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Court finds that LNG hub is not 'significant'

Josie Walker, Principal Solicitor

Roe v the Director-General of DEC and Woodside [2011] WASC 57; *Roe v the Director-General of DEC and Main Roads* [2011] WASC 58

The WA Court of Appeal handed down its findings on 15 March 2011, dismissing Joseph Roe's two legal challenges to clearing of native vegetation on James Price Point, the site of the proposed Kimberley Gas Hub.

The cases were commenced by the EDO on behalf of Mr Roe in late 2010. The central legal issue was whether the Department of Environment had power to issue two clearing permits, one to Woodside, and one to the Department of Main Roads while the EPA was assessing the Gas Hub proposal. The Court found that the LNG Hub was not a 'significant' proposal as defined under the *Environmental Protection Act 1986* (the Act), therefore the clearing permits were legal.

Mr Roe is an indigenous law boss for the area around JPP. He says that any clearing of this land, even if only for environmental testing, will cause irreparable damage the spiritual values of the land for future generations. Such damage is difficult to justify, considering that the State or Federal Environment Minister may refuse to grant environmental approval for the project.

The EDO argued that the Gas Hub proposal was a "significant" proposal under the Act, and therefore a clearing permit which was "related" to this proposal could not be granted while assessment of the proposal was pending.

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James Price Point. yaruman5@Flickr

However, the WA Supreme Court found that the Gas Hub proposal currently being assessed by the State and Federal Governments is legally a "strategic" proposal rather than a "significant" proposal. While the Court accepted that building an LNG plant in the Kimberley will eventually have major environmental impacts, it found that in essence the proposal currently being assessed by the EPA is only a site selection or land use planning proposal, not a proposal to actually construct a plant, therefore legally the proposal must be treated as not having any environmental impact.

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Margaret River coal mining proposal 'environmentally unacceptable'

Jessica Smith, Outreach Solicitor

The Environmental Protection Authority (EPA) has determined that the Vasse coal mining proposal in Margaret River is environmentally unacceptable. The EPA released its decision on 21 March 2011 that the proposal would be assessed at the level of 'Assessment of Proponent Information Category B'. This means that the EPA was satisfied, on the basis of the referral information, that the proposal was environmentally unacceptable and that further information would not change its view.

According to EPA Chairman Paul Vogel, "[t]he Board considered that there are likely to be significant impacts, or risks, from the proposal on the Leederville and Sues Aquifers and on significant environmental values, including the social surrounds of the Margaret River region, which these aquifers support.

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LNG hub not 'significant'

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The outcome in this case is closely connected to the earlier decision of the Supreme Court in *Environmental Protection Authority; Ex Parte Chapple* (1995) 95 LGERA 310. In that case the applicant sought an order that the EPA must assess a proposal for a Land Use Plan on the Burrup Peninsula. The Court found that the Land Use Plan was not a "significant" proposal because it would cause no physical changes on the ground. Rather, any environmental impacts would be linked to later development proposals which would become permissible by virtue of the Plan coming into force, and could be assessed at that stage.

Important changes were made to the Act in response to the decision in *Ex Parte Chapple*. Firstly, a new part of the Act was introduced to deal specifically with assessment of land-use plans. Secondly, a provision was introduced allowing a proponent to refer a "strategic" proposal to the EPA. A "strategic" proposal is defined as a 'future proposal that will be a significant proposal'. The process for assessing a "strategic" proposal is similar to that for assessing a "significant" proposal, however there is no prohibition on granting clearing permits or making other related decisions while assessment of a "significant" proposal is pending.

Mr Roe's case was the first to test the distinction between a "strategic" and a "significant" proposal.

The Court found that the purpose of the provisions related to strategic proposals is to allow proposals to be assessed which would not have any impact on the environment because they are still at the early planning stage (like the Land Use Plan in *Ex Parte Chapple*).

The Court noted that, in February 2008, the Federal and State governments entered into a Strategic Assessment Agreement for assessment of the impacts of a common-user LNG hub to process gas from the Browse Basin. The agreement committed the governments to assess the full range of options for gas processing, including feasible alternatives to locating the gas ghub on the Kimberley coast. The "strategic" proposal which was referred to the EPA in March 2008 was the proposal described in this Agreement.

