

Friday, 30 October 2015

Submission to Independent Enquiry into the EPA

I am writing on behalf of the Yarra Riverkeeper Association to make a submission to Melbourne Water's Price Review. The Yarra Riverkeeper Association is the authoritative and credible community voice for the Yarra River.

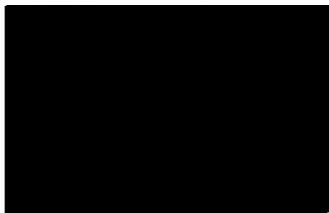
We are concerned about the following:

- The issues are changing and the EPA must be empowered to and charged with managing issues such as diffuse pollution enter our waterways from hard surfaces such as roads and car parks. These issues are more difficult to manage than industry sites and the EPA must educate the community so that there is a proper understanding of the issues and how the community can contribute to preventing pollution. And it needs to develop programs to manage these issues. The agencies and businesses, for example, building the roads and providing car parking need to be responsible for building systems, as part of the construction, that manage this sort of pollution.
- The EPA should be a proactive agency rather than a reactive agency, and needs to be resourced to be so. It needs to be more than a regulator. It should be to be an educator, and a community leader, and it needs to be resourced and empowered to fulfill these roles. For example, the community is still largely unaware that what falls on our roads, goes into the storm water and ends up in our waterways.
- The EPA should be proactively identifying risks to our air and waterways, and proactively auditing waterways and risk managers. For example, groundwater contamination is a key issue that needs to be pro-actively dealt as the built environment penetrates further underground.
- The funding model for the EPA needs to be reviewed so it has a secure and ongoing income that is not sourced directly from industry. Only then can it be an effective and independent voice. The EPA needs to

be an advocate for reducing pollution (and therefore improving liveability) as much as it is a regulator for point source pollution. Pollution should be defined broadly rather than narrowly.

- Where responsibilities are delegated to others — for example, to local councils for the management of what enters the storm water system from building sites — the EPA needs to remain responsible and ensure that the tasks are carried, that the agency to which the task is delegated is resourced to fulfill the requirements.
- We don't require more regulation so much as for the current regulations to be enforced. If regulations are not enforced then the businesses that are doing the right thing are disadvantaged and disincentivised. There is an appeal from a cost point of view to allow businesses to self-regulate, but this is only effective if backed by increased penalties and improved reporting; businesses should be obliged to publish their data online for public review, These penalties need to be enforced both for any failure by business to prevent pollution or for reporting inaccurately.
- If citizen reporting is to be part of the regulatory toolkit, then the EPA needs to be properly resourced to provide adequate response to these reports. Every report needs to be acknowledged and responded to. The public needs to be properly engaged as real partners. If reports are not responded to, members of the public will feel they are wasting their time in making reports that apparently go nowhere.

Yours sincerely,



Andrew Kelly
Riverkeeper and Vice-President