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Q1: Contact details

Name	[REDACTED]
City/Town	Jindivick
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Postcode	3818
Email Address	[REDACTED]
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Q2: I am making this submission on behalf of: Individual

Q3: Industry Activity or Scheduled Category (if applicable): DO1 (Abattoir) - Knackery

Q4: Privacy Options - please select an option: I am making this submission as an individual. I request my submission be published anonymously with my postcode but with no other details.

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.

D01 - Abattoir operations	The disposal of waste created by this industry needs to be regulated to prevent contamination of land and waterways and to address odour issues in our increasingly urbanised environment. Regulations should be site specific as what works in one environment would not necessarily behave in the same manner in another environment.
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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.	<i>Respondent skipped this question</i>
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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?

I think Knackeries (no rendering) should be included as a separate category. I have been fighting since 2012 against a knackery being built 800metres from my home on a site not suited to the waste disposal proposed. This has so far been defeated at council level and again at VCAT. A new application is back before council with works approval having been applied for. EPA has now served a section 22 notice on the applicant. At VCAT much time was wasted arguing under what regulation this application would fall under. Being very specific as to the industrial activity ie: Knackery with no rendering, would eliminate confusion and provide clarity for all involved, both for and against.

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?

I believe that without the appropriate EPA works approvals and licence requirements our environment would suffer from apathy. Past practices have not always been ideal so anything that makes us examine what will happen can only be good. There is a large educational side to these approvals and licences and I am sure that each one investigated requires both individuals and authorities to contemplate the long term outcome and what we hope to achieve for the planet that we all share.

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?

D01 - Abattoir operations

Should include Knackeriy Operation with no rendering.

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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,

Please tell us why you think that an increased focus on emissions-based triggers would/would not make the Scheduled Premises Regulations more effective.

With population density constantly evolving, some emissions that in the past may have been overlooked become an environmental nuisance. This can be a trigger for a broader look at what that nuisance is really doing to our environment. Better environmental outcomes come from constant examination of current practices

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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?

No

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

I believe that although the environmental challenges outlined in section 4.1 are extremely relevant we cannot overlook emerging and changing industrial activities. In most activities there are both positive and negative outcomes, the challenge is in always bettering the outcome.

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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? *Respondent skipped this question*

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? *Respondent skipped this question*

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? *Respondent skipped this question*

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.

As long as the site was independently assessed by EPA then this idea could lead to companies putting greater thought into the best site for their individual activity. There is no one size fits all. All sites have factors that can make them more environmentally sensitive, whether it is topography, weather patterns or proximity to other activities.

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? Yes

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

A more challenging site would require more regulatory effort on the part of EPA. I believe in user pays. EPA should not be restricted in their efforts to protect our environment by the cost. If some of this cost can be recouped then that would be good.

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