Executive Summary

Introduction

Armidale Dumaresq Council (Council) has engaged AECOM Australia Pty Ltd (AECOM) to prepare this Environmental Assessment (EA) under Part 3A of the *Environmental Planning and Assessment Act 1979* (*EP&A Act)* for the development of the Armidale Regional Solid Waste (Putrescible) Landfill Facility off Waterfall Way in Armidale, NSW.

The proposed landfill facility would be designed to accept up to 15,000 tonnes per annum (tpa) of general solid waste, up to a total capacity of 750,000 tonnes over the proposed landfill's life span of 50 years. The proposed landfill facility is intended to service the future waste disposal needs of the Armidale Dumaresq, Guyra Shire, Uralla Shire and Walcha Local Government Areas (LGAs).

The existing landfill facility at the Armidale Waste Management Centre is fast approaching its final capacity. No further options are available to extend or otherwise prolong the life of the landfill, mainly due to the lack of further available land area at that site. As such, the need now exists to provide a long-term waste disposal solution for the region. It is therefore proposed to seek approval to construct and operate a new regional landfill facility.

This EA has been prepared in accordance with the provisions of Part 3A of the *EP&A Act*, together with the Director General's Requirements (DGRs) issued by the Director General of the Department of Planning (DoP) on the 20 November 2008.

Site Description

The Project Site for the proposed landfill facility is located on Waterfall Way (also known as Grafton Road) about 12 kilometres east of the central business district (CBD) of the City of Armidale. The Project Site has been selected to minimise potentially adverse land use, environmental, social and economic impacts.

The terrain that surrounds the Project Site is generally undulating. The north and south parts of the Project Site are at higher elevation and gradually slope towards a low lying area in the centre of the property. The lower area is associated with an intermittent unnamed creek that flows east towards the Gara River.

A large proportion of the Project Site has been cleared for agriculture. To the north of the site is a partially protected remnant of good quality native vegetation that forms part of the Gara Travelling Stock Route.

Background and Project Need

Armidale Dumaresq and several other surrounding LGAs are facing a waste management crisis. The existing Armidale Waste Management Centre landfill (currently used by both Armidale Dumaresq and Guyra Shire Councils) is predicted to reach capacity within the next year, with only very limited and currently unapproved possibilities for any further expansion. Others landfills within the broader region (those currently used by Uralla Shire and Walcha Councils) will progressively reach their final capacities over the next five to 15 years and would not have capacity within that time to realistically accommodate Armidale Dumaresq's and Guyra's ongoing landfill needs. Current predictions indicate that both population numbers and waste production rates within the region will remain relatively stable over the next 50 years, such that a total of approximately 15,000 tonnes of residual waste will need to be sent to landfill each year from the four participating councils of Armidale Dumaresq, Guyra, Uralla and Walcha LGAs.

Since the early 1990's, Council has investigated over 40 potential landfill sites throughout the region. These were progressively narrowed down to 11 sites via further investigation. Each of sites was then further considered via a more rigorous site investigation process. This process recommended the finally proposed landfill site, 12 kilometres east of Armidale on Waterfall Way, combining portions of two existing properties known as "Sherraloy" and "Edington". It is proposed that the land required for the landfill site would be formally subdivided from each of these two properties for purchase by Council as part of the development proposal. This combined 86 hectare site is the subject of this EA.

The existing Council owned and operated Waste Transfer Station (WTS), as part of the Armidale Waste Management Centre on Long Swamp Road, will continue to act in its current capacity as a waste processing and recycling centre, with only residual, non-recyclable waste needing to be sent to landfill at a separate site.

Project Justification

The environmental impact assessment of the proposal undertaken in this EA has addressed the relevant biophysical, economic, social and sustainability considerations. The proposed landfill facility is considered to be fully justified due to:

- A genuine need for a landfill site in the region.
- Long-term biophysical benefits arising from the project.
- Relatively minor social and economic impacts.
- Compliance with the criteria for sustainability.

Review of Alternatives and Site Selection Process

Review of Alternatives to Landfilling

Council has considered a number of alternative options for landfilling, including:

- A mechanical (rolling drum) composting process.
- A cellular composting process.
- Re-excavation of existing landfills to recover compostable material.
- A Vertical Composting Unit (VCU).
- It was determined that notwithstanding new technologies and a commitment to recycling and reuse, there would always be residual waste that would require final disposal as landfill.

