

Our Ref: EPA Victoria Submission

The Productivity Commission's draft report,
Regulator Engagement with Small Business

Attention: Christine Underwood

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Dear Christine,

Thank you for the opportunity to be involved in the development of the Productivity Commission's draft report, *Regulator Engagement with Small Business*.

EPA would like to confirm that we support the intent of the recommendations outlined in the report and over the past three years have been focused on our transformation into a predictable and transparent, modern regulator. We would like to take this opportunity to highlight how EPA's reforms align with your recommendations.

The development and implementation of EPA's Compliance and Enforcement Policy clearly outlines our risk-based regulatory model and approach. EPA prioritises its compliance, monitoring and inspection efforts towards the biggest risks of harm to the environment and to those businesses that are less likely to comply. We believe that this approach supports the intent of recommendation 3.1 in the draft report.

EPA's Annual Compliance Plan provides a more detailed and public account of the targets and activities we will focus on for the coming year and provides business and the community the opportunity to evaluate their environmental performance and ensure they are compliant ahead of an inspection. EPA provides public performance reporting against our Annual Compliance Plan on a quarterly basis. We believe that this approach supports the intent of recommendation 4.3 in the draft report.

Other reforms that have been implemented with the aim of streamlining and simplifying processes and reduce red tape for business include:

- EPA's licence reform and Annual Performance Statement reporting
- Approvals reform which will see a risk based approach adopted to EPA's works approvals
- Business Systems reform which has seen the implementation of a online portal for businesses to access information and services online
- Remedial Notice Review Policy, which enables business to apply for an internal review of a notice issued ahead of lodging a formal appeal through VCAT

We believe that these reforms support the intent of recommendations 4.3 and 5.2 and 5.4 in the draft report.

Finally we would like to support the comments made under recommendations 2.3 and 6.2. EPA has invested heavily on transforming its organisational culture to one that embraces continuous improvement and building partnerships with co-regulators in order to foster contribution and collaboration. Our partnerships with Ai Group and PACIA to provide compliance support tools and services for small business are good examples of EPA's commitment to a tailored and collaborative approach. EPA Officers have recently been involved in a rigorous knowledge and skills-based training and evaluation process in order to be successfully re-authorised. Each of these initiatives are steps towards ensuring our interactions with business, community and all stakeholders are professional and consistent.

EPA would like to thank you for the opportunity to comment on the draft report and look forward to reading the final publication.

Kind regards,

A handwritten signature in black ink, appearing to read 'L. D'Angelo', with a small blue dot at the end of the final stroke.

Laurie D'Angelo
Senior Advisor, Industry & Business
EPA Victoria