scheduled Premises) Regulations 2017. Most of these exemptions are threshold limits set by EPA experts collaborating with relevant industry bodies.
Exemptions under the Act	Exemption under the Act is when circumstances presented by the applicant to EPA confirm that the proposal will not adversely affect: a) any segment of the environment and b) any other person than the applicant. Describing circumstances for this type of exemption can be found in the Act under section 19(A) (further under 19A(4) to 19A(6)).
Research, development and demonstration (RD&D)	For this pathway the proposed work is by scale, dimensions, purpose, duration and potential environmental impact proved to be a research, development or demonstration project. For more information see the Act under section 19D or Research, development and demonstration (RD&D) approval ( <a href="#">EPA publication 1369</a> )
Licence amendment	A licence amendment is used when the current licence needs to be changed and it is determined that a works approval is not required. A licence amendment can be initiated by a licence holder wanting to update details on their licence or when works allowed by a works approval have been completed. The legislation surrounding this can be found in the Act under section 20A.
Fast track works approval	Fast track works approval is a pathway developed by EPA as a quicker alternative to a standard works approval. To get accepted to this pathway, the proponent needs to provide information with their proposal that it will: a) not have a significant potential impact on the environment, b) not raise significant concern in the community and c) use standard proven technology.
Standard works approval	EPA uses the standard works approval pathway for proposals that require a works approval and have a medium to high potential impact to the environment and/or when there is a significant third-party interest in the proposal and thus will take more time to assess. For more information contact EPA, visit the <a href="#">EPA website</a> or look at the Act under section 19A.

# Approvals proposal pathway

---

## Commencing and completing the works

Once a pathway has been approved, the construction phase cannot begin until the final relevant approval has been issued. As seen in Figure 1, these timings are different for each pathway. For example, (assuming all the required information is submitted to EPA):

- No approval required and general exemption – the timeframe should be a total of two weeks from submitting the approvals proposal pathway form to final decision and being able to start construction.
- Standard works approval – the timeframe should be three months after the works approval application has been accepted before a final decision is issued. Construction could then commence (in accordance with any conditions) if the decision was to approve the works.

At the completion of works under a works approval (fast track or standard works approval), applicants can request commissioning approval or licence amendment. In the case of partial completion of works, the applicant can request approval from EPA for partial operation of the facility. This would also be reflected in the licence which parts could be operated. At the finalisation of all works and confirmation that the premises have achieved full compliance, EPA will issue the licence to operate the entire facility specified in the approved proposal.

