



SCHEDULED PREMISES REGULATIONS REVIEW SUBMISSION TEMPLATE

DELWP and EPA are reviewing the current Scheduled Premises Regulations in order to revise and update them before they sunset in mid-2017.

A [Discussion Paper](#) has been published. It explores options for the new version of the regulations. It is an initial opportunity for you to help shape the review by providing feedback.

We welcome your comments on the questions in the [Discussion Paper](#) by **14 December 2015**.

You can provide your comments using this template. Alternatively, you can use the [online questionnaire](#).
Please note: The online questionnaire needs to be completed in one sitting.

The [Discussion Paper](#) provides further details about the next steps for this review, including how to stay informed and involved.

Your input may be made public. If you would like your contribution to remain confidential, please clearly indicate this on the next page. Please note that Freedom of Information access requirements will apply to all comments, even those treated as confidential. Accordingly, your comments may potentially be released to members of the public.

We thank you in advance for your cooperation and feedback.

Contact details

Name	[REDACTED]
Company	Southern Grampians Shire Council
City/Town	Hamilton
State	Victoria
Postcode	3300
Email Address	Council@sthgrampians.vic.gov.au
Phone Number	03 5573 0256

I am making this submission on behalf of:

- Individual
- Non-government organisation / community organisation
- Business
- Local Government
- Other government entity
- Other (please specify)

Industry Activity or Scheduled Category (if applicable):

Privacy Options - please select an option:

- I am making this submission as an individual and I understand that it may be published
- I am making this submission as an individual. I request my submission be published anonymously with my postcode but with no other details.
- This submission is being made by an organisation and I understand that it may be published, including the name of the organisation

The Current Regulations

These questions relate to the list of industry activities covered by the current Environment Protection (Scheduled Premises and Exemptions) Regulations 2007 as discussed in Section 3 of the Scheduled Premises Regulations Review [Discussion Paper](#).

For a full list of industry activities and their definitions, please refer to the current regulations [here](#).

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	For public health and environmental protection purposes i.e. prevent contamination of soils, water, air.
A02	Other waste treatment	
A03	Sewage treatment	For public health and environmental protection purposes i.e. prevent contamination of soils, water, air and odour issues
A04	Industrial wastewater treatment	In particular the treatment of hazardous waste and greater than 5000L waste water per day. For public health and environmental protection purposes i.e. prevent contamination of soils, water, air and odour issues.
A05	Landfills	For public health and environmental protection purposes i.e. prevent litter, odour, contamination of soils, water and air
A06	Land disposal	For public health and environmental protection purposes i.e. prevent litter, odour, contamination of soils, water and air. Ensure sludge is disposed of in the appropriate manner.
A07	Composting	Require to be risk based taking into account matter to be composted, scale, potential contaminates and the site location. For public health and environmental protection purposes i.e. prevent litter, odour, neighbourhood amenity, contamination of soils, water and air.
A08	Waste to energy	Require to be risked based taking into account fuel type, scale and location. For public health and environmental protection purposes i.e. prevent litter, odour, neighbourhood amenity, contamination of soils, water and air.
A09	Waste tyre storage	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent harborage of vermin, odour, neighbourhood amenity, contamination of soils, water and air.
B01	Intensive animal industry	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent spread of disease, odour, neighbourhood amenity, contamination of soils, water and air.
B02	Livestock saleyards	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent spread of disease, harborage of vermin, odour, neighbourhood amenity, contamination of soils, water and air.
B03	Fish farms	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent spread of disease, neighbourhood amenity and contamination of water.
C01	Extractive industry and mining	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and

		air.
D01	Abattoirs	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
D02	Rendering	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
D03	Animal skin tanning	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
D04	Seafood processing	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. litter, noise, odour, neighbourhood amenity, contamination of soils, water and air.
D05	Pet food processing	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
D06	Food processing	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
D07	Milk processing	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
D08	Edible oil	
D09	Beverage manufacturing	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, harborage of vermin, neighbourhood amenity, contamination of soils, water and air.
E01	Textiles	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
F01	Timber preservation	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
F02	Fibreboard	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
F03	Paper pulp mills	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
G01	Chemical works	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
G02	Coal Processing	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.

