



Environmental Protection Authority

EPA REFERRAL
FORM
PROPONENT

Referral of a Proposal by the Proponent to the Environmental Protection Authority under Section 38(1) of the *Environmental Protection Act 1986*.

PURPOSE OF THIS FORM

Section 38(1) of the *Environmental Protection Act 1986* (EP Act) provides that where a development proposal is likely to have a significant effect on the environment, a proponent may refer the proposal to the Environmental Protection Authority (EPA) for a decision on whether or not it requires assessment under the EP Act. This form sets out the information requirements for the referral of a proposal by a proponent.

Proponents are encouraged to familiarise themselves with the EPA's *General Guide on Referral of Proposals* [see Environmental Impact Assessment/Referral of Proposals and Schemes] before completing this form.

A referral under section 38(1) of the EP Act by a proponent to the EPA must be made on this form. A request to the EPA for a declaration under section 39B (derived proposal) must be made on this form. This form will be treated as a referral provided all information required by Part A has been included and all information requested by Part B has been provided to the extent that it is pertinent to the proposal being referred. Referral documents are to be submitted in two formats – hard copy and electronic copy. The electronic copy of the referral will be provided for public comment for a period of 7 days, prior to the EPA making its decision on whether or not to assess the proposal.

CHECKLIST

Before you submit this form, please check that you have:

	Yes	No
Completed all the questions in Part A (essential).	✓	
Completed all applicable questions in Part B.	✓	
Included Attachment 1 – location maps.	✓	
Included Attachment 2 – additional document(s) the proponent wishes to provide (if applicable).	✓	
Included Attachment 3 – confidential information (if applicable).		✓
Enclosed an electronic copy of all referral information, including spatial data and contextual mapping but excluding confidential information.	✓	

Following a review of the information presented in this form, please consider the following question (a response is optional).

Do you consider the proposal requires formal environmental impact assessment?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<input type="checkbox"/> Not sure	
If yes, what level of assessment?	
<input type="checkbox"/> Assessment on Proponent Information	<input type="checkbox"/> Public Environmental Review

PROPONENT DECLARATION (to be completed by the proponent)

I, Nial Stock, (*full name*) declare that I am authorised on behalf of SITA Australia Pty Limited (being the person responsible for the proposal) to submit this form and further declare that the information contained in this form is true and not misleading.

Signature	Name (print)
Position	Company
Date	

PART A - PROPONENT AND PROPOSAL INFORMATION

(All fields of Part A must be completed for this document to be treated as a referral)

1 PROPONENT AND PROPOSAL INFORMATION

1.1 Proponent

Name	SITA Australia Pty Limited
Joint Venture parties (if applicable)	
Australian Company Number (if applicable)	002 902 650
Postal Address (where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State)	SITA Australia 116 Kurnall Road Welshpool WA 6106
Key proponent contact for the proposal: <ul style="list-style-type: none">• name• address• phone• email	Nial Stock 116 Kurnall Road Welshpool WA 6106 Phone: (08) 9350 7101 Mobile: 0458 001 121 Email: nial.stock@sitaustralia.com.au
Consultant for the proposal (if applicable): <ul style="list-style-type: none">• name• address• phone• email	Bowman & Associates Pty Ltd PO Box 2059 ROSSMOYNE WA 6148 (08) 9457 5899 bruce@bowmanassociates.com.au adam@bowmanassociates.com.au

1.2 Proposal

Title	Allawuna Landfill
Description	Class II or III Putrescible Landfill
Extent (area) of proposed ground disturbance.	Approximately 50 hectares
Timeframe in which the activity or development is proposed to occur (including start and finish dates where applicable).	Construction to begin in 2014, with a nominal landfill waste placement lifespan of 37 years.
Details of any staging of the proposal.	The landfill will be constructed in three stages, with each stage consisting of multiple cells.
Is the proposal a strategic proposal?	No
Is the proponent requesting a declaration that the proposal is a derived proposal?	No
Please indicate whether, and in what way, the proposal is related to other proposals in the region.	This proposal is unrelated to any other proposal in the region.
Does the proponent own the land on which the proposal is to be established? If not, what other arrangements have been established to access the land?	The proponent has entered into an exclusive right to purchase arrangement with the owner, conditional on the acquisition of the appropriate environmental approvals for the site.
What is the current land use on the property, and the extent (area in hectares) of the property?	The current land use is agricultural. The area of the property is 1,500 hectares.

