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Via email to noiseguidelines@epa.vic.gov.au

NOISE FROM INDUSTRY IN REGIONAL VICTORIA GUIDELINES

Thank you for the opportunity for the Construction Material Processors Association (CMPA) to provide comment on the draft EPA *Noise from Industry in Regional Victoria Guidelines*.

The CMPA represents a broad spectrum of independent operators involved in construction material processing businesses engaged in the extracting, processing or otherwise working in hard rock, gravel, sand, masonry, clay, lime, soil, or recycling across Victoria.

CMPA's comments are as follows:

- CMPA supports the concept that earth resource noise limits are not planning zoned based as the location of operating quarries is subject to geological criteria. A planning zone based approach to setting recommended noise levels for quarries would have led to meaningless differences between operationally similar sites.
- CMPA supports the concept that the new noise limits for earth resource industries are slightly higher than the limits under the previous N3 guidelines.
- CMPA notes that the new noise limits may still be difficult to meet in some especially quiet rural areas and may drive the location of new operations to areas where there is a higher background noise. This potential move to "noisier" locations needs to be balanced with required buffer distances for other potential offsite impacts such as blasting.
- CMPA notes that some quarry sites may find it difficult to operate before 7am or on Saturday afternoons in quiet country areas as they will exceed the evening limit. Whilst these guidelines are intended for new sites, they may be progressively used as the new limit for existing sites into the future. This may well present operational issues which is of concern to the CMPA.
- CMPA supports that this document is a guideline rather than a statutory SEPP so that there can be some degree of flexibility in applying these guidelines and allowances made for higher noise levels in special circumstances.
- CMPA urges that the EPA not support the imposition of stricter noise requirements by a planning authority over and above the requirements of this guideline. It is noted that a planning authority may vary the guidelines recommendations to protect the amenity of areas only "as far as practicable" and the CMPA urges the EPA to ensure planning authorities fully understand this terminology.
- CMPA urges the EPA to continue to provide advice, tools and support to industry on noise issues. To assist this, the guidelines should contain contact details of regional and head office noise experts that industry can consult to discuss any noise issues they may have.
- CMPA has concerns regarding the cost of any ongoing offsite monitoring that may be required. Advice from EPA on a cost effective methodology and equipment to the Work Authority holder would be appreciated.

- CMPA suggests that Government funding be available to encourage industry best practice in operations and monitoring activities. This could be considered as part of a total package of minimising/monitoring offsite impacts, including such issues as noise and dust.

If you have any questions on the CMPA's submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Roger Buckley". The signature is written in a cursive style with a long, sweeping tail.

Roger Buckley
Executive Director
CMPA