

30 October 2015

Recycling and waste recovery Australia

Independent Inquiry into the EPA
PO Box 21428
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Via email: info@epa-inquiry.vic.gov.au

Submission to the independent inquiry into the EPA

SUEZ welcomes the opportunity to provide a submission and feedback for the public inquiry into the Victorian Environment Protection Authority.

As a leader in resource recovery and with a strong presence in both collections and infrastructure in Victoria, SUEZ is in a unique position to comment on the inquiry. SUEZ is a member of the Waste Management Association of Australia (WMAA) and is also supportive of its submission from its Victorian Landfill branch, in particular the points raised in respect to Environmental Justice.

SUEZ would like to take this opportunity to comment on a small number of questions raised by the inquiry:

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

There is concern that EPA enforce and regulate too strictly on licenced sites of companies that have displayed a strong history of environmental compliance. In early 2015, the EPA were piloting an *Earned Autonomy Program* where certain accredited licensees could earn autonomy for particular licenced sites based on an organisation's history of environmental performance and compliance. This was to develop an alternative program to encourage, recognise and reward excellence in environmental performance across all EPA licensees. We believe this is a beneficial program and should be made available to licenced landfill sites should this become an ongoing program of the EPA.

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

With respect to the ongoing concern over interstate transport of waste, the Victorian Government must engage with other states namely New South Wales, Queensland and South Australia to agree on compliance with the guidelines within NEPM. Furthermore, there is a need to understand whether guidelines within the NEPM are being complied with as it is believed EPA Victoria is unaware of all movements of controlled wastes interstate.

Another option available to the Government would be exempting State Government infrastructure projects from the waste levy, so at least the State Government will not be contributing to the problem of interstate movement of PIW. Rules could also be included in tenders prohibiting interstate movement of contaminated soils.



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

In regards to interstate transportation of Prescribed Industrial Waste, the EPA need utilise the current legislation in place already to enforce and regulate against companies not obtaining the appropriate permits. The EPA has been slow to act on this issue and have not kept key stakeholders informed appropriately. The Victorian EPA must take action against those companies transporting waste across the state border without approval.

The Victorian EPA needs to develop a reporting protocol where sites containing contaminated soils are identified through NATA accredited lab analysis, site investigations by consulting firms or EPA appointed auditor reviews. This will automatically provide the EPA with information to track the movement of controlled wastes. EPA should also consider the requirement for a contaminated land remediation plan to be developed for identified sites to include plans on treatment/disposal requirements.

To continue to monitor and enforce the issue of contaminated soils, SUEZ believes there needs to be regulation of Clean Fill sites in Victoria. There is no current structure in place.

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

Currently there appears to be a 'one-size-fits-all' approach to some forms of enforcement. Pollution Abatement Notices (PAN) are being issued for non-conformances that are being self-reported by the company. Whilst the EPA have stated these types of PAN's are not punitive measures, rather introduced as a function to provide structure around reporting timeframes, PAN's can have a commercial impact on organisations such as our own. As an alternative approach to, SUEZ suggests to issue another form of notice to address these matters rather than a PAN.

Industry engagement and customer service is also an area of the EPA that SUEZ believes needs attention. With various tasks to complete such as Annual Performance Statements, Works Approval applications and licence amendments to name a few, contacting the relevant staff within EPA to address these matters is proving time consuming and potentially detrimental to finishing these tasks within in set timeframes.

EPA staff do not appear to have direct phone numbers available in their communications, thus leaving to caller to contact the person via a general customer service number. Our employees have reported they rarely receive a call back from the person they wish to speak to.

SUEZ suggests the EPA implement 'Client Liaisons' for major clients. This would greatly benefit companies with complex needs who interact frequently with the EPA have a designated contact who can be easily accessed and can facilitate the relationship between relevant staff at the EPA and the client.

SUEZ appreciates the opportunity to raise these matters with the Inquiry. Should you require any further information, please don't hesitate to contact me.

Yours Sincerely

Kelvin Sargent
State General Manager VIC