1.3 Location

Name of the Shire in which the proposal is located.	The Shire of York
For urban areas: <ul style="list-style-type: none"> • street address; • lot number; • suburb; and • nearest road intersection. 	
For remote localities: <ul style="list-style-type: none"> • nearest town; and • distance and direction from that town to the proposal site. 	York. The site boundary is 16 km to the East of the town of York.
Electronic copy of spatial data - GIS or CAD, geo-referenced and conforming to the following parameters: <ul style="list-style-type: none"> • GIS: polygons representing all activities and named; • CAD: simple closed polygons representing all activities and named; • datum: GDA94; • projection: Geographic (latitude/longitude) or Map Grid of Australia (MGA); • format: Arcview shapefile, Arcinfo coverages, Microstation or AutoCAD. 	Enclosed?: Yes / No

1.4 Confidential Information

Does the proponent wish to request the EPA to allow any part of the referral information to be treated as confidential?	Yes / No
If yes, is confidential information attached as a separate document in hard copy?	Yes / No

1.5 Government Approvals

Is rezoning of any land required before the proposal can be implemented? If yes, please provide details.		Yes / No	
Is approval required from any Commonwealth or State Government agency or Local Authority for any part of the proposal? If yes, please complete the table below.		Yes / No	
Agency/Authority	Approval required	Application lodged Yes / No	Agency/Local Authority contact(s) for proposal
DEC	Works Approval	No	Cristina Angel
Shire of York	Development Approval	No	Shire of York
Main Roads WA	Intersection Upgrade Approval	No	Melinda Marshall
Department of Water	Construction of culvert across 13 Mile Brook	No	James Mackintosh

PART B - ENVIRONMENTAL IMPACTS AND PROPOSED MANAGEMENT

2. ENVIRONMENTAL IMPACTS

Describe the impacts of the proposal on the following elements of the environment, by answering the questions contained in Sections 2.1-2.11:

- 2.1 flora and vegetation;
- 2.2 fauna;
- 2.3 rivers, creeks, wetlands and estuaries;
- 2.4 significant areas and/ or land features;
- 2.5 coastal zone areas;
- 2.6 marine areas and biota;
- 2.7 water supply and drainage catchments;
- 2.8 pollution;
- 2.9 greenhouse gas emissions;
- 2.10 contamination; and
- 2.11 social surroundings.

These features should be shown on the site plan, where appropriate.

For all information, please indicate:

- (a) the source of the information; and
- (b) the currency of the information.

2.1 Flora and Vegetation

2.1.1 Do you propose to clear any native flora and vegetation as a part of this proposal?

[A proposal to clear native vegetation may require a clearing permit under Part V of the EP Act (Environmental Protection (Clearing of Native Vegetation) Regulations 2004)]. Please contact the Department of Environment and Conservation (DEC) for more information.

(please tick) ☒ Yes **If yes**, complete the rest of this section.

☐ No **If no**, go to the next section

2.1.2 How much vegetation are you proposing to clear (in hectares)?

4.67 ha of scattered remnant trees on otherwise cleared cropland

2.1.3 Have you submitted an application to clear native vegetation to the DEC (unless you are exempt from such a requirement)?

☐ Yes ☒ No **If yes**, on what date and to which office was the application submitted of the DEC?

2.1.4 Are you aware of any recent flora surveys carried out over the area to be disturbed by this proposal?

☒ Yes

☐ No

If yes, please attach a copy of any related survey reports and provide the date and name of persons / companies involved in the survey(s).

If no, please do not arrange to have any biological surveys conducted prior to consulting with the DEC.

Attachment:

Company:

Contact Person:

Phone:

Referral Document Appendix A.

ENV Australia.

Karen Godridge

(08) 9214 6100

2.1.5 Has a search of DEC records for known occurrences of rare or priority flora or threatened ecological communities been conducted for the site?

☒ Yes

☐ No

If you are proposing to clear native vegetation for any part of your proposal, a search of DEC records of known occurrences of rare or priority flora and threatened ecological communities will be required. Please contact DEC for more information.