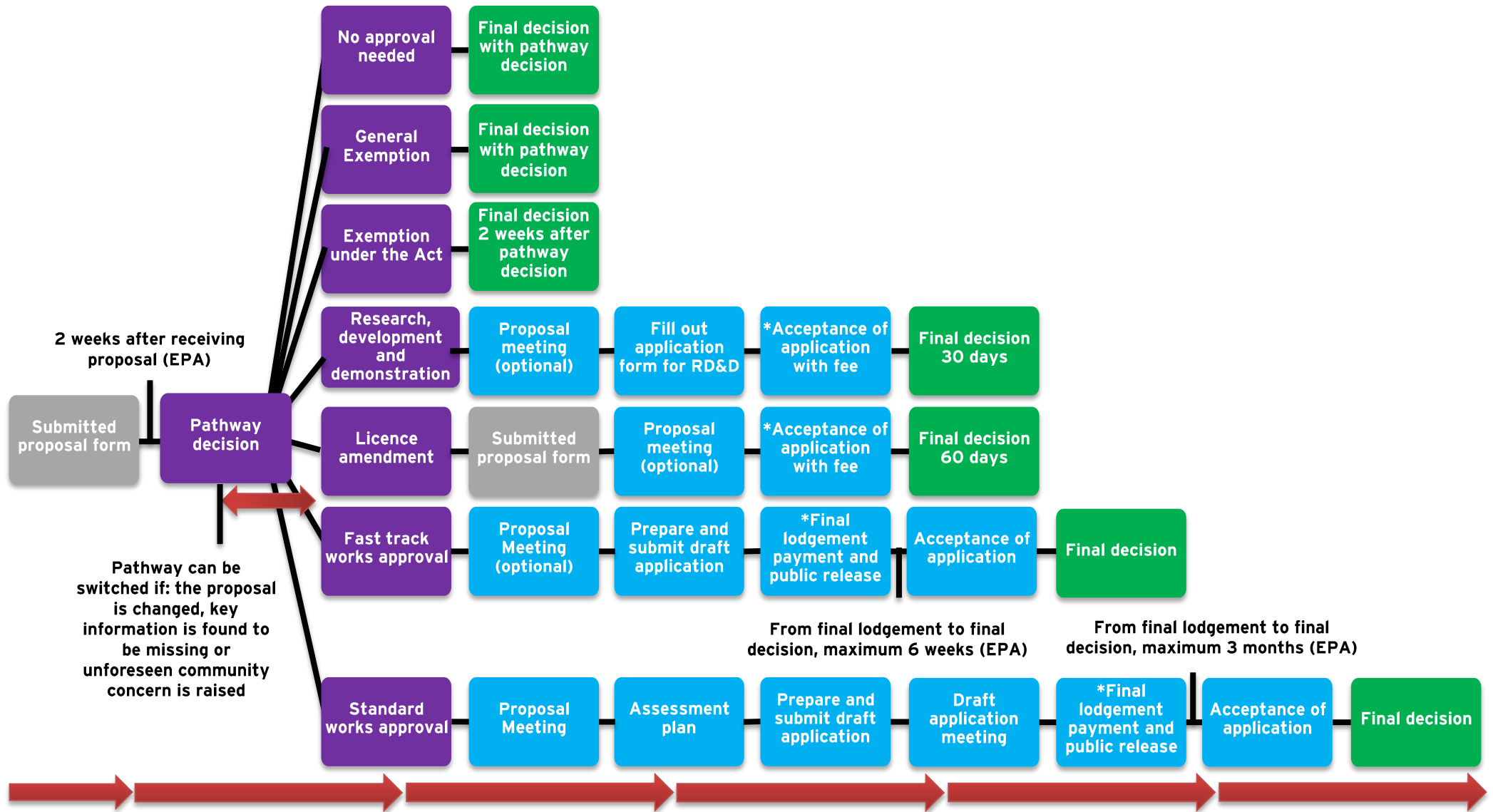


Figure 1. The process for the different pathways from submitting the approvals proposal pathway form to the final decision. The grey boxes represent the approvals proposal pathway form (twice for licence amendment as the form acts as the starting point in this pathway), the light-blue boxes indicate the pathway-specific steps and the green boxes indicate the final step of the pathway.

\* It should be noted that when EPA has requested further information the application will be put on hold pending receiving the required information.

## Approvals proposal pathway form: How to complete sections 1 to 3

### 1. Proposal

The proposal section of this document is a mandatory section for anyone applying for an approval for new works from EPA and it is part of the pre-application process. If you are unsure whether or not an approval is required or have any questions when completing the proposal form, please contact EPA.

Commercial in confidence

EPA asks that commercial-in-confidence material is not incorporated in the proposal. It should be included only if necessary as a separate hard copy and clearly marked 'commercial in confidence'.

EPA prefers to receive any commercial-in-confidence document as a separate hard copy and hand delivered to the officer.

This material will be filed separately to ensure security.

#### 1.1 General information

Company details – the applicant must be the occupier of the premises. Provide the registered company name, the Australian Company Number (ACN), the CEO contact details, the registered office address and a copy of the ASIC Certificate of Incorporation.

Individual details – if you are not an incorporated company then you will need to provide the individual legal names and a copy of the ASIC Certificate of Registration.

Billing address – the address where invoices and financial queries are directed.

Provide the premises' address where the proposed works will take place.

#### 1.2 Primary contact details

Give contact details for the person who will be dealing with EPA. If you are using a consultant or environmental auditor to assist with your application, you may also provide their details. It is important that you provide all of the details requested here so that EPA may communicate easily with the key contact as required.

#### 1.3 Works details

Provide the cost of the project; this is the cost of the proposed works that causes your activity to require an approval. This includes items such as plant, equipment and controls. It does not include items such as offices and car parks.

#### 1.4 Scheduled premises category

Appendix 1 – this document provides a table of scheduled premises. If your industry is not a scheduled site you do not need to seek approval from EPA.

#### 1.5 Describe what you are planning to do

This question asks the proponent to describe what they are planning to do. Providing detailed information will be helpful for understanding the project and for the pathway decision process. Feel free to submit supporting information such as diagrams, tables etc. to help describe your proposal.

#### 1.6 Documents to be included

Administrative:

- For companies - provide a copy of their Certificate of Incorporation to EPA which includes the registered company name, the Australian Company Number (ACN) and the registered address for the proposal applicant. Individuals need to provide the legal names in the form if incorporation is not applicable.

