

Submission for the future of the Environment Protection Authority.

Thank you for conducting public consultation events at locations in regional Victoria and metropolitan Melbourne. Thank you for taking the time and effort to speak with people, hear their opinions, view facilities and sites. Thank you for producing the discussion paper (Examining the future task of Victoria's Environment Protection Authority).

It is very important that Victoria has and continues to have an Environment Protection Authority (EPA).

The EPA needs the necessary resources to fulfil its roles into the future "within an evolving policy context at state, national and international levels" (Examining the future task of Victoria's Environment Protection Authority, page 25). The EPA needs to be able to operate without unnecessary interference by political parties, business, lobbyists, etc.

The EPA needs to be proactive and prevent incidents occurring as it is much easier and cheaper to prevent incidents than it is to try to contain, rehabilitate, repair. Most cases it is not possible to restore human health and environmental status after being damaged.

It is necessary to identify sustainable revenue sources that do not cost shift to local government. Local government is not able to absorb state and federal government responsibilities. It is essential to review and identify revenue sources for the EPA. 60% of EPA operating budget is from landfill levy revenue (Examining the future task of Victoria's Environment Protection Authority, page 15). This is not sustainable. The landfill levy should be used at the local level (e.g. resource recovery, recycling, composting, waste, education, etc.). It is stated in the discussion paper, "avoidance of the landfill levy has led to illegal dumping (including of hazardous waste such as asbestos), and banning the disposal of tyres to landfills has led to stockpiling, which in turn poses a major fire risk" (Examining the future task of Victoria's Environment Protection Authority, page 28).

It is of great concern that "the business conducting an activity is best placed and has the primary responsibility to identify and manage the associated risks" (Examining the future task of Victoria's Environment Protection Authority, page 17). I realise it is a risk based approach, but it is too costly when incidents occur. While most businesses acts appropriately, there are some businesses who seem not to, either unintentionally or possibly allegedly deliberately. If we could rely on all business to act appropriately, there would not be a need for Occupational Health and Safety legislation to ensure employees have access to safer working environments and hopefully do not die at work. I realise the EPA does not oversee Occupational Health and Safety (OH & S). Using OH & S as an example to highlight that self-regulation by all business may not be the most effective way to ensure compliance.