2.1.6 Are there any known occurrences of rare or priority flora or threatened ecological communities on the site?

☐ Yes

☒ No

If yes, please indicate which species or communities are involved and provide copies of any correspondence with DEC regarding these matters.

2.1.7 If located within the Perth Metropolitan Region, is the proposed development within or adjacent to a listed Bush Forever Site? (You will need to contact the Bush Forever Office, at the Department for Planning and Infrastructure)

☐ Yes

☐ No

If yes, please indicate which Bush Forever Site is affected (site number and name of site where appropriate).

N/A

2.1.8 What is the condition of the vegetation at the site?

Scattered trees on otherwise cleared cropland. Low habitat value.

2.2 Fauna

2.2.1 Do you expect that any fauna or fauna habitat will be impacted by the proposal?

(please tick)

☒ Yes

If yes, complete the rest of this section.

☐ No

If no, go to the next section.

2.2.2 Describe the nature and extent of the expected impact.

Clearing of scattered remnant trees with isolated evidence of Black Cockatoo foraging. No evidence of nesting or roosting. Impact is considered negligible.

2.2.3 Are you aware of any recent fauna surveys carried out over the area to be disturbed by this proposal?

☒ Yes

☐ No

If yes, please attach a copy of any related survey reports and provide the date and name of persons / companies involved in the survey(s).

If no, please do not arrange to have any biological surveys conducted prior to consulting with the DEC.

Attachment:

Referral Document Appendix A.

Company:

ENV Australia.

Contact Person:

Karen Godridge

Phone:

(08) 9214 6100

2.2.4 Has a search of DEC records for known occurrences of Specially Protected (threatened) fauna been conducted for the site?

☒ Yes

☐ No

(please tick)

2.2.5 Are there any known occurrences of Specially Protected (threatened) fauna on the site?

☐ Yes

☒ No

If yes, please indicate which species or communities are involved and provide copies of any correspondence with DEC regarding these matters.

2.3 Rivers, Creeks, Wetlands and Estuaries

2.3.1 Will the development occur within 200 metres of a river, creek, wetland or estuary?

(please tick)

☐ Yes

If yes, complete the rest of this section.

✓ No

If no, go to the next section.

The site access road will cross a minor waterway, however the landfill infrastructure and waste placement area will be over 200 m from the waterway (13 Mile Brook). Refer to referral document for more detail.

2.3.2 Will the development result in the clearing of vegetation within the 200 metre zone?

☐ Yes

✓ No

If yes, please describe the extent of the expected impact.

Minor clearing may be required for access road construction at the creek crossing.

2.3.3 Will the development result in the filling or excavation of a river, creek, wetland or estuary?

☐ Yes

✓ No

If yes, please describe the extent of the expected impact.

2.3.4 Will the development result in the impoundment of a river, creek, wetland or estuary?

☐ Yes

✓ No

If yes, please describe the extent of the expected impact.

2.3.5 Will the development result in draining to a river, creek, wetland or estuary?

☐ Yes

✓ No

If yes, please describe the extent of the expected impact.

2.3.6 Are you aware if the proposal will impact on a river, creek, wetland or estuary (or its buffer) within one of the following categories? (please tick)

Conservation Category Wetland	<input type="checkbox"/> Yes	✓ No	<input type="checkbox"/> Unsure
Environmental Protection (South West Agricultural Zone Wetlands) Policy 1998	<input type="checkbox"/> Yes	✓ No	<input type="checkbox"/> Unsure
Perth's Bush Forever site	<input type="checkbox"/> Yes	✓ No	<input type="checkbox"/> Unsure
Environmental Protection (Swan & Canning Rivers) Policy 1998	<input type="checkbox"/> Yes	✓ No	<input type="checkbox"/> Unsure
The management area as defined in s4(1) of the <i>Swan River Trust Act 1988</i>	<input type="checkbox"/> Yes	✓ No	<input type="checkbox"/> Unsure
Which is subject to an international agreement, because of the importance of the wetland for waterbirds and waterbird habitats (e.g. Ramsar, JAMBA, CAMBA)	<input type="checkbox"/> Yes	✓ No	<input type="checkbox"/> Unsure

2.4 Significant Areas and/ or Land Features

2.4.1 Is the proposed development located within or adjacent to an existing or proposed National Park or Nature Reserve?

☐ Yes ✓ No **If yes**, please provide details.