Environmental groups have long been concerned that the WA environmental assessment process has not followed the approach promised in the Strategic Assessment Agreement. Instead, a site selection process was undertaken by the Northern Development Taskforce (NDT), outside of the state environmental assessment framework. This process did not incorporate consideration of non-Kimberley options. The NDT produced a report in December 2008 recommending that the Gas Hub should be located at JPP, and this was followed by an announcement by the Premier that JPP was the government's preferred site.

Then, in December 2009, the EPA approved a 250-page scoping document describing how the proposal should be assessed. The scoping document assumed that the gas hub would be located on JPP, and did not require any further consideration of site options. Arguably, the proposal described in the scoping document was different from the proposal originally referred to the EPA, because it involved assessment of one site only.

Therefore the EDO for Mr Roe argued that the gas hub proposal, although it continued to be a "strategic", had also become a "significant" proposal, at least by late 2009.

The Court made three findings, leading to the conclusion that the proposal had not become a "significant" proposal.

Firstly, the Court found that a proposal could not be simultaneously a "strategic" proposal and a "significant" proposal, in spite of the wording in s 40B(3) of the Act which refers to 'the extent to which the strategic proposal is itself a significant proposal'. The Court found that for a strategic proposal to be 'itself a significant proposal', there would need to be two separate referrals and two separate assessment processes: one of the strategic proposal, and one of the significant proposal.

Secondly, the Court found that a proposal could not change from a "strategic" proposal to a "significant" proposal in the course of assessment without a new proposal being referred, on the grounds that s43A of the Act provides that the EPA may consent to a proponent changing a proposal in the course of assessment only if the change is unlikely to significantly increase the impact of the proposal. The Court held that changing a "strategic" proposal to a "significant" proposal would necessarily lead to a significant increase in the impacts of a proposal.

Thirdly, the Court found that the State's proposal as described in the 2009 Scoping Document was still not a "significant" proposal, because the proposal was in essence a proposal for land-use planning at JPP, rather than an actual development proposal. Since the limitation on issuing clearing permits only applied to a "significant" proposal, the Court found that the clearing permits were valid.

This conclusion will come as a surprise to many objectors who have waded through the lengthy Strategic Assessment Report for the gas hub, which was released in December 2010. The report provides a detailed layout of the proposal, specifies an exact site, and devotes over 1,000 pages to assessing the likely impacts of building a Gas Hub at JPP. It is difficult to imagine how a proposal could be more concrete and specific than the one described in the Strategic Assessment Report. This proposal is certainly much more advanced, and the impacts more easily identified than the Land Use Plan in *Ex Parte Chapple*. Nevertheless, because further approvals will be required for construction, and because the State is not actually proposing to build the gas plant itself, the Court found that the proposal was still strategic rather than significant in nature.

Both environmental groups and industry have largely been in favour of strategic assessment processes for major developments, because it should result in more early-stage consultation, better consideration of options, and better consideration of cumulative impacts. However, this decision highlights a strange paradox in the strategic assessment regime under the Act, where assessment of proposals at the "planning" stage does not prevent the pre-emptive commencement of works which would be prohibited if the proposal had advanced to the "project approval" stage.

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A step towards a secure future for the Great Western Woodlands

Lisa Kastropil, EDO volunteer, and Claudia Maw, Solicitor

Lake Hope from Honman Ridge. Barbara Madden

Covering an area three times the size of Tasmania and located between Western Australia's Wheatbelt and the Nullarbor Plain, the Great Western Woodlands (the Woodlands) is the largest remaining temperate woodlands on the planet with a semi-arid environment. The Woodlands contains about one-fifth of all known flora within Australia, including nearly a quarter of Australia's Eucalypt species, and, despite minimal rainfall, the woodland vegetation consists of many tall, mature trees. Its varied vegetation and landscape are home to numerous animal species, and the area also holds great cultural significance, with Aboriginal occupation dating back over 22,000 years.

