

31 December 2012

Stephen Gatford, Approvals Review
Environment Protection Authority Victoria
200 Victoria Street
Carlton Vic 3053



EnergyAustralia

Dear Stephen,

EPA Approvals Review Draft Report Publication 1501, Nov 2012

Thank you for the opportunity to provide comments on the EPA Approvals Review Draft Report.

In reviewing the EPA Approvals Review Draft Report, it appears that a solid effort has been made to identify areas of improvement in the EPA approvals processes. Suggestions are aimed at being far more targeted, rather than one size fits all, and the risk based approach would appear to provide a good foundation for that to take place.

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However, one area of concern to EnergyAustralia is Section 6.5 on Accredited Licences. As the draft report notes, one of the key advantages to the business in obtaining accredited status of their licence is a 25% reduction in their licence fee. This fee discount is a significant means of providing recognition and assists in offsetting some of the costs involved in ensuring certified EMS processes are established and remain in place.

As noted in the report, EPA are considering doing away with the accredited licence status and replacing it with a "reward for excellent performance" due to the current process not being taken up by all Victorian EPA licence holders. From a large emitters perspective the 25% reduction in licence fee, for going to the effort to become and maintain accredited licence status is far more useful than some esoteric "award".

If the EPA were to do away with the Accredited Licence system and then require the large emitters to pay an additional 25% on their fee, this would seem at direct odds to not increasing the cost of regulation.

From EnergyAustralia's perspective, if the EPA were to do away with the Accredited Licensee program, then the fee discount should still remain as though that process was in place, as the cost of administration has not altered.

It is noted that EPA has initiated a consultative approach with industry to this aspect of the review to occur in 2013 and that any changes to the current Accredited Licence system will not occur until 2014 at the earliest.

Please contact me on 03 5128 2116 or email Ray.French@energyaustralia.com.au if you would like further clarification or wish to discuss this response further.

Regards,

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