Synthesis of the Findings of a Survey and Interviews Conducted Under the EPASU-ECA Partnering Agreement Concerning Ways to Improve the Process of EIA in WA

Prepared for:
   Environmental Consultants Association (WA) Inc; and
   Environmental Protection Authority Service Unit

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Firstly, the ECA and EPASU would like to acknowledge the tremendous effort by Angus and his team in undertaking this task and distilling a mountain of information into a digestible format. We would also like to thank all the practitioners who contributed their time to this landmark report, whether it be attending meetings, completing surveys or submitting to the interview process.

The work has now been presented by Angus in seminar format to the ECA membership, the EPA board and ECA committee. This report has been reviewed by the ECA and EPASU and found to be suitable for general distribution. More detailed results and analyses are available, however these are not suitable for general distribution but may be accessed through the EPASU-ECA if such access is found to be appropriate.

The finalisation of the report is timely, given that in February the Minister and Chairman of the EPA announced a review of the Part IV process. The Chairman has read this report and stated that results will be considered in the Part IV review, while he has also formally invited the ECA and Angus to be participants in the review process. To address and build on the findings of the report, the EPASU and ECA have committed to undertaking the following actions over the next 12 months:

- To run two EIA practitioner training courses in the second half of 2008 (July and December).
- To develop a formal awards process. The ECA committee has set-up a subcommittee which has the aim of developing a formal awards process to recognise good EIA practice in WA, the EPA has endorsed this concept. The concept will be developed over 2008 with the aim to have the first awards in 2009.
- To review the scoping process. The EPA has recognised the comments on the scoping process and Guidance amend Position Statements and has agreed to make the revision of these matters an immediate priority.
- To develop a process for training and interaction (such as workshops) on other elements of the EIA process (e.g. adaptive management, DEC guidelines and policy).
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Acknowledgements

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1. Background

In 2005, the Environmental Protection Authority Service Unit (EPASU) and Environmental Consultants Association Inc (WA) (ECA) entered into a Partnering Agreement aimed at improving environmental protection processes in Western Australia by working together to build and sustain professional relations through partnering. Specifically the purpose of the agreement is to "encourage improved environmental management practice and performance and to facilitate timely and effective assessment". The partnering agreement is "intended to increase cooperation, shared understanding, consistency, effectiveness and efficiency in the delivery of environmental services under the responsibilities and requirements of Part IV of the Environmental Protection Act". A committee of people representing position bearers within the ECA together with senior staff from the EPASU oversee activity undertaken in relation to the Partnering Agreement.

To meet the aims of the Partnering Agreement, in mid 2007, it was decided to canvass ECA members and EPASU staff along with some other closely associated environmental impact assessment (EIA) stakeholders in order to capture key concerns and suggested areas for improvement in relation to EIA practice under Part IV of the Environmental Protection Act 1986 (WA) in WA. Two approaches were adopted for doing this: an online questionnaire (hereafter the Survey) and structured interviews (hereafter the Interviews) with stakeholders from both organisations.

An independent researcher from Murdoch University was employed to conduct both the Survey and Interviews and a contract was drawn up accordingly between the ECA Committee and MurdochLink (the consulting arm of Murdoch University) for the research activity.

Survey and Interview questions were drafted in July 2007 and were subsequently approved by the ECA Committee and Murdoch University Human Research Ethics Committee. Interviews were conducted in the last two weeks of August 2007, while the online Survey was conducted during the first two weeks of September 2007.

This report presents the main findings of both the Survey and Interviews followed by conclusions and recommendations as to how the ECA and EPASU can collectively work together in the spirit of the Partnering Agreement to improve EIA practices in Western Australia.

2. Quantitative Survey

2.1 Survey Design

The Partnering Agreement identifies six general areas of Shared Interest:

- Understanding of project-related science and confidence in the quality of the related environmental management;
- Cooperation;
- Managing and communicating change;
- Certainty of environmental outcomes;
• Improving the quality of consultant reports; and
• Enhance the reputation for excellence of the agreement partners
with 3-8 sub points concerning specific aspects of EIA practice under each. These were translated into 49 statements for respondents to rate on a six point Likert scale using an online survey hosted by Murdoch University. This quantitative approach tested the extent to which parties to the Partnering Agreement agree that these points are being met. It also enables the survey to be repeated in the future so that any progress or change in position can be determined. Making the survey available online was a cost-effective approach that maximised the opportunity for input from all levels of members.

Respondents were also asked to fill out some basic demographic questions to identify their normal role in and experience with EIA practice in Western Australia. With sufficient sample size, this would permit statistical analysis of the Likert question responses in relation to respondent demographics.

2.2 Explanation of Data Presentation

The demographic data is presented first in table format.

In presenting the results of the EIA related survey questions, each question is grouped under the areas of Shared Interest in the Partnering Agreement and addressed in accordance with the sequence of questions in the Survey instrument. The results are displayed as graphs of the percentage frequency of response to each Likert scale option. Where possible the same scale has been used for each of the graphs to enable rapid visual comparison of the findings (the exceptions to this are noted when discussed). The graphs each display three 'agree' and three 'disagree' related categories (i.e. 'strongly', 'moderately' and 'slightly' respectively) as well as an 'unable to judge' category. A simple and effective way to interpret the data obtained for each question is to consider the cumulative percentage of responses for all three of the 'agree' categories and this result is recorded below each graph.

2.3 Survey Results

Each of the survey questions is addressed in the following sections with paired or larger related groups of questions being addressed together. For the 49 EIA related Likert scale questions, the statement that survey participants responded to is exactly reproduced as the title for individual graphs.

2.3.1 Demographic information

A total of 64 people participated in the on-line survey. This sample size only permits statistical analysis when the number of response categories is low. Some of the demographic questions with multiple response options are therefore not suitable for conducting statistical tests beyond recording frequencies unless grouping of response categories is undertaken.

