

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
PREFERED PIPELINE ALIGNMENT		
1.	Adopt the preferred pipeline alignment as: A3 – B1c - C3 – D2 - E1 (including 800 metre tunnel) – F3 – G6 – H2.	<p>I intend to approve a pipeline alignment from the off-take point on the Goulburn River north of Yea to the Sugarloaf Reservoir that generally conforms with the preferred alignment put forward by the proponent at the Advisory Committee’s public hearing and then recommended by the Committee. As an initial step, I have endorsed plans for a pipeline corridor, within which a specific pipeline alignment will be defined once more detailed investigations are completed. Issues emerging from the Committee’s report, as well as continuing investigations by the proponent, have pointed to the need for further assessments in order to finalise the alignment.</p> <p>I have consulted with the Minister for Environment and Climate Change on the suitability of the pipeline route as recommended by the Advisory Committee in relation to the avoidance, minimisation and offsetting of impacts on native vegetation, consistent with Victoria’s Native Vegetation Management Framework. I shall also consult with the Minister in relation to more detailed alignment plans for the pipeline.</p> <p>To provide an effective planning framework for the use and development of the project, I asked the Governor-in-Council to authorise the project under section 16 of the <i>Planning and Environment Act 1987</i>, subject to a set of conditions. The Governor-in-Council approved an Order under section 16 on 5 August 2008.</p> <p>Under the required conditions, the proponent has provided plans of a corridor within which it proposes to construct the pipeline, which I have now endorsed. The actual construction and maintenance areas within this corridor, and other requirements applying to the works, will be specified for each route section in an Environmental Management Plan (EMP) to be prepared by the proponent.</p> <p>To guide the preparation of the EMPs, I will authorise an Environmental Management Framework (EMF) that will form part of the proponent’s overall project environmental management strategy. The EMF provides the overarching framework for environmental management of works and related effects during project construction, post-construction and operational phases.</p> <p>I will endorse both the EMF and suitable EMPs following consultation with the Minister for Environment and Climate Change.</p>

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
GREENHOUSE GAS		
2.	Review the greenhouse gas emissions for the project and recalculate these when the final alignment and construction methodology is determined.	This is supported. The proponent will need to review and recalculate the emissions as part of its EMPs for the project.
3.	Modify dot point 1 in the Greenhouse Gas Management Plan (referenced in Appendix Y of the Environmental Management Strategy) to read " <i>Monitoring and public reporting of greenhouse gas emissions on an ongoing basis</i> ".	This is supported. The proponent will need to include a program for monitoring and reporting greenhouse emissions associated with the project in the EMPs.
4.	Add a new dot point in relation to the Greenhouse Gas Management Plan; " <i>Suitable offsets for residual project greenhouse gas emissions (design, construction and materials) should be explored and implemented where practical</i> ".	I note that the proponent has already committed to offsetting the emissions associated with the operation of the pipeline. As the residual emissions associated with design, construction and materials account for only 2% (approximately) of the total lifecycle emissions, I encourage the proponent to consider implementing this.
FLORA AND FAUNA		
5.	Undertake detailed assessment of impacts on State and Commonwealth listed species in the micro-design of the final alignment to inform the development of EMPs and WAPs.	I note that detailed field studies of flora and fauna have advanced since the Advisory Committee prepared its report, and that the proponent proposes to complete its surveys at appropriate times over the coming months. A commitment to this remaining survey work will need to be incorporated in the species mitigation plans that will form part of the EMF to be prepared by the proponent.
6.	Finalise investigations and surveys of flora and fauna, and ensure an ecologist is in continuous and close contact with construction crews to oversee mitigation measures.	See previous response. The flora and fauna management plans will need appropriate procedures for oversight of mitigation measures, including monitoring by relevant specialists. I note that in addition to the on-going availability of specialist ecologists to advise the construction teams, the Department of Sustainability and Environment (DSE) will need to have continuous access to works areas to monitor flora and fauna management as well as other aspects of site management.

