

PORT KEMBLA POLLUTION MEETING

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16/12/16

Re: Load Based Licensing Consultation

Please be advised that the PKPM (Port Kembla Pollution Meeting) committee had studied the consultation document and if we interpret the system correctly we only have the following comments:

The shortcomings that we can see with the system are:

1- That similar industries are all tarred with the same brush when it comes to their license fee.

Whilst the pollutants emitted might be the same across similar industries, each individual business might emit much more than another similar industry.

2- If that is not the case and fees are based on individual businesses a possible shortcoming of the system is perhaps when, to determine their license fee, an individual business provides data on the volumes of expected pollution . The volume of pollution stated could be understated in order to achieve a lesser licensing fee.

3- We also note that with some industries it is very difficult to determine what the actual level of pollution is. For example, it is not possible to determine the actual level of wind blown pollution that is emitted from an open stockpile.

We do appreciate the complexities of the LBL system and the application thereof. We agree with the philosophy of the system. We believe that having this system, in whatever form it takes, is far better than not having the system.

Thank you for the opportunity to comment.

**Mark Peterlin
For and on behalf of PKPM.**

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