The opening Survey question asked respondents to indicate how much of their working time is spent directly on EIA related activities (Table 1).
Table 1 Working time spent on EIA activity

<table>
<thead>
<tr>
<th>Time Spent on EIA</th>
<th>No.</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
<td>13</td>
<td>20</td>
</tr>
<tr>
<td>Between 75% and 100%</td>
<td>21</td>
<td>33</td>
</tr>
<tr>
<td>Between 50% and 75%</td>
<td>12</td>
<td>19</td>
</tr>
<tr>
<td>Between 25% and 50%</td>
<td>7</td>
<td>11</td>
</tr>
<tr>
<td>Up to 25%</td>
<td>8</td>
<td>12</td>
</tr>
<tr>
<td>None of my working time</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>64</td>
<td>100</td>
</tr>
</tbody>
</table>

The six categories of response in Table 1 did not permit statistically valid testing with any of the other survey questions owing to small sub-sample size. Grouping the first of these two categories together (i.e. 75-100% of working time) and grouping the next three categories (i.e. up to 75% of working time) created two approximately equal sized groups (53% and 42% respectively). However, when the sample was grouped in this way and then tested against other questions in the survey, there were no statistically significant differences in the responses to any of the Likert scale questions. Thus the proportion of time spent on EIA had no bearing on the opinions of respondents regarding EIA practice in WA.

As evident in Table 1, there were three respondents (5%) to the first question who indicated that they spend none of their working time on EIA activities. The survey subsequently directed them to the Demographics questions (which appeared at the end of the survey), meaning that they did not respond to any of the EIA-related Likert scale questions. Thus, in terms of the EIA content of the Survey, there were actually 61 respondents in total for each question.

The results of the remaining demographic questions are reproduced in Tables 2 - 7.

Table 2 Work role of survey respondents

<table>
<thead>
<tr>
<th>Work role</th>
<th>No.</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultant</td>
<td>48</td>
<td>75</td>
</tr>
<tr>
<td>EPASU staff member</td>
<td>14</td>
<td>22</td>
</tr>
<tr>
<td>Other</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>64</td>
<td>100</td>
</tr>
</tbody>
</table>

Consultants formed the largest group of respondents to the Survey followed by EPASU staff (Table 2). Only two respondents were classified as the 'Other' role option. The emphasis throughout this research has been on the roles of consultants and EPASU staff in EIA in WA so this result was hoped for. Separation into the two main roles proved to be useful in analysing the survey data.

Many of the Likert scale questions were 'paired' in the sense that the same question was asked twice but with the issue directed specifically at the role of consultants or EPASU respectively. It is therefore interesting to compare responses to these questions in terms of the current role of respondents. Sample size was sufficient here to enable T tests or two-way ANOVA (simultaneous comparisons between the means) for respondent's current role in EIA against the Likert scale questions and quite often statistically significant associations were evident as the subsequent discussion will demonstrate.

Table 3 Previous work role of survey respondents

<table>
<thead>
<tr>
<th>Previous work role</th>
<th>No.</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultant</td>
<td>9</td>
<td>14</td>
</tr>
<tr>
<td>EPASU staff member</td>
<td>6</td>
<td>9</td>
</tr>
<tr>
<td>Other</td>
<td>23</td>
<td>36</td>
</tr>
<tr>
<td>(Not applicable)</td>
<td>(26)</td>
<td>(41)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>64</td>
<td>100</td>
</tr>
</tbody>
</table>

3
A number of people had worked in the 'opposite' role (i.e. a consultant now who had previously worked in the EPASU or vice versa) and a substantial number of people had worked in some 'other' capacity (Table 3). The subsequent text responses indicate that these people had largely worked for proponents or government agencies as well as some academics. No clear patterns emerged here in the data that would permit further useful analysis (and sample size is limited).

Table 4 Years worked as an environmental professional

<table>
<thead>
<tr>
<th>Years worked</th>
<th>No.</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 5 years</td>
<td>10</td>
<td>16</td>
</tr>
<tr>
<td>Between 5 and 10 years</td>
<td>17</td>
<td>26</td>
</tr>
<tr>
<td>Between 10 and 15 years</td>
<td>12</td>
<td>19</td>
</tr>
<tr>
<td>More than 15 years</td>
<td>25</td>
<td>39</td>
</tr>
<tr>
<td>Total</td>
<td>64</td>
<td>100</td>
</tr>
</tbody>
</table>

For the remainder of the demographic questions relating to:
- years worked as an environmental professional (Table 4);
- years worked in WA (Table 5);
- number of individual EIAs worked on each year (Table 6); and
- gender (Table 7),
the frequency of responses was generally reasonably evenly distributed between the option categories. For each question either sample size was limited or else no pattern emerged in subsequent testing to suggest that different category responses related to differences in response to the EIA related Likert scale questions.

Table 5 Years worked as an environmental professional in Western Australia

<table>
<thead>
<tr>
<th>Years worked in WA</th>
<th>No.</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 5 years</td>
<td>16</td>
<td>25</td>
</tr>
<tr>
<td>Between 5 and 10 years</td>
<td>15</td>
<td>24</td>
</tr>
<tr>
<td>Between 10 and 15 years</td>
<td>11</td>
<td>17</td>
</tr>
<tr>
<td>More than 15 years</td>
<td>22</td>
<td>34</td>
</tr>
<tr>
<td>Total</td>
<td>64</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 6 Number of individual projects/EIAs worked on each year on average

<table>
<thead>
<tr>
<th>No. of EIAs</th>
<th>No.</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 per year</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>1 per year</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>2 per year</td>
<td>8</td>
<td>12</td>
</tr>
<tr>
<td>3 per year</td>
<td>5</td>
<td>8</td>
</tr>
<tr>
<td>4 per year</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td>5 per year</td>
<td>7</td>
<td>11</td>
</tr>
<tr>
<td>6 per year</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>7 per year</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>8 per year</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>10 or more per year</td>
<td>34</td>
<td>52</td>
</tr>
<tr>
<td>Total</td>
<td>64</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 7 Gender of survey respondents

<table>
<thead>
<tr>
<th>Gender</th>
<th>No.</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>38</td>
<td>59</td>
</tr>
<tr>
<td>Female</td>
<td>26</td>
<td>41</td>
</tr>
<tr>
<td>Total</td>
<td>64</td>
<td>100</td>
</tr>
</tbody>
</table>

The remaining discussion of the quantitative survey relates to the EIA content based questions presented in the order they appeared in the survey instrument.
2.3.2 Understanding of Project-Related Science and Confidence in the Quality of the Proposed/Eventual Environmental Management Outcome

Ten questions were posed for the Shared Interest area of understanding of project-related science and confidence in the quality of related environmental management.