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
7.	Apply the precautionary principle for mitigation measures wherever there is suitable habitat for listed State and Commonwealth species, and assume their presence for planning and construction purposes.	<p>The Committee considered that measures to mitigate adverse effects of the pipeline construction on listed flora and fauna species should be available, although further investigations by the proponent's specialists are needed to clarify the appropriate combination and application of these measures relative to impact.</p> <p>The proponent is to prepare flora and fauna management plans, including proposed management measures for species listed under the <i>Flora and Fauna Guarantee Act 1988</i> (FFG Act) that have a reasonable likelihood of occurring either within or immediately adjoining the project construction areas. These plans should be aligned with requirements of the Commonwealth Government for species listed under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). They should apply the precautionary principle in specifying protective measures to address the potential presence of listed species.</p> <p>I will endorse the flora and fauna management plans as part of the EMF, when these are satisfactory, following consultation with the Minister for Environment and Climate Change.</p>
8.	Reinstate habitat at each construction site immediately after construction and closely monitor structures (and provide timely repair as appropriate) or other measures to manage processes threatening to the environment.	<p>The proponent will need to provide an overarching statement of environmental commitments, including performance standards for land rehabilitation and habitat restoration, as well as a strategy for monitoring, in the EMF that it is to prepare.</p> <p>In order to provide both an incentive for sound rehabilitation practices on the part of the proponent, and a financial guarantee to enable appropriate restorative measures if the execution by the proponent should falter, the Minister for Environment and Climate Change can apply a legally binding financial bond for the project works that would be drawn down, if needed, at his direction.</p>
AQUATIC ECOLOGY		
9.	Finalise investigations and surveys of aquatic ecology and ensure an ecologist is in continuous and close contact with construction crews to oversee mitigation measures.	Refer to response to Recommendation 6. Close liaison with the Goulburn Broken Catchment Management Authority and Melbourne Water (the latter in its capacity as waterways manager) will be appropriate.

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
10.	Apply the precautionary principle for mitigation measures wherever there is suitable habitat for listed State and Commonwealth species, and assume their presence for planning and construction purposes.	Refer to response to Recommendation 7.
11.	Rehabilitate each waterway and adjacent construction site immediately after construction, and closely monitor structures (and provide timely repair as appropriate) or other measures to manage processes threatening to the environment.	Refer to response to Recommendation 8.

IMPLICATIONS OF TRANSFERRING WATER		
12.	Design the pipeline crossing of the Yea River flood plain to include a groundwater shunt within the deep channel to permit the water tables to equilibrate post construction across the pipeline.	This issue should be addressed in the relevant EMP, following more detailed risk assessment.
13.	<p>Restrict the Melbourne Water off-take to the Sugarloaf Pipeline to be:</p> <p>(i) not more than 7.5% of the riverflow at the time as measured at the nearest upstream river flow gauge station;</p> <p>(ii) not more than 75GL in any one year (as is proposed); and</p> <p>(iii) zero if the necessary regulated releases are for the maintenance of environmental flows or materially deplete water stored in Eildon Weir that is designated as being an environmental reserve.</p>	<p>The Advisory Committee considered that the off-take from the Goulburn River can be managed without detriment to downstream values and users if the amount of water diverted is effectively controlled. I note the Committee's recommendations in relation to rules for governing the water off-take.</p> <p>I intend that the EMF will include binding commitments specifying that:</p> <ul style="list-style-type: none"> • a daily maximum limit of 7.5 percent of river flow may be diverted from the river during the non-irrigation period • the pipeline may convey a maximum of 75 gigalitres of water in any one year. <p>I note that the proponent may access part of the water quality entitlement but will not be accessing environmental flow entitlements stored in Eildon Weir.</p> <p>I also note that this matter is relevant to the decision to be made by the Minister for Water with respect to the bulk entitlement to be issued to Melbourne Water under the <i>Water Act 1989</i>.</p>

