

14 January 2020

Better Regulatory Practice
Department of Water Environmental Regulation
Locked Bag 10
JOONDALUP DC WA 6919



Environment Institute
of Australia and
New Zealand Inc.

Dear Sir / Madam

RE: Feedback on Draft Guideline: Air Emissions

The Environment Institute of Australia and New Zealand (EIANZ or Institute) Western Australia Division (EIANZ-WA) is pleased to provide feedback on the draft *Guideline: Air Emissions* (the Guideline) released by the Department of Water and Environmental Regulation (DWER) on 11 October 2019 for public consultation.

We are a not-for-profit, professional association for environmental practitioners. EIANZ promotes independent and interdisciplinary discussion on environmental issues and advocates good practice environmental management delivered by competent and ethical environmental practitioners.

We forward this submission on behalf of the Western Australian EIANZ members. Currently, we have 160 members in WA while across Australia and New Zealand we have over 2000 members. Our members come from a range of technical disciplines including certified environmental practitioners (CEnVP), ecological consultants, environmental advocates and environmental specialists working in government, industry and the community.

Overall, EIANZ-WA views the updated Guideline as a positive step towards achieving the objectives of the *Environmental Protection Act 1986*, by providing a clear framework for community, industry and government when assessing air emissions associated with Part V works approval and licence applications. Furthermore, we acknowledge our support of the following components of the guideline:

- Alignment with the Environmental Factor Guideline – Air Quality of Western Australia's Environmental Protection Authority (EPA) and associated definitions.
- Inclusion of a screening process to determine the likelihood of emissions requiring detailed analysis.
- Adoption of ambient air quality guideline values (AVG) based on approved health guidelines of Western Australia's Department of Health (DoH) and the New South Wales Environmental Protection Authority publication, *Approved methods for the modelling and assessment of air pollutants in New South Wales* (EPA 2016).
- A reference hierarchy to identify suitable alternative criteria for pollutants not listed in the Guideline.
- Clarification on the assessment approach and expectations associated with meeting AVGs within and outside of the modelling domain.

We also provide the following additional comments:

- A glossary is recommended to clarify terms used throughout the guideline (e.g. AVGs, identified air emission component, modelling domain).
- With regard to proposals that occur in areas where ambient standards and limits are defined under an Environmental Protection Policy (EPP), it is noted that the EPP takes precedence over the Guideline. It should be specified that this statement applies only to pollutants included in the EPP and all other pollutants are subject to the Guideline.
- The screening analysis method may be viewed as overly conservative (i.e. likely to provide estimates of concentrations higher than would actually occur) and does not take into consideration the location of sensitive receptors. This may potentially result in unnecessary, detailed analysis being triggered for many proposals. EIANZ recommends more focus on impacts to sensitive receptors in the screening phase in addition to case-by-case consideration to ensure that a reasonable assessment is made.
- The Guideline refers to cumulative impacts of emissions however there is limited guidance on how cumulative impacts should be analysed by proponents and assessed by DWER. EIANZ encourages further definition on assessment of cumulative impacts within the Guideline to provide greater clarity on process.
- We understand that separate guidelines are being developed for fugitive dust and that the *Air quality modelling guidance notes* (DoE 2006) are under review. We look forward to the release of draft guidance documentation relating to both fugitive emissions and air quality modelling.

We thank the Department for the opportunity to comment on the draft *Guideline: Air Emissions*. If there are any queries regarding this submission, please contact Belinda Bastow, President EIANZ-WA Division on wa@eianz.org.

Yours sincerely



Belinda Bastow
President
EIANZ – WA Division