The first two questions concerning the quality of project-related science (Figure 1) were a pair. While there is a high level of agreement that both consultant and EPASU staff documentation is based on high quality science, ANOVAs for these two questions matched against respondent's role in EIA revealed statistically significant differences (Question 1-1, \( p=0.003 \); Question 1-2, \( p=0.010 \)). In each case for a question relating to the role of one party, respondents from that stakeholder group rated performance higher than the other party. In other words, it is evident that consultants hold the quality of their work in higher regard than do the EPASU staff and vice versa.

![Figure 1 Quality of project-related science used in EIA](n=61)

Note: Owing to the high number of 'moderately agree' responses, the scale of these two graphs is from 0-60% (nearly all other graphs are plotted on a scale of 0-50%)

Questions 1-3 and 1-7 form a pair in that both relate to EIA outcomes (Figure 2). There was a high level of agreement that high quality environmental management outcomes are normally achieved via EIA (Question 1-3). A similarly strong response was recorded in relation to ratings of environmental protection (Question 1-7) with both graphs demonstrating an almost identical pattern of responses. Given that all survey respondents answered the first question and all but one answered the latter this gives a particularly favourable implication for the effectiveness of EIA in WA in terms of environmental management and protection outcomes.

![Figure 2 Quality of environmental management and protection](n=61)
A trio of questions addressed the accountability of information used in EIA (Figure 3). For Questions 1-5 and 1-6, EPASU staff were more likely to give a more favourable response than were consultants (Question 1-5, p=0.004; Question 1-6, p=0.001). Whether or not this implies that consultants are sceptical of the accountability of information used by EPASU staff in EIA or just are not as confident of this factor as their EPASU counterparts is not clear. But this finding points to an area that could be a focus for ongoing collaboration and information sharing between the two stakeholders under the Partnering Agreement.

As with the other questions previously discussed for this Shared Interest area, high levels of agreement were recorded concerning the quality of science used in environmental protection standards and policies (Figure 4) and the quality of scoping activity undertaken by consultants (Figure 5). However, in contrast, the majority of survey respondents disagreed that EIA timeframes are adequate (Figure 6). It appears that both consultants and EPASU staff alike are dissatisfied with adequacy of timeframes for conducting environmental studies in EIA.

Figure 3 Accountability for information used in EIA (n=61)
6.3.3 Cooperation
Six questions were posed for the Shared Interest area of cooperation.

Communication and cooperation between consultants and EPASU staff was generally considered in high regard as the responses to the initial trio of questions attest (Figure 7). This is a positive finding and suggests that one of the principal aims of the Partnering Agreement is being achieved, notwithstanding that it is obviously possible and desirable to further improve relationships between consultants and EPASU staff.
For the pair of questions relating to openness to new ideas (Figure 8), while consultants were strongly considered to be open to alternative ideas and direction from the EPASU (q2.4), the same was not registered for the reverse scenario (q2.5). ANOVA testing against respondent’s role for both questions were statistically significant (Question 2-4, p=0.021; Question 2-5, p=0.026) suggesting that each of the two stakeholder types consider themselves to be more open to alternative ideas relative to the other group. While lines of communication and cooperation are open, it appears that there is a notable degree of lack of trust between consultants and EPASU staff.
The final question concerning cooperation related to the shared responsibility for achievement of environmental outcomes in EIA practice (Figure 9). There is little sense of shared responsibility for achievement of environmental outcomes between the two groups with a clear majority of respondents disagreeing with the survey question statement. There was no information recorded elsewhere in the survey findings or interviews to shed light on who is perceived to hold the greatest amount of responsibility for environmental outcomes. This may be an area worthy of future investigation under the auspices of the Partnering Agreement.

2.3.4 Managing and Communicating Change
Nine questions were posed for the Shared Interest area of managing and communicating change. Overall, relative to other shared interest areas, the cumulative percentage of respondents agreeing with each of this suite of survey questions is relatively low, but some interesting patterns or findings did emerge.

A pair of questions examined the issue of adaptive management in EIA in WA (Figure 10) in terms of potential capacity (Question 3-1) and application in practice (Question 3-2). Whilst the theoretical perspective was reasonably well supported, the majority of participants indicated that this has not been effectively translated into practice. It should be noted though that the concept of 'adaptive management' was not defined in the Survey instrument and the concept frequently debated by interviewees as is discussed later in this report. Thus these results for issues of adaptive management need to be considered in light of the potential that there is no clear understanding of what the concept is intended to mean in the WA practice of EIA.
Respondents were generally satisfied with levels of consultation and communication regarding changes to environmental policies and EIA practices in WA (Figure 11).

In contrast ratings of each stakeholder's awareness of the other party's responsibilities and perspectives was not so strong (Figure 12). The profiles of these two graphs are quite similar with the exception of the 'strongly disagree' category for Question 3-5, implying that consultants do not consider EPASU staff to be very aware of their responsibilities for, or perspectives on, EIA practice.
The final three questions under this Shared Interest area form an interesting trio concerning the level of education, debate and sharing regarding various aspects of EIA. All were all rated relatively low (Figure 13) and taken collectively underscore the intention and potential value of the Partnering Agreement activities which clearly offers mechanisms to address these concerns. As with some of the previous Shared Interest area responses, these findings point to a lack of trust between consultants and EPASU staff (which was also evident in interview findings discussed later on in this report).

Figure 13 Levels of education, sharing and debate concerning EIA matters (n=61)

2.3.5 Certainty of Environmental Outcomes

The Shared Interest area concerning certainty of environmental outcomes was relatively short with just five survey questions. As is clear from the graphs that follow, different stages of the EIA process returned dramatically different ratings with respect to matters of certainty. In terms of the EIA process and outcomes overall, certainty was not rated very high (Figure 14).
In contrast identification of key project issues early in the EIA process and availability of relevant information were both ranked highly by survey respondents (Figure 15).