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
SOCIAL AND CULTURAL		
14.	Establish a Project Advisory Group, comprising members of the local Councils, industry, business, tourism and community, to act as a formal conduit for referral of issues, complaints and other matters. Employ an Executive Officer to support the Group, independent of the Proponent and other representatives.	<p>The Advisory Committee has highlighted the need for more effective engagement between the proponent and stakeholders during the implementation phase of the project to address issues that may arise.</p> <p>The establishment of a Project Consultative Group (PCG) by the proponent will be an effective mechanism for it to receive feedback and advice on implementation issues. The title 'PCG' is preferable to 'Project Advisory Group' to avoid confusion with the Advisory Committee. Terms of reference and appointment procedures for the PCG will be drafted and confirmed by me after consultation with the two Councils.</p> <p>An independent convenor will be appointed by the proponent, following consultation with me, to act as Chair and Executive Officer for the PCG. The proponent will be responsible for the administration costs of the PCG, including the convenor and reasonable travel costs of participants.</p>
15.	Provide a shared community officer, to work with both Yarra Ranges and Murrindindi Shire Offices, to liaise with the community, the Councils and the Proponent for the duration of the project.	This is supported. A shared community officer should be jointly appointed by the Shires of Yarra Ranges and Murrindindi to provide a project liaison function, including administrative support for the PCG. This position is to be funded by the proponent.
16.	Establish two Community Liaison Groups, one on each side of the Divide, comprising various representative members of the community, to act as a focal point before, during, and for two years after construction of the pipeline.	I note the Advisory Committee's recommendation. It will be appropriate for the PCG (refer to Recommendation 14) to initiate meetings of stakeholder representatives to enable discussion of local project implementation issues as the project progresses.

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
17.	Provide a community support fund, to assist individuals who face or experience physical or social hardship due to the project. Funding proposals should be allocated by the Community Liaison Group, and endorsed by the Project Advisory Group. These funds are separate from any compensation program.	<p>While the concept of a Community Support Fund is supported in principle, I consider that the Shires of Yarra Ranges and Murrindindi are best placed to consider and address situations of individual hardship that may relate to the pipeline construction.</p> <p>I am therefore requiring the proponent to make an allocation of \$200,000 as an offset payment to each of the above Councils to provide a fund for hardship payments to individuals and to augment available support services for individuals whose circumstances have been affected by the project.</p> <p>The funds should be allocated by the respective Council, in consultation with the Department of Planning and Community Development (DPCD) and the Department of Human Services (DHS) regarding criteria and procedures.</p> <p>The above amounts are separate from any payments or direct measures by the proponent for the repair of roads affected by project construction activities, and also separate from any payments for land acquisition or “compensation program”.</p> <p>I also note that the Alliance has proposed a \$5 million ‘Regional Benefits Program’ to provide support for community projects.</p>
18.	Ensure that affected land owners are provided with at least a months advance direct notification of any works to be conducted on, or within 500 metres of their property.	The proponent will be required to provide a protocol for landowner consultation and stakeholder engagement as part of the EMF which it is to prepare. This protocol should include a process for notification of works. While early notification of potentially affected landowners is desirable, this may not be practicable in all circumstances.
19.	Establish a public complaints reporting process to report on possible breaches of project environmental performance criteria (for example noise, dust, traffic, erosion/sedimentation, water quality impacts, vegetation clearing, other construction breaches) to the independent auditor.	<p>The proponent will be required to provide a complaints management and reporting procedure as part of the EMF which it is to prepare.</p> <p>Refer also to Recommendation 45.</p>

