



Les.Harman@qenos.com

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To approvals.review@epa.vic.gov.au

cc Rob.Berton@qenos.com

Subject Comments from Qenos of  
Approval review and accredited  
Licences

## Approvals review Comment

The main issue from the current system is the overall length of time to get through the process and what feels like altered targets in the process when EPA asks for new or different information .

Putting in a new approvals system will only be a success if the time from initial discussion with EPA and receiving the approval, or exemption becomes significantly shorter .

Having a pre application stage should facilitate this , however the potential for a two stage process to take longer.

Key points to having the pre application stage facilitate a more efficient process are

- Having an early meeting with EPA that is able to identify the key issues of a proposal . It is inefficient and frustrating to have significant new requirements introduced well into the process.
- Having clear guidance material available that is pointed to at the initial meeting .

Agree with the concept of exempting pre approved Standard technologies.

Agree with using risk based criteria for determining the level of assessment that is required for an approval.

The requirement for demonstration of Best Practice also needs to consider risk criteria both current and foreseeable. For example a sensitive receptor in one region may require the installation of better technology compared to another that does not have the sensitive receptor. There should not be a lot time spent on this if regulatory requirements are met and the residual risk of the proposal is acceptable.

With regard to best practice guidance material it needs to be outcome focussed with examples of how to achieve this. Proposals that can meet these outcomes would therefore be meeting best practice requirements

## Future Of Accredited Licences

Agree that the licence system should provide an incentive to improve beyond just meeting compliance.

The benefits of the accredited licence we see are :

Public and business (could be customers, suppliers or financial) recognition that the licensee is a sound environmental manager as a holder of an accredited licence .

Having this licence along with the Independent auditors reports assist businesses in their dealings with insurance, financial institutions as well as customers and suppliers .

Concept of a bubble licence managing total impact rather than specific point management impact providing flexibility to manage activities with earned autonomy .

Saving in licence fee and prescriptive testing requirements of previous licence .

It keeps a pull in place for our business to keep improving our performance .

We would like to retain the benefits that accreditation provides but would like to make the administration of it more stream lined.

In the existing licence system there is no pathway to progress from licensee to accredited licensee .  
The gap is too wide to achieve

There should be stages between the entry level licence and the best performers . (suggest four overall). This would allow businesses to improve their environmental management in a stepwise and sustainable manner.

The cornerstones of accreditation are all valid and are predominantly leading indications

High level of performance  
Capacity to maintain and improve performance  
EMS  
Audit program  
EIP process

Lead measures of performance should remain as the key requirements for obtaining higher levels of licence.

Compliance as reported in the APS is relevant in the assessment of the level of performance however it needs to take in more than a single years performance and be used in context. Also any legacy issue impacts on a sites current APS performance outcomes ( ie groundwater ) need to be considered

The Independent Audits that are completed for Accredited licensees could be structured to remove a lot of the EPA administrative load associated with the current model. eg approval of EIPs which EPA cannot currently resource. The savings in licence fees for large businesses fund this .

I re iterate that the system needs to take medium to longer term time horizon ( 3-5 years) to obtain sustainable improvements. For this reason the use of the latest APS will not figure significantly in the determination of the better performers. Sustained effort over time is needed to achieve consistent good performance and the system needs to be able to nurture this.

If I was to point to a concept model it would be the points system for drivers licences where if enough points are accrued the licence would be impacted.

## **Les Harman**

Senior Environmental Advisor

**Qenos Pty Ltd**

**P:** +61 3 9258 7204 | **M:** +61 409 418 987

**E:** [les.harman@qenos.com](mailto:les.harman@qenos.com) | **W:** [www.qenos.com](http://www.qenos.com)