Maps (all should contain orientation and scale):

- Attach a site plan in jpg format showing the layout of your proposal. The site plan should be drawn to scale and indicate the site boundary and premises' dimensions, any buildings, roads, discharge points or sampling locations. It should also show any features relevant to your application, for example: dams, treatment lagoons, waterways and drainage; storage areas and bunding.
- Attach a planning locality plan showing surrounding land uses. The plan should cover a 2-kilometre radius and indicate clearly: road names at the premises' borders, houses, waterways and any other features relevant to your application. If possible, please provide the locality plan in jpg format.
- Attach a planning zoning map showing current land use zones.
- Attach a map in jpg format of any sensitive land uses in the area. Sensitive land uses include: land used for a residential dwelling (other than a caretaker's house on industrial or commercial premises), hospital, school, caravan park or other

# Approvals proposal pathway

---

similar use involving the presence of individual people for extended periods (except in the course of their employment or recreation). The map should include details of buffer distances and documentation of mechanisms put in place to mitigate environmental risk.

Engagement/consultation:

- Include a stakeholder analysis clearly identifying stakeholders.
- Include evidence of all engagement/consultation undertaken and/or planned for the proposed works (completed template as per Appendices 3, 4, 5 and 6).

Supporting documents:

Please submit any documents you may have to support your description of the proposals (answer to question 1.5) and answers in Section 2 (see below) of the form. These documents will be used to assist EPA's determination of the correct pathway selection and give credibility to your answers. It could be: air emissions testing, noise modelling, environmental impact assessment, water samples etc. Further documentation may be requested at the assessment stage.

## 2. Key questions

This section aims to assist the proponent completing the approvals proposal pathway form. Not all questions are applicable for all proposals.

### 2.1 What changes in emissions, discharge or other impacts to the environment do you expect as a result of the proposal?

To where (air, land, water, odour and noise), as what (what type of substances), from where (incinerator, waste treatment etc.) and what quantity (per day, per week, per month, per year)?

EPA expects you to answer all parts of the question. To give support to your answers you should present the data behind these predicted emissions as an attachment. One reason for this question is to make a decision about whether or not a general exemption applies. This pathway is used when the premises do not emit more than specified threshold limits for a number of substances. These are found in the Environment Protection (Scheduled Premises) Regulations 2017. Note that some scheduled premises are not eligible to receive a general exemption from noise.

### 2.2 Please explain why your proposal and its inherent changes should be considered best practice.

For some pathways the proponent will need to demonstrate that the proposed work has a low impact on the environment, as well as on the community. The impact on the environment can be reduced by using best practice technology. Further information and guidance on demonstrating best practice can be found on the EPA website under [Demonstrating best practice](#) or through contacting EPA.

Further information on how to demonstrate best practice can be found in *Guideline – Demonstrating best practice* ([publication 1517](#)). There are also tips and examples in how to present it. Demonstrating how the project meets best practice may result in a less time-consuming pathway.

### 2.3 Please explain how your proposal will incorporate waste minimisation principles and how you have sought to minimise impact on the environment.

A way of reducing your environmental impact is to use EPA guideline documents related to your specific scheduled premises. If you have reduced your impact on the environment, please describe in what way and refer to the information used. For more information, please look in the guideline to this document.

On EPA's website there are several documents connected to different scheduled premises or different emissions. Implementing these is a way for you to show EPA that measures are being taken to make the impact as low as possible. Taking these measures might benefit you as the proposal might end up in a faster pathway. Examples of guidelines are:

- *Recommended separation distances for industrial residual air emissions – guideline* ([publication 1518](#))
- *Designing, constructing and operating composting facilities* (publication 1588)
- *Energy from waste guideline* (publication 1559)

### 2.4 If waste is handled, generated or stored on the premises, please describe the nature of this waste, the expected quantities and management of these waste streams.

To answer this question, EPA expects the applicant to describe the details surrounding the waste on the site. For example, what type of waste (organic waste or biomedical waste are two waste types)? How long is the waste on the premises and how does it leave? Which part of the environment will be affected upon discharge? How is the waste managed on the site, and which methods are used?

# Approvals proposal pathway

---

## 2.5 Is the proposal related to technology development?

This could be that it relates to research, development or testing of a new technology, process or plant. If these conditions apply, please refer to EPA publication 1369 Guidelines for research, development and demonstration approvals, and provide relevant information i.e. the purpose of the RD&D project, its scale and duration.

This question is for proposals with the purpose of technology development or research. Explain the circumstances surrounding the project. For example, duration of the project, goals, and expected outcome and plans for the future.

## 2.6 Will there be changes to your current licence?

(This question is only applicable for current licence holders.) Highlight the proposed changes in the relevant existing condition of your licence and provide supporting evidence to demonstrate how the proposed change will affect/not affect the environment.

