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Review of Environmental Protection Policies (Air, Noise and Water)

Dear Rachel

The Australian Industry Group (Ai Group) welcomes this opportunity to make a contribution to the review of the Environment Protection Policies being conducted by the Queensland Environmental Protection Agency (EPA).

Ai Group is one of Australia's leading industry organisations representing over 10,000 employers nationally. Membership is drawn primarily from a broad range of industry sectors, including manufacturing, construction and related services sectors. As such many of our members are certainly affected by the review of the air and noise policies (in particular).

This submission has been developed in consultation with members of Ai Group's Queensland Environment and Water Users Group, and therefore is about practical issues and concerns from the perspective of industry customers.

Air

Feedback from Ai Group's member companies indicates that the draft statements are unclear on the expectations of the EPA on emitters, referring at times to "best practice" environmental management and design activities.

Ai Group believes that without an appropriate definition taking into account the nature of each industry and the size of each business, as well as assistance to businesses to understand and move towards best practice, this term should not be used.

Ai Group also questions the environmental benefits of further refining the quality objectives, markedly increasing the costs for industry to demonstrate compliance, when these resources could be better spent on noise prevention and reduction. This seems to be an administrative review to align the State with international trends rather than a common sense approach to addressing environmental issues.

Noise

Ai Group is supportive of the principles adopted by the EPA (as listed in Part 2) and suggests that the order of occupancy principle be applied to existing situations where rezoning and residential developments have been allowed near existing industrial areas.

Ai Group believes that the proposed State Planning Policy (Air and Noise Emissions) will be a critical piece of legislation for our members, and as such recommends that consultation be carried out with industry when developing this document.

General comments

We have some concerns over level of specificity in some of the wording of the draft policy statements – at times they can appear vague or ambiguous.

With this in mind, we strongly urge that the draft EPPs and SPP (Air/Noise) be made available for broader comment by the industry prior to their introduction.


Broadening the current consultation process would help ensure greater support throughout the industry and, we believe, improve the final policy outcome.

It is also unclear in the draft policy statements if changes made to current objectives will override objectives stated in existing Development Approvals, and if so what mechanism will be used to reassess these.

In summary, Ai Group supports the EPA's efforts to review current policies and regulations, and is looking forward to assisting the EPA in developing a set of clear and practical documents as part of the development of the broader environmental protection legislative package.

If you have any questions regarding this submission, please contact me on (07) 3244 1767 or email aaron.johnstone@aigroup.asn.au.

Yours sincerely



Aaron Johnstone
Manager - Policy and Public Affairs