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
SOCIO-ECONOMIC AND TOURISM		
20.	Prepare and adopt bio-security protocols in consultation with relevant Government regulatory agencies and industry groups.	This is supported. The proponent will be required to include a biodiversity protocol, prepared in consultation the Department of Primary Industries (DPI), in the EMPs which I will endorse.
21.	Prepare and adopt a bio-security protocol for the Chytrid fungal disease of amphibians through the project environmental management framework.	A protocol relating to Chytrid Fungus will need to be included in the flora and fauna management plan which I will endorse, following consultation with the Minister for Environment and Climate Change.
CULTURAL HERITAGE		
22.	Include the relevant Aboriginal communities on the Community Liaison Groups to be established for the Project.	<p>This is supported in principle. I note that the proponent has consulted relevant indigenous groups as part of its preparation of a Cultural Heritage Management Plan (CHMP) for the project, as required under the <i>Aboriginal Heritage Act 2006</i>.</p> <p>The proponent should further liaise with relevant representatives of the Taungurung Clans Aboriginal Corporation, Wurundjeri Tribe Land and Compensation Cultural Heritage Council and Wandoon Estate Aboriginal Corporation to establish the most beneficial forums for engaging with indigenous people during the project's implementation.</p>
LANDSCAPE AND VISUAL		
23.	Liaise and negotiate with landowners, the Shires of Yarra Ranges and Murrindindi and local affected communities to finalise appropriate landscape and visual impact mitigation.	It will be appropriate for the proponent to work with stakeholders to finalise landscape and visual impact mitigation measures. Relevant commitments on the approaches or measures to be adopted for visual/landscape mitigation should be included in the respective EMPs.
24.	Revegetate and maintain the alignment post construction consistent with the agreed mitigation measures, and negotiate opportunities for adjacent landscape enhancement.	Refer to Recommendations 23 and 8.

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
25.	Actively seek to reduce the width of the permanent easement in all areas to the absolute minimum, and particularly in areas of high visual impact such as the Christmas Hills escarpment and the Toolangi State Forest.	<p>As detailed in my response to Recommendation 1, I have endorsed a corridor within which the proponent proposes to construct the pipeline.</p> <p>The actual allowable construction and maintenance area ('easement') widths within the corridor will be determined on a section by section basis, and will be documented in the EMPs for each route section which I will endorse following consultation with the Minister for Environment and Climate Change.</p> <p>In this regard, the proponent has been asked to develop a set of proposed decision criteria to guide the location and minimisation of the construction and maintenance easements within different sections of the route. The construction easement is to be as narrow as practicable, with widths up to a maximum of 30m, other than in exceptional and clearly justified circumstances.</p>
CONSTRUCTION DUST		
26.	Develop a list of sensitive receptors along the final pipeline route in consultation with property owners.	It will be appropriate for the proponent to consult landowners and other stakeholders to identify dust sensitive receptors and appropriate management actions.
27.	Invite community input into the Air Quality Management Plan.	Noted. I encourage the proponent to consider both the need and practical opportunities for community input on air quality management issues.
28.	Include standards for dust control (visual and other appropriate methods) in individual landowner agreements, which must contain a methodology for landowners to report breaches and the agreed actions that will be taken in response.	Performance standards for dust control – including for crop protection and amenity - should be established in the context of State Environment Protection Policy, and in consultation with the Environment Protection Authority. These standards should be consistent across the project area, rather than something to be negotiated at an individual property level. The proponent will need to include standards for dust control, mitigation measures as well as a complaints reporting and response procedure as part of the EMPs which I will endorse.

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
NOISE AND VIBRATION		
29.	Identify sensitive receptors for noise from construction and operation along the pipeline route in consultation with property owners, and develop appropriate noise management and monitoring responses.	It will be appropriate for the proponent to consult landowners and other stakeholders to identify dust sensitive receptors and appropriate management actions. I suggest that as part of this the noise impacts of air relief valves be examined.
TRAFFIC IMPACT		
30.	Undertake a baseline traffic survey along the Melba Highway and major secondary roads, and incorporate the findings into the Traffic Management Strategy (including allowances for any increases in traffic consequent upon the opening of Eastlink).	The adequacy of available data and the need for further traffic surveys is a matter for VicRoads to consider.
31.	Develop Traffic Management Plans (detailed and/or site specific) in consultation with VicRoads and local councils, taking account of construction scheduling, updated traffic figures, movements within the local road network, road and/or lane closures, local weather conditions and the need to provide for emergency vehicle transit.	This is supported. Traffic Management Plans, developed in consultation with the relevant municipalities and VicRoads, will need to be included in each of the section-based EMPs which I will need to endorse.
32.	Spray seal the unmade section of Glenview Road (Yarraview Road to Kings Street) and Gulf Road (Steels Creek Road to existing seal) immediately upon the conclusion of the project in those areas.	I encourage the proponent to undertake this recommended action. It would be beneficial for the proponent and Councils to reach an agreement on how each Shire's local roads will be reinstated and maintained throughout, and following, the project's construction.

