

# Environmental auditor guidelines - *Provision of statements and reports for environmental audits and preliminary risk screen assessments*

---

Publication 2022 August 2021

Publication 2022 August 2021. This replaces publications 1147, 1147.1 and 1147.2.

Authorised and published by EPA Victoria

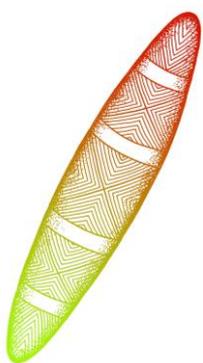
Level 3, 200 Victoria Street, Carlton VIC 3053

1300 372 842 (1300 EPA VIC) [epa.vic.gov.au](http://epa.vic.gov.au)

This publication is for general guidance only. You should obtain professional advice if you have any specific concern. EPA Victoria has made every reasonable effort to ensure accuracy at the time of publication.

This work is licensed under a [Creative Commons Attribution 4.0 licence](https://creativecommons.org/licenses/by/4.0/).

Give feedback about this publication online: [epa.vic.gov.au/publication-feedback](http://epa.vic.gov.au/publication-feedback)



EPA acknowledges Aboriginal people as the first peoples and Traditional custodians of the land and water on which we live, work and depend. We pay respect to Aboriginal Elders, past and present.

As Victoria's environmental regulator, we pay respect to how Country has been protected and cared for by Aboriginal people over many tens of thousands of years.

We acknowledge the unique spiritual and cultural significance of land, water and all that is in the environment to Traditional Owners, and recognise their continuing connection to, and aspirations for Country.



For languages other than English, please call **131 450**.

Visit [epa.vic.gov.au/language-help](http://epa.vic.gov.au/language-help) for next steps.

If you need assistance because of a hearing or speech impairment, please visit [relayservice.gov.au](http://relayservice.gov.au)

## Contents

Introduction .....	4
Purpose of this guideline.....	4
Overview of audit system .....	4
Provision of statements and reports for environmental audits preliminary risk screen assessments .....	5
Digital submission .....	5
File type and format.....	6
File naming structure .....	6
Searchability .....	8
Prohibited file features.....	8
Provision of information to the Authority .....	9
Victorian Electronic Records Strategy .....	9
Long-term preservation of audit report information.....	10
Retention of audit and PRSA reports and evidence by auditors .....	10
Related documents .....	11
Appendix A: Template for Audit Report and PRSA Executive Summary .....	12
Supporting Information .....	12

## Introduction

Environment Protection Authority Victoria (EPA) maintains a public register accessible through the EPA website in which the details of completed environmental audits and preliminary risk screen assessments (PRSAs) are provided.

EPA accepts environmental audit reports and PRSAs in digital format. Audit reports and PRSAs provided to EPA by environmental auditors are public documents<sup>1</sup> and must be stored and managed like other public records.

Audit reports and PRSAs must be provided to EPA in a digital format that:

- conforms to the Victorian Government standard,
- is suitable for long-term preservation, and
- enables ready access.

## Purpose of this guideline

This guideline provides information to EPA appointed environmental auditors with on how to submit completed environmental audit reports and PRSAs to EPA, and how to retain that information.

This guideline focuses primarily on the specific requirements for retaining and lodging digital documents (completed audit reports and PRSAs) based on the Victorian Government's Long Term Sustainable Formats specifications. These specifications are available from the Public Record Office Victoria website [www.prov.vic.gov.au/recordkeeping-government](http://www.prov.vic.gov.au/recordkeeping-government).

## Overview of audit system

This guideline applies to the administrative and notification requirements for environmental audits and PRSAs, conducted under Part 8.3 of the *Environment Protection Act 2017* (the Act).

EPA administers Victoria's environmental audit system. Environmental auditors are appointed under Division 1 of Part 8.3 of the Act and are legally required to perform thorough, objective and accurate environmental audits.