Questions regarding EIA timelines (Figure 16) returned lower responses, especially in relation to the management of timelines by EPASU staff (Question 4-5). There was divergence regarding opinions of whether consultants have a good understanding of process timelines between EPASU staff and consultants (Question 4-4). As might be expected, consultants were more likely to rank their own understanding of process timelines higher than the ranking given by EPASU staff ($p<0.001$). The graph profile for Question 4-5 and percentage of agreement is very similar to that of Question 1-10 (Figure 6) discussed previously concerning adequacy of timeframes in EIA practice.
2.3.6 Quality of Reports
Eight survey questions addressed the Shared Interest area concerning quality of EIA reports. Responses were generally positive but not as strong as for some of the earlier questions in the survey. The first three questions relating to the quality and standards for consulting reports (Figure 17) demonstrate this. In each case the responses are relatively evenly distributed across the Likert scale categories compared to other questions in the survey.

Figure 16 Understanding and management of EIA timelines (n=61)
Four further questions examined various aspects of the quality of information contained in EIA reports (Figure 18) and exhibited similar total agreement scores. There was a statistically significant divergence in means scores for the levels of confidence that can be placed on environmental management provisions in consultant reports (Question 5.4, p=0.005) and the integrity of data in EPA reports (Question 5.8, p=0.010). As with similar results previously, consultants hold their reports in higher regard than do EPASU staff, while EPASU staff hold EPA reports in higher regard than do consultants.
The remaining question in this shared interest area concerned maintenance and enhancement of skills and learning in EIA (Figure 19). While responses were overall positive, this is an area where future activity under the Partnering Agreement could enhance the situation for consultants and EPASU staff.

2.3.7 Enhancement of the Reputation for Excellence of the Agreement Partners
The final shared interest area was addressed by 11 survey questions.

The first two questions make an interesting pair (Figure 20). Whilst the levels of public confidence in the environmental management outcomes of EIA practice were rated low by EPASU staff and consultants alike (Question 6-1), it was acknowledged that high levels of transparency are being
achieved (Question 6-2). This implies that it is the substance of EIA in terms of outcomes that is in question, rather than the process. However, it should be pointed out that for the question about public confidence a relatively high number of 'unable to judge' responses were recorded. With respect to the question about transparency, EPASU staff were more likely to rate this aspect higher than consultants (Question 6-2, p=0.013).

Survey respondents considered that the environmental management profession in WA as a whole exhibits high levels of honesty, cooperation and mutual respect between its members (Figure 21). This finding has a strong resonance with those obtained for Questions 2-1 – 2-3 (Figure 7) discussed previously in relation to the shared interest area of cooperation.

Similarly, ratings of professional independence between consultants and EPASU staff were rated highly (Figure 22).
A pair of questions tested the professional integrity of environmental professionals in WA as a whole (Figure 23), rather than separation into roles of consultant or EPASU. Whilst overall positive, the ratings of altruism in terms of environmental professionals putting the interests of the community before their own or those of their clients (Question 6-5) were lower than that of ethical and responsible behaviour (Question 6-6). Of particular interest in the latter case is the absence of any 'strongly disagree' responses. Consultants were more likely to rate demonstration of ethical and responsible behaviour higher than EPASU staff (Question 6-6, p=0.024).

A pair of questions concerned the expansion of skills and knowledge through the partnering activities of consultants and EPASU staff (Figure 24). Whilst overall responses were favourable, there is clearly scope for further information sharing and learning activities to be implemented. These numerical indications were supported by interview comments which are discussed further on.
A pair of questions concerning the extent to which EIA is enhanced by the level of service provided by consultants and EPASU staff respectively (Figure 25) returned higher rankings in favour of consultants. Once again, each stakeholder group rated their own performance higher than the other party did (Question 6-9, $p=0.002$; Question 6-10, $p=0.006$).

The final survey question concerned efforts to achieve best practice standards in EIA practice in WA (Figure 26).

The relatively high ratings overall returned in Figure 26 gives a positive message about the enthusiasm and commitment of consultants and EPASU staff alike to strive for effective EIA.
3. Interviews

3.1 Interview Design

A total of 30 EIA practitioners were interviewed comprising 15 consultants and 15 representatives of the EPASU. The latter sample included past and present EPA Board members and staff from the Office of Appeals Convenor and the Office of the Minister for the Environment.

A member of the ECA Committee provided the author with a list of consultants to target and nearly all of the 15 consultants interviewed came from this list. The list generally attempted to include each of the larger consulting firms in Western Australia (notwithstanding that there are far more than 15 environmental consulting firms operating in the state) and to ensure that a variety of different roles or specialisations were covered (e.g. some consultants specialise in marine work, planning, mining, terrestrial ecology etc).

As with the Survey respondents, many of the 30 people who participated in the Interviews have worked in different roles over the years. For example some consultants have formerly served on the EPA Board or have worked in the EPASU and vice-versa. The sample size of 30 (and subsequently split into two groups of 15) is not intended to be representative as such, but taken collectively is an adequate size to identify common issues or concerns and their solutions.

In keeping with the Murdoch University Human Research Ethics Committee approval granted for this research, the comments of individual interviewees have not been included in this report to ensure that the identity of participants is not revealed. The author has synthesised key messages from the interview comments.

The rationale for conducting the interviews was to investigate issues more deeply than was possible through the relatively simple quantitative survey. Open-ended questions were posed relating to the Shared Interests elements of the Partnering Agreement. An identical suite of 11 questions covering the six Shared Interests and including an opportunity for interviewees to make any other comments was put to each interviewee in the identical sequence (Table 8).

Being more of a conversation than a static survey exercise, answers to the interview questions would often extend beyond the immediate scope of the question. On these occasions, the researcher posed additional questions as appropriate in order to delve further into particular interviewee responses.
Table 8 Shared Interest Areas and Associated Interview Questions

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<thead>
<tr>
<th>1. Understanding of project-related science and confidence in the quality of the related environmental management.</th>
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<td>(i) How do you rate the quality of science and environmental management in current EIA practice in WA?</td>
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<th>2. Cooperation</th>
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<td>(ii) How effective or 'healthy' are the current levels of cooperation between environmental consultants (and their clients) with EPASU staff and vice versa?</td>
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<th>3. Certainty of environmental outcomes</th>
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<td>(iii) How do you rate the EIA process in WA with respect to certainty of environmental outcomes?</td>
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<td>(iv) How effective is the scoping process?</td>
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<td>(v) Please comment on the timeliness of consultant and EPASU activity in the process.</td>
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<th>4. Improving the quality of consultant reports</th>
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<td>(vi) How do you rate the overall quality of consultant reports? How reliable is the data or information presented in them?</td>
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<th>5. Managing and communicating change</th>
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<td>(vii) How do you rate the responsiveness and capacity for adaptive management approaches by consultants (and their clients) and the EPASU staff?</td>
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<td>(viii) How can we ensure transfer of knowledge, the &quot;lessons learnt&quot;, from one project to another if different consultants and EPASU staff are involved?</td>
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<th>6. Enhance the reputation for excellence of the agreement partners</th>
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<td>(ix) How do you rate the reputation for excellence of consultants and EPASU staff with respect to EIA practice in WA?</td>
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<td>(x) What is your perception of public confidence in the EIA process?</td>
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<th>7. Other comments – Enhancing EIA practice in WA</th>
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<td>(xi) Do you have any other comments about how EIA practice in WA could be enhanced (in the context of the Partnering Agreement)?</td>
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### 3.2 Interview Responses