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
SUSTAINABILITY FRAMEWORK		
33.	Negotiate with affected landholders along the preferred pipeline route in order to incorporate minor realignments and other engineering options to the benefit of the landowner or their land as are practicable within the pipeline design.	<p>It will be appropriate for the proponent to work with landholders and consult with other stakeholders in developing detailed site-level plans which seek to avoid, minimise or offset detrimental consequences of the pipe placement on individual properties, providing this is within the framework of the relevant EMP which I will endorse.</p> <p>Refer also to Recommendation 18.</p>
34.	Avoid, minimise or offset the consequences of the pipe placement on valued elements on individual land holdings.	Refer to Recommendation 33.
RISK ANALYSIS AND ASSESSMENT		
35.	Carry out a comprehensive risk identification, magnitude and probability evaluation before construction commences at any location.	<p>The need for further risk assessment is supported. To guide and scope the required risk assessment, the proponent has been asked to provide a proposed methodology and procedures for risk assessment of micro-siting, construction techniques and rehabilitation options for different project sections and elements, having regard to:</p> <ul style="list-style-type: none"> ▪ current rural productivity ▪ third-party infrastructure ▪ flooding and inundation ▪ erosion, surface water quality and sedimentation ▪ groundwater movement and interflow ▪ geotechnical instability ▪ dust and noise ▪ soil-borne pathogens ▪ listed flora and fauna and associated habitats ▪ groundwater dependent ecosystems. <p>I will endorse the risk assessment methodology and procedures as an element of the EMF. I note that the actual risk assessment can occur progressively for individual route sections.</p>

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
36.	Determine the most practical and least risk construction technique and pipeline design using multi criteria evaluation on the basis of the risk identification and analysis.	The outcomes of the risk assessment process outlined in my response to Recommendation 35 will inform the finalisation of the pipeline design and construction techniques endorsed through the EMPs.
37.	Include landowner representatives through the Project Advisory Group and/or Community Liaison Group to develop contingency plans for key project risks to be incorporated in WAPs and landholder agreements.	I draw the proponent's attention to this recommendation, and suggest that relevant and practical opportunities for community input into risk management issues be explored.
ENVIRONMENTAL MANAGEMENT FRAMEWORK		
38.	Include environmental and social performance criteria in contracts for project delivery (for example dust levels, noise, vegetation clearance, erosion/sedimentation levels, traffic, and protection of listed species).	While this recommendation is supported in principle, the terms of engagement of contractors, as well as the Alliance arrangements, are a matter for the proponent. I encourage the proponent to consider this recommendation in advancing its delivery of the project. I note that Melbourne Water Corporation, as the formal proponent, will be responsible for ensuring that required standards of project delivery are complied with.
39.	Negotiate individual property landowner agreements to ensure construction and rehabilitation requirements are agreed prior to works commencing, including compensation (for example infrastructure and primary production losses).	I note the Advisory Committee's recommendation. While the proponent will be required to develop a protocol for landholder consultation, agreements and dispute resolution as part of the EMF, the conclusion of individual agreements need not be a prerequisite for the commencement of works on particular properties.
PIPELINE SECTIONS		
40.	Prevent unacceptable damage to Groundwater Dependent Ecosystems and groundwater and interflow to ensure movements are not materially diverted and give rise to environmental detriment or unacceptable impacts on rural land productivity (Sections A, B, C, D, southern section of F, G, H).	I draw the proponent's attention to this recommendation, and suggest these issues be addressed in the appropriate section-based EMPs which I will endorse.

