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| **Primary Permission Applicant Name** |  |
| **Date** | 30 November 2023 |

Note: in this document **‘*activity*’** refers to the activity that is subject of the decision on the application/review*.*

This Application Checklist may be required for permit, licence and permission exemption applicants. If you are applying for a designation or registration, you do not need to complete this checklist. For further details see [Additional application requirements](https://www.epa.vic.gov.au/for-business/permissions/application-requirements).

Complete **Part A** of this checklist for all other permission applications.

You must also complete **Part B** if your application proposes:

* new scope 1, 2 or 3 emissions, or a change to an existing activity’s annual gross scope 1, 2 or 3 emissions (see “Step 1 – Identifying your GHG emission sources” in the [Guideline for minimising GHG emissions (publication 2048)](https://www.epa.vic.gov.au/-/media/epa/files/publications/2048-guideline-for-minimising-ghg-emissions.docx?la=en&hash=E7B5FC18EDDA1C69F0C67D6A00DEF0E1)), and/or
* a new activity that is likely to be impacted by climate change, or any changes resulting in increased potential impacts of climate change on an existing activity, and/or
* a new activity, or any changes to an existing activity that is likely to increase the potential impacts of climate change.

Purpose

Climate change is one of the many considerations EPA must have regard to in assessing a permission application. There are eight elements EPA must consider, derived from the *Environment Protection Act 2017* and the *Climate Change Act 2017*.

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| EPA’s permissioning consideration of climate change  |
| **Climate Change Act 2017** |
| **Potential impacts of climate change** | EPA must consider the potential impacts of climate change relevant to a prescribed decision. Potential impacts of climate change include biophysical impacts, long and short-term economic, environmental, health and other social impacts, beneficial and detrimental impacts, direct and indirect impacts, and cumulative impacts.  |
| **Potential contribution to the State’s GHG emissions** | EPA must have regard to the potential contribution to the State’s GHG emissions of a prescribed decision. In having regard to the potential contribution to the State’s GHG emissions of an activity, EPA considers potential short-term and long-term GHG emissions, potential direct and indirect GHG emissions, potential increases and decreases in GHG emissions, and potential cumulative impacts of GHG emissions.  |
| **Guidelines issued by the Minister** | The Minister may issue guidelines as to the scope and application of the factors set out in the above considerations. The EPA must have regard to any such guidelines issued by the Minister in making prescribed decisions.  |
| **Environment Protection Act 2017** |
| General Environmental Duty  | The general environmental duty (GED) outlines the responsibility of all persons, including individuals, small businesses and corporations, to take action in minimising harm to human health and the environment arising from their activities. This includes taking steps to reduce GHG emissions and adapt to the impacts of climate change, so far as reasonably practicable. Where EPA is required to consider the general environmental duty in its permission decisions, it must take into account any measures an applicant for a licence or permit has taken, or proposes to take, to comply with the general environmental duty when engaging in the proposed activity. |
| Impacts of the activity | When determining whether to issue (or amend) development licences, operating licences (including review of operating licences) or project pilot licences, EPA considers the impact of the activity on human health and the environment and the impact on any environmental values identified in the Environment Reference Standard (ERS), along with any other activities being or proposed to be carried out by the holder of the licence or any other person. |
| Principles of Environment Protection | The principles of environment protection (PEPs) guide EPA on how to administer the Environment Protection Act. In the context of climate change, EPA considers the PEPs when determining whether to issue, or grant an exemption from, a licence or permit.  |
| Best available techniques and technologies  | Best available techniques and technologies (BATT) requires EPA to consider whether the applicant has demonstrated that the mitigation measures it has proposed are the most effective and advanced stage in the development of activities and their methods of operation, that are reasonably practicable for the applicant to implement. |
| Consistency with the Act and Regulations | EPA must consider whether the proposed activity is compatible with or adheres to those components of the Environment Protection Act and Regulations that have not already been considered. |

How EPA considers climate change

EPA considers many factors affecting human health and the environment when making decisions on licences and permits. In relation to climate change, EPA must have regard to the eight considerations outlined above, including an activity's potential GHG emissions and the potential impacts of climate change relevant to the proposed activity. This requires EPA to undertake a balancing process to weigh the various factors as they apply to the facts of a particular application. EPA applies the principle of proportionality when exercising decision-making powers under the EP Act.

**What you need to provide and how to work through this checklist**

To enable EPA to assess your application, you must provide:

* an assessment of the potential impacts of climate change relevant to your activity (Step A.1),
* an assessment of your GHG emissions (Step A.2), and
* (where applicable) an assessment of risks associated with your activity’s GHG emissions and climate change impacts relevant to your activity that includes a plan for eliminating/reducing those risks and/or emissions (part B).

This Application Checklist will support you to complete your assessments and ensure that you have provided all the necessary information to enable assessment of your application for a permit, licence or permission exemption.

EPA recommends that you download and complete this checklist, and attach it to your application for a permit, or permission exemption.

Your responses must reference the relevant sections in your application documents. For your own records and to support assessment, include the document name, section number and page number.

EPA publication 2048 provides business owners with relevant state of knowledge on how you can meet your obligation under the general environmental duty in relation to GHG emissions. It may help you prepare your risk assessment and complete sections of this checklist.