This question can only be answered by current licence holders. If you need to change something in your current licence, please follow the instructions in the question. You should also describe and support what the environmental impact will be.

Licences are in place to minimise harm/potential harm to the environment due to discharges from your premises. You need to demonstrate, with evidence, how the proposed change to your licence will not result in an increased environmental impact. Evidence required will depend on the change being requested.

## 2.7 Are there special circumstances that apply? For example is there other legislation related to the project or other approvals that are still pending?

This question requires the proponent to provide information on other approvals and legislation that apply to the works. This will allow EPA to understand and coordinate conflicting or other governmental pathway decisions.

## 3. Stakeholder/third-party interest in the proposal

When engagement/consultation is conducted well and at an early stage, EPA's assessment can often be less complex and completed earlier. This is why EPA emphasises that the proponents carry out its own engagement/consultation prior to making an application to EPA. Being in touch with stakeholders and maintaining a relationship has shown to be a positive step the proponent to being good corporate citizens.

Third-party interest can come from any person(s) that is not EPA or the applicant for the proposal, such as other businesses and competitors, local residents or various community or association groups. Third-party/stakeholder interest may be high or low depending on the proposal and a number of other factors. EPA will take into account the type of concerns of stakeholders and the outcomes of engagement/consultation carried out. EPA does not put a weighting on the number of concerns specifically, but rather the issues raised.

The aim of early engagement/consultation with stakeholders is to:

- properly consult any stakeholders and the public about the proposal
- answer questions and respond to concerns raised
- provide an opportunity to scope out potential issues, concerns and risks in order to address these and to develop the application.

The International Association for Public Participation Australasia ([www.iap2.org.au](http://www.iap2.org.au)) provides some extensive resources online that can be used to plan out your engagement/consultation and gain a greater understanding of the possible activities. Depending on the scale of engagement/consultation required and/or if you are not confident with consulting stakeholders, you may consider getting assistance from an engagement professional to guide you through the process until your company is more comfortable. EPA can also provide engagement advice.

EPA understands that engagement/consultation can be difficult especially if a company has not had contact with stakeholders before. We understand that some stakeholders may never be satisfied with the level of engagement/consultation carried out or the proposed works. If this occurs it is expected that you record the process you took and the outcomes whether positive or negative. Having this sort of disagreement with stakeholders does not mean that you are ineligible for a fast track works approval, it means we want to see that you have consulted well and addressed potential impacts where possible. In some instances EPA may contact objectors to confirm the engagement/consultation carried out.

The level of engagement/consultation will vary with the type of industry being proposed, the distance to residents and any local community or environment groups that may have an interest in your proposal. Demographics of the surrounding area will also make a difference and EPA will look at how you may have tailored your engagement/consultation to suit this. EPA expects that your engagement/consultation is carried out to the level of 'consult' on iap2's participation spectrum. This participation spectrum can be easily downloaded from the resources section of their [website](http://www.iap2.org.au). We have provided a number of resources that EPA has used in various forms to assist us plan our own engagement/consultation. These will assist you if you have chosen not to hire an engagement professional to assist you through the engagement/consultation. The following are the resources we have provided for you to adapt to your needs and there are many more resources available on the iap2 website.



# Approvals proposal pathway

---

## Appendix 3 – stakeholder analysis table

- There are two tables in this appendix. One can be used to help identify who your stakeholders may be and the other to identify what their interest/impact may be alongside the influence or power they may have on your company and the proposal. This will give you an indication of where you would be best placed to spend more time on engagement in order to help your project run more smoothly.

## Appendix 4 – stakeholder risk assessment

- Use this matrix to assist assessment of the risk of your proposed project and the level of stakeholder consultation that may need to be carried out. If the project requires a works approval and is high risk then it may be more beneficial for your company to have EPA-guided engagement/consultation and for your project to go through the standard works approval pathway. Simply tick the relevant risk levels that fit your project under environmental/health risk and stakeholder interest/impact. Read the legend to make your own assessment of what level of engagement/consultation is most appropriate for the project.

## Appendix 5 – consultation template

- This is a template that will prompt you to think about the process of engagement/consultation, some of the resources you can prepare and also some of the information to collect and feedback to EPA with your proposal. This is a very basic template and EPA expects it to be adapted as needed.

## Appendix 6 – advertising for works approvals

- EPA has a statutory obligation to advertise works approval applications in the newspaper. This template outlines EPA's specifications for advertising. It has been provided so that you can advertise yourself and capture the same audience that will be captured by an EPA advertisement and allow for stakeholders to make comment. If this process along with the other consultation is complete prior to lodging your proposal form, there is a higher chance your proposal will be considered for a fast track pathway.

