

**Name**

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**1. One objective of the Draft SEPP (Waters) review is to provide a framework to protect and improve the quality of Victoria's waters.**

**2. The second objective of the Draft SEPP (Waters) is to improve certainty for the industry to enable compliance.**

**3. The third objective of the Draft SEPP (Waters) is to improve clarity for industry to enable improved compliance.**

**4. Has the Draft SEPP (Waters) achieved these objectives?**

Partially

**5. Is there anything missing that would help the Draft (SEPP) Waters meet its objectives?**

The CMPA agrees with the approach of combining the State Environment Protection Policies (SEPPs) - Waters of Victoria, and Groundwater's of Victoria, into one single policy. The CMPA approves the main objectives of the Draft SEPP: 1. To provide a framework to protect and improve the quality of Victoria's waters. 2. To improve certainty for the industry to enable compliance. 3. To improve clarity for industry to enable improved compliance. An additional objective would be the provision of clarity, consistency and certainty by the regulator.

**6. Do you have specific comments on clauses 1-19 of the Draft SEPP (Waters), including the explanatory notes? Is there sufficient clarity of rules and obligations to enable implementation?**

The requirement is for a risk assessment to be conducted on a case by case basis in assessing practicability and gives consideration to environmental, social and financial aspects. The accompanying Policy Impact Assessment (PIA) does not address the costs associated with "as far as practicable" nor the requirement for continuous improvement.

**7. Do you have specific comments on clauses 20-31 of the Draft SEPP (Waters), including the explanatory notes? Is there sufficient clarity of rules and obligations to enable implementation?**

**8. Do you have specific comments on clauses 32-42 of the Draft SEPP (Waters), including the explanatory notes? Is there sufficient clarity of rules and obligations to enable implementation?**

**9. Do you have specific comments on clauses 43-52 of the Draft SEPP (Waters), including the explanatory notes? Is there sufficient clarity of rules and obligations to enable implementation?**

**10. Do you have specific comments on clauses 53-59 of the Draft SEPP (Waters), including the explanatory notes? Is there sufficient clarity of rules and obligations to enable implementation?**

**11. Are the Schedules easy to understand and use? General comments - please identify the section of the schedules you are commenting on.**

**12. Do you have any comments on the Policy Impact Assessment?**

The PIA does not go into detailed estimate of costs associated with changes proposed to the draft SEPP WoV. Concern is held that a move to a risk based approach as proposed and the costs, where, given, may have been underestimated. Measures adopted to manage wastewater must be cost effective and proportionate to the risk.

**13. Has the Draft Implementation Plan identified the highest priorities to be addressed in the first 3-5 years of implementing the policy?**

**14. Why have you provided the response to question 13**

**15. Other general items**

No file specified

**Privacy and confidentiality**

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**16. Tick this box if you do not want your submission published or content quoted in the DELWP response report.**

Regards,  
The Engage Victoria Team