PART A – MANDATORY CONSIDERATIONS (all applications)

**Step A.1 – Identify potential impacts of climate change relevant to the activity**

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|  | Assessment | Response | Document name and section reference |
| 1.1 | I have adequately considered and identified different types of potential climate change impacts on the activity for the duration of the activity |  |  |
| 1.2 | I have adequately considered and identified different types of potential climate change impacts that may be increased as a result of the activity (not including impacts of the activity’s GHG emissions) |  |  |
| 1.3 | I have used reputable source(s) or engaged a reputable independent third party to conduct/verify the impacts assessment of climate change on my activity |  |  |

Step A.2 – Identify activity’s GHG emissions

Refer to “Step 1 – Identifying your GHG emission sources” in [publication 2048](https://www.epa.vic.gov.au/-/media/epa/files/publications/2048-guideline-for-minimising-ghg-emissions.docx?la=en&hash=E7B5FC18EDDA1C69F0C67D6A00DEF0E1)

|  |  |  |  |
| --- | --- | --- | --- |
|  | Assessment | Response | Document name and section reference |
|  | I have identified my emissions sources:   | * Scope 1:
* Scope 2:
* Scope 3:
 |  |
|  | I have calculated my new annual emissions (provide annual breakdown of the combined total emissions over the life of the activity): | New annual emissions:* Scope 1 (tCO2-e):
* Scope 2 (tCO2-e):
* Scope 3 (tCO2-e):
* Scopes 1, 2 and 3 combined total (tCO2-e):
 |  |
|  | My new combined total annual emissions above have considered avoided emissions (where applicable) and measures to reduce my activity’s GHG emissions over the life of the activity **(excluding emission offsets)** | [ ]  Yes[ ]  No |  |
|  | Complete this step only if this application relates to an existing and operational activity:1. what are the current emissions totals; and
2. what is the permission ID relevant to your application?
 | a) Current annual total emissions:* Scope 1 (tCO2-e):
* Scope 2 (tCO2-e):
* Scope 3 (tCO2-e):
* Scopes 1, 2 and 3 combined total (tCO2-e):

b) Existing Permission/Exemption ID: |  |
|  | I have selected the GHG accounting tool most relevant to my business for emission accounting |  |  |
|  | I have used a reputable GHG specialist for emission accounting or engaged an independent third party to verify it  |  |  |

PART B – RISKS ASSESSMENT AND MITIGATION STRATEGIES

**Step B.1 – Assess risks of harm from GHG emissions and climate change impacts**

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|  | Assessment | Response | Document name and section reference |
| 1.1 | I have adequately assessed the risks **posed by the GHG emissions associated with the activity** and used an appropriate and proportionate approach to conduct the risk assessment |  |  |
| 1.2 | I have adequately assessed the risks **posed to the activity by climate change (excluding GHG)** and used an appropriate and proportionate approach to conduct the risk assessment |  |  |
| 1.3 | I have adequately assessed the risks of **the activity increasing the potential impacts of climate change (excluding GHG)** and used an appropriate and proportionate approach to conduct the risk assessment |  |  |

Step B.2 – Implement strategies to mitigate risks from GHG emission and climate change impacts

Refer to "Step 3 – Identify and implement controls to minimise risks arising from GHG emissions” in [publication 2048](https://www.epa.vic.gov.au/-/media/epa/files/publications/2048-guideline-for-minimising-ghg-emissions.docx?la=en&hash=E7B5FC18EDDA1C69F0C67D6A00DEF0E1)

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|  | Assessment | Response | Document name and section reference |
| 2.1 | I have used a risk assessment methodology and considered the hierarchy of control in:1. implementing measures to reduce GHG emissions associated with my activity, and/or
2. minimising risks on my activity from climate change, and/or
3. minimising the risk of my activity increasing potential climate change impacts (excluding GHG)
 |  |  |
| 2.2 | My application demonstrates the chosen controls and measures are so far as reasonably practicable  |  |  |
| 2.3 | I have: 1. used reputable sources to choose the most suitable and effective techniques and technologies for minimising GHG emissions
2. used reputable sources to choose the most suitable and effective technologies for reducing the potential climate change impacts on and of the activity
3. identified and documented the best available techniques and technologies
4. evaluated the techniques and technologies I propose to use against the best available techniques and technologies
 |  |  |

Step B.3 – Review mitigation strategies to ensure they are effective

Refer to "Step 4 – Review controls to ensure they are effective” in [publication 2048](https://www.epa.vic.gov.au/-/media/epa/files/publications/2048-guideline-for-minimising-ghg-emissions.docx?la=en&hash=E7B5FC18EDDA1C69F0C67D6A00DEF0E1)

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|  | Assessment | Response | Document name and section reference |
| 3.1 | My application outlines a process for continuous improvement and review of measures to reduce GHG emission (emission targets/pledges) over the life of the activity |  |  |
| 3.2 | My application outlines a process for continuous improvement and review of risk controls related to the activity’s resilience to climate change impacts over the life of the activity |  |  |
| 3.3 | The processes proposed in sections 3.1 and 3.2 are relevant and reasonably practicable for my proposed activity and I have integrated them in my Risk Management and Monitoring Program |  |  |