



**COMPLETE**

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**Q1: Contact details**

Name	Kerstin Brauns
Company	Mandalay Resources
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Postcode	3523
Email Address	[REDACTED]
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**Q2: I am making this submission on behalf of:**

Business

**Q3: Industry Activity or Scheduled Category (if applicable):**

Extractive industry and mining

**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.**

A03 - Sewage treatment	Spill risk
A04 - Industrial wastewater treatment	Correct treatment and discharge
A06 - Land disposal of night oil, septic tank and sewage sludge	Spill risk
A08 - Waste to energy conversion	Should be made easier for emerging technologies
A09 - Waste tyre storage	Explore more recycling options through the community
B03 - Fish farming	Should be made easier to preserve wild fish communities
C01 - Extractive industry and mining	Should be carefully weighed between community concerns and the welfare of the state
D06 - Food processing	risk of contaminants
F03 - Paper pulp milling	wastewater discharge management
G01 - Chemical works	risk of discharge to environment
K04 - Water desalination plants	increase community engagement and promotion
L02 - Contaminated sites—onsite soil containment	improved diligence system so that contaminated land not recycled to residential

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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.**

C01 - Extractive industry and mining	Better reporting processes and improved community interaction
F01 - Timber preservation	improved public understanding

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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?**

Pollution events would increase as businesses would not be held as accountable

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?**

C01 - Extractive industry and mining	Take into account natural elevations of minerals in areas to increase thresholds of exceedance levels
L01 - General emissions to air	take into account seasonal variation eh higher thresholds in dryer months
L02 - Contaminated sites—onsite soil containment	policy in places for cost of rehabilitation of historic sites to contain contaminants
L04 - Contaminated sites—long term management	clarify possible future residential planning opportunities - future landowners to be made aware of historic previous land uses and any dangers.

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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.

could promote improved technology in industry to reduce emissions in general and support increased recycling. Would make businesses think about emission reduction improvements

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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?**

Area specific contamination should be addressed rather than blanket thresholds accross all geographic regions. eg natural soil elevations in mining areas

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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?** No

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

Need contingency measures in the event of bankrupt or dissolved businesses

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.**

Businesses can promote environmental improvements against competitors rather than assuming the same processing conditions. Easier to see where improvements could be made to a business if they are aware of their ranking.

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

May not take into account variations in conditions. Business may be ranking on best operating or average operating conditions. Would require a rigorous testing regime. May be open to interpretation.

**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.**

Would take into account the size of an organisation and their budgets.

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

Open to interpretation. Information should not be public.

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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.**

More site specific information.

**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*

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