Approximately 16 hours of recording in total was generated from the interviews which translated into approximately 86,500 words in the edited transcripts. There is a wealth of interesting and valuable material in this large data set, not all of which can be incorporated into this report. In the interests of brevity the 11 interview questions are provided as section headings with discussion of key issues arising under each. Some of the questions are closely aligned and the responses received for different questions often overlap or correlate strongly. Thus many of the issues raised are common to different areas of shared interest within the Partnering Agreement. These more commonly raised issues provide a degree of focus of the research (e.g. as synthesised in the Conclusions and Recommendations), notwithstanding that all of the comments made by interviewees provide valuable insights into understanding existing EIA practice in WA and possible ways to improve it.

#### 3.2.1 How do you rate the quality of science and environmental management in current EIA practice in WA?

As might be expected, the most common response to a request to rate the quality of science and environmental management in EIA was that 'it varies' so what is of interest are the factors that were perceived to determine quality. Two factors were raised by almost all parties interviewed: staffing resources, especially within the EPASU and government agencies more generally; and the effect of the current economic boom times being experienced in Western Australia in terms of the sheer

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1 The original transcripts ran to more than 120,000 words.
amount of work subject to statutory EIA in recent years. These factors are inextricably linked. Beyond just identifying these two factors, the perceived consequences for EIA practice are also particularly interesting.

With respect to the staffing situation within the EPASU, the main concern was the high turnover of staff within the department with the consequence that a high proportion of current staff is newer, younger and less experienced than has been the case in the past. The perceived impact of this on EIA performance within the EPASU is loss of judgement with respect to understanding and application of science and related environmental management in EIA, replaced by increased reliance on following due process. For some too, the increase in what was perceived as prescriptive measures as contained in the relatively recent publication of EPA Position Statements and Guidance Statements was seen to contribute to a more 'process driven' approach to EIA, rather than one based on informed judgement and decisiveness.

There was also a perception that the values base of EPASU staff are different to that of consultants and that this affects EIA practice. This was indirectly apparent in terms of the 'them and us' feeling that often emerged from the interviews when taken overall – the EPASU staff and consultants each clearly identify as separate stakeholders in the EIA process. Tensions between the two groups appear to arise from differences in values, expectations and motivations for participating in EIA. For example, some interviewees perceived that the expectations of the EPA with respect to quality science and environmental management have increased in recent years or are different to those of consultants and that this had led to conflict between the two stakeholder groups.

Some interviewees noted that staffing problems also affected consultants too. One interviewee suggested that the large resource companies have been absorbing many of the experienced staff from both consultant and government agencies owing to their ability to pay higher salaries or offer other attractive working conditions. Hence some consulting firms were perceived to be in a similar situation at the EPASU with regards to the recruitment of and reliance upon younger, relatively inexperienced staff.

The economic boom conditions currently being experienced in WA were generally considered to contribute to a decline in the quality of science used in EIA practice because of excessive workloads leading to insufficient time and resources being available for quality studies. However, some people held the converse view that the greater amount of work and money available has actually resulted in improved scientific capacity and studies in EIA practice.

The experience/expertise of consultants and the financial capacity of proponents were also identified by many interviewees as factors affecting the quality of science utilised in EIA. This appears to relate in part to the sector in which proponents operate. Distinction was sometimes made between planning/land development activities and mining/resource development activities. Major mining proponents were perceived as being involved in EIA over the long-term and generally having large operating budgets relative to the land-development sector. This was perceived to result in better quality science and environmental management by these proponents.

Finally a small number of interviewees suggested that the quality of science and the quality of information being provided in EIA practice was not really an issue of concern. They perceived work load levels and the ability of practitioners to make firm judgements over strict adherence to process or domination of political influences (e.g. increasing number of appeals and Minister level intervention) to be more pressing matters.
3.2.2 How effective or 'healthy' are the current levels of cooperation between environmental consultants (and their clients) with EPASU staff and vice versa?

Many of the tensions and issues identified in relation to the first interview question were subsequently linked to how current levels of cooperation between consultants and EPASU are experienced. First and foremost among these concerns was the EPASU staffing resources combined with the consequences of the economic boom conditions. It was perceived that EPASU staff are not available for meeting; consultants would generally prefer to have more meetings with EPASU staff than they currently are able to. Notwithstanding these perceived difficulties, most interviewees suggested that there was good intent for cooperation. This perception both reinforces and is reinforced by the overall spirit of the Partnering Agreement.

Whilst many consultants indicated frustration that they could not meet with EPASU staff as often as they would like, at least one complained that they have been expected to participate in too many meetings. Similarly some EPASU staff felt as though some meetings were unnecessary and a waste of their time.

The consequences of the perceived staff shortages within EPASU combined with relatively inexperienced staff is two-fold. Firstly, as noted for the previous question on quality of science, there is a tendency to emphasise procedures; in this case, a tendency to rely on written communication and document review rather than face-to-face meetings to resolve things. Secondly concerns were raised that the senior staff of the EPASU (who were almost unanimously held in very high regard by all interviewees) have been put under increasing pressure to cope with the extra workload that arises. In part this is because decisions that consultants expect junior officers to make get 'passed up the line'. Also, though, long-term WA consultants have well established relationships with the senior staff and willingly seek them out for meetings to resolve matters expeditiously.

There was great concern that any further erosion of senior or experienced staff within the EPASU will result in total collapse of the system. There was recognition that responsibility needs to be taken by consultants and the ECA to resolve this situation notwithstanding that the staffing capacity of the EPASU is a state government responsibility.

