



Adam Polkinghorne  
<Adam.Polkinghorne@barwonwater.vic.gov.au>

07/01/2013 10:43 AM

To ""approvals.review@epa.vic.gov.au""  
<approvals.review@epa.vic.gov.au>

cc ""Shauna McDonald""  
<Shauna.McDonald@vicwater.org.au>, David Greaves

Subject RE: Approvals Review - extension of time for comments

Hi,

In general, I thought the direction of the report was good. There are a number of documents & processes that are referred to that are still to be developed and how the direction of the report is interpreted into these documents will be important. Hopefully we can be involved in this process as well.

My only real comments are around the 30A section.

The option of inserting a clause relating to 30A discharges in discharge licenses is in line with the position of the working group. The detail of the 'restricted conditions' is still unclear at this stage.

Section 5.3 para 4. *The longer-term remedy is to alter the design basis for water storages, including through EPA's works approval process (where applicable), to account for greater variability in rainfall patterns.*

This statement sounds like EPA have reached a decision already on altering the design basis for storages in response to taking regard for potential impacts due to climate change. This line has significant implications for water businesses and the situation needs to be collaboratively investigated before a change is adopted. Does this also mean that the revised clause in licenses would be revoked in favour of increased storages?

The referenced Climate Change Act 2010 Section 14(3) requires the decision-maker to consider a number of factors:

- (a) biophysical impacts;
- (b) long and short term economic, environmental, health and other social impacts;
- (c) beneficial and detrimental impacts;
- (d) direct and indirect impacts;
- (e) cumulative impacts.

Has any review of the environmental impact of the significant number of recent 30A requests been undertaken to quantify the (any) impact in either short or long term? Water businesses completed risk assessment on their 30A discharges (not sure if this occurred in all cases) and this information needs to be reviewed & interpreted to assist in determining an overall picture of environmental impacts from the 30A discharges. There are a range of economic & practicality implications of altered storage design requirements that would require investigation.

Feel free to contact me if any of the above comments needs clarification.

Regards,  
Adam

Adam Polkinghorne  
Acting Manager Water Reclamation | Barwon Water  
61-67 Ryrie Street (PO Box 659) Geelong VIC 3220  
T (03) 5226 9117 | F (03) 5226 9140 | M 0409 951 107 | W  
www.barwonwater.vic.gov.au