Section 190(1) of the Act lists the functions of an environmental auditor, they are to:

- conduct PRSAs and environmental audits
- prepare PRSA statements, PRSA reports, environmental audit statements and environmental audit reports
- perform any other function conferred on an environmental auditor under the Act or any other Act
- perform any prescribed function of an environmental auditor.

---

<sup>1</sup> Refer to section 2 of Public Records Act 1973.

## Environmental auditor guidelines – Provision of statements and reports for environmental audits and preliminary risk screen assessments

---

When undertaking their duties as environmental auditors, the *Environment Protection Act 2017* (the Act) requires that environmental auditors have regard to:

- any EPA guidelines issued under section 203 of the Act
- any relevant environment reference standard (ERS)
- any relevant compliance code, and
- any prescribed matter<sup>2</sup>.

These guidelines may be replaced, amended or updated periodically.

### Provision of statements and reports for environmental audits preliminary risk screen assessments

An environmental auditor must provide a copy of these documents to EPA within 5 business days of completion<sup>3</sup>:

- environmental audit report
- environmental audit statement
- PRSA report
- PRSA statement

This should be a digital PDF copy provided via the EPA Portal.

Where a statutory provision requires an environmental audit, the environmental auditor should provide a copy of the completed audit report to the Manager of Environmental Audit via the EPA portal in addition to any requirement to provide the report to EPA's requesting delegate (EPA officer or Regional Manager).

Only digital copies should be submitted to EPA, not hard copies. Follow the steps in this guideline to provide copies of environmental audit reports, environmental audit statements, PRSA statements, and PRSA reports the right way.

Submitted documentation which does not conform to these guidelines may need to be resubmitted to meet the specifications in these guidelines.

### Digital submission

Environmental auditors should provide digital files as outlined in the following sections.

*Information sheet for environmental audits and preliminary risk screen I* (Publication 2009) should be added as the first page to each scanned file to provide an outline of the environmental audit or PRSA conducted. The information sheet states the need to read the environmental audit report, PRSA report, appendices or any executive summary or environmental audit or PRSA statement collectively.

---

<sup>2</sup> Refer to section 190 (2) of the Act.

<sup>3</sup> Refer to sections 205 and 210 of the Act

### File type and format

All files should be in Portable Document Format (PDF). For record keeping purposes, we recommend using variants of PDF-A, but PDF 1.7 is acceptable. Don't use features which may make it difficult to display PDF files in the future or limit the ability to use the information contained within environmental audit reports. EPA will not accept any file that use any of the listed prohibited features further below, under the heading 'Prohibited features'.

Number all pages Use a universally standard page size, (ISO A-series standard), for example, A4, A3, A0 and so on. Use a resolution no lower than 300 dots per inch (DPI). Any secondary attachments, such as photos, figures and maps should also be submitted as a PDF according to the following guidelines.

### File naming structure

File name conventions ensure that environmental audit reports and PRSAs can be stored and retrieved efficiently.

#### File naming structure for environmental audits

EPA stores and manages all notified audits according to an administrative number based on EPA's business information system. This number will be automatically generated through the auditor portal and provided to the auditor at the notification stage.

For environmental audit submissions this will be a number with the following format EA00XXXX. Audit reports (including the environmental audit statement) should be provided to EPA in three separate PDF files. This will enable easier retrieval and access to this information by EPA, other government agencies, environmental auditors and the general public.

The first PDF should be named using the relevant administrative number followed by '\_a.pdf', the second '\_b.pdf' and the third '\_c.pdf'. Auditors must attach the information sheet as the first page in each of the three PDF documents.

These documents should not be copy protected (see prohibited file features in section 4.3), as information will be extracted into a database to enable searching for audit information.

#### First PDF – Audit report (EA00XXXX\_a.pdf)

This will contain a copy of the environmental audit report including key figures, maps and tables. It will also include a signed copy of the environmental audit statement.

#### Second PDF (EA00XXXX\_b.pdf)

This will contain all relevant appendices and attachments that support the environmental audit report including remediation and monitoring plans, assessors' reports, any bore/pit data etc.