## 3.1 Identifying potential stakeholders

Applicants must consider the potential impacts of the proposed works on third parties including residents and other businesses. Some examples of impacts are:

- impacts from construction and operation of the works
- building new premises in an area not accustomed to industrial activities
- activities likely to be odorous or noisy
- proposals that may be controversial due to broader environmental issues
- activities that may affect areas under the control or regulation of other government agencies i.e. Department of Health and Human Services (DHHS), Department of Environment, Land, Water and Planning (DELWP), Department of Economic Development, Jobs, Transport and Resources
- local government concerns about maintaining buffer distances and encroachment.

You may discover that during engagement consultation, impacts may have been experienced by the local community that you were not aware of. EPA will also consider the history of pollution reports made in relation to the site or the applicant in order to confirm the stakeholders and potential impacts. If you have a history of public reports, EPA requests that you describe this fully in section 3.1.

Stakeholder interest can come from local residents, businesses or community groups and can be in the following forms:

- someone is interested in EPA's approval process and would like to learn about it
- a person or group interested in being kept informed on new developments in the area
- a proposal may be in direct competition with a nearby business, therefore there is an interest in what the new proposal may be.

## 3.2 Description of engagement

This question prompts you to dot point any engagement/consultation you have carried out regarding the proposed works. You may also include any engagement/consultation activities that you plan to do as a part of the proposed works. The detail of this will need to be submitted as attached documents and this section simply requires bullet points.

If you can demonstrate that you have tried to engage/consult and received no interest you still need to provide supporting documents for this.

## 3.3 Response

For this question it is important that you describe what type of response you received through the engagement/consultation. If you received concerns during your consultation, EPA wants to know the details surrounding each concern. This means who raised it (individual or organisation) and where they are located in regards to the proposed site. The next step would be to answer if it has

# Approvals proposal pathway

---

been addressed. For example, addressing interest could include responding to letters from interested parties, holding community meetings with notes taken, individual phone calls etc. EPA may verify this information using the stakeholder contact details provided.

## Important documents

On the website [Victorian Legislation and Parliamentary Documents](#) under acts and regulations, you can find relevant legislation such as the *Environment Protection Act 1970*, *Major Transport Project Facilitation Act 2009*, the *Victorian Environment Effect Act 1978*, *Environment Protection (Industrial Waste Resource) Regulations 2009*, and *Environment Protection (Scheduled Premises) Regulations 2017*.

Listed here are some important documents if you are looking for more information:

- [Noise from industry in regional Victoria](#) (publication 1411)
- [SEPP N-1 and NIRV explanatory notes](#) (publication 1412)
- [Research, development and demonstration \(RD&D\) approval](#) (publication 1369)
- [Recommended separation distances for industrial residual air emissions – Guideline](#) (publication 1518)
- [Demonstrating best practice](#) (publication 1517)
- [Siting, design, operation and rehabilitation of landfills](#) (Landfill BPEM – publication 788)
- Guideline *Works approval application* (publication 1658). Appendix A in this document contains an extended list of relevant documents.
- Information bulletin *EPA's works approval assessment process* (publication 1657)
- Prompt sheets *Selected scheduled premises* (publication 1659)

# Approvals proposal pathway

## Appendices

### 1. Scheduled premises categories

#### Scheduled premises summary

Schedule Category
A Waste Treatment, disposal and recycling
A01 Prescribed industrial waste management
A02 Other waste treatment
A03 Sewage treatment
A04 Industrial wastewater treatment
A05 Landfills
A06 Land disposal
A07 Organic waste processing
A08 Waste to energy
A09 Waste tyre storage
B Primary industry and allied operations
B01 Animal industries
B02 Livestock saleyards or holding pens
B03 Fish farms
C Mining
C01 Extractive industry and mining
D Animal derived by-products and food
D01 Abattoirs
D02 Rendering
D03 Animal skin tanning
D04 Seafood processing
D05 Pet food processing
D06 Food processing
D07 Milk processing
D08 Edible oil
D09 Beverage manufacturing
E Textiles
E01 Textiles
F Wood and wood derivatives
F01 Timber preservation
F02 Fibreboard
F03 Paper pulp mills
G Chemicals including petroleum
G01 Chemical works
G02 Coal processing
G03 Oil and gas refining
G04 Bulk storage