Australia has already lost 85% of it is temperate woodlands since European settlement, and only 3% of the world's temperate woodlands and shrublands are formally protected today. Protection of assets such as the Woodlands is therefore vitally important to conserve biodiversity within Australia. Currently, the majority of the Woodlands is classified as 'Unallocated Crown Land'– ie, land which is not dedicated for any specific purpose such as a pastoral lease or national park. The remaining area consists of pastoral leases, conservation reserves, about 350 active mine sites, and approximately 5,000 other mining and exploration tenements. The entire area is covered by as yet unresolved Native Title claims. Viewed optimistically, this gives the State government the opportunity to allocate this land for conservation purposes. Until recently, however, there has been minimal government funding to manage and invest in the regions conservation, leaving the world's most intact temperate woodlands with no cohesive management plan in place.

To put greater pressure on the government, the Great Western Woodlands Collaboration (the Collaboration) was formed. An alliance of four conservation organizations - The Wilderness Society, Pew Environment Group, The Nature Conservancy and GondwanaLink – the Collaboration campaigns for a single, integrated regional management approach. In 2009, the Western Australian government responded with the creation of a stakeholder reference group, which included representatives from the Collaboration, in addition to representatives from Traditional Owner Native Title representative bodies, industry and local government. The reference group worked with the Department of Environment and Conservation to develop a strategy for the future management of the Woodlands. A separate reference group was established for consultation between government agencies with responsibilities in the region.

At the end of 2010, the Department of Environment and Conservation released *A Biodiversity and Cultural Conservation Strategy for the Great Western Woodlands* (the Strategy), which provides an "overarching framework under which diverse planning and management processes can be integrated". The Strategy is a significant first step in the conservation battle as it is the first conservation plan which addresses the woodlands as a single ecological region, highlighting the major issues threatening the Woodlands, and giving strategic directions to aid in framing the conservation effort. The Strategy challenges the typical reserve based approaches Australia has taken to conservation in the past, advocating instead for efficient coordinated management of the entire woodland region. The Strategy therefore aims to integrate the long term protection of the Woodland's natural and cultural values with economic and social activities in the region by managing apparently conflicting land uses such as exploration and mining, timber harvesting, pastoralists, tourism and beekeeping within the landscape.

The State government has committed $3.8 million to develop and implement the Strategy over the next two years as the first part of a ten year program to implement a list of prioritized objectives. The Strategy reflects on the Woodlands having a powerful sense of place, being highly significant and special to the local and visiting community.

Once the broad directions and approaches are established, the Strategy lists seven strategic outcomes which are given top priority for implementation. Among these are: an integrated fire management plan; commitment to the joint management of conservation reserves with the Traditional Owners; and the promotion of voluntary partnerships in order to coordinate conservation and competing land use issues across different tenures. Due to the success of the initial reference group, the Strategy established a Great Western Woodlands Reference Group to enable ongoing consultation and to advise on the Strategy's initial implementation.

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Great Western Woodlands

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Release of the Strategy has, for the most part, been positively acknowledged by environmental stakeholders as a good first step towards better protection and management of the Woodlands. In early 2010, however, over 50 leading Australian and international scientists released a declaration to the Premier of Western Australia, Colin Barnett, and the former Environment Minister, Donna Faragher, calling for the urgent protection of the Woodlands (the Declaration). While encouraging the government to put the Strategy into effect as quickly as possible, the Declaration is critical of the breadth of the document, arguing that it does not effectively resolve underlying issues such as government transparency when negotiating mining proposals, or control of fire threats and invasive species.

Further, the Declaration argues that for the Strategy to be sustainable into the future, greater and more permanent funding will need to be dedicated to the large natural area. Most significantly, the Declaration calls for the State government to move quickly towards legislating measures that will ensure the future of the Woodlands, stating that codified, legal protection for the Woodlands is essential for securing the area's long term conservation.

Reflecting these concerns, the Collaboration is continuing to develop a broader agenda, one that is beyond political timeframes, agency limitations, and the constraints imposed by existing tenure arrangements. These moves include an investigation of statutory models to secure long term protection, the development of a land use planning process, and the establishment of broader management and funding structures. Project Director for the Collaboration, Wayne O'Sullivan, summed this up in a recent address to the National Environmental Lawyers Association state conference by saying "In this setting, a management board, with trust arrangements in place, will oversee a program of identified and costed works, reflecting the priorities of the stakeholders.