#### Third PDF (EA00XXXX\_c.pdf)

This will contain an additional extract copy of the signed environmental audit statement and an executive summary. The executive summary should include a copy of the populated tables (one and two) outlined in Appendix A of this document.

For example, an environmental auditor notifies EPA of a contaminated land audit in Clifton Hill. EPA acknowledges the notification and provides an administrative reference number of 'EA001234'. When the environmental auditor has completed the environmental audit report, they notify EPA and provide an electronic PDF copy of:

- audit report EA001234\_a.pdf
- report appendices EA001234\_b.pdf
- statement and executive summary EA001234\_c.pdf.

### File naming structure for PRSA's

PRSAs do not have a notification stage, therefore, EPA's Administrative number based on the authority's business information system will not be provided to auditors prior to their submission of a PRSA to EPA.

Auditors should use the following nomenclature when naming PRSA files. The date of completion of the PRSA and the suburb/town where the site is located.

<DATEOFCOMPLETION>\_<SUBURB>

For example, the auditor submits a PRSA for a site in Carlton which they completed on 1 December 2021 they would name the file:

011221\_CARLTON

Please note that in this example, if the auditor was submitting more than one PRSA completed in the same locality and on same day, they would need to add a sequential number after the locality.

For example: if the auditor submitted 3 PRSAs completed on exactly the same day in the same locality, the files would be named as follows:

011221\_CARLTON1

011221\_CARLTON2

011221\_CARLTON3

Similar to audits, PRSAs should be provided to EPA in three separate PDF files. As with audit files, these documents should not be copy protected (see prohibited file features in section 3.4), as information will be extracted into a database to enable searching for audit information.

The first PDF should be named using the PRSA nomenclature followed by '\_a.pdf', the second '\_b.pdf' and the third '\_c.pdf'. Auditors must attach the information sheet as the first page in each of the three PDF documents. The first PDF will contain a copy of the PRSA report including key figures, maps and tables. It will also include a signed copy of the PRSA Statement.

<DATEOFCOMPLETION>\_<SUBURB>\_a.pdf

The second PDF will contain all relevant appendices and attachments that support the PRSA report including remediation and monitoring plans, assessors' reports, any bore/pit data etc.

<DATEOFCOMPLETION>\_<SUBURB>\_b.pdf

The third PDF will contain an additional extract copy of the signed PRSA statement and an executive summary. This document should not be copy protected (see prohibited file features in section 4.3), as information will be extracted into a database to enable searching for audit information. The executive summary should include a copy of the populated tables (one and two) outlined in Appendix A of this document.

<DATEOFCOMPLETION>\_<SUBURB>\_c.pdf

Using the earlier example where the auditor submitted a PRSA for a site in Carlton which they completed on 1 December 2021 they would name the files:

- |                                   |                  |
|-----------------------------------|------------------|
| • PRSA Report                     | 011221_CARLTON_a |
| • Report appendices               | 011221_CARLTON_b |
| • Statement and executive summary | 011221_CARLTON_c |

### Searchability

All submitted files should be accessible and text searchable.

A PDF file with formatted text and graphics is likely to be more accessible than one with images. Auditors should ensure that appendices are not image-only PDFs, but rather a PDF based on an original digital text document (for example, Word, Excel), which provides searchable and copiable text.

Where auditors receive files from third parties that are scanned, optical character recognition (OCR) functions within Adobe Acrobat software can be used to ensure documents are close to the quality of the original, searchable.

### Prohibited file features

Prohibited features are those which may make it difficult to display PDF files in the future or limit the ability to use the information contained within environmental audit reports. EPA will not accept any file that uses:

- **encryption**
- **passwords**
- **copy protection.**

EPA will not accept audit reports that are encrypted or require passwords to access, display, search or print them. Encryption, passwords, and copy protection are used to secure the contents of a file from unauthorised access. The use of encryption and password protection opens the possibility of losing the audit report if the decryption key or password is lost. This risk increases over time.