Schedule Category
G05 Container washing
H Non-metallic minerals
H01 Cement
H02 Bitumen (asphalt) batching
H03 Ceramics
H04 Mineral wool
H05 Glass works
I Metal and engineering
I01 Primary metallurgical
I02 Metal melting
I03 Metal galvanising
I04 Metal finishing
I05 Can and drum coating
I06 Vehicle assembly
J Printing
J01 Printing
K Utilities
K01 Power stations
K02 Carbon geosequestration
K04 Water desalination plants
L Other
L01 General emissions to air
L02 Contaminated sites – onsite soil containment
L03 Tunnel ventilation systems
L04 Contaminated sites – long-term management

\*Source: Environment Protection (Scheduled Premises) Regulations 2017

# Approvals proposal pathway

## 2. Class 3 indicators: Schedule A – State Environment Protection Policy (Air Quality Management)

Class 3
Acrolein
Acrylonitrile
Alpha chlorinated toluenes and benzoyl chlorinated
<sup>1</sup> Arsenic and compounds
Asbestos
Benzene
Beryllium and beryllium compounds
1,3 Butadiene
Cadmium and cadmium compounds
Chromium VI compounds
1,2-dichloroethane (ethylene dichloride)
<sup>5</sup> Dioxins and Furans (as TCDD I-TEQs)
Epichlorohydrin
Ethylene oxide
<sup>6</sup> Hydrogen cyanide
MDI (Diphenylmethane diisocyanate)
Nickel and nickel compounds
PAH (BaP)
Pentachlorophenol <sup>6</sup> Phosgene
Propylene oxide
<sup>7</sup> Radionuclides
<sup>1</sup> Respirable crystalline silica (inhaled in the form of quartz or cristobalite) ( measured as PM <sub>2.5</sub> )
TDI (toluene-2,4-diisocyanate and toluene-2,6-diisocyanate)
Trichloroethylene
Vinyl chloride

1 applies to point sources only. For area-based sources and roads, applicable criteria are specified in the relevant industry PEM.

2 the fluoride content is calculated by dry weight and expressed as fluoride (F-) ppm

3 the International Agency for Research into Cancer, USEPA and Worksafe Australia classify formaldehyde as a probable human carcinogen. The USEPA and Worksafe Australia (NICNAS) have initiated reviews about the human health effects of formaldehyde. The SEPP (Air Quality Management) classification will be reassessed once the USEPA and Worksafe Australia reviews have been completed.

4 the wood panel industry has initiated a wood dust work place study, which will be taken into account in any future review of wood dust management.

5 TCDD I-TEQ means 2,3,7,8-tetrachloro-dibenzodioxin as international toxic equivalents.

6 due to the acute impacts of these substances the additional safety factor of 10 applied to Class 3 indicators has not been applied.

# Approvals proposal pathway

## 3. Stakeholder analysis table

The tables below can be used to help map out who your stakeholders are and what their interest/impact may be alongside the influence or power they may have on your company and the proposal. This will give you an indication of where to focus your engagement in order to help your project run more smoothly.

The following table lists some examples of potentially relevant stakeholders.

Table A3.1 Identifying relevant stakeholders

Category	Type	Description	Considerations
Neighbours	Community	Residents in close proximity to your site	Consider in light of recommended buffer distances and relevant modelling
	Business	Businesses in close proximity to your site	
	Downstream	e.g. downstream water users	
Government	Other regulators	<ul style="list-style-type: none"> <li>State and local planning authorities</li> <li>WorkSafe</li> <li>Water authorities</li> </ul>	There will be multiple regulations pertaining to your proposal
	Other	<ul style="list-style-type: none"> <li>Local MPs</li> <li>Relevant departments (e.g. DHHS, SV, DELWP*)</li> </ul>	MPs and departments may be an important source of information provision
Community	Locally organised	<ul style="list-style-type: none"> <li>Residents groups</li> <li>Nature conservation and 'Friends of' groups</li> <li>Other relevant groups</li> </ul>	Use local networks to gain greater participation and distribute information
	Non-government organisations	<ul style="list-style-type: none"> <li>Relevant interest groups</li> <li>Regional conservation groups</li> </ul>	It is beneficial to work proactively with groups who may be concerned with your proposal
Business	Peak bodies	<ul style="list-style-type: none"> <li>Local Chamber of Commerce</li> <li>Industry sector groups</li> </ul>	Gain relevant industry contacts and sector support

\*DHHS – Department of Health and Human Services; SV – Sustainability Victoria; DELWP - Department of Environment, Land, Water and Planning

# Approvals proposal pathway

Table A3.2: Template for mapping stakeholder interest versus influence

Interest/impact Level of interest or impact of the stakeholder	Stakeholder influence/power on company at corporate level or on the project/issue			
		Low		High
	High	Important stakeholder that often needs help to participate Keep informed Don't overlook – involve, collaborate		Potential advocate/ potential partner Strategic threat or opportunity Focus efforts – actively engage
Low	Spectator/advisor Respond to requests Lower priority – but don't forget, provide access to information updates and feedback. Consult when necessary		Keep informed Keep satisfied Consult and seek feedback but don't over-service Potential aggressor	

# Approvals proposal pathway

## 4. Stakeholder risk assessment

Use this matrix to assist assessment of the risk of your proposed project and the stakeholder engagement/consultation that can be carried out. If the project is high risk then it may be more beneficial for your company to have EPA-guided engagement/consultation and your project to go through the standard works approval pathway.