Alternative Site Assessment

Eleven alternative sites were assessed taking strategic planning guidelines, statutory planning issues, ground and surface water environment, level of service, adequacy of service, local amenity and environmental considerations, site features required, set-up costs, operational costs, social issues and geotechnical investigations into account. Community consultation was also undertaken during the site selection process. Following this selection process Council resolved to pursue the establishment of a new landfill on the proposed Project Site.

Project Description

It is proposed that the new landfill facility on Waterfall Way would be constructed and licensed to operate as a General solid waste (putrescible) facility (formerly known as “Solid Waste Class 1” facility) although it is also intended, as soon as possible in the future after initial commencement, to continue its routine operation only as a General solid waste (non-putrescible) facility (formerly known as “Solid Waste Class 2” facility). In order to achieve this, it is Council’s intention to introduce additional waste processing facilities at its Armidale Waste Management Centre. These would operate in association with the proposed landfill facility and would seek to remove, for re-processing, as much possible of the “putrescible” fraction of Council’s waste from the current, otherwise non-recyclable waste stream.

The proposed landfill facility on Waterfall Way is being designed as a conventional landfill that would be constructed above natural ground level. It would require some initial excavation of the landfill’s footprint area for site establishment reasons, mainly for construction / installation of the landfill liner and leachate collection system. The final landform would be above natural ground levels but would be progressively covered, rehabilitated and appropriately landscaped over the life of the landfill in order to complement the existing surrounding topography of the local area.

The landfill would be progressively developed as five individual, operational cells that would each contain approximately 211,000 m^3 of landfill material (comprising both waste and cover materials). At currently proposed filling rates (i.e. without any further re-processing of the putrescible fraction of the existing, non-recyclable waste stream) each cell would have an operational life of approximately 10 years. The total landfill development would therefore have an operational life of approximately 50 years.

Each cell would consist of the following main components, detailed in **Section 5.0** of this EA.

- Leachate Barrier System.
- Leachate Collection and Conveyance System.
- Leachate Pond.
- Sedimentation Basin.

- Dry Basin.
- Internal Access Road.
- Biodiversity Offset Area.
- Diesel Storage Tank and Bunded Area.

A site amenities building, including staff toilets, staff lunch room, office, first aid / Occupational Health and Safety (OH&S) facilities (eye wash facilities and fire extinguishers, etc) and car parking spaces for both staff and visitors would also be constructed as part of the proposal.

Typical dimensions of each cell would be approximately 80 metres wide, 275 metres long and 14 metres high. A leachate barrier and leachate collection and conveyance system that would drain to an appropriately sized leachate pond would be installed to contain leachate on site. Intermediate cover would be applied to all landfilled areas that would otherwise be exposed for more than 90 days. Final clay capping of each cell would occur progressively and final capping would commence within 30 days of the final landfill height being reached at each location. Finally capped areas would be progressively revegetated with shallow rooted native grasses and shrubs to return the landfill footprint to its pre-existing land use condition, suitable for agricultural purposes.

The landfill facilities include a single lane access road between the proposed landfill facility and Waterfall Way. The access road would be bitumen sealed from the intersection with Waterfall Way to a wheel wash located near the landfill footprint.

Planning Framework

Commonwealth Legislation

The *Environmental Protection and Biodiversity Conservation Act 1999* (*EPBC Act*) governs the Commonwealth environmental assessment process and provides protection for matters of National Environmental Significance (NES), including Australia's World Heritage properties. The *EPBC Act* defines proposals that are likely to have an impact on matters of NES as a "controlled action" and also requires a referral to be made to the Commonwealth Minister for the Department of Environment, Water, Heritage and the Arts (DEWHA) for a determination as to whether the proposed action is considered to be a controlled action. The Minister declared in October 2007 that the project is a controlled action under the *EPBC Act*.

The proposed development therefore requires approval under the *EPBC Act*. Assessment requirements of the Commonwealth have been incorporated into the formal requirements of the NSW State Government. While the State process is the primary mechanism for assessment, the project will ultimately be reviewed for approval at both State and Commonwealth levels on this basis.