The closest National Park is 1 km from the proposed development.

2.4.2 Are you aware of any Environmentally Sensitive Areas (as declared by the Minister under section 51B of the EP Act) that will be impacted by the proposed development?

☐ Yes ✓ No **If yes**, please provide details.

2.4.3 Are you aware of any significant natural land features (e.g. caves, ranges etc) that will be impacted by the proposed development?

☐ Yes ✓ No **If yes**, please provide details.

2.5 Coastal Zone Areas (Coastal Dunes and Beaches)

2.5.1 Will the development occur within 300metres of a coastal area?

(please tick) ☐ Yes **If yes**, complete the rest of this section.
 ✓ No **If no**, go to the next section.

2.5.2 What is the expected setback of the development from the high tide level and from the primary dune?

2.5.3 Will the development impact on coastal areas with significant landforms including beach ridge plain, cusped headland, coastal dunes or karst?

☐ Yes ☐ No **If yes**, please describe the extent of the expected impact.

2.5.4 Is the development likely to impact on mangroves?

☐ Yes ☐ No **If yes**, please describe the extent of the expected impact.

2.6 Marine Areas and Biota

2.6.1 Is the development likely to impact on an area of sensitive benthic communities, such as seagrasses, coral reefs or mangroves?

☐ Yes

✓ No

If yes, please describe the extent of the expected impact.

2.6.2 Is the development likely to impact on marine conservation reserves or areas recommended for reservation (as described in *A Representative Marine Reserve System for Western Australia*, CALM, 1994)?

☐ Yes

✓ No

If yes, please describe the extent of the expected impact.

2.6.3 Is the development likely to impact on marine areas used extensively for recreation or for commercial fishing activities?

☐ Yes

✓ No

If yes, please describe the extent of the expected impact, and provide any written advice from relevant agencies (e.g. Fisheries WA).

2.7 Water Supply and Drainage Catchments

2.7.1 Are you in a proclaimed or proposed groundwater or surface water protection area?

(You may need to contact the Department of Water (DoW) for more information on the requirements for your location, including the requirement for licences for water abstraction. Also, refer to the DoW website)

☐ Yes

✓ No

If yes, please describe what category of area.

2.7.2 Are you in an existing or proposed Underground Water Supply and Pollution Control area?

(You may need to contact the DoW for more information on the requirements for your location, including the requirement for licences for water abstraction. Also, refer to the DoW website)

☐ Yes

✓ No

If yes, please describe what category of area.

2.7.3 Are you in a Public Drinking Water Supply Area (PDWSA)?

(You may need to contact the DoW for more information or refer to the DoW website. A proposal to clear vegetation within a PDWSA requires approval from DoW.)

☐ Yes

✓ No

If yes, please describe what category of area.

2.7.4 Is there sufficient water available for the proposal?

(Please consult with the DoW as to whether approvals are required to source water as you propose. Where necessary, please provide a letter of intent from the DoW)

☒ Yes ☐ No (please tick)

2.7.5 Will the proposal require drainage of the land?

☐ Yes ☒ No

If yes, how is the site to be drained and will the drainage be connected to an existing Local Authority or Water Corporation drainage system? Please provide details.

2.7.6 Is there a water requirement for the construction and/ or operation of this proposal?

(please tick)

☒ Yes

If yes, complete the rest of this section.

☐ No

If no, go to the next section.

2.7.7 What is the water requirement for the construction and operation of this proposal, in kilolitres per year?

Estimated water requirements are:

50,000 kL total for construction.

2,000 to 2,500 kL per year for operation.

2.7.8 What is the proposed source of water for the proposal? (e.g. dam, bore, surface water etc.)

Water will be sourced from the existing farm dams on site and the surface water catchment to the east of the development (refer attached referral document). If required water may also be transported in from off site.

2.8 Pollution

2.8.1 Is there likely to be any discharge of pollutants from this development, such as noise, vibration, gaseous emissions, dust, liquid effluent, solid waste or other pollutants?

(please tick) ☒ Yes **If yes**, complete the rest of this section.

☐ No **If no**, go to the next section.

2.8.2 Is the proposal a prescribed premise, under the Environmental Protection Regulations 1987?

(Refer to the EPA's *General Guide for Referral of Proposals to the EPA under section 38(1) of the EP Act 1986* for more information)

☒ Yes ☐ No **If yes**, please describe what category of prescribed premise.

