

## **Power-Less Pty Ltd**

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

The unfolding challenge is that of the energy sector transformation to clean techniques and with that the retirement of fossil fuel fired power stations with focus on reduction in CO<sub>2</sub> emissions and remediation of sites. The increasing pressure for action could lead to accelerated closure of power stations in Victoria by 2030.

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

Oversight of mandated power station emission levels and remediation activities. Many of Australia's power stations predate the broader understanding of climate change mechanisms gained between the late 1980's and today. The irrefutable link to CO<sub>2</sub> emissions was not therefore a consideration in initial design and construction standards. The short term carbon price mechanism was unpopular but drove reduced utilization of coal fired power stations with increased use of gas. The alternative to a pricing mechanism of a mandatory graduated CO<sub>2</sub> emissions is now required to drive transition to clean energy generation.

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

Any new mandatory emission standards settings for CO<sub>2</sub> will require close coordination with the industry department, energy department, and health sectors. Many of the facilities involved form part of Essential Services and staged closure would have to match the entry of new clean energy sources including the interim utilization of base and peak load gas (of lower intensity). Involvement of the health department would add weight to the health impact correlation which extends beyond CO<sub>2</sub> emissions to other emissions such as particulates, mercury, heavy metals, etc. Coordination with AEMO in consideration to the possibilities arising out of cross connection of East Coast power generation assets on the grid would also be required.

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

The added powers of oversight should be informed and invoked under the Climate Change Act and in this take input from the health department. As demonstrated recently with the Hazelwood mine fire, mine remediation activities would have benefited from ongoing oversight by the EPA as a parallel activity to operation of the power station. The Latrobe Valley mine licences require ongoing remediation by the operator.

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

The focus of this submission is air quality emission standards with a particular focus on CO<sub>2</sub>. There are associated environmental risks and land use conflicts such as indigenous considerations, water utilization, effluent and other to consider. This should be subject to a separate study along the lines of that undertaken for the Murray Darling water catchment

area. The interrelationship becomes more complex when it comes to alternative use of resources.

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

The EPA should be involved in an investigative and advisory capacity to resources in place. Early involvement would be required. EPA involvement should be one of independent oversight in order to ensure that its actions and findings are not compromised.

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

The Power Generation Sector has access to good records and data bases through their historian and logs. Maintenance, assurance and supplementary requirements should be subject to periodic audit and review. Near miss and incident registers should be included. A formal risk management, risk and improvement register will already form part of the materials maintained by the power stations and to be addressed.

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

The EPA should publish an annual report and recommendations based on its activities over course of the year.

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

See above - the EPA has a large role to play in either a regulated environment or where a pricing mechanism such as a carbon price exists.

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

The EPA role should be clear and independent of any environmental justice considerations beyond the allocation of cost and fines under a prescribed regulatory framework.

**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?**

The Work Safe model works well in that the triggers for engagement and oversight of OHS activities are well defined and understood. A regular review of international best practice would also be beneficial.

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

No.

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

Ensure that they are adequately resourced and trained.