NSW State Legislation

This proposal has been assessed in accordance with the requirements of *State Environmental Planning Policy (Major Projects) 2005* (*SEPP 2005*) under Part 3A (Major Infrastructure and Other Projects) of the *EP&A Act*. The proposed landfill is defined as a 'waste facility' under *SEPP 2005* as it would have the capacity to receive more than 650,000 tonnes of putrescible waste over the site's 50 year lifespan. Accordingly, project approval is sought by Council from the Minister for Planning, who is the approval authority under Part 3A. This EA provides information required by the Minister to assess the proposal and follows consultation with government and community stakeholders, pre-planning studies to assess the need and feasibility of the proposal and subsequent impact assessment studies. Planning approvals, land valuation and acquisition, detailed design, licensing and construction would follow approval of this EA. A draft Landfill Environmental Management Plan (LEMP) has been prepared as part of the assessment. The LEMP would be finalised when detailed design of the facility is completed.

A range of Environmental Planning Instruments (EPIs), created under the *EP&A Act*, provide further guidance and regulation for development at a state, regional and local level. The EPIs considered in relation to the Project include:

- State Environmental Planning Policy (Infrastructure) 2007.
- State Environmental Planning Policy No. 33 (Hazardous and Offensive Industry).
- State Environmental Planning Policy No. 44 (Koala Habitat Protection).
- State Environmental Planning Policy No. 55 (Remediation of Land).
- The New England Draft Development Strategy.
- Armidale Dumaresq Local Environmental Plan 2008.

Other NSW State Legislation relevant to the Project include:

- Crown Lands Act 1989.
- Heritage Act 1977.
- Native Vegetation Act 2003.
- Noxious Weeds Act 1993.
- Protection of the Environment Operations Act 1997.
- Roads Act 1993.
- Rural Fires Act 1997.
- Threatened Species Conservation Act 1995.
- National Parks and Wildlife Act 1974.
- Water Management Act 2000.

Consultation

This EA has been prepared in accordance with Part 3A of the *EP&A Act* and its regulation. Part 3A of the *EP&A Act* ensures that the potential environmental effects of a proposal are properly assessed and considered in the decision making process.

In preparing this EA, the Director-General's Requirements (DGRs) have been addressed as required by Clause 75F of the *EP&A Act*.

Government Consultation

Consultation with NSW and Commonwealth government departments has been carried out to obtain the assessment requirements for the EA and to identify potential issues that should be addressed. Issues raised through government consultation have been addressed throughout this EA.

Community Consultation

Community consultation was strategically planned and aimed to target Primary Stakeholders, the wider community and Special Interest Groups. Consultation was undertaken during key stages of the project to ensure continued stakeholder involvement. Various communication mediums were used to address stakeholder and community information needs, including community meetings, newsletters, a website, media releases, direct contact, a Community Liaison Manager, a free phone number and email, forms, letters and public information displays. Key issues raised through community consultation have been addressed in this EA.

Environmental Impact Assessment

Landform and Soils

An investigation of soils and their management was undertaken as part of the EA. The assessment included:

- Identification of site history.
- Potential contamination and salinity related impacts.
- Identification of the soil landscapes.

Suitable erosion and sediment control measures would be installed during the initial construction period of the access road and for each cell footprint to mitigate potential erosion impacts. Appropriate ongoing control measures would also be implemented and fully maintained during the progressive development of each subsequent landfill cell and control measures would be applied during the operation of the proposed facility. These sediment and erosion control measures would be documented in the final LEMP as part of an Erosion and Sediment Control Plan (ESCP).

Geology

The Project Site is in an undulating landscape on the New England Plateau. The dominant underlying substrata include greywacke, siltstone, mudstone-argillite and chert associated with the deep marine sedimentary Sandon Beds.

A geological mapping programme was undertaken to investigate the apparent geological fault identified to be present within the proposed landfill site. Detailed field observations, structural measurements and examination of available data do not support the existence of a significant geological fault within the vicinity of the Project Site.

No mitigation measures would be required, however further geotechnical and hydrogeological investigation would be undertaken should evidence of a geological fault be encountered during earthworks.

Surface Water

An assessment was undertaken of the existing surface water environment of the proposed site and the potential construction and operational impacts on the environmental integrity of these local waters was assessed.

