

## **Landserv Pty Ltd**

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

Protection of water and groundwater resources – as demand for these resources increases and recharge cycles are affected by climate change.

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

Regulations and policing regulatory compliance are the most effective way to protect the environment.

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

More initiatives such as the collaborative joint processing of EPA works approval and planning permit applications.

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

The EPA needs more people and more resources to allow stronger communications and media coverage, more decisive communications and responses to business and consultants. More education, checking and policing of the earthworks and soil trucking industry should be resourced, to strengthen the prevention of illegal transport and disposal of contaminated soil.

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

Landfill gas risk assessment requirements in the Landfill BPEM should be legally binding rather than a guideline, although circumstances requiring an audit should be better defined (as audits are not always required); The anomaly of landfill leachate being acceptable to Water Authority treatment plants via Trade Waste Agreement to Sewer, vs them not being able to accept truck-transported leachate because it is Prescribed Industrial Waste – needs to be addressed; Strengthen the clarity of Ministers Direction No. 1 in the legal framework so that a legally binding clear process is required for potentially contaminated land – similar to the DSE Practice Note but updated and clarified. Consider whether there is a role in the statutory framework for accredited practitioners other than Auditors. Reviews should be conducted progressively across all Planning Scheme areas of Environmental Audit overlays. There may also be a role for Environmental Assessment overlays requiring planning applicants to carry out an assessment to determine whether an Audit is required, or whether any further assessment / clean up is required but not an Audit.

### **What role should the EPA play in emergency management?**

Lead role in coordinating the response to spills, landfill gas and other clearly environmental emergencies – e.g. coordinating / allowing Worksafe and CFA to protect people as their first priority but then as a close second priority coordinating CFA and other resources to conduct initial clean up and prevent further impact etc. For other emergencies where environment is

not the highest priority – e.g. fire, natural disaster – they should be a referral organisation but still play a significant role.

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

This could only be done with more resources allocated, for example to assisting complainants whose land is impacted by neighbouring land uses.

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

No Answer

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

As water becomes a more critical resource in the future - maybe EPA could have a role holding other government agencies accountable for the sustainability of using / licensing water resources, particularly licensing for irrigation dams and groundwater extraction (Southern Rural Water etc) and policing activities within water catchment areas that are outside of the direct waterway jurisdiction of CMA's but still impact the catchment – to ensure that these practices are sustainable as recharge becomes progressively more affected by climate change.

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

It would be hard for EPA to regulate given that targets and binding obligations would normally come from the Commonwealth level. However there is benefit in a promotional / support role, encouraging WA Applicants and businesses to measure, reduce, mitigate.

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

Can't think of any improvements over the existing system of notices and infringements etc.

**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?**

No Answer

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

No Answer