Audit reports and PRSAs should not be altered by anyone other than the environmental auditor who authored the document. EPA will do its best to ensure that PDF versions of audit reports made available to the public will not be editable.

Any file attachments, sound files, movie files, plug-in extensions or JavaScript actions should be removed or disabled. Such features are difficult to preserve in the long term and may alter how the file is displayed in the future.

PDF files should be self-contained. There are several options in the PDF specification that allow components of a PDF document to be external to the PDF file. Such components are most likely to be lost during long-term preservation, so externally linked objects or referenced content should be removed or included/embedded in the PDF file.

### Printing and rendering options

All fonts should be embedded within the PDF file. Not including the font definitions here makes the PDF file smaller but means the file cannot be accurately displayed. Fonts and font sizes should be set to ensure the report content is legible.

PDF files should include 'printing permissions' that allow printing. Features that limit printing to specific output devices are prohibited because they limit the ability of the file to be reproduced in the future.

## Provision of information to EPA

Environmental audit and PRSA statements and reports are to be provided to EPA through the EPA portal.

Audit reports and PRSAs are provided to EPA for a number of reasons, including for:

- use as part of EPA's quality assurance program to ensure environmental auditors comply with the Act and guidance issued by EPA<sup>4</sup>
- central storage of environmental audit reports for access by other environmental auditors to assist in site and background environmental assessments
- storage and access for members of the public as part of EPA's responsibilities under the Public Records Act 1973
- development of long-term information and trends on environmental conditions for use by Victorian Government agencies, academic institutions and the general public.

### Victorian Electronic Records Strategy

The Victorian Electronic Records Strategy (VERS) was originally developed by the Public Record Office of Victoria in 2000 to preserve the records of the State for the long term. The strategy specifies a standard format for all public records in all formats, including electronic records.

The VERS was developed in collaboration with the objectives of the Australasian Digital Record Keeping Initiative, established by the Council of Australasian Archives and Records Authorities,

---

<sup>4</sup> Refer section 10 of EPA Publication 865 – Environmental auditors guidelines for appointment and conduct.

the peak body of government archives and records institutions in Australia and New Zealand. Consideration was also given to the Australian Standard on Records Management (AS 4390).

### Long-term preservation of audit report information

Environmental audit and PRSA reports provide information which may be useful to existing environmental auditors, their clients, government agencies and the general public. Reports contain information relating to environmental conditions and site management, and provide a history of contamination and redevelopment.

The level of information available in these reports is unlikely to be replicated in other public documents and therefore represents a key source of current and historical information. Under EPA's Retention & Disposal Authority PROS 19/10, Environment Protection Functions, these types of reports and associated material should be retained permanently as State archives documents.

Long-term preservation of electronic records is covered by the Public Record Office Victoria Standard - "PROS 19/05 Create, Capture and Control Standard. The relevant detailed document is Specification 3 of the Standard", PROS 19/05 S3 Long Term Sustainable Formats Specification (PROS 19/05). The majority of electronic audit reports held by EPA have been provided in PDF (Portable Document Format), which is regarded as suitable for long-term record preservation.

The ability of PDF to precisely describe and identically reproduce pages irrespective of the printer used is a key benefit in preserving record content. Unlike other representations (for example, Word) a new version of the PDF reader tool will not result in text or other objects moving around a page or between pages, or changing font size or colour.

EPA will only accept electronic versions of completed audit reports and PRSAs as PDF files.

### Retention of audit and PRSA reports and evidence by auditors

The environmental auditor should ensure that they retain copies of all environmental audit reports and PRSAs they have prepared and the supporting evidence used in the conduct of the audit consistent with the requirements in these guidelines and the *Public Records Act 1973*. Wherever possible, this information should be retained for periods longer than seven years and in manner or format that provide for longer term preservation as outlined in this guidance and PROS 19/05.