The stormwater management system proposed for the Project Site would ensure that clean stormwater is diverted away from the site and would not come into contact with dirty water and leachate. Dirty water and leachate would be directed to an appropriately sized sedimentation basin and leachate pond, respectively. Monitoring of surface water and leachate would to be carried out at the Project Site as detailed in the Water Quality Monitoring Programme and Management Plan and the Water and Leachate Management Plan.

Groundwater

Hydro-geological investigations were conducted to establish the current hydro-geological conditions across the site and to determine the potential impacts arising from the project. The area of elevated topography at the southern part of the Project Site is expected to act as a local groundwater recharge location, with infiltrating waters forming spatially and temporally transient perched groundwater at shallower depths. Deeper percolation of groundwater is expected to occur to deeper aquifers via the site's fractured mudstone.

An assessment of the potential risk and subsequent impacts of leachate infiltration through the landfill liner concluded that the estimated timeframe for leachate to reach the Gara River would be approximately 700-800 years. It was concluded that even under worse case conditions, leachate leaks from the landfill liner would have negligible impacts on the Gara River.

A number of design features and management measures would be implemented to mitigate the potential for leachate generated by the waste in the proposed landfill to impact upon groundwater. Appropriate mitigation measures are detailed in this EA. The management of groundwater impacts in the post-closure phase would continue in the same manner for the leachate management system as used during the operational period. Monitoring of groundwater would be carried out at the Project Site as detailed in the Water Quality Monitoring Programme and Management Plan and the Water and Leachate Management Plan

Air Quality

The Project Site occurs within a rural, agricultural area where background pollution levels are typically low. The wind environment at the site indicates that emissions would quickly disperse for a significant proportion of the time. Dust and odour may potentially impact upon nearby receivers, however, detailed air quality modelling shows that the impacts arising from the proposed landfill facility would not be significant. Appropriate dust and odour control measures would nevertheless be employed in order to minimise all off-site dust and odour impacts.

Greenhouse Gas Emissions

Greenhouse gases (GHG) would be generated during both the construction and operation of the proposed landfill facility with the largest proportion of these gases generated as putrescible waste within the proposed landfill decomposes. A *Greenhouse Gas Inventory* prepared for the proposal predicts net emission quantities for all significant GHGs and proposes methodologies for emissions avoidance (including energy efficiency measures), reduction, abatement and offsetting measures.

Noise

The background noise levels at the Project Site are extremely low. The noise environment is typical of rural areas, with ambient noise levels during the day dominated by routine rural human activities, animal and bird noises and intermittent traffic. Equipment used during the construction and operation of the landfill has the potential to impact upon these ambient noise levels. An assessment based on the 'worst-case scenario' concluded that with the implementation of proposed mitigation measures, noise levels generated by the proposed landfill facility would generally comply with environmental criteria. Traffic generated by the development would increase traffic noise levels by less than 2dB(A) and would comply with road traffic noise criteria.

A Construction Noise Management Plan (CNMP) would be implemented and would include a noise monitoring program, reasonable and feasible noise mitigation measures and a complaint management strategy.

Biodiversity

The Project Site is partially cleared and has been grazed over time. Surveys undertaken during spring and autumn identified one threatened plant species (narrow-leaved black peppermint) and one Rare Or Threatened Australian Plant (ROTAP) species (Bendemere white gum) occurring on the site. A relatively small area of box-gum woodland Endangered Ecological Community was identified in the Gara Travelling Stock Route. Up to 17 other threatened plant species are considered to potentially occur at the site.

Four species of threatened fauna were detected during the study, including speckled warblers, diamond firetails, koalas and eastern bent-wing bats. A further 13 threatened fauna species are considered to potentially occur at the site. The proposed landfill facility will require the clearance of approximately 20 hectares of woodland and grassland that supports native flora and fauna, however a Biodiversity Offset Area is proposed as an integral part of the proposal. This offset area would comprise a compensatory habitat of approximately 61 hectares and would connect to the Travelling Stock Route and provide connectivity between remnant woodlands in the Project Site. Together with feral species eradication programmes and appropriate fencing, these measures would contribute to the maintenance of biodiversity value in the local area.

Socio-Economic

The construction phase of the proposed landfill facility would employ up to 15 people. During operation of the proposed landfill, it is estimated that 2 people would be permanently employed on site, however there may also be other indirect employment opportunities including carrying out environmental monitoring of the proposed landfill and suppliers of goods and services.