'This will be framed in a legal model that provides secure long-term protection, recognition and management of the Great Western Woodlands.'

• *Sincere thanks to Wayne O'Sullivan, Project Director for the Great Western Woodlands Collaboration, for his assistance in writing this article* – Ed. ■

Honman Ridge Road. Barbara Madden

Margaret River coal mining proposal

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Margaret River. Matt Dwen

'Even though some of the significant impacts, or risks, may be presented as being manageable because of their low probability of occurring, the environmental consequences of some low probability event may be so serious, widespread or irreversible that the proposal, taken as a whole, on balance, presents unacceptable risks to important environmental values, and thus makes the proposal environmentally unacceptable.

'The EPA will now prepare an assessment report to the Minister for Environment recommending against the implementation of Vasse Coal Management's coal mining proposal.'

Once the EPA issues its assessment report, the public will have 14 days in which to appeal the content of the report. The proponent, LD Operations, has not yet indicated whether it will appeal the content of the EPA's report. Ultimately, however, the decision as to whether or not the proposal will go ahead rests with the Minister for Environment.

The EDO has received a number of enquiries in relation to the Margaret River coal mining proposal and welcomes the EPA's decision. ■

Amendments proposed to Noise Regulations – opportunity for public comment

The Department of Environment and Conservation (DEC) has recently released proposed amendments to the *Environmental Protection (Noise) Regulations 1997* (WA).

The existing Regulations set out when noise is taken to be unreasonable for the purposes of the *Environmental Protection Act 1986* (WA), and contain general noise limits on how noise from particular sources is regulated – such as sporting events and construction work.

The proposed amendments and explanatory notes are available on www.dec.wa.gov.au/content/view/3406/1957

DEC is seeking public comment on the proposed amendments. The deadline for submissions is 23 May.

For more about how noise is regulated in WA (including information on the existing Noise Regulations), see the Factsheet #25 ('Noise') on the EDO website. ■

Broome regional trip, 2-3 March

EDO Principal Solicitor Josie Walker visited Broome in early March to deliver a workshop on laws relating to the Kimberley LNG Hub proposal. The workshop was timed to coincide with the public comment period for the Strategic Assessment Report on the hub, which commenced on 13 December 2010 and closed on 28 March 2011.

Workshop participants gained a better understanding of the strategic assessment process being followed under State and federal laws, and the relationship between the two. Josie also explained what other environmental and planning approvals would be required for the project, and talked about the possible National Heritage listing of the West Kimberley being considered by the Federal Department of Environment.

The workshop concluded with an interactive session on writing effective submissions to government departments.

On the following day there was an advice clinic, which provided an opportunity for local residents to obtain one-on-one advice on many different environmental law issues.

The EDO would like to thank Environs Kimberley for hosting the workshop and advice clinic at Broome Lotteries House. ■

Expansion of liability for environmental offences

Clare Fielding, EDO volunteer

In a series of recent decisions the New South Wales Land and Environment Court (the Court) has found that in a number of circumstances, contractors and consultants can be held liable for any contribution to environmental offences, whether intended or not. With these decisions, consultants have been held liable for providing incorrect advice and contractors for failing to make independent inquiry. The Court has warned consultants to restrict themselves to their areas of expertise and advised contractors to strictly comply with statutory requirements.

In the case of *Gordon Plath of the Department of Environment and Climate Change v Fish & Orogen Pty Ltd [2010]* NSWLEC 144, consultant Anthony Fish and his company, Orogen Pty Ltd, failed to advise a developer as to the prohibition against clearing the habitat of a protected species under the *National Parks and Wildlife Act 1974* (NSW). Subsequently, the developer, acting on the advice of the Defendants, destroyed 3.7 hectares of koala habitat. The Defendants accepted responsibility for providing incorrect advice on legislative compliance. The Court found that even though it was the developer that acted on the advice given by the Defendants, harm to the habitat could have been prevented if the correct advice had been given and followed, thus establishing a causal link between the clearing and the Defendants' failure to give the correct advice.

