Attachment 2: General guidance from NRE Tas for the Major Project Impact Statement in addressing potential impacts of the project

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While some details of the Major Project may not be finalised at the time the MPIS is submitted, the information in the document should be as up to date as possible. Where information is unavailable or details have not yet been finalised, estimates and the range of options under consideration should be provided. However, sufficient technical detail must be provided to enable an accurate assessment of likely impacts and realistic mitigation proposals.

Proposal description

The proposal description must be sufficiently detailed to enable an assessment commensurate with the size and scale of the proposal. This includes site plans and georeferenced GIS files with outlines the boundaries of all proposed infrastructure including:

- Wind Turbine Generator (WTG) locations and associated supporting infrastructure.
- Locations, extent of, and type of vegetation to be cleared.
- Works including lay-down areas, tensioner/puller yards, staging areas, roads (temporary or permanent) to be constructed, road structures culverts/bridges/retaining walls and any widening of existing roads that may be required.
- Natural features or constraints that influenced the site-planning.
- Any excavation areas required for temporary or permanent infrastructure, plus temporary and permanent quarry locations for gravel sourcing.
- Proposed water sources for construction purposes.
- Areas requiring rehabilitation following construction works.

If the exact location of WTGs and the associated infrastructure is not specifically located, the potential impacts and residual impacts will not be fully understood. This approach would not allow a complete assessment and may increase the risk of long-term legacy impacts. Shifting site-planning for 500 WTGs locations to post assessment or post approval stages would impose a high workload for NRE Tas officers in ongoing assessments and frequent amendments of authorities such as leases and licences. Defining infrastructure locations in the assessment phase should be a priority.

Performance requirements

Identify the environmental performance requirements (targets or indicators) to be achieved for each environmental impact and provide evidence to demonstrate that these can be achieved. These may be derived for the site from standards or requirements specified in legislation, codes of practice, state policies, national guidelines (including relevant recovery plans or conservation advice) or as determined by agreement with the assessing agencies. Industry best practice standards should be referred to where appropriate. Unsupported assertions that performance requirements will be achieved would not be adequate.

Potential impacts

Outline the potential environmental, social and economic impacts of the Major Project (positive and negative) through all stages, including construction, operation and closure, in the absence of special control measures. Likely foreseeable variations in impacts during the start-up and operational phases should be identified. An analysis of the significance of the relevant impacts should be included. The level of detail provided on each issue should be appropriate to the level of significance of that environmental issue to the Major Project. The evaluation of potential impacts should identify plausible worst case scenario consequences, the vulnerability of the affected environment to the potential impacts, and the reversibility of the impacts.

Potential cumulative impacts of this Major Project in light of other activities underway or approved also need to be addressed. This includes likely impacts on potential or existing competing land uses at the site or adjoining the site.

Predictions and evaluations of impacts should be based on scientifically supportable data. The methodologies used or relied on should be referenced, together with the relevant research and investigations supporting them. Assumptions, simplifications and scientific judgements should be stated clearly, and the nature and magnitude of uncertainties should be clearly defined. Where relevant, the choice of a particular methodology over alternative methodologies should be explained. Where impacts are not quantifiable, they should be adequately described. Where positive benefits are claimed it will generally be appropriate to explain what measures are to be taken to ensure that those positive outcomes are realised and sustained.

Avoidance and mitigation measures

Describe the measures proposed to avoid or mitigate potential adverse impacts in order to achieve the environmental performance requirements. The extent to which they will overcome the anticipated impacts should be specified. Where there are clear, alternative avoidance or mitigation measures for a particular adverse environmental impact, the alternatives should be reviewed, and the preferred option justified. A discussion of the achievability of the measures should be included.

All proposed management measures must be clearly identified in the MPIS. Specific measures should be presented in the form of a management plan, such as an Environmental Management Plan (EMP), that sets out the framework for management, mitigation and monitoring of relevant impacts of the action, including any provisions for independent environmental auditing. The EMP should address the project phases (construction, operation, decommission) separately and include the performance outcome, management measures to be used, nominated responsible person, and corrective actions that may be applied.

Assessment of residual impacts

Undertake an assessment of the overall impacts of the development on environmental values after allowing for the implementation of proposed avoidance and mitigation measures. This should include an evaluation of the significance of impacts, comparison with current environmental conditions (for existing activities) and with State, national and international regulations, and standards. If applicable, include the reasons why avoidance or mitigation of impacts cannot be reasonably achieved.

Any net benefits likely to result from the Major Project should be identified. The impacts of the Major Project should be discussed in terms of the constraints or benefits it may place on the current or future use of land within the Major Project site and surrounding area as a result of environmental impacts, including impacts on other uses, particularly within reserve land.

The MPIS should outline a suitable rehabilitation plan and financial mechanism to ensure that all areas occupied by the proposal can be rehabilitated at the end of the useful life of the project. The financial mechanism may be in the form of a bond, or similar financial arrangement.

Offsetting unavoidable adverse impacts

If adverse residual environmental impacts from the Major Project are found to be unavoidable despite the adoption of best practice environmental management avoidance and mitigation measures, then proposals to offset such impacts should be detailed. For example, if the loss of conservation values is considered unavoidable, measures to compensate for those losses should be proposed in proportion to the loss. Any offset actions proposed must be demonstrated to be 'real' actions, that is, the offset actions must have a measurable and relevant benefit which would otherwise not have occurred.

Conclusion

An overall conclusion should be provided as to the acceptability of the proposal, including discussion of compliance with the principles of Ecologically Sustainable Development and the objectives and requirements of LUPAA, and other relevant legislation.