The proposed landfill facility would have a positive economic impact on the Armidale Dumaresq LGA, particularly through the increase in efficiencies associated with waste transport. There would be a direct impact on agricultural production at the Project Site, however the proposal includes progressive rehabilitation of the landfill footprint to its pre-exiting land use condition.

Appropriate landfill management practices would ensure that introduced animal pests do not increase in abundance or affect local stock or crops. Appropriate compensation would be negotiated for affected landholders with respect to the required subdivision and purchase of the required portions of their properties that would be needed for the proposed landfill facility.

Indigenous and European Heritage

An archaeological assessment undertaken for the site identified two items of indigenous heritage (i.e. Aboriginal artefacts), these being a silcrete flake scraper and a silcrete flake. The Project Site is considerably disturbed and there are few undisturbed contexts in which archaeological material may still occur, therefore it was concluded that there is little potential for the Project Site to contain any significant archaeological material.

An appropriate management strategy has been developed to mitigate the potential for either of the identified sites to be damaged by construction or operational activities associated with the proposed landfill facility. An Indigenous Heritage Management Plan would also be prepared to outline the appropriate mitigation measures to protect the known sites. Further consultation with Aboriginal stakeholders would be undertaken prior to construction commencing.

The TSR is a significant item of European heritage found in the vicinity of the site. Impacts on biodiversity within the TSR resulting from the project would be mitigated by providing compensatory habitat and the implementation of a Biodiversity Offset Management Plan.

National Environmental Heritage

There is potential for the proposed landfill facility to impact on the water quality of the Gara River and therefore potentially have downstream impacts on the Oxley Wild Rivers National Park and Gondwana Rainforests of Australia World Heritage Area. Impact to the World Heritage Property would be negligible due to stringent mitigation measures that would be implemented, including the development of a WLMP that:

- Ensures both surface water and leachate are properly and effectively controlled and managed during the operational life of the landfill.
- Considers all aspects of the surface water and leachate storage at the Project Site, including design of a permanent leachate pond, sedimentation basin and dry basin.

Land Use

The current land use at the site is predominantly agricultural. Land use within the footprint of the proposed landfill facility would be altered from its existing agricultural use for approximately 50 years. The Project Site would, however, be progressively rehabilitated to its pre-existing landuse condition and the long term impact on agricultural land use would be negligible. The rehabilitation and planting of approximately 61 hectares of compensatory habitat (as part of a Biodiversity Offset Area) surrounding the proposed landfill facility would change the current land use, however this would provide important habitat corridors for the long term maintenance of local biodiversity.

Traffic and Transport

The potential impacts associated with the landfill development are expected to be related to changes in:

- Traffic flows.
- Traffic generation.
- Traffic distribution.

The Traffic Assessment has considered these potential traffic impacts of the proposed landfill facility. Traffic impacts as a result of the proposal are expected to be negligible.

Hazards

Potential hazards such as bushfires, hazardous materials, vandalism, explosions, land subsidence and flooding have been considered, with respect to their potential to affect the site or to create other significant impacts in relation to the proposed landfill facility. The development is not potentially hazardous or offensive according to the requirements of *SEPP 33 - Hazardous and Offensive Development* . With the adoption of sound design principles and the implementation of the proposed management and mitigation measures, the proposed landfill facility would not pose a significant risk to human health or the biophysical environment during construction or operation.

Visual

The proposal would alter the existing appearance of the site throughout the construction phase and during the operational life of the landfill, however the progressive landscaping and revegetation of each completed landfill cell would mitigate the visual impacts on nearby receivers resulting from the proposal.

Existing vegetation within the property boundary but outside the proposed landfill and associated infrastructure footprint would be maintained throughout the life of the landfill project. The Biodiversity Offset Area would comprise predominantly stringybark woodland, which when mature would provide considerable screening of the proposed landfill facility. The final location and nature of all planting would be subject to NSW Rural Fire Service bushfire regulations.

Climate Change

An assessment of the projected climate change in the region of the Project Site was undertaken and the potential climate change risks and adaptation responses for incorporation into the design phase of the landfill project have also been outlined.

