

DISCUSSION PAPER

Draft Licence Fee Structure

FOR PUBLIC CONSULTATION

May 2006

Public consultation

The EPA seeks your views regarding the details of the *Draft Licence Fee Structure* and would appreciate your comments by **Friday 30th June 2006**.

All submissions received by the EPA will be acknowledged and treated as public documents unless provided in confidence, subject to the requirements of the *Freedom of Information Act 1991*, and may be quoted in EPA reports.

You may provide your comments online at the EPA consultation web site—www.epacomments.sa.gov.au—or you can forward them by mail, fax or e-mail to:

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Introduction

The EPA intends to change the way that fees for licences under the *Environment Protection Act 1993* (the Act) are determined. It plans to implement the changes from 1 July 2007. As part of this process, in November and December 2004, we consulted stakeholders on some of the basic elements of the proposed system. We now seek your views on some options for the proposed system.

The EPA is developing the new licensing system in consultation with a reference group composed of members from organisations that represent many licensees. These organisations include Business SA, SA Water, the Engineering Employers Association, SA Chamber of Mines and Energy, SA Farmers' Federation, SA Wine Industry Association, Northern Industries Environmental Forum, the power sector in the Port River region, Department of Trade and Economic Development, Waste Management Association, Local Government Association, and the Environmental Defenders' Office representing the community.

Independent consultants, BDA Group, together with the EPA, have developed the proposed fee structure. This discussion paper summarises their proposals. For more information, refer to BDA Group's report 'A proposed licence fee system for South Australia', available on the EPA website at <www.epa.sa.gov.au> or phone 8204 1096 and ask us to post a copy of the report to you.

Licence fees make up about 25% of the EPA's revenue and are used solely for managing the licensing system. This includes compliance, inspection and enforcement. For a detailed breakdown of what licence fees are used for, see Section 1.1 of the consultant's report¹.

What this paper is about

This paper explains the structure of the new licensing system that has been developed so far, and outlines some options for which we are seeking your input. The paper:

- gives an overview of the proposed system
- describes the parts of the new system on which we would like your opinion
- tells you the best way of communicating your views to us
- explains how we will move towards the new system.

We have tried to build a fairer fee structure, but as it needs to cater for the varied activities that businesses undertake, there is a lot of detail that may not apply to you. To overcome this, we will refer to sections of the consultant's report that give comprehensive information about the proposal. Although we encourage you to read all of this document, we understand that you may only be interested in some aspects of the proposed licence fee system.

¹ Consultant's report 'A proposed licence fee system for South Australia', available on the EPA website at <www.epa.sa.gov.au>.

Why change the system?

The existing licensing fee system is an amalgamation of systems under various acts that were repealed on commencement of the Act. The *Environment Protection (Fees and Levy) Regulations* were developed when the EPA was established in 1995 and, although periodic review is good practice, there are also more compelling reasons.

The Environment, Resources and Development Committee of Parliament, and a subsequent detailed review of the licensing system, noted that under the existing system, fees are based on indicators of economic activity, rather than on environmental impact, and thus give no incentive to improve environmental performance. This penalises businesses that are able to lift production without increasing emissions of pollutants.

In view of this, the Government has decided that the use of load-based licensing (where licence fees are based on the amount and types of pollutants discharged to the environment) should be extended. Currently, about 20% of licence fees are based on a load-based system for discharges to the marine environment; there is no similar system for discharges of pollutants to freshwater, land or the atmosphere.

Furthermore, the EPA's experience as an environmental regulator since the commencement of the Act has shown that although some activities cost more time and effort than others, this is not fully reflected in the existing fee structure. Fees need to fairly reflect the regulatory effort required by the EPA, so that business activities that require more of our effort to regulate, pay appropriate fees, rather than this cost being spread across other businesses.

We have two aims in reviewing the system:

- to recover, in an efficient and equitable manner, the costs we incur due to the environmental management of licences
- to provide an economic incentive to reduce pollution.

We are aiming for a much better system than the present one, one where licensees can be confident that they are paying a fair proportion of the cost of managing licences.

What is proposed?

We are proposing that in the future, licence fees would consist of up to three components:

- a **flat minimum fee** of \$235 per licence to cover the minimum paperwork common to all licences
- an **environment management fee** that reflects the cost to the EPA of managing a licence. We intend to apply this by basing the fee on the activity that incurs the highest cost out of all activities carried out on a site. Waste transport, dredging and earthworks drainage, if applicable, will be an additional charge. This single fee will include the costs of managing the other activities. To find out which scheduled activities apply to a licensed site, see the front page of the licence for that site.

You can look up the fee in the Environment Management Fee Schedule in Attachment A.

- a **load-based fee**, which is a fee for the pollutants discharged from the licensed site to the environment. We've included pollutants that are key environmental issues in South Australia. We have specified emission thresholds to ensure that significant emissions are captured. Refer to Attachment B for a list of pollutants and emission thresholds. If the pollutants on the list are not discharged from a site, or the discharge is less than the emission threshold, then the load-based fee would not apply to that site. We expect that the load-based fee would apply to about 100-200 licences. As a guide, if you don't need to report your pollutant emissions to the National Pollutant Inventory (NPI), the load-based component may not apply to you. However, we've also included some pollutants, such as suspended solids in the load-based fee, which although not NPI pollutants, are important environmental issues in South Australia. If you're unsure whether the load-based component applies to you, please contact your licence coordinator or the project officer on 8204 1096.

