

Survey Submission Confirmation: Review of the load-based licensing scheme

Survey Name:	Review of the load-based licensing scheme
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Q 13: Please add your comments here:	<p>The LBL scheme has the potential to be an effective tool to for the regulation of licence compliance and to provide a funding source for projects that achieve an improved environmental outcome. The scheme should not be used to raise revenue for the administration costs of the EPA, and should not be used to generate revenue from those who are meeting licence conditions. The LBL scheme could be effectively used as an alternative to other regulatory action such as Pollution Reduction Programs and fines, by providing a financial "punishment" to licence holders where they fail to meet licence conditions. This is a genuine "polluter pays" system, and would provide a simple ongoing incentive to achieve compliance with licence conditions, without the need for formal orders and fines. This would however also need to be considered in the broader catchment context, taking into account the contribution from diffuse pollution sources that are not licenced, and ensuring that the financial costs to point sources are consistent with their overall contribution to the pollutant loads on the receiving waters, and equitable. This combined with a genuine whole of government approach to regulation that takes into account the social, economic and environmental impacts, and the communities ability and willingness to pay, has the potential to provide an improved regulatory response and generate revenue to fund projects that improve environmental health beyond the limited scope of point source licensing.</p>
Q 14: Or, upload your comments:	N/A
Q 15: Confidentiality:	I give permission for my submission to be made public