The influence of different values and roles in the EIA process between consultants and EPASU staff was also raised as an issue concerning cooperation too. The challenge therefore is to craft an EIA process that either overcomes these differences somehow (e.g. through communication and relationship building) or else unites the two stakeholder groups by providing an alternative purpose for engagement in EIA in the first place.

Clearly, cooperation in EIA is not solely the responsibility of the EPASU staff. Some interviewees noted that consultants bring a lot to the relationship while others noted the role of other stakeholders in the EIA process too, especially that of proponents. One interviewee noted a tendency for the poorer quality consultants to bully EPASU staff but suspected that that was a consequence of the pressure being placed upon consultants by their clients to expedite EIA approvals. The extent to which proponents choose to engage in the EIA process also affected relationships between their consultants and the EPASU staff.

3.2.3 How do you rate the EIA process in WA with respect to certainty of environmental outcomes?

This question could be interpreted in different ways and was frequently clarified by interviewees before they answered. One interpretation related to certainty of outcome in terms of gaining an
approval for a proposal undergoing EIA. Another related to certainty of environmental quality outcomes in terms of either putting in place an appropriate environmental management framework during EIA or the actual environmental management performance demonstrated once a project has been implemented.

With respect to approval certainty, some interviewees were of the view that because most EIA proposals get approved, that there is certainty of outcome. This was not necessarily considered to be an entirely positive aspect of EIA practice in WA. The point was raised that given that the vast majority of projects are approved, it would make more sense to reduce the proportion of staff deployed for the approvals aspects in favour of follow-up and compliance activity that could then better promote environmental protection.

Some interviewees noted that new and emerging issues over which there is lack of information or a high degree of uncertainty can hold up the approval process and potentially stop it altogether. Additionally, EPASU workload and staff attitude were identified by some as factors that determine the certainty, or at least expediency, of the EIA process.

An alternative view was that an EIA approval (i.e. Ministerial conditions) that establishes requirements for environmental management plans (EMPs) to be prepared further down the track is not in fact an approval and hence generates uncertainty. This is because an EMP will be subject to secondary approval by the EPA, DEC or other agencies.

Similarly, political influences that lie outside of the technical or immediate EIA process engaged with by the Partnering Agreement stakeholders influenced perceptions of certainty and the integrity of EIA practice. The appeals process and approaches to sustainability and/or strategic assessment that have recently been applied in WA were mentioned here. A number of interviewees were unsatisfied with strategic level assessments that still resulted in detailed project level assessments for which the project approval was not a certainty, even where this was implicit in the previous favourable strategic level assessment. A problem related to environmental values was noted for the EPA and EPASU staff in instances where their advice at the strategic level had been overruled by a government decision in favour of development when the subsequent project level EIA was being undertaken. The implication was that the staff would attempt to stall or stop the development at the project level assessment stage because they were fundamentally opposed to the decision outcome at the strategic level.

Two interviewees noted the importance of having a supporting policy environment for effective EIA practice and the relationship that exists between the two. They noted that gaps in the policy environment often become revealed through project level EIA (i.e. a major benefit of conducting EIA) and that ultimately certainty and consistency in decision-making stems from the existence and effective application of environmental policy more than through an individual project level assessment.

Interviewees who reflected on actual environmental management outcomes of approved and implemented projects were unsatisfied with the situation. Inadequate or lack of follow-up or public reporting on monitoring and management effort was considered to be a major shortfall of current EIA practice in WA. It was acknowledged that the transparency of the Ministerial conditions was positive in terms of clearly specifying what the environmental outcomes of project implementation should be, but there is little or no accountability for what actually subsequently occurs on the ground.
3.2.4 How effective is the scoping process?

Opinions on scoping were mostly diametrically opposed; in short, EIA practitioners appear to either 'love' or 'hate' the current scoping process in WA. Supporters of current scoping practice generally considered the process to be comprehensive and appeared to be in favour of proponents and consultants taking the lead with it. Opponents generally considered the Environmental Scoping Documents produced to be far too large and for it to take too long for scoping approval by the EPASU.

It was considered to be easy to add new issues to the scoping and ongoing EIA process, but much more difficult to explicitly leave out or to remove issues later on. Several participants indicated preference for the former scoping system whereby the EPA issued (relatively short) guidelines to proponents on what issues should be addressed in environmental review documents. Others suggested that a simple round-table meeting of proponent, consultant, EPASU staff and relevant other stakeholders would be a more effective way to conduct scoping. This would also help the relationships between EIA stakeholders and help build trust and a sense of common direction or purpose for a given assessment.

Many interviewees were concerned that the current scoping process fails to adequately prioritise environmental issues, and instead tends to become a 'catch-all' kind of exercise. A focus on priority matters or 'fatal flaws' along with identification of the work to be undertaken by the proponent in order to address these matters was identified as the key purpose of scoping. This was perceived as something that is not adequately achieved in current practice.

3.2.5 Please comment on the timeliness of consultant and EPASU activity in the process

The issue of timeliness in particular raised a kind of defensive 'them and us' kind of approach from most participants. EPASU staff tended to defend their adherence to meeting statutory or agreed timelines. Consultants often accused the EPASU of causing unnecessary delays in terms of responding and providing feedback on draft work. Both 'sides' generally recognised the difficulties each party operates under though (i.e. the previously discussed staffing and resource boom related issues) and were sympathetic and concerned about these.

Some consultants have apparently seized the initiative in various ways to try and manage or speed up timelines in order to more quickly obtain EPASU feedback. They were motivated to do this because of the effect of time delays on their relationship with proponents and with being competitive. The issue of timeliness is an aspect of EIA practice where clear communication and cooperation between consultants and EPASU staff is key for success. Both stakeholder groups also often identified aspects outside of their own role in the EIA process that cause delays, such as the appeals process and other Ministerial decision-making responsibilities.

Some interviewees did not perceive timeliness to be an issue of concern. They suggested on the one hand that a certain amount of tension over time is healthy for the EIA process and on the other that the whole issue has been over-blown. Undue focus on timing issues was perceived to detract attention away from achievement of sound environmental management outcomes from EIA.
3.2.6 How do you rate the overall quality of consultant reports? How reliable is the data or information presented in them?