The extension of load-based licensing builds on the incentives offered in 2003, namely accredited licences and fee reductions for entering into environment performance agreements.

The EPA offers accredited licences to reward best practice environmental management. A 50% discount on the total licence fee (including the load-based fee) is available for holders of an accredited licence. For more details, refer to the EPA website for the guideline on accredited licences at www.epa.sa.gov.au/pdfs/guide_accreditation.pdf and the consultant's report section 6.1.

As an additional incentive for improved environmental performance, the EPA may offer fee reductions for licensees who enter into an environment performance agreement. Entering into an environment performance agreement can mean an immediate fee reduction for licensees who are willing to commit to future sustained reductions in emissions. For more information, refer to section 6.2 of the consultant's report.

How to calculate a licence fee

A flowchart describing how to calculate a licence fee is shown in Attachment D.

Example calculations are shown in Attachment C.

What we would like your views on

We would like to hear your views on the split between the different components of the fee structure, the use of a fee cap and its level, and the use of the factor 'proximity to residents' in the environment management fee schedule.

The split between the environment management and the load-based components of the fees

The split between the load-based component and the other parts of the fee structure has been the subject of much discussion in both the EPA and the reference group. The split is in the different components of the overall fee structure (total EPA licence fees), not the split for each individual licence. Some licences will not have any load-based component at all.

A very high load-based component in the overall fee structure would make a few industries pay for the majority of the cost of EPA licence management in South Australia. A small load-based component would mean that individual businesses with high discharge loads have little or no financial incentive to reduce their pollutant discharges.

The EPA has suggested a load-based component of between 30% and 40% of licence fees. In this range, there is some financial incentive to reduce pollution loads without making a few industries pay most of the EPA licence fees. We are recommending as a starting point for consultation, a 35% load-based component in the overall fee structure.

The value of the fee units will change if the load-based component percentage changes. In the Tables 1, 2 and 3 below you will see:

- the value of the environment management fee unit when the load-based component of the fee structure accounts for 30%, 35% and 40% of total licence fees. The fee unit reduces as the percentage load-based component increases
- the fee per tonne of different pollutants at 30%, 35% and 40% load-based components. The fees increase as the load-based component increases.

Table 1 Draft monetary value of the environment management fee unit at different load-based component percentages in the overall fee structure.

Load-based component percentage	Environment management fee (unit)
30%	\$377
35%	\$348
40%	\$318

Table 2 Draft fee for pollutants discharged to the air at varying load-based component percentages in the overall fee structure.

Pollutant	Fee at 30% LBC	Fee at 35% LBC	Fee at 40% LBC
sulphur dioxide, nitrogen oxides (\$/tonne)	2.9	3.7	4.6
particulates, volatile organic compounds (\$/tonne)	29	37	46
lead (\$/tonne)	292	369	455

Table 3 Draft fee for pollutants discharged to water with varying load-based component percentages in the overall fee structure.

Pollutant	Fee at 30% LBC	Fee at 35% LBC	Fee at 40% LBC
temperature (\$/MW)	2.9	3.7	4.6
suspended solids, nitrogen, phosphorus, organic matter, zinc (\$/tonne)	29	37	46
lead, copper (\$/tonne)	292	369	455

Section 7 of the consultant's report has more information on the split, and Attachment 6 of the consultant's report shows the value of the environment management fee unit and pollutant fees for 10% up to 60% load-based component in the overall fee structure.

The proposed changes in EPA licence fees will align the cost of licences more closely with the cost of regulating each activity, and provide a modest incentive to reduce pollutant emissions. While this means that the cost of some licences will fall, others will rise. Fee reductions and increases have economic effects, but a better fit between the cost of managing the licences and the potential or actual environmental effect of activities will make for a fairer system. Changes in licence fees by activity groups are shown in Attachment E.

The final load-based component percentage that will be recommended to the Government will be informed by the comments we receive during consultation. Please advise us what your preferred load-based component percentage in the overall fee structure is, as well as your reasons.

Fee cap on load-based component

A small number of licences would pay very high fees under the proposed system (35% load-based component). The EPA has encouraged these licensees through environment improvement plans (EIPs) to invest significant amounts in reducing their discharges to much lower levels. We are therefore proposing a fee cap of \$500,000 per licence. That means that the maximum load-based fee that would apply to any one licensed site is \$500,000. As these licensees reduce their discharges, their fees would still provide an incentive to further reduce their discharge loads.

The fee cap increases the incentive to improve environmental performance. The fee cap also enabled us to adjust the zone weightings for lead emissions in Port Pirie to reflect the importance of reducing lead emissions.

Proximity to residents

A factor, 'proximity to residents', has been included for some types of activities in the environment management fee schedule in Attachment A. It has only been included if an activity generally requires more of the EPA's time and attention when it is closer to

residents². This would result in a fairer licence fee system—those activities would attract a higher licence fee.

