



Sydney Trains

ABN: 38 284 779 682

PO Box K349 Haymarket NSW 1238

Tel: (02) 8922 4129 Fax: (02) 8922 4592

www.sydneytrains.nsw.gov.au

23 December 2016

Our reference: DSYD2016/241724

David Fowler
Director Regulatory Reform and Advice
Environment Protection Authority
PO Box A290
SYDNEY SOUTH NSW 1232

Dear David

Re: Review of the Load-based Licensing Scheme – Issues paper

Thank you for the opportunity to provide comment on the Environment Protection Authority's (EPA) issues paper Review of the Load-based Licensing (LBL) Scheme. In general Sydney Trains is a supporter of the 'polluter pays' principal in the management of environmental impact and provides the following as comments on the options being considered by the EPA.

LBL Assessable Pollutants

Sydney Trains supports Option 2 that focuses the scheme on pollutants of higher concern. Such an approach would prevent a dilution of effort and would assist in a better discussion between industry and the EPA and the development of a more unified way forward in these key areas.

LBL Critical Zones

Sydney Trains does not provide specific comments on Critical Zone but would be cautious of supporting additional administrative burden when similar schemes and initiatives outside of LBL are likely to be at achieving the same or better outcomes.

Scheduled Activities

Sydney Trains notes that mobile sources are currently excluded from the coverage of the LBL Scheme. Sydney Trains supports the continuation of this exclusion. Because the emissions of some Scheduled Activities are predominantly mobile sources Sydney Trains would support either Option 2 or Option 3 as being appropriate approaches to any expansion of the coverage of the LBL Scheme by the EPA.

LBL Load limits

Sydney Trains is not subject to Load Limits and do not have any specific comments on the options at this point.

Further detailed comments can be provided if required.

If you have any questions regarding this submission, please contact the undersigned on 02 8922 4538.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'R Barber', with a long horizontal flourish extending to the right.

Rod Barber
A/GM Environment
Sydney Trains