Like the answer to the first question concerning quality of science and environmental management, the most common response to the question about quality of consultant reports was 'highly variable'. The same range of factors that were identified about science were repeated here. Many interviewees mentioned quality assurance processes as an important mechanism for ensuring quality consultant reports. This was especially relevant for the large consultancies. Smaller 'owner-operator' type of consultants were held in high regard for consistency and high quality documents. In terms of improving quality of consultant reports, a role for the ECA was identified by some interviewees including through the suggested activities included in the Partnering Agreement.

An issue of quality raised by several interviewees concerned consultants working in areas beyond their own field of expertise. This in part was perceived to arise from the boom conditions being experienced at present. It was perceived that consultancies had taken on more work than they could handle or that specialist sub-consultants had not been available. Other interviewees pointed out that consultants were at the mercy of the information available or provided to them. This was a product of the proponent's budget and willingness to commit to quality EIA performance.

As with the issue of science, one interviewee reiterated that quality of consultant documents matters only as far as there is sufficient information to be able to make a decision on an EIA proposal. This perspective on EIA is grounded in more of a pragmatic approach in terms of having sufficient information to make a judgement call on a project proposal rather than an emphasis on the rational-scientific and quality aspects of EIA documents.

3.2.7 How do you rate the responsiveness and capacity for adaptive management approaches by consultants (and their clients) and the EPASU staff?

The concept of adaptive management clearly means different things to different people. A number of interviewees either further clarified the concept before answering or otherwise differentiated between different meanings of the concept. EIA practitioners aware of the academic or theoretical interpretation of adaptive management generally observed that this does not occur in practice in Western Australia. Many interviewees noted that there is no common understanding of the concept in local EIA practice despite acknowledging the importance attached to it by the EPA.

Practitioners with a more general interpretation of adaptive management gave a range of perspectives about its use in local practice. Several noted that the emphasis on EIA for most proponents was in obtaining approval and less attention gets paid to ongoing management issues. This was compounded by perceptions that auditing and follow-up by the DEC has not been pursued adequately and that there is insufficient accountability for proponent actions post-approval, especially where flexibility via EMPs has been intended.

A number of observations related to the nature of Ministerial conditions in terms of the extent to which they do or do not enable flexibility to be achieved. Part of this concerned legal issues with respect to the drafting of approval conditions and changes in the way that EMPs are now being treated. Variability in the capacity of the EPASU staff and proponents to respond in an adaptive way was also noted. Factors relevant here include levels of expertise and financial capacity or willingness of proponents to take a flexible approach to environmental protection and management.
3.2.8 How can we ensure transfer of knowledge, the “lessons learnt”, from one project to another if different consultants and EPASU staff are involved?

Interviewees generally found the question of sharing the lessons learnt from practice to be a challenging one but almost universally recognised it as being a critical thing to do. Some interviewees considered the EIA process overall including policy and strategic levels which typically invites a significant role for government. These more formal approaches also included suggestions for ‘audit’ type procedures conducted by an independent party. Most however, reflected on their own immediate role in the EIA process and what their organisation does to transfer knowledge between practitioners. Several people noted the significant role that the ECA could play in this process to encourage individual environmental consultants to share their own material (which tends to be treated as 'intellectual property' and part of the marketing or competitive edge of consultants); and also to help alleviate the resource constraints experienced by the EPASU. Many interviewees advocated open and cooperative communication through meetings or workshops but noted that issues of dealing with criticism or confrontation would need to be addressed.

Several ways forward were mooted including:

- an independent audit approach – where learning from experience is derived from formal follow-up audit and evaluation processes possibly conducted by small teams dedicated to particular designated issues of interest at a particular moment in time (i.e. as opposed to simply attempting to audit all active projects all of the time);
- strengthening of the DEC Audit Branch functions with an aim to provide feedback from the results of follow-up and audit investigations in terms of ways to actively improve EIA practice in the future;
- internal feedback approaches – within both consulting firms and the EPASU alike whereby feedback through seminars or internal reports ensure that experience and lessons learnt is passed on to others (especially important with respect to agencies experiencing high staff turnover);
- a public reporting approach – including published environmental policies, Position Statements and Guidance Statements arising from matters identified in project level EIAs as well as publicly available databases of follow-up and audit results provided by proponents to the DEC and their subsequent evaluation by Audit Branch staff;
- a workshop approach – including training seminars and forums at which case studies and the lessons learned from them are discussed from the perspectives of different EIA stakeholders so that consultants and EPASU staff alike could share and learn collectively; and
- an ECA-led approach under the scope of the Partnering Agreement – instead of relying solely upon the EPA to produce Position and Guidance Statements concerning best practice EIA, it was suggested that the ECA could also make contributions here.

3.2.9 How do you rate the reputation for excellence of consultants and EPASU staff with respect to EIA practice in WA?

The question of reputation for excellence generated the shortest responses of all the interview questions. Some interviewees commented on their perceptions of the quality of work produced by their immediate colleagues and other stakeholders in the EIA process. As might be expected some individuals were judged favourably and others not so. Other interviewees reflected on the overall status of the EIA system in WA relative to other jurisdictions internationally. Most responses were in a sense a 'report card' on practice and little was offered in terms of potential ways forward. As was the case with some of the earlier interview questions some interviewees expressed strong disapproval of the perceived ethics of 'others' in the EIA process from them. Some issues that have
been discussed previously such as different values being held by different EIA stakeholders and EPASU staff resource issues were reiterated.

3.2.10 What is your perception of public confidence in the EIA process?

As with the previous question, the perception of public confidence in the EIA process in WA was largely based upon individual encounters; obviously it is hard to have a perspective across all practice. Nevertheless, some interesting points were made. A key point concerned the influence or viewpoint expressed by a minority subset of the population, such as the media or active conservation groups involved in EIA versus what the majority of the public might think. A second concern related to inability of the public to differentiate the EIA process that consultants and EPASU staff are involved with from political and other processes that often affect the outcomes of assessments. Overall, it was perceived that the EPA itself is generally well respected and sometimes this respect is earned in situations where the final government decision is contrary to the advice provided to the Minister by the EPA. Equally though, where there have been notable environmental failures or problems was seen as damaging to the reputation of the EIA process. These also are examples where a minority of outcomes affects public perception of the system as a whole.