## Related documents

This guideline should be read in conjunction with, and the auditor should have regard to:

- a. the Act, in particular Part 8.3— Environmental audit system.
- b. *Environmental auditor guidelines for appointment and conduct* (EPA publication 865)
- c. *PROS 19/05 Create, Capture and Control Standard* (Public Record Office Victoria)
- d. any other guidelines issued by EPA under section 203
- e. any relevant environment reference standard made under Part 5.2
- f. and any relevant compliance code made under Part 5.3
- g. and any prescribed matter.

## Appendix A: Template for Audit Report and PRSA Executive Summary

All submitted audit reports and PRSA reports should contain an executive summary that includes a copy of Tables 1 and 2 in Appendix A.

### Supporting Information

#### Street address information

Where the environmental audit site covers multiple streets or is better described by a reference to the corner of street x and y, the street name reported in the table should be that which borders the longer side of the audit site.

#### Standard parcel identifier — lot on plan

Where the audit site is comprised of multiple titles or parts, the largest part or whole single title should be provided in the first 'Dominant' title field. Any additional or remaining lots should be recorded in the 'Additional' title field. Detailed lot on plan information is available in Customer Information Bulletin Edition 82 available from the Land Use Victoria website [www.land.vic.gov.au](http://www.land.vic.gov.au)

Table 1: Summary of Audit Report and PRSA information

Summary information required		Environmental Audit	PRSA
Auditor	First_name Last_name	✓	✓
Auditor account number	EXT00XXXX	✓	✓
Date EPA notified of audit	__/__/20__	✓	
Environmental Audit reference	EA00XXXX	✓	
Name of person requesting audit or PRSA	First_name Last_name	✓	✓
Relationship of person requesting audit or PRSA to site	For example, Owner/manager Wade Enterprises Pty Ltd	✓	✓
Name of site owner	(If different to person requesting audit/PRSA) Title_First name_Last name	✓	✓
Date of auditor engagement	__/__/20__	✓	✓
Completion date of the audit or PRSA	__/__/20__	✓	✓
Reason for audit or PRSA	For example, planning system, EPA notice, voluntary	✓	✓
Elements of the environment assessed	For example, ambient air, ambient noise, land, water	✓	✓
Planning permit number or requirement detail if applicable		✓	✓
EPA Region		✓	✓
Municipality		✓	✓
Dominant — Lot on plan	For example, Lot 1 TP102965	✓	✓
Additional — Lot on plan(s)	For example, Lot 2 TP102964, Lot 3 TP102966	✓	✓
Site/premises name	For example, Wade Enterprises	✓	✓

Environmental auditor guidelines – Provision of statements and reports for environmental audits and preliminary risk screen assessments

Summary information required		Environmental Audit	PRSA
Building/complex sub-unit No.		✓	✓
Street/Lot — Lower No.	182	✓	✓
Street/Lot — Upper No.	186	✓	✓
Street Name	St Franks	✓	✓
Street type (For example, road, court)	Street	✓	✓
Street suffix (For example, North, South)	South	✓	✓
Suburb	Fitzroy North	✓	✓
Postcode	3068	✓	✓
Site area (in square metres)	x,xxx.x m2	✓	✓
Plan of site/premises/location showing the audit site boundary attached		✓	✓
Members and categories of support team utilised	First_name Last_name (expertise)	✓	✓
Further work or requirements	For example, ongoing monitoring of groundwater	✓	✓
Nature and extent of continuing risk of harm	Brief description of risks that remain at the site (if applicable)  For example, risks in soil include... and will be managed by ...  Risks in groundwater include... and will be managed by ...  Risks in soil vapour include... and will be managed by ...	✓	✓
Outcome of the PRSA report	Is an environmental audit required?		✓
Outcome of environmental audit report	Results and any recommendations that have been made in the environmental audit statement.	✓	
Land use suitability	Suitable for the use or proposed use/ Suitable for the use or proposed use subject to compliance with recommendations/ Not suitable for the use or proposed use.	✓	
Has groundwater cleanup been undertaken as far as reasonably practicable?	Yes/No	✓	
Does groundwater contamination remain at the site and is the site the source?		✓	
If groundwater contamination remains, does it extend off-site?	Yes/No	✓	
Is a GQRUZ recommended?	Yes/No	✓	