EPA suggests that this tool be used as a guide only. If you need assistance it would be beneficial to hire a qualified engagement professional to determine what types of engagement/consultation will work best for your community. Alternatively, if you have limited capacity EPA suggests consulting the iap2 resources online ([www.iap2.org.au](http://www.iap2.org.au)).

Table A4.1: Stakeholder risk assessment template

Date: .....

(Tick one box next to both columns.)

	Environmental/health risk	✓	Stakeholder interest/impact	✓
Very High (VH)	<ul style="list-style-type: none"> <li>Modelling near policy limit</li> <li>Ongoing amenity impact possible</li> <li>High-volume discharge/waste</li> <li>High resource consumption</li> <li>Hazardous materials</li> </ul>		<ul style="list-style-type: none"> <li>High level of pollution reports on current site/locality</li> <li>Project opposed by stakeholders/environment group(s)</li> <li>Contentious industrial zone</li> <li>Related planning/VCAT dispute; past/current/future</li> <li>Interest in application extends beyond municipal area</li> </ul>	
High (H)	<ul style="list-style-type: none"> <li>Modelling in upper policy range</li> <li>Moderate local amenity impact possible</li> <li>Medium-volume discharge/waste</li> <li>High resource consumption</li> <li>Hazardous materials</li> </ul>		<ul style="list-style-type: none"> <li>Significant level of pollution reports on current site</li> <li>Contentious industrial zone</li> <li>Some concurrent planning issues (planning scheme amendment, objections etc)</li> <li>Local community have raised some concerns</li> </ul>	
Medium (M)	<ul style="list-style-type: none"> <li>Modelling within policy range</li> <li>Some minor impacts to local amenity</li> <li>Unlikely to breach health standards</li> <li>Medium-volume discharge/waste</li> </ul>		<ul style="list-style-type: none"> <li>Some pollution reports on current site/locality</li> <li>No history of community opposition to development</li> </ul>	
Low (L)	<ul style="list-style-type: none"> <li>Modelling well within policy range</li> <li>Unlikely impact to amenity/health</li> <li>Unlikely health standards breach</li> <li>Low-volume discharge/ waste</li> </ul>		<ul style="list-style-type: none"> <li>Appropriate location for industry type (correct planning zones)</li> <li>Greenfield site away from residents</li> <li>No history of pollution reports for site</li> <li>Company has good reputation</li> </ul>	

# Approvals proposal pathway

Table A4.2: Recommended engagement/consultation based on stakeholder risk assessment

Use the results of the risk assessment to plan engagement activities. This should be used as a guide only.

Rating from matrix Environment risk/ community interest		Who should conduct consultation?	Primary consultation	Secondary consultation	Level of engagement for your proposal
Environment risk	Community impact				
VH (standard works approval)	VH H M L	EPA conducts information session	EPA conducts 20B conference or other as appropriate	Online interactive forum if appropriate	
H (standard works approval)	VH H M L	EPA conducts information session	EPA conducts 20B conference or other as appropriate		
All other combinations (fast track works approval)		Applicant to undertake engagement	Completing the stakeholder consultation table and the consultation template will assist you in determining what types of consultation are best suited to your stakeholders		

Completing the stakeholder risk assessment template will assist you in determining what types of consultation are best suited to your stakeholders. You may still choose to carry out some of your own engagement/consultation even if you are on the standard works approval pathway. Being in touch with stakeholders and maintaining a relationship has proven for industry to be a positive step towards being a good corporate citizen.



# Approvals proposal pathway

---

## 5. Consultation template

### Form

- Name
- Business
- Outline of proposal etc.

### Purpose

The key purpose of engagement/consultation on the above approval application is to:

1. Notify interested and potentially affected parties about the proposal, including its construction, operation and decommissioning.
2. Identify issues raised by stakeholders in response to the proposal, and address these early in the proposal's development.
3. Establish and develop relationships with the community who are relevant to your application and ongoing operation.
4. Please provide any additional purpose relevant to your application.