Category 64 - Class II or Class III Putrescible Landfill

2.8.3 Will the proposal result in gaseous emissions to air?

☒ Yes ☐ No **If yes**, please briefly describe.

Decomposition of waste will produce landfill gas comprising mainly of methane and carbon dioxide. The composite lining and capping system will capture landfill gas for extraction and flaring (to convert methane to carbon dioxide) and potentially power generation. For more detail on landfill gas management please refer to the attached referral document.

2.8.4 Have you done any modelling or analysis to demonstrate that air quality standards will be met, including consideration of cumulative impacts from other emission sources?

☒ Yes ☐ No **If yes**, please briefly describe.

Odour modelling has shown any impacts would be retained within the site boundary.

Attachment: Referral Document Appendix E. Model data included with digital submission.

Company: Environmental Alliances Pty Ltd

Contact Person: David Pitt

Phone: (08) 9343 0554

2.8.5 Will the proposal result in liquid effluent discharge?

☐ Yes ☒ No **If yes**, please briefly describe the nature, concentrations and receiving environment.

The decomposition of waste will generate leachate. Leachate will be collected from the base of the landfill and evaporated or recirculated. A maximum leachate head of 300 mm in the base of the landfill will be maintained at all times. Leachate may also be transported off site for alternative treatment. No leachate will be discharged to the surrounding environment during normal

operations. A more detailed description of leachate management processes can be found in the attached referral document.

- 2.8.6 If there is likely to be discharges to a watercourse or marine environment, has any analysis been done to demonstrate that the State Water Quality Management Strategy or other appropriate standards will be able to be met?

☐ Yes ☒ No **If yes**, please describe.

Discharges to the surrounding environment are unlikely given the design and operational management features of the site. Any leachate discharge to the surrounding environment would be managed on a case by case basis, with remediation actions determined by the volume and composition of the leachate.

- 2.8.7 Will the proposal produce or result in solid wastes?

☒ Yes ☐ No **If yes**, please briefly describe the nature, concentrations and disposal location/ method.

Waste from the construction and operation of the site will be either placed in the landfill or transported to another appropriate facility for disposal.

- 2.8.8 Will the proposal result in significant off-site noise emissions?

☐ Yes ☒ No **If yes**, please briefly describe.

Noise modelling for the site construction and operation shows noise levels within guideline limits at nearest sensitive receptors.

Attachment: Referral Document Appendix D.
Company: Vipac Engineers and Scientists Ltd
Contact Person: Sheikh Mahbub Alam
Phone: (08) 9277 3335

- 2.8.9 Will the development be subject to the Environmental Protection (Noise) Regulations 1997?

☒ Yes ☐ No **If yes**, has any analysis been carried out to demonstrate that the proposal will comply with the Regulations?

Please attach the analysis.

Noise modelling performed as described above.

- 2.8.10 Does the proposal have the potential to generate off-site, air quality impacts, dust, odour or another pollutant that may affect the amenity of residents and other “sensitive premises” such as schools and hospitals (proposals in this category may include intensive agriculture, aquaculture, marinas, mines and quarries etc.)?

☒ Yes ☐ No **If yes**, please describe and provide the distance to residences and other “sensitive premises”.

Given the large buffer distances and proposed design and operational features, offsite impacts due to landfill construction or operation are very unlikely. The nearest single dwelling ‘sensitive premises’ is 1,900 m from the proposed landfill footprint.

- 2.8.11 If the proposal has a residential component or involves “sensitive premises”, is it located near a land use that may discharge a pollutant?

☐ Yes ✓ No ☐ Not Applicable

If yes, please describe and provide the distance to the potential pollution source

2.9 Greenhouse Gas Emissions

2.9.1 Is this proposal likely to result in substantial greenhouse gas emissions (greater than 100 000 tonnes per annum of carbon dioxide equivalent emissions)?

☐ Yes ✓ No

If yes, please provide an estimate of the annual gross emissions in absolute and in carbon dioxide equivalent figures.