One issue concerning EIA practice that was mentioned concerns how issues raised by the public that are not relevant to the mandate of the EPA get dealt with. There was a perception that the absence of adequate community participation in other approvals and decision-making processes means that the public turn to the EIA process to vent these issues. This also means that EIA gets blamed for failures arising from other systems. When spurious issues arising from public submissions are included in the EIA process, some practitioners find it frustrating that the EIA process loses perspective or focus. They call for firmer treatment (i.e. active dismissal) of non-relevant issues. One practitioner suggested that project EIA itself is too narrowly focused (i.e. the EPA's mandate to primarily consider only environmental issues) so while the reputation of EIA practice in WA might be sound, as a tool it has failed to adequately address sustainability issues.

A number of interviewees spoke about the process for engaging the public in EIA. Some perceived that the current EIA processes generates an adversarial situation in that only opponents to proposals will publicly comment on proponent documents and/or appeal against the recommendations of the EPA. They suggested that a more constructive and cooperative approach to community engagement could be pursued. The issue of public engagement was extended into auditing and follow-up too with at least one interviewee noting that public credibility can only be gained if follow-up is undertaken and reported on publicly (and is able to demonstrate that the proponent has satisfactorily implemented management strategies that have protected the environment).

3.2.11 Do you have any other comments about how EIA practice in WA could be enhanced (in the context of the Partnering Agreement)?

Most participants considered the Partnering Agreement to be an important initiative for fostering cooperation between the ECA and EPASU and for working together to improve EIA practice in the state. The EIA training course already established under the terms of the Partnering Agreement was strongly supported. Suggestions for the future included further collaborative meetings and events between the two groups. The ECA was identified as being the appropriate body to take the initiative here. This extended into the concept of the ECA preparing guidance documents for consultants, an interesting alternative approach to relying on the EPASU to take this role.
4. Conclusions and Recommendations

A quantitative survey (sample size of 64) and qualitative interviews (sample size of 30) were undertaken with EIA practitioners in Western Australia between July and September 2007. Both research approaches elicited practitioner responses relating to a series of 'shared interests' identified in the Partnering Agreement between the Environmental Protection Authority Service Unit (EPASU) and Environmental Consultants Association Inc (WA) (ECA). The overall aim was to identify issues of concern relating to these two stakeholder groups and possible ways forward to improve the process of EIA in WA.

Both the Survey and Interview results show a high level of willingness by EIA practitioners to cooperate and work together to improve both working relationships and EIA practice in WA. The following conclusions and recommendations pertain to the Partnering Agreement.

1. The Partnering Agreement between the EPASU and ECA is perceived as a positive initiative and should be continued.

2. The EIA Training Course already established under the Partnering Agreement should be continued on an at least an annual basis. Consideration should be given to offering additional training courses focused on other aspects of EIA practice.

3. Additional collaborative interaction between ECA members and EPASU staff on both a formal and informal level should be pursued under the auspices of the Partnering Agreement. This may include structured workshops, round-table meetings, training courses or seminars focused on elements of EIA practice in WA or other forums that also enable social interaction between the two stakeholder groups to occur.

4. The Survey and Interview results should be disseminated to relevant EIA stakeholders (including consultants, EPASU staff, the EPA Board, the Office of the Appeals Convenor and the Office of the Minister for the Environment) as appropriate.

5. Consultants would benefit from a clarification of the values of the EPA and the EPASU with respect to their role in and purpose for undertaking EIA, and vice-versa. In terms of documentation, this might best be achieved by incorporating appropriate text into the Partnering Agreement itself, however, a process of dialogue between the stakeholder groups would also be valuable.

The remaining conclusions and recommendations relate to ways to improve EIA practice in WA.

6. It is clear that the EPASU, EPA and DEC more generally, are under-resourced and suffering from staff shortages and loss of experienced staff, hampering their ability to carry out EIA functions to the levels expected by consultants and other EIA stakeholders. Any further erosion of staffing and resources of the EPASU may lead to the collapse of the system in the near future, with adverse consequences for industry, consultant and public stakeholders alike. In the interests of maintaining standards of EIA practice in WA, the capacity of the EPASU must be enhanced. This is clearly a State Government responsibility. Notwithstanding this, opportunities to support and enhance the capacity of the EPASU should be explored under the auspices of the Partnering Agreement, for example, by the ECA taking a more active role in education and staff training, information sharing and dissemination of EIA guidance advice.

7. In the interests of building trust, cooperation and time efficiency, face-to-face meetings would be preferable where appropriate over reliance on the provision of written comments on draft
documents as the main mechanism for gaining feedback during EIA. In the interests of a more effective and efficient EIA process, opportunities to streamline the process through appropriate meetings of experts and stakeholders should be investigated (this may be particularly relevant during the scoping stage).

8. Proponents play a crucial role in determining quality of EIA practice in Western Australia. Opportunities to involve proponents in education, training and workshop and other activities undertaken by the ECA and EPASU should be pursued.

9. The existing suite of EPA Guidance Statements and Position Statements should be reviewed to determine the extent to which they make a useful contribution to EIA practice. It would appear that some are either conflicting or otherwise impossible to comply with. There are also concerns that these documents promote a 'checklist' or 'box-ticking' approach to EIA, rather than one that promotes use of judgement and a focus on environmental outcomes. Consideration should be given to alternative mechanisms for improving EIA practice beyond continued reliance on existing or proposed guidance and position statements.

10. Scoping processes should be streamlined with emphasis placed on prioritisation of environmental issues and factors, reducing the size of environmental scoping documents and speeding up the process of approving and signing off on scoping documents.

11. The concept of adaptive management needs to be clarified along with the overall purpose of EIA so that all stakeholders are aware of what is intended to be achieved in practice and can act more collaboratively with a better sense of shared values or goals. This extends into the issue of condition setting and the use of EMPs – some discussion and/or guidance on these matters would be useful for EPASU staff and consultants alike, as well as other EIA stakeholders.

12. Disproportionate resources are spent on the approvals part of the process relative to the post-decision phases of EIA. Considerable disillusionment and cynicism about the point of doing EIA with respect to actual environmental outcomes was expressed by both EPASU staff and consultants and was perceived also to be a view similarly shared by proponent and public stakeholders too. Audit and follow-up functions need to be significantly upgraded, including public reporting of the findings.