

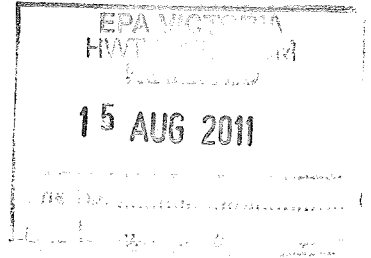


**CONSULTING ENVIRONMENTAL ENGINEERS**  
**Environmental Scientists and Engineers**

Level 1, 90 Bridge Road, PO Box 201, Richmond VIC 3121  
Phone 03 9429 4644 Fax 03 9428 0021  
Email wallis@cee.com.au

12 August 2011

Statutory Policy Review Team  
EPA Victoria  
GPO Box 4395  
Melbourne VIC 3001



Dear Team,

**Submission on Statutory Policy review Discussion paper**

In response to the EPA request for submissions, Consulting Environmental Engineers is pleased to provide comments on a revised environmental statutory policy framework.

In our view, the SEPP have been very successful in making clear the environmental objectives, targets and requirements for the various segments of the environment, and we use them regularly.

We favour Model 2 – significant changes to statutory policy – but using the same general framework as now, with the following improvements:

1. All SEPP to have a common layout and sequence;
2. The SEPP and WMP be consolidated to the following:
  - a. Air Environment
  - b. Water Environment
  - c. Noise
  - d. Products and Materials (not wastes)
  - e. Energy and Greenhouse Gases
  - f. Land Use.
3. The air SEPP to include ozone and NEPM requirements
4. The water SEPP to include groundwater, oceans, bays, estuaries, make specific provisions for ephemeral streams and discharges to the water environment (including ship ballast water).
5. All noise documents be brought into a single document

6. The SEPP for products and materials should cover recycling, landfills, contaminated soils, etc

Guidelines should fall under SEPP.

We do not favour Model 4 as it will provide insufficient guidance as to the requirements.

In general terms, SEPP should specify environmental quality objectives, indicators, specify the minimum requirements, specify what is acceptable and what is not acceptable, set out the basis and general procedures for risk assessments.

In the future, there will be greater need to compromise between energy use and other environmental objectives, and the SEPP energy must address how this difficult issue is to be addressed and documented.

Yours sincerely



Dr Ian Wallis