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
41.	Re-evaluate the proposed waterway crossings of the Yea River at Devlins Bridge (Section D) and Castella (Section E), and the two crossings of Dixons Creek (Section F) in the light of the (recommended) risk assessment, to determine whether pipe bridge crossings are feasible and carry less risk than the preferred trench crossing.	<p>I note that the Goulburn Broken Catchment Management Authority (CMA) will need to approve waterway crossing methods for the pipeline north of the Divide, and am advised that the proponent has already commenced a risk assessment exercise to inform the CMA's decision on waterway crossing techniques.</p> <p>This risk assessment should also consider the feasibility of tunnelling under the Yea River at Castella and the Kallatha Creek.</p> <p>It will be sensible for the proponent to integrate the requirements arising from the waterway crossing approvals process, including details of the risk assessment undertaken, into each of the EMPs which I will need to endorse.</p>
42.	Establish minimum performance monitoring sites, including sites at which ground water levels are monitored and stream water quality (for example turbidity, electrical conductivity) can be evaluated, both during and post construction (All Sections).	<p>This is supported. A program for monitoring the impacts of project works and site management on erosion and sedimentation, landslip hazard, groundwater movement/interflow, waterway condition and land reinstatement will need to be included in the EMPs.</p> <p>Further, the conditions of the Order under the <i>Planning and Environment Act 1987</i>, which authorise the project, require the environmental performance of the works to be monitored, audited and reported in accordance with procedures that I will endorse following consultation with the Minister for Environment and Climate Change.</p>
43.	Pay particular attention to avoiding noise and dust (Sections G and H), and to the potential for the pipeline being a source of ground and water pollution due to brackish water inflow of groundwater or interflow (Section G).	<p>I draw the proponent's attention to this recommendation, and suggest these issues be addressed in the appropriate section-based EMPs which I will endorse.</p>
MANAGEMENT AND MONITORING		
44.	Refine the management and monitoring commitments (as in the updated Table 10 from the PIA – Document 55), in consultation with stakeholders. Use this as the basis for a 'Statement of Commitments' to help guide project implementation.	<p>The concept of a 'statement of commitments' is supported. The proponent will need to document this in the EMF, which will provide the framework for the EMPs. I will be seeking advice from the Minister for Environment and Climate Change on the proposed EMF, as well as monitoring procedures, before these are endorsed.</p> <p>Refer to Recommendation 14 in relation to input from Project Consultative Group.</p>

SUGARLOAF PIPELINE

RESPONSE TO ADVISORY COMMITTEE RECOMMENDATIONS

NUMBER	RECOMMENDATION	RESPONSE
INDEPENDENT AUDITOR		
45.	<p>Further, the Advisory Committee considers the engagement of an independent auditor to be particularly beneficial for this project given the timeframe for which it is proposed to be constructed and the community concerns raised about the overall project. It therefore further recommends that the Victorian Government appoint an independent project auditor (with the capacity to engage technical assistance) to:</p> <ul style="list-style-type: none"> (i) oversee the risk assessment and construction technique evaluations; (ii) oversee the pipeline construction and reinstatement; (iii) act as a high level monitor to deal with major issues that arise during the project; (iv) ensure that agreed standards are met in construction and in all rehabilitation programs through implementation of the EMS, EMPs, WAPs and landowner agreements; (v) provide independent reporting of project performance separate from the Proponent; and (vi) investigate public complaints that have not been resolved through the Project Advisory Group or Community Liaison Groups. 	<p>The project Order made under section 16 of the <i>Planning and Environment Act 1987</i> requires the environmental performance of the works to be monitored, audited and reported in accordance with procedures which I will endorse following consultation with the Minister for Environment and Climate Change.</p> <p>As part of these procedures, an external EPA-accredited auditor is to be appointed by the proponent to audit the environmental performance of the project. The appointee is to be agreed with DPCD.</p> <p>In addition, I consider that there is also a need for peer review of the EMPs to be developed by the proponent. DPCD will appoint an expert peer reviewer for this role.</p> <p>Summary statements from the environmental auditor and the expert peer reviewer are to be publicly released.</p>