#### What do you think are the key environmental challenges which will impact the EPA in the future?

Legacy contaminated sites - how to deal with contaminated sites from the perspective of both orphan sites and sites where contamination is a historical issue with current owners unable to fund cleanup or not being responsible for cleanup. Landfills - once closed which business will really undertake post closure rehabilitation? EPA must be proactive, and not reactive. Air monitoring after the fact is not adequate. Insisting on an investigation in the present where the contamination is historical is not good science, in fact it si a ludicrous waste of money. If asbestos was used in a factory prior to 1980 it will not be present now - it is already present in offsite properties as it was disposed in dust. Spend the money looking in peoples roof spaces, their wall cavities, in the crawl space beneath homes, in soils of backyards and open spaces. Do a proper investigation. If you are investigating an odour complaint identify all the potential odour sources, do not try and mould the investigation to arrive at the outcome you have predetermined. A saleyards will always be more odourous than pretty much ANY other activity, especially if it is right next to a residential area and the business you are trying to pin the odour problem on is over 1 km from the houses. Doing a proper investigation Part 3 - Review all your data and call in the appropriate experts. Contamination in the ground is almost always historical, not the result of current operations. The work done at the Port Melbourne Service Station is shoddy at best. Communication - communicating in a scientifically and fact based manner all the issues that EPA deal with. EPA should not be political, nor take the side of the loudest winger. EPA need to approach issues using science and evidence and to undertake investigations that are correct. The cost of doing business in Victoria is ridiculous. Getting through the works approval process, getting a licence to operate a site, ongoing compliance costs, defence costs against futile and ultimately incorrect EPA assertions. Waste disposal - a massive issue when disposal is so expensive. We need new landfills and we also need waste disposal to be cost effective. It is ridiculous that waste disposal can cost \$1,000 per tonne. The costs for getting an environmental audit completed are in excess of \$100,000. There must be a 2 tiered approach where the simple sites remain simple and uncomplicated and the complex sites are just that a time consuming and costly process to ensure there are no health risks

#### What aspects of the EPA's work do you value and wish to preserve in the future?

The ability to access documentation for free online. The approach of EPA into 4 or 5 investigations over the past 3 years leaves me with a total lack of confidence that EPA are able to undertake effective work.

### How can the EPA effectively work in partnership with other government agencies to meet the environmental challenges of the future?

EPA need to determine what they are, are they a regulator or are they trying to set guidelines and policies? My read is EPA are to be the regulator, ie another department will develop the guidelines and EPA will act like police. In this case EPA will need to understand how to enforce regulations and will be told how to enforce.

## How can the EPA's role in safeguarding the community against the health impacts of pollution be clarified or strengthened?

You assume that we think EPA can safeguard the community. This is a big assumption. EPA need to engage persons with clear technical abilities and who are experts in their relevant fields. EPA need to use science and a rigorous and intensive investigative approach to addressing any work they do – not the current ad hoc and predetermined approach that currently occurs. EPA need to understand what the issues are and to have an idea of how to fix them.

### How could statutory frameworks more effectively prevent future environmental risks and land use conflicts?

Place responsibility for planning decisions with Planning Authorities. It is ridiculous that EPA manage the environmental audit system and yet planners rarely know how it works or what the outcomes are.

#### What role should the EPA play in emergency management? None

### How can the EPA better identify and, where necessary, address problems that are the result of past activity?

The EPAct is clearly outdated. Look at how historical contamination is managed in NSW and SA. There needs to be a register of contaminated and potentially contaminated sites. This si being proactive.

#### What can the EPA do to avoid potential future problems?

Regulate in a fair and balanced manner.

## What role should the EPA play in improving environmental outcomes beyond those necessary to safeguard human health?

EPA need to remove themselves from their ideologies and become a pragmatic regulator

#### What role should the EPA play in reducing greenhouse gas emissions? None

#### How do you see environmental justice being applied to the work of the EPA?

There needs to be a manner of appealing EPA decisions that doesn't require going to the Supreme Court or to VCAT. There also needs to be a fairer way for complaints against EPA to be heard and resolved.

What can we adopt from other regulators and regulatory models to implement bestpractice approaches and ensure that the EPA can rise to key future challenges? A notification process for identifying contamination of land and a register of potentially contaminated sites. Declaration of areas of the State where groundwater is contaminated and may not be suitable for use.

# Are there any other issues relevant to the Terms of Reference that you would like to raise?

No Answer

**Upload your submission** No Answer