The distinction between employees and independent contractors has been used to support the finding that an independent contractor can be found negligent for not making its own inquiries regarding approval for clearing native vegetation. In *Director General, Department of Environment, Climate Change and Water v Vin Heffernan Pty Ltd [2010]* NSWLEC 200, Vin Heffernan was told by a developer that the clearing it had been hired to do had been authorised. The developer did not advise that this excluded a 22-hectare area, which the Vin Heffernan employees erroneously cleared. The court found that although Vin Heffernan's failure to make independent inquiries did not amount to reckless indifference, it was negligent for the company to fail to do so, despite its long-standing working relationship with the developer.

In the *Director General, Department of Environment, Climate Change and Water v Ian Colley Earth Moving Pty Ltd [201*0] NSWLEC 102, the owner of the land contracted Ian Colley Earthmoving to clear 'non-protected regrowth' and to build two dams. Mr Colley's usual practice was to send one of his employees and the required equipment to the site, to be directed by the employer. In this case the employee received no instruction from the owner, and cleared 128 trees that were protected under the *Native Vegetation Act 2003* (NSW) (NV Act). Ian Colley Earthmoving was charged and pled guilty to a s 12 NV Act offence of clearing native vegetation without prior approval; the owner of the land was not charged.

The related decisions in *Willoughby City Council v BCPD Pty Ltd [2010]* NSWLEC 163 and *Willoughby City Council v Finlay (No 2) [2010]* NSWLEC 233 found both the building designer and the builder liable for offences under the *Environmental Planning and Assessment Act 1979* (NSW). Finlay (the designer) was engaged by the owners to renovate a 1920s Californian bungalow within a heritage conservation area. Finlay engaged BCPD (the builder) to demolish all but the front facade of the house. The plans agreed upon with the builder were markedly different from the ones approved by the Council. It was accepted in *Willoughby City Council v BCPD Pty Ltd* that BCPD had been misled by the designer. However, this factual finding was not accepted by Sheahan J in *Willoughby City Council v Finlay (No 2)*. BCPD pled guilty to the charges. Finlay contested the causal connection between her actions and the environmental harm (the demolition), but Sheahan J, referring to the Plath cases, found the designer guilty. Sheahan J stated that a message must be sent that 'strict compliance ... is required'.

The implication of these decisions is that neither contractors nor consultants are so far removed as to escape liability, and that, in New South Wales at least, courts are willing to impose a greater responsibility upon on all parties involved in contravention of environmental protection requirements. It remains to be seen whether a similar principal would be followed in WA. ■

LNG hub not 'significant'

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There is a need for law reform in this area if the strategic assessment process is to perform its intended function of facilitating better strategic decision-making, rather than allowing developers to jump the gun on the approvals process. ■

A nuclear future for Western Australia?

The Ranger uranium mine, in Kakadu National Park. Alberto Otero Garcia

Ed Fearis, EDO volunteer

The recent nuclear disaster at the Fukushima nuclear power plant in Japan has drawn attention to the uranium mining and nuclear power debate in Australia once again. Following the tsunami on 11 March, Australian politicians were quick to distance themselves from a nuclear power future in our own country. However, these public protestations actually contradict the recent tide of the nuclear debate in Australia. As recently as December of last year, Queensland Premier Anna Bligh called for a review of the ALP's long-standing ban on nuclear power, and vowed to bring up the issue at the Party's national conference. A few days later, WA Premier Colin Barnett said that nuclear power was a 'proven and safe source of energy' and that a site for a nuclear power plant in Australia should be identified. At a Commonwealth level, while there is no major party support for nuclear power in Australia as yet, there are key supporters from both sides of politics.

Furthermore, it is now a couple of years since the WA government lifted a policy which excluded uranium mining from all mining leases. This has resulted in many companies now scouring the WA outback for uranium, and the proposed implementation of several new projects. These include BHP Billiton's $17 billion Yeelirrie project, and projects led by Mega Lake Maitland at Lake Maitland and Toro Energy at Lake Way. These projects are still being assessed the EPA, with the proponents currently completing the "Environmental Review Document". Another proposed project, led by Cameco in the East Pilbara, is at a slightly earlier stage of assessment, with the proponent having just submitted its 'Environmental Scoping Report' to the EPA.

