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2 July 2017

Air Quality Coordinator  
Department of Environment, Land, Water and Planning  
PO Box 500  
Melbourne VIC 8002  
Via email: [air.quality@delwp.vic.gov.au](mailto:air.quality@delwp.vic.gov.au)

**Re: Clean Air for All Victorians: Victoria's Air Quality Statement**

The Victorian Water Industry Association (VicWater) is grateful to have an opportunity to respond to *Clean Air for All Victorians: Victoria's Air Quality Statement*.

VicWater is the peak body of the Victorian Water Industry, with its membership constituted by Victoria's statutory water corporations. Those corporations are responsible for the provision of urban water and wastewater services, rural water supply, including irrigation, and related drainage services.

VicWater supports the Statement's unambiguous focus on protecting human health and the environmental impacts of air pollution. There is a perception that previously the EPA's regulatory resources (for air pollution) have been disproportionately focused towards aesthetic impacts, such as odour from water corporation sewerage assets.

VicWater identified the need for a strategic realignment of regulatory focus (with regards to air quality) in the October 2015 submission on the Independent Inquiry to the EPA:

*"The EPA can do more to report the human health benefits of its regulatory activities, for example by publicly reporting the impact of various activities in terms of disability adjusted life year (DALY) saved. The recent example of the US EPA investigation into Volkswagen for exceeding vehicle emission standards demonstrated the power of using such human health metrics. The US EPA were able to provide data on the approximate number of early deaths that could be attributed to the unlawful Nitrogen Oxide emissions from Volkswagen vehicles over the period that they were in breach of the standard"*

In an ideal future state, EPA's regulatory resources would be focused on air pollution that impacts human health or the environment. Whereas odour issues would be addressed with more rigorous preventative instruments, such as buffer protections and overlays.

VicWater looks forward to further opportunities to be involved in *Clean Air for All Victorians*. Please contact James Cleaver ([James.Cleaver@vicwater.org.au](mailto:James.Cleaver@vicwater.org.au)) should you have any questions, or if you would like to discuss any of the issues raised herein in greater detail.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Amanda Smith".

**Amanda Smith**  
**Interim Chief Executive Officer**