### Designing the engagement/consultation for your proposal

There are many ways of sharing information and obtaining feedback from potentially impacted stakeholders. These can include basic processes such as letters, advertising, and public information sessions, as well as more tailored events and processes.

You will need to ensure that all potentially interested or impacted stakeholders are made aware of your proposal.

The type of approach adopted will depend on specifics of the proposal and the community: Are people interested or concerned? How many? Can they be easily addressed at one meeting or are many required? Are the issues relevant to the proposal complex?

### Advertising and promotion

The community cannot be expected to know about your proposal unless you tell them. At this stage in your application, information will be for the purpose of bringing stakeholders into contact with you.

### Information provision

You will need to provide stakeholders with relevant information available in multiple formats (i.e. digital and hard copy). Such information should be communicated in plain English or other languages if applicable in the proposal area. It could include:

- proposal summaries/fact sheets
- PowerPoint presentations
- modelling and other specific technical information presented in a way that is meaningful to the stakeholder
- design descriptions and maps.

Stakeholders will need an opportunity to provide feedback such as:

- information sessions
- informal meetings (in homes, cafes, places of business)
- online via websites
- reply paid postal.

### Relevant questions

- What are the discharges from the proposed facility?
- What are the potential impacts (noise, odour, dust, emissions etc.)?
- How big is the development?
- How long will it operate for and at what times?
- Are there indirect impacts, for example, truck movements?

# Approvals proposal pathway

Please outline how you have addressed the following:

## Advertising

- Where was information advertised/provided?
- Were other channels used to notify community?

## Events

- Who attended events?
- How many?
- What is the proportion of RSVPs compared to invitees to events held?

## Direct contact

What other methods of engagement have been employed? For example, local networks, letterbox drops, mailouts, telemarketing etc.

## Stakeholder list

Name	Organisation	How or why are they interested or impacted by your proposal?	Approach to engagement (methods/tools used)	Stakeholder response to proposal	Issues encountered? (E.g. accessibility, ESL etc.)
Jim Brown	N/A	<ul style="list-style-type: none"> <li>• lives adjacent to proposed site</li> <li>• concerned about odour and truck movements</li> </ul>	<ul style="list-style-type: none"> <li>• letterbox drop</li> <li>• public information session</li> </ul>	<ul style="list-style-type: none"> <li>• he would like second opinion on air modelling provided</li> </ul>	<ul style="list-style-type: none"> <li>• limited English capability</li> <li>• interpreting service used</li> </ul>

## Outcomes

1. Did the proposal change as a result of feedback obtained from stakeholders?
2. Is further engagement/consultation required?
3. Please summarise outcomes from the engagement/consultation process.

## Appendices

Please provide:

- contact list for stakeholders you have made contact with in developing your project
- other relevant documentation of your engagement activities (for example, meeting minutes, information sheets etc.).

# Approvals proposal pathway

## 6. Advertising for works approvals – proposal phase

Applicants wishing to engage consult with stakeholders at the proposal phase may wish to hold an information session or invite comments on their proposal.

The template below details how EPA suggests advertising to be conducted for proposals and what we expect from applicants.

- If you decide to advertise yourself, we recommend you complete your advertisement using the template below. Advertisements can be completed in this structure and as long as it contains all the information it will be considered valid.
- Your advertisement needs to be at least the standard size of other advertisements in the newspaper you are advertising in.
- Advertise in the Melbourne *Herald Sun* and relevant local or regional newspapers. Allow any member(s) of the public to make a submission to your company regarding their concerns about the proposed works.
- Allow a minimum three-week period for making submissions.
- EPA will place advertisements in relevant newspapers as a part of all works approvals.
- Advertising by proponents does not replace the advertising that EPA will do for works approvals.

Company logo	Potential approval application – NAME	
Company name will soon be applying for an approval for the following work from EPA Victoria. This will be to issue an approval or licence which will permit work to be undertaken, which will result in a discharge of waste to the environment or an increase or alteration in an existing discharge.		
Name of works	Location of works	
	Short description of what the works will do. i.e. milk processing plant, oil refinery, wastewater treatment system	
A copy or a summary of the draft proposal, accompanying draft plans, specifications and other information can be viewed at no charge at {company address}, online at {www. ....} or request a copy by contacting {company email and phone number}. Interested persons may, within 21 days of the date of advertisement, comment in writing on the draft application.		

How to advertise:

Each newspaper will have its own requirement for advertising and you may like to employ the help of a graphic designer to make your advertisement look more appealing and ensure it is the correct size. Make sure you contact the newspaper well in advance of preparing your advertisement and of the date you want to advertise.