G03	Oil and gas refining	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
G04	Bulk Storage	
G05	Container Washing	
H01	Cement	Require to be risked based taking into account scale, greenhouse emissions and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, light pollution, neighbourhood amenity, contamination of soils, water and air.
H02	Bitumen (asphalt) batching	Require to be risked based taking into account scale, greenhouse emissions and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, light pollution, neighbourhood amenity, contamination of soils, water and air.
H03	Ceramics	Require to be risked based taking into account scale, greenhouse emissions and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
H04	Mineral wool	Require to be risked based taking into account scale and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
H05	Glass works	
I01	Primary metallurgical	
I02	Metal melting	
I03	Metal galvanising	
I04	Metal finishing	
I05	Can and drum coating	
I06	Vehicle assembly	
J01	Printing	
K01	Power stations	Require to be risked based taking into account scale, greenhouse emissions and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, neighbourhood amenity, contamination of soils, water and air.
K02	Carbon geosequestration	Require to be risked based taking into account scale, greenhouse emissions and location. For public health and environmental protection purposes i.e. prevent noise, neighbourhood amenity, contamination of soils, surface and ground water
K03	Potable water treatment plants	Require to be risked based taking into account scale, chemicals used and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, light pollution neighbourhood amenity, contamination of soils, water and air.
K04	Water desalination plants	Require to be risked based taking into account scale, greenhouse emissions and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour, light pollution, neighbourhood amenity, contamination of soils, water and air.
L01	General emissions to air	
L02	Contaminated sites— onsite soil containment	
L03	Tunnel Ventilation Systems	Require to be risked based taking into account scale, concentration of gases, greenhouse emissions and location. For public health and environmental protection purposes i.e. prevent dust, noise, odour,

L04 Contaminated sites—long term management

neighborhood amenity, contamination of air.

Sites that have been abandoned to protect neighborhood public health and environment i.e. prevent dust, noise, odour, neighborhood amenity, contamination of soils, water and air.

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.

A01	PIW management	
A02	Other waste treatment	
A03	Sewage treatment	
A04	Industrial wastewater treatment	
A05	Landfills	
A06	Land disposal	
A07	Composting	
A08	Waste to energy	
A09	Waste tyre storage	
B01	Intensive animal industry	
B02	Livestock saleyards	
B03	Fish farms	
C01	Extractive industry and mining	
D01	Abattoirs	
D02	Rendering	
D03	Animal skin tanning	
D04	Seafood processing	
D05	Pet food processing	
D06	Food processing	
D07	Milk processing	
D08	Edible oil	
D09	Beverage manufacturing	
E01	Textiles	
F01	Timber preservation	
F02	Fibreboard	
F03	Paper pulp mills	
G01	Chemical works	

G02	Coal Processing	
G03	Oil and gas refining	
G04	Bulk Storage	
G05	Container Washing	
H01	Cement	
H02	Bitumen (asphalt) batching	
H03	Ceramics	
H04	Mineral wool	
H05	Glass works	
I01	Primary metallurgical	
I02	Metal melting	
I03	Metal galvanising	
I04	Metal finishing	
I05	Can and drum coating	
I06	Vehicle assembly	
J01	Printing	
K01	Power stations	
K02	Carbon geosequestration	
K03	Potable water treatment plants	
K04	Water desalination plants	
L01	General emissions to air	
L02	Contaminated sites—onsite soil containment	
L03	Tunnel Ventilation Systems	
L04	Contaminated sites—long term management	

QUESTION 3:

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

Consider including Greenhouse gas emissions over a certain threshold.

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?

Expect the incidence of pollution events to increase and increased hospitalizations.

Adapting to changes

The following questions relate to Section 4 of the Scheduled Premises Regulations Review [Discussion Paper](#), which discusses the need to ensure that the new scheduled premises regulations are as up-to-date and effective as possible, in light of recent and anticipated changes in Victoria's population, economy, mix of industrial technologies etc.

Please see the [current regulations](#) for the full descriptions and application thresholds (requiring works approvals, licences or financial assurances) in the current regulations.

QUESTION 5:

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

- Yes (If yes, go to Question 5A)
- No (If no, go to Question 6)

QUESTION 5 A:

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?

