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Q1: Contact details

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Q2: I am making this submission on behalf of: Individual

Q3: Industry Activity or Scheduled Category (if applicable): *Respondent skipped this question*

Q4: Privacy Options - please select an option: I am making this submission as an individual and I understand that it may be published

PAGE 3: Current Regulations

Q5: Question 1: Which of the following currently scheduled categories or industrial activities are the most important for EPA works approval, licensing, and/or financial assurance requirements? For each of the activities you regard as most important, please tell us why in the box provided.

- | | |
|--|---|
| A01 - PIW management | Highest due to the potential direct impact on human and environmental health |
| A02 - Other waste treatment | Low to moderate importance, depending on the level of toxicity |
| A03 - Sewage treatment | Moderate to high due to potential health and environmental impacts. If possible, encouragement should be given to innovation. For instance processing human waste into fertilizer. |
| A04 - Industrial wastewater treatment | Direct impact on human and environmental health |
| A05 - Landfill operations | Moderate - reasonable precautions should be mandated to prevent seepage of toxins from the site into surrounding land or waterways |
| A06 - Land disposal of night soil, septic tank and sewage sludge | Moderate to high due to potential health and environmental impacts. If possible, encouragement should be given to innovation. For instance composting toilets and/or septic tanks containing compost worms for processing waste |

DELWP and EPA Review of Environment Protection (Scheduled Premises and Exemptions) Regulations 2007

A07 - Composting	Low - all substances in a compost heap will break down and be safely absorbed into the environment. Main hazard would be excessive nutrients reaching waterways.
A08 - Waste to energy conversion	Low - depending on the substance. Meatworks waste being used to provide gas for electricity, for example, the problem would be the smell which should be negated by existing abattoir regulations.
A09 - Waste tyre storage	Low - any encouragement that can be provided towards recycling would be positive
B01 - Intensive animal industry	Low - producers should be required to prevent effluent reaching waterways.
B02 - Livestock saleyard operation	Low - producers should be required to prevent effluent reaching waterways.
B03 - Fish farming	Low - producers should be required to prevent excess nutrient reaching waterways.
C01 - Extractive industry and mining	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (coal dust, etc)
D01 - Abattoir operations	Low - producers should be required to prevent excess nutrient reaching waterways. Recycling of waste products should be encouraged
D02 - Rendering	Low - producers should be required to prevent excess nutrient reaching waterways. Recycling of waste products should be encouraged
D03 - Animal skin tanning	Low - producers should be required to prevent excess nutrient or chemicals/toxins reaching waterways. Recycling of waste products should be encouraged
D04 - Seafood processing	Low - Recycling of waste products into fish food and/or gardening products should be encouraged
D05 - Pet food processing	Low - largely the same as for meat processing.
D06 - Food processing	Low - composting/recycling should be encouraged
D07 - Milk processing	Low - producers should be required to prevent effluent reaching waterways.
D08 - Edible oil	Low - composting/recycling should be encouraged
D09 - Beverage manufacturing	Low - composting/recycling should be encouraged
E01 - Textile, manufacturing and processing	Low - producers should be required to prevent excess nutrient or chemicals/toxins reaching waterways. Recycling of waste products should be encouraged
F01 - Timber preservation	Low - producers should be required to prevent excess nutrient or chemicals/toxins reaching waterways. Recycling of waste products should be encouraged
F02 - Fibreboard processing	Low - producers should be required to prevent excess nutrient or chemicals/toxins reaching waterways. Recycling of waste products should be encouraged

DELWP and EPA Review of Environment Protection (Scheduled Premises and Exemptions) Regulations 2007

F03 - Paper pulp milling	Low - producers should be required to prevent excess nutrient or chemicals/toxins reaching waterways. Recycling of waste products should be encouraged
G01 - Chemical works	Moderate to high - depending on the substances - due to potential health and environmental impacts.
G02 - Coal processing	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (proximity to towns, etc)
G03 - Oil and gas refining	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (proximity to towns, etc)
G04 - Bulk storage of carbon compounds (including petroleum or oil)	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (proximity to towns, etc)
G05 - Bulk container washing	Low to Moderate depending on the substance previously contained by the container
H01 - Cement works	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (proximity to towns, etc)
H02 - Bitumen (asphalt) batching	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (proximity to towns, etc)
H03 - Ceramics works	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (proximity to towns, etc)
H04 - Mineral wool works	Low to Moderate depending on the potential damage to the water table/aquifers and the potential risks to human health (proximity to towns, etc)
H05 - Glass works	Low
I01 - Primary metallurgical works	Low - depending on which metals, therefore possible toxins.
I02 - Metal melting works	Low - depending on which metals, therefore possible toxins.
I03 - Metal galvanizing work	Low - depending on which metal, therefore possible toxins.
I04 - Metal finishing works	Low - recycling should be encouraged
I05 - Can and drum coating works	Low - recycling should be encouraged
I06 - Vehicle assembly works	Low - recycling should be encouraged
J01 - Printing	Low - Non- and low-toxin inks/dyes should be encouraged
K01 - Power stations	Low to Moderate - depending on the method of production - due to potential health and environmental impacts.
K02 - Carbon geosequestration	Moderate to High - due to potential health and environmental impacts, as there is limited evidence of safety and success at this point.

