



Submission by the

Australian Environment Business Network (AEBN)

to the

Ministerial Advisory Committee

for the

Inquiry into
Environment Protection Authority (Vic)

30 OCTOBER 2015

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Ms Jane Brockington
Deputy Chair
Ministerial Advisory Committee
PO Box 21428,
Lt Lonsdale Street
MELBOURNE VIC 8011

Dear Ms Brockington

The Australian Environment Business Network (AEBN) welcomes the opportunity to comment on the Victorian Government's Independent Inquiry into EPA Victoria.

The AEBN is Australia's peak organisation that represents the interest of its members on environmental and energy issues likely to impact our member organisations and their business operations. Our member organisations consist of manufacturing and service industries, as well as local government across Australia. Collectively, member organisations have a turnover in excess of \$50 billion and employ well over 50,000 people. For further information about AEBN, please visit www.aebn.com.au

In the course of developing this submission, the AEBN consulted with its members. The AEBN held a Briefing on 23 October 2015 at which Jane Brockington, Deputy Chair of the Ministerial Advisory Committee had kindly provided an overview of the Inquiry.

The AEBN provides the following comments by members on the Inquiry into EPA Victoria based on the questions provided in the online documentation:

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

As the population increases in the future, there will be an increased need for management of the societal impact on the environment. A pragmatic approach to this management will be required as time goes on.

Traditionally, regulatory systems have been rigid and cumbersome and have in many instances stifled innovation in how wastes may be handled, reused or disposed of. Greater flexibility must be applied to approval systems particularly relating to waste management infrastructure. Approval systems must be able to be undertaken quickly but must still deliver the appropriate level of environment protection.

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

The EPA plays a valuable role as a regulator and as researchers/independent authority. The EPA is also a valuable resource to Government relating to the environmental aspects of planning and development. The EPA also plays a critical role in relation to the development and provision of guidelines and other advisory materials. The monitoring and reporting functions are also critical functions of EPA and should be maintained.

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

The EPA provides expert advice in relation to government activities. Particularly in relation to planning, the EPA should be used as a key advisor through all decision making processes. The EPA should adopt a role of facilitator of development, not as a barrier to development. A pragmatic approach should be adopted as the mantra for this role.

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

EPA's role in developing State Environment Protection Policies and providing input to National Environment Protection Measures should be maintained. This is the key initiative to ensure human health is not impacted by pollution.

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

As outlined above, the EPA regulatory must become more flexible and responsive to society needs. The existing system is cumbersome and rigid in its application.

6. What role should the EPA play in emergency management?

As currently exists, the EPA should act as an advisory group to the police and fire authorities. EPA must ensure that the advice provided is timely and pragmatic.

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

AEBN has no comment on this issue.

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

AEBN has no comment on this issue.

9. What role should the EPA play in reducing greenhouse gas emissions?

Greenhouse gas emissions should be managed only at the National level. State based systems become duplicative and inefficient. Greenhouse management is not an issue properly managed at the State level.

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

AEBN has no comment on this issue.

11. What can we adopt from other regulators and regulatory models to implement best-practice approaches and ensure that the EPA can rise to key future challenges?

AEBN has no comment on this issue.

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

AEBN has no comment on this issue.

13. What can the EPA do to avoid potential future problems?

AEBN has no comment on this issue.

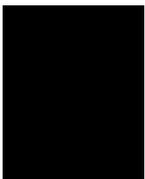
14. Any other comment you wish to add?

In summary, AEBN members have reported that from an industry perspective –

- the EPA is a difficult organisation to contact and to seek advice from;
- that the EPA should endeavor to work cooperatively with industry and industry representative groups;
- that Industry relationships have deteriorated significantly over the last five years and this should be rectified. A “modern regulator” should want to have constructive relationships with stakeholders, not try to set itself apart from the groups that it should be interacting with.

The AEBN is grateful to EPA for their support in relation to our activities and for the availability of EPA representatives at AEBN seminars.

Yours sincerely



Tina Khoury
Chief Executive Officer
Australian Environment Business Network (AEBN)