A01	PIW management	
A02	Other waste treatment	
A03	Sewage treatment	
A04	Industrial wastewater treatment	
A05	Landfills	
A06	Land disposal	
A07	Composting	Consider raising the threshold depending of location and feedstock.
A08	Waste to energy	
A09	Waste tyre storage	
B01	Intensive animal industry	
B02	Livestock saleyards	
B03	Fish farms	
C01	Extractive industry and mining	
D01	Abattoirs	
D02	Rendering	

D03	Animal skin tanning	
D04	Seafood processing	
D05	Pet food processing	
D06	Food processing	
D07	Milk processing	
D08	Edible oil	
D09	Beverage manufacturing	
E01	Textiles	
F01	Timber preservation	
F02	Fibreboard	
F03	Paper pulp mills	
G01	Chemical works	
G02	Coal Processing	
G03	Oil and gas refining	
G04	Bulk Storage	
G05	Container Washing	
H01	Cement	
H02	Bitumen (asphalt) batching	
H03	Ceramics	
H04	Mineral wool	
H05	Glass works	
I01	Primary metallurgical	
I02	Metal melting	
I03	Metal galvanising	
I04	Metal finishing	
I05	Can and drum coating	
I06	Vehicle assembly	
J01	Printing	
K01	Power stations	
K02	Carbon geosequestration	
K03	Potable water treatment plants	

K04	Water desalination plants	
L01	General emissions to air	
L02	Contaminated sites— onsite soil containment	
L03	Tunnel Ventilation Systems	
L04	Contaminated sites—long term management	

Aside from the current activity-by-activity triggers for works approval or licence requirements, the current Scheduled Premises Regulations allow for a works approval or licence to be required for any activity with general emissions of certain substances to air over a set amount per year (see Category L01 – General emissions to air). Section 4 of the [Discussion Paper](#) introduces the idea that introducing more of these ‘emissions based triggers’ could increase the flexibility of the regulations in keeping pace with new industry activities.

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
- No

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

Large industry likely to produce increasing amount harmful toxic emissions and should encourage better practices.

Section 4.1 of the Scheduled Premises Regulations Review Discussion Paper introduces some environmental challenges considered most relevant to this review.

QUESTION 7:

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

- Yes (If yes, go to Question 8A)
- No (If no, go to Question 7A)

QUESTION 7 A:

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

Considering the environmental issues in section 4.1 of the [Discussion Paper](#), the following questions seek your input on whether works approvals, licences, financial assurances, or other tools are best suited to addressing them.

QUESTION 8:

Are works approvals a suitable tool to address the environmental challenges outlined in section 4.1 of the [Discussion Paper](#)?

- Yes (If yes, go to Question 8B)
- No (If no, go to Question 8D)

QUESTION 8 B:

Are licences a suitable tool to address the environmental challenges outlined in section 4.1 of the [Discussion Paper](#)?

- Yes (If yes, go to Question 8C)
- No (If no, go to Question 8D)

QUESTION 8 C:

Are financial assurances a suitable tool to address the environmental challenges outlined in section 4.1 of the [Discussion Paper](#)?

- Yes (If yes, go to Question 9A)
- No (If no, go to Question 8D)

QUESTION 8D:

What other tool(s) would be more suitable than works approvals, licences and/or financial assurances to address the environmental challenges outlined in section 4.1 of the [Discussion Paper](#)? Why?

Undertake more monitoring.

New Elements being considered

Section 5 of the Scheduled Premises Regulations Review [Discussion Paper](#) describes some potential new components which could be introduced into the Scheduled Premises Regulations and EPA's administrative processes which sit behind them, in order to meet the challenges of modern regulation.

Section 5.1 introduces the concept of tiered licence conditions, applied depending on a site's individual risk profile.

Section 5.2 introduces the concept of a licence fee component that reflects EPA's likely regulatory effort at each site.

QUESTION 9 A:

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

Yes

No

Please tell us why.

Would lead to more site specific regulation

QUESTION 9 B:

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

Yes No

Please tell us why.

Proximity to Melbourne should not influence the licence fee. Licence fee should be based on the receivable and output quantity , greenhouse emissions and level of compliance

QUESTION 10:

Please tell us if you think there are any components of the Scheduled Premises Regulations or Fees Regulations, or how they are applied by EPA, which could be improved.

QUESTION 11:

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

Yes (If yes, go to Question 11A)

No (If no, go to Question 12)

QUESTION 11 A:

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

Presence of EPA Officers to investigate pollution complaints in rural areas is not at the same level as Melbourne and regional centres. Placing rural communities and environments at risk. Distance of sites from Melbourne and EPA Offices should not impact the process of regulating schedule premises.

QUESTION 12:

Are there any other key points you would like to make?

Please return written submissions by 14 December 2015 to:

Email: scheduled.premises@epa.vic.gov.au

Mail:

Scheduled Premises Regulations Review
c/o- Policy and Regulation Unit
EPA Victoria
GPO 4395
Melbourne VIC 3001