K03 - Potable water treatment plants	Low to moderate - Environmental impacts will be low if it is deemed there is going to be no harm to human health
K04 - Water desalinisation plants	Moderate to high - due to the economic and environmental impacts of increased salinity
L01 - General emissions to air	Low to moderate - depending on the substance
L02 - Contaminated sites—onsite soil containment	High - due to the potential direct impact on human and environmental health
L03 - Tunnel Ventilation Systems	Low to moderate depending on the possible level of emissions and their potential impacts on human health
L04 - Contaminated sites—long term management	High - due to the potential direct impact on human and environmental health

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Q6: Question 2: What currently scheduled categories or industrial activities might no longer warrant EPA works approval, licensing, and/or financial assurance requirements? For each of the activities you regard as longer warranting requirements, please tell us which risks have been reduced and how in the box provided.

A07 - Composting	Minimal risk in the first place
B01 - Intensive animal industry	Definitions of "intensive" are ridiculous and unnecessary. As long as effluent is not polluting waterways etc, the property is in an appropriately zoned area and the RSPCA has no issues with stocking rates, I can't see the harm in providing fodder

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Q7: Question 3: What other industrial activities, not included in the current regulations, might warrant works approval, licensing, and/or financial assurance requirements and why?

Respondent skipped this question

Q8: Question 4: What would happen to emission levels, the numbers of pollution events, and the management of wastes if there were no EPA works approvals or licence requirements in Victoria? Why?

Stringent regulation based on science should be used in conjunction with appropriate penalties. Licence, approval and the like should be reserved for moderate to high risk activities only.

PAGE 6: Adapting to changes

Q9: Question 5: Do any of the descriptions and application thresholds for currently scheduled categories need to be changed or clarified?

Yes

Q10: Please indicate which definitions or application thresholds need to be changed or clarified for industrial activities in the list below. For the activities, please tell us in detail for each activity, what specific changes or clarifications could be required?

B01 - Intensive animal industry	What makes it 'intensive' and why
L01 - General emissions to air	Such as..?

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Q11: Question 6: Would an increased focus on emissions-based triggers for works approval or licence requirements, regardless of the activity creating these emissions, make the Scheduled Premises regulations more effective?

Yes, it would

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Q12: Question 7: Do you agree that the environmental challenges outlined in section 4.1 are the most relevant ones for this review?

Yes

Q13: Please tell us what other environmental challenges relating to industrial activities should be considered? Why?

Respondent skipped this question

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Q14: Question 8: Are works approvals a suitable tool to address the environmental challenges outlined above?

Yes

Q15: What other tool would be more suitable than works approvals to address these environmental challenges? Why?

Clear regulation and penalties for lower risk activities

Q16: Are licences a suitable tool to address the environmental challenges outlined above?

Yes

Q17: What other tool would be more suitable than licences to address these environmental challenges? Why?

Clear regulation and penalties for lower risk activities

Q18: Are financial assurances a suitable tool to address the environmental challenges outlined above?

Yes

Q19: What other tool would be more suitable than financial assurances to address these environmental challenges? Why?

For moderate to high risk challenges

PAGE 10: New elements being considered

Q20: Question 9: Would tiered licence conditions, applied depending on a site's individual risk profile be worthwhile?

Yes

Q21: Please tell us why you consider that tiered licence conditions would be worthwhile.

It would mean that regulation, cost, etc were more proportionate to the risk posed.

Q22: Please tell us why you consider that tiered licence conditions would not be worthwhile.

Respondent skipped this question

Q23: Would a site-based licence fee component, reflecting EPA's regulatory effort at each site, be worthwhile?

No

Q24: Please tell us why you consider that a site-based licence fee component would be worthwhile.

It would lower the immediate impact on the government's bottom line

Q25: Please tell us why you consider that site-based licence fee component would not be worthwhile.

It may punish innovators who have invested in new technology/practice for needing extra checks so as to achieve a lower tiered license or cost.

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Q26: Question 10: Please tell us if you think there are any components of the Scheduled Premises regulations, or how they are applied by EPA, which could be improved.

If you were appropriately funded, you could engage better with the community, stakeholders and the scientific community for better outcomes.

Q27: Question 11: Do you have any concerns with how current processes for managing scheduled premises are operating?

No

Q28: What are your concerns with how current processes for managing scheduled premises are operating, and how might these concerns be effectively addressed?

Respondent skipped this question

Q29: Question 12: Are there any other key points you would like to make?

Respondent skipped this question