Environmental auditor guidelines – Provision of statements and reports for environmental audits and preliminary risk screen assessments

Summary information required		Environmental Audit	PRSA	
If applicable, please indicate which of the following are threatened environmental values of groundwater	For example, site-sourced and regional pollution.		✓	
	Water dependent ecosystems and species	Yes/No		
	Potable water supply (desirable)	Yes/No		
	Potable water supply (acceptable)	Yes/No		
	Potable mineral water supply	Yes/No		
	Agriculture and irrigation (irrigation)	Yes/No		
	Agriculture and irrigation (stock watering)	Yes/No		
	Industrial and commercial use	Yes/No		
	Water-based recreation (primary contact recreation)	Yes/No		
	Traditional Owner cultural values	Yes/No		
	Buildings and structures	Yes/No		
Geothermal properties	Yes/No			
Is ongoing groundwater monitoring required?	Yes/No	✓		
Is ongoing vapour/gas monitoring required	Yes/No	✓		
Are vapour/gas mitigation measures required	Yes/No	✓		
List any other ongoing management requirements if applicable				

✓ = Mandatory information requirement

Table 2: Physical site information

Summary Information Required		Environmental Audit	PRSA
Current EPA permission/s and related permission ID if applicable			
Historical land use	For example, the main contaminating activities/land use associated with the historical use of the site (list more than one if appropriate)	✓	✓
Current land use		✓	✓
Proposed land use		✓	✓
Current land use zoning	For example, commercial, industrial	✓	✓

## Environmental auditor guidelines – Provision of statements and reports for environmental audits and preliminary risk screen assessments

Proposed land use zoning	For example, commercial, industrial	✓	✓
Surrounding land use – north (if applicable)	For example, the most sensitive land use receptor in the vicinity of the site	✓	✓
Surrounding land use – south (if applicable)	For example, the most sensitive land use receptor in the vicinity of the site	✓	✓
Surrounding land use – east (if applicable)	For example, the most sensitive land use receptor in the vicinity of the site	✓	✓
Surrounding land use – west (if applicable)	For example, the most sensitive land use receptor in the vicinity of the site	✓	✓
Has EPA been notified about the site under Section 40 of the <i>Environment Protection Act 2017</i> ? <sup>5</sup>		✓	✓
Nearest surface water receptor – name	For example, Yarra River	✓	✓
Nearest surface water receptor – direction	For example, Southwest	✓	✓
Likely point of groundwater discharge	For example, stormwater drain 5m north of site (If different from surface water receptor)	✓	
Site aquifer formation	For example, Brighton Group	✓	✓
Groundwater flow direction	For example, South-southwest	✓	
Groundwater TDS range (mg/L)	For example, 560–1,500	✓	
Groundwater segment	For example, A1, A2, B, C, D, E, F	✓	✓
Are there multiple aquifers impacted by pollution at the site	Yes/No	✓	
Perched groundwater depth – upper (metres below ground level (mbgl))	For example, 0.5	✓	
Perched groundwater depth – lower (mbgl)	For example, 1.5	✓	
Regional groundwater depth – upper (mbgl)	For example, 7.8	✓	
Regional groundwater depth – lower (mbgl)	For example, 15.2	✓	
Number of bores within 2 km	For example, 60	✓	
Closest extractive use (distance in m)	For example, 525	✓	
Zone of groundwater plume influence (m from site boundary)	For example, 2	✓	
Year groundwater last monitored	For example, 2021	✓	

<sup>5</sup> Section 40 refers to a duty to notify EPA of notifiable contamination. Further information in relation to this can be found in EPA Publication 2008: Notifiable contamination guideline: Duty to notify of contaminated land.