The Fukushima nuclear incident has also drawn attention to the regulation of the nuclear industry in Japan. For example, the IAEA had previously expressed concern about the ability of Japan's nuclear plants to withstand seismic activity. Since the disaster, it has been revealed that the Fukushima plant was central to a falsified-records scandal a decade ago by its operator, Tokyo Electric Power Co (TEPCO). Further, after a powerful quake hit the area near TEPCO's Kashiwazaki-Kariwa nuclear plant in 2007, the company was slow to report two radiation leaks and miscalculated the amount of radiation released. Lastly, in 1999, a study determined that workers at the Tokaimura fuel plant had been given insufficient training before they accidentally touched off an uncontrolled nuclear chain reaction.

In the wake of this grim reminder of the consequences of regulatory failure for such a dangerous industry, it is worth looking at the current legislative framework which protects us from the harmful effects of uranium mining and nuclear activities in WA. In 2007, the Nuclear Facilities Prohibition Bill 2007 (WA) was introduced, a Bill which would have prohibited a nuclear power industry from operating in WA. However, this Bill was never passed. Queensland, New South Wales and Victoria are the only states which have this type of legislation. However, WA does have specific legislation (the *Nuclear Waste Storage and Transportation (Prohibition) Act 1999* (WA) which bans the storage and transport of nuclear waste.

There are a range of state Acts which regulate radiation safety in WA, the principle ones being the Radiation Safety Act 1975 (WA) and the *Mines Safety and Inspection Act 1994* (WA). The Radiation Safety Act imposes a requirement on a person who does any one of a ➤

A nuclear future for WA? cont'd

broad range of activities in relation to a 'radioactive substance' to be licensed, and further states that the owner of premises on which a radioactive substance is manufactured, used or stored must be registered with the Radiological Council. The Mines Safety and Inspection Act imposes similar obligations, although specifically tailored to the context of mining operations. Administrative guidelines published by the Department of Mines and Petroleum (DMP) assist in the meeting of these obligations.

At a Commonwealth level, the primary protection derives from the *Australian Radiation Protection and Nuclear Safety Act 1998* (Cth), the *Australian Radiation Protection and Nuclear Safety (Licence Charges) Act 1998* (Cth) and various Codes of Practice published by the Australian Radiation Protection and Nuclear Safety Agency (ARPNSA). The two Australian Radiation Protection and Nuclear Safety Acts only regulate radiation protection and nuclear safety aspects of Commonwealth entities involved in radiation or nuclear activities. However, the Codes of Practice published by ARPNSA are applied by persons and entities throughout Australia, and seek to limit and control harmful exposure from radiation.

As regards the decision to approve a uranium mine, the principal Act at the Commonwealth level is the *Environment Protection and Biodiversity Conservation Act 1999* (Cth), which declares a 'nuclear action' (which includes mining or milling uranium ore) to be a matter of "national environmental significance". This then triggers an extensive approval process under Part 9 of the Act, incorporating environmental impact assessment reports, public comment and final Ministerial discretion on whether to approve the proposal or not.

At a state level, the *Mining Act 1978* (WA) and *Environmental Protection Act 1986* (WA) are the two main pieces of legislation which govern the approval of a uranium mine (or nuclear site). There is no special process for the approval of a uranium mine under the Mining Act. Rather, a proponent just needs to submit the usual 'mining proposal' to DMP, which must detail all matters relating to the environmental management of the proposed project. Again, under the Environmental Protection Act there is no different process for referring a uranium or nuclear proposal to the EPA. That is, only a 'significant proposal' must be referred to the EPA.

The existing State and Commonwealth legislative and regulatory framework is strong, and new legislation can be expected to govern any significant further developments towards a nuclear future. However, the WA government's record when it comes to the regulation of other harmful contaminants (the most obvious example being lead) does not inspire confidence, notwithstanding the inherent difficulties in effective radioactive harm-prevention through regulation. In light of the recent tragedy in Japan, the community has reason to be concerned about the creation of a nuclear industry in WA. ■

A section of the Fukushima nuclear reactor, following the explosions. Globovision

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