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30<sup>th</sup> October 2015

Penny Armytage  
Chair  
Ministerial Advisory Committee for the Inquiry into the Environment Protection Authority

Via Email: [info@epa-inquiry.vic.gov.au](mailto:info@epa-inquiry.vic.gov.au)

AORA aims to act as an advocate for the wider organics resource recovery and beneficial reuse industries and to represent their views in a constructive dialogue with policy makers. The Association envisages an industry in which best practice is shared, standards are maintained and surpassed, and which makes a positive contribution to safeguarding the environment

AORA Victoria appreciates the opportunity to provide input to the Ministerial Advisory Committee for the Inquiry into the EPA

As an industry body, AORA is providing solutions to organic management issues across Australia and promotes a can-do culture within and seeks to see EPA Victoria do the same to create and maintain a cooperative relationship.

An industry workshop was hosted by AORA on Friday October 23<sup>rd</sup> where Jane Brockington presented, providing guidance to the role and purpose of the MAC EPA Inquiry. As part of this we seek to provide input on behalf of the Organics Recycling Industry. This feedback is backed by extensive industry experience, both informal and formal interactions, as well as a vast knowledge bank regarding the organics recycling industry.

Following Ms Brockington's presentation, the workshop proceeded to collect information and feedback from the industry members as to the areas of the EPA's operation which may benefit from review and reform

### 1. Consistency

The workshop identified several areas of the EPA's operation which are not consistent and can be improved including: inspections, communications and records of advice.

Inconsistency between head office and local branch offices is noted by members as problematic. An example being some conditions of works approvals granted through head office being challenged by branch office officers and inspectors as inadequate. This can be frustrating for operators where the authority offers conflicting advice from its various offices.

### 2. Expertise

Internal: The workshop identified that there is a lack of expertise within the regulator, particularly in areas of land air and water emissions. The impacts of this lack of expertise is

compounded by the heavy reliance on one or two particular EPA officers, resulting in significant procedural delays in the event said staff members take leave.

There was sentiment expressed that EPA did not manage staff transitions well which resulted in at times critical loss of expertise and experience. Lack of experience often lead to the inability to make decisions in a timely manner within authority. The import of staff from overseas often skewed perspective on policy issues bringing with it concerns

External: EPA should engage external experts at an earlier stage of the application process.

### 3. Local Government Interaction

Issues have arisen out of lack of communication between the EPA and local government in terms of zoning, when encroachment develops as a result of rezoning land surrounding an existing facility. There are several poor outcome examples of the problems this causes for the industry and community when not properly managed.

Noise has also presented an issue, in that there should be clearer distinction between which authority is responsible for monitoring this aspect of environmental impact, councils or EPA

### 4. On-Farm Composters

The current practice under the newly revised composting policy (Compost Guidelines 1588) allows farms to accept up to 100 tonnes per month of waste material before being required to report to EPA to seek approval or implement any sort of environmental management plan. This contrasts strongly with the labour intensive and financially prohibitive requirements of licenced facilities to monitor their potential for environmental impacts. The environmental risks posed by composting operations exist even in small volumes and this should be reflected in EPA's practices.

Further the elimination of the loophole of 100t per title, as opposed to per farm to prevent farms on multiple titles multiplying their threshold. The delivery of shredded but otherwise untreated garden organic material should be ceased on the grounds bio-security risks associated with transporting untreated organics containing weed seeds and plant pathogens to food producing operations. Any site receiving untreated garden organics under the 100 t/pm exemption should be required to submit an Environment Management Plan.

Large facilities producing food waste should also be accountable for where their waste is sent and should have to comply with EPA requirements.

Large facilities producing food waste should also be accountable for where their waste is sent and should have to comply with EPA requirements. It is well known within the industry that many waste producers dispose of their waste to uncontrolled and illegally operated sites across Victoria to minimise disposal costs.

### 5. Communication

The industry would like to see an industry contact number, as opposed to the 1300 number used by the general public. Five years ago, licensed composting facilities were assigned an EPA client liaison officer which enabled consistency of contact and was well received by the industry. This practice was discontinued by EPA.

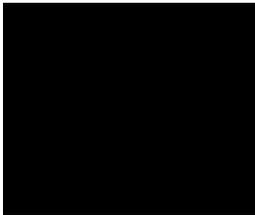
Additionally, the relocation of EPA internal technical experts to the EPA Macleod office has put a further disconnect between the technical experts, EPA head office and the industry

AORA would like to see an outcome focussed Authority moving forward.

AORA Vic has been a keen observer of the NSW EPA's transition to an exemption based system for the application of composted wastes for use. This solution is a bureaucratic nightmare for industry and its customer base and AORA Victoria does not endorse the adoption of the exemption system to Victoria.

We offer the above commentary with hopeful expectation that the work of the Inquiry will help EPA continue to improve its performance overseeing the critical work industry provides in managing organic wastes to recover resources and protect the environment.

Sincerely



Michael Wood

Chairman AORA Vic