Greenhouse gas emissions generated by a putrescible landfill are a function of the amount and type of waste placed, the rate of waste decomposition due to climatic effects and leachate recirculation and the efficiency of the lining and capping gas capture system. While the landfill is likely to exceed the 20,000 tonnes of carbon dioxide equivalent emissions threshold for National Greenhouse and Energy Reporting Scheme (NGERS) reporting at some stage in its operational life, reaching a 100,000 tonnes threshold is unlikely. Further discussion on carbon emissions and likely annual emissions can be found in the attached referral submission.

2.9.2 Further, if yes, please describe proposed measures to minimise emissions, and any sink enhancement actions proposed to offset emissions.

Emissions are minimised through effective gas capture and extraction and flaring to convert methane into carbon dioxide (which has 21 to 25 times less global warming potential than methane).

2.10 Contamination

2.10.1 Has the property on which the proposal is to be located been used in the past for activities which may have caused soil or groundwater contamination?

☐ Yes ✓ No ☐ Unsure **If yes**, please describe.

2.10.2 Has any assessment been done for soil or groundwater contamination on the site?

✓ Yes ☐ No **If yes**, please describe.

Baseline testing of groundwater quality in 7 monitoring bores installed across the site.

2.10.3 Has the site been registered as a contaminated site under the *Contaminated Sites Act 2003*? (on finalisation of the CS Regulations and proclamation of the CS Act)

☐ Yes ✓ No **If yes**, please describe.

2.11 Social Surroundings

2.11.1 Is the proposal on a property which contains or is near a site of Aboriginal ethnographic or archaeological significance that may be disturbed?

☐ Yes ☒ No ☐ Unsure **If yes**, please describe.

2.11.2 Is the proposal on a property which contains or is near a site of high public interest (e.g. a major recreation area or natural scenic feature)?

☒ Yes ☐ No **If yes**, please describe.

The Mount Observation Picnic area is 4.6 km to the northwest of the proposed landfill footprint. The site is beyond a ridgeline and not visible from the lookout at the picnic area.

2.11.3 Will the proposal result in or require substantial transport of goods, which may affect the amenity of the local area?

☒ Yes ☐ No **If yes**, please describe.

Traffic impact on the Great Southern Highway is estimated at a 3% increase on 2008/2009 levels between the Great Eastern Highway intersection and the Allawuna site, 18 km west of York.

The proposal will include the upgrading of the site access intersection to enable passing of vehicles slowing down to enter the site in both directions and a speed up lane for trucks returning to Perth.

3. PROPOSED MANAGEMENT

3.1 Principles of Environmental Protection

3.1.1 Have you considered how your project gives attention to the following Principles, as set out in section 4A of the EP Act? (For information on the Principles of Environmental Protection, please see EPA Position Statement No. 7, available on the EPA website)

- | | | |
|--|-------|-----------------------------|
| 1. The precautionary principle. | ✓ Yes | <input type="checkbox"/> No |
| 2. The principle of intergenerational equity. | ✓ Yes | <input type="checkbox"/> No |
| 3. The principle of the conservation of biological diversity and ecological integrity. | ✓ Yes | <input type="checkbox"/> No |
| 4. Principles relating to improved valuation, pricing and incentive mechanisms. | ✓ Yes | <input type="checkbox"/> No |
| 5. The principle of waste minimisation. | ✓ Yes | <input type="checkbox"/> No |

3.1.2 Is the proposal consistent with the EPA's Environmental Protection Bulletins/Position Statements and Environmental Assessment Guidelines/Guidance Statements (available on the EPA website)?

✓ Yes ☐ No

The following guidelines were used for assessment of the site for potential use as a Landfill:

Best Practice Environmental Management - Siting, Design, Operation and Rehabilitation of Landfills EPA-Victoria 2010.
Landfill Waste Classification and Waste Definition 1996 (as amended) December 2009.
Separation Distances between Industrial and Sensitive Land Uses 2005.
Environmental Protection Act 1986 (as amended).
Australian Drinking Water Guideline 2004.
Environmental Protection and Biodiversity Conservation Act 1999.
Environmental Protection (Noise) Regulation 1997.

3.2 Consultation

3.2.1 Has public consultation taken place (such as with other government agencies, community groups or neighbours), or is it intended that consultation shall take place?

✓ Yes ☐ No **If yes**, please list those consulted and attach comments or summarise response on a separate sheet.

Refer to Appendix I of the Referral Document.