Cumulative Impacts

There are no major developments planned in the vicinity of the landfill site. Consequently, there are not considered to be any significant cumulative impacts associated with the proposal, if the proposed mitigation measures for biodiversity and other suggested mitigation measures are implemented.

Statement of Commitments

In accordance with the DGRs issued under Part 3A of the *EP&A Act*, a Statement of Commitments (SoC) for the Project is included in this EA. The SoC sets out the environmental management and monitoring measures that would be put in place during the construction and operation of the proposed landfill facility to minimise adverse impacts on the environment.

The Proponent is committed to ensuring the preparation and implementation of the environmental management and monitoring plans, further investigations and studies and environmental mitigation measures detailed in the SoC for the proposed Project Approval.

This reiterates the commitment of Council and any of its contractors to the mitigation of environmental impacts that have been indentified in this EA.

Environmental Risk Assessment

The Environmental Risk Analysis for the proposed landfill facility is based on a process adapted from Australian Standard AS 4360:2004 Risk Management, as well as environmental risk tools developed by other organisations. The process is qualitative and is based on a Residual Risk Matrix.

Residual Environmental Risk is assessed on the basis of the significance of environmental effects of the proposal and the ability to confidently manage those effects to minimise harm to the environment.

The Environmental Risk Analysis indicates that the proposal presents an overall low to medium risk in relation to each of the identified environmental issues, provided that the recommended mitigation, management and monitoring measures are implemented.

Sustainability

The design of the proposed landfill facility has been conducted in accordance with the four principles of Ecologically Sustainable Development (ESD), namely:

- The "*precautionary principle*" i.e. if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.
- "*Inter-generational equity*" i.e. the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.
- "*Conservation of biological diversity and ecological integrity*" i.e. biological diversity and ecological integrity should be preserved as much as possible by investigating appropriate design and site options that minimise the impact on biological resources including threatened species and their habitats and ecologically sensitive communities.
- "*Improved valuation, pricing and incentive mechanisms*" i.e. environmental factors should be included in the valuation of assets and services.

These principles have been considered during all aspects of the project development. The relevant requirements of the Commonwealth *EPBC Act* have also been taken into account.

Conclusions

This EA addresses the requirements set out by the DoP in their letter to AECOM dated 11 November 2008 and in response to Adequacy Review comments received in July and August 2009. In the context of these requirements the following overall conclusions are made:

- There is an urgent need to find an alternative waste disposal solution for the Armidale region.
- Council has investigated alternative options to landfilling, including do-nothing, composting, mechanical biological treatment and thermal treatment, but concluded that land filling of residual waste in conjunction with a number of current waste avoidance/recycling initiatives would be the best option for this region.
- Based upon a stringent rating and weighting process along with an intensive community consultation program, the Project Site assessed in this EA is considered to be the best site available. No environmental issues were identified that would preclude this site from use as a landfill.

- The potential impacts of the proposed landfill facility on water (surface and groundwater), air (greenhouse, dust, methane, odours), noise, litter, feral animal/weeds and heritage have been fully assessed and it is considered that with the adoption of the proposed mitigation measures outlined in this EA, there would be a negligible impact on the surrounding environment.
- Through the adoption of the mitigation measures proposed in this EA the potential impacts would be successfully addressed to ensure that there is an overall negligible impact on the environment.
- In particular, stringent controls for leachate management, groundwater and surface water monitoring, landfill lining and surface water management would be put in place to ensure that there is no discharge of contaminated ground and/or surface waters to the receiving water bodies in this catchment.
- The assessment has indicated that there would be some habitat loss or disturbance on the site resulting from the proposed works. However, this habitat loss would be offset by providing approximately 61 hectares of revegetated, compensatory habitat.
- Further, with this offset in place, it has been concluded that there would be no significant impact on biodiversity, the environment or heritage arising from this proposal.

It is concluded that identified potential impacts from the proposed landfill facility can be appropriately managed through the implementation of proposed specific mitigation measures and commitments outlined in this assessment and contained in the SoC. Council would implement these commitments via the initiation of its LEMP for the proposed landfill facility. This LEMP would also be used by government agencies to both administer and regulate the proposed landfill facility.

The findings of the environmental assessment presented in this EA and accompanying technical studies confirm that the proposed landfill facility has a strong justification for proceeding and is considered to be suitable for approval under Part 3A of the *EP&A Act*.

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