In the previous round of consultation on options for a licence fee structure (November and December 2004), we received a lot of comments on this issue. Some felt that it was unfair to include this—for example, if they were located close to residents because of poor planning decisions.

If we did **not** include this factor, there would be cross-subsidisation of licence fees. The environment management fee unit would increase from \$348 to \$369³. Fees would increase for activities without this factor in the fee schedule (e.g. waste transporters) or where the licensee is located further away from residents than the distance in the environment management schedule. Fees would reduce for licences for activities carried out close to residents (where proximity to residents applies).

So that we can analyse comments on 'proximity to residents' properly, please let us know whether you believe your fees would increase or decrease if we did **not** use this factor in the environment management fee schedule.

Interstate comparisons

Other states in Australia also regulate businesses that discharge pollutants. The form of regulation differs in some states for some activities and it is often difficult to make a direct comparison. Victoria, New South Wales and Western Australia have a load-based component in their fee structures.

Some interstate fee comparisons are included in section 8.5 of the consultant's report, where licence fees for similar activities in another state could be compared with proposed fees in South Australia.

How does this affect me?

The new licence fee system will result in fee increases or decreases for individual licensees. We will only charge you for the single scheduled activity that attracts the highest fee, rather the accumulated fees from the different activities that you may undertake at your licensed site (except for waste transport, dredging and earthworks drainage). You may also be liable for a load-based fee for emissions of pollutants to the environment.

Information on the impact of the change for activity groups is provided in Attachment E.

² For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

³ At 35% load-based component.

How can I give feedback?

You can give feedback by

- filling in the comment slip at the back of this discussion paper (before the attachments) and posting it to: Licence Fee Structure Consultation, Environment Protection Authority, GPO Box 2607, Adelaide SA 5001
- sending an e-mail with your comments to bettina.venner@epa.sa.gov.au
- making your comments online at <www.epacomments.sa.gov.au>
- writing us a letter and posting it to: Licence Fee Structure Consultation, Environment Protection Authority, GPO Box 2607, Adelaide SA 5001.

How will my comments be used?

The responses we get from you will be used in the same way as the previous input for the development of the new system. Responses, and individual points and opinions expressed will be separated and collated. They will be summarised by the project group and will be available for you to see on the EPA website (along with previous responses). You will also be able to see your original comments, without your personal details. The reference group and the EPA Board will use this as they make decisions on the details of the new licensing system that will be recommended to the government.

Please note that your name and other details will not be attached to your comments, and will only be viewed by the EPA officers who are collating the responses. Your personal details will not be seen by the reference group or the Board, and will not be available on the EPA website for others to see.

How will I find out about the outcome?

The project group will keep your contact details (unless you ask us to delete them) and we will inform you directly about the outcome of consultation. Information about the new licensing system will be posted on the EPA web site by about March 2007. We will also post information on the new licensing system to all licensees by about April 2007.

When will the changes happen?

The new fee system will begin from 1 July 2007. Invoices for licences with a renewal date after 1 July 2007 will be based on the new fee system.

What if I have questions about my fees under the new system?

Information will be made available to you in a number of ways:

- material posted directly to you
- on the EPA website
- contact with your EPA licence coordinator (name and number on the top of your licence)
- at a public meeting (see list of dates below)

- you can also contact the project officer on 8204 1096.

In the lead up to the introduction of the new fee system, you will be able to have your new fee calculated for you by faxing the attached calculation sheet (Attachment F) and your contact details to 8124 4674.

What does the EPA want comments on?

There are some aspects of the fee system that we'd like you to comment on. However, you are free to comment on any other aspects as well.

We're looking for comments on:

- the process of developing a new licence fee structure
- the details of the flat minimum, environment management and load-based components
- the split between the environment management and load-based components
- the use of a fee cap, as well as the level of the fee cap (proposed at \$500,000)
- the use of the factor 'proximity to residents' in the environment management fee schedule.

Schedule of public meetings (time and venue to be advised)

Monday 29 May	Port Lincoln
Tuesday 30 May	Port Augusta
Wednesday 31 May	Barossa Valley
Thursday 1 June	McLaren Vale/Victor Harbor
Monday 5 June	Mount Gambier
Tuesday 6 June	Riverland
Wednesday 7 June	Port River area
Thursday 8 June	Edwardstown/Adelaide southern suburbs

Please let us know which of the public meetings you'd like to attend by fax (8124 4674), phone (8204 1096), email (bettina.venner@epa.sa.gov.au) or post (Licence fee structure consultation, Environment Protection Authority, GPO Box 2607, Adelaide, SA 5001). We will let you know when and where the meetings will be when we know how many people will attend.

If your industry group is interested in a more personalised meeting, please contact the project officer on 8204 1096 or bettina.venner@epa.sa.gov.au

Comments

All contact details are confidential and will not be shared with the Reference Group.
Your contact details will only be seen by the EPA project group.

Your:

Name

Address

Phone Fax.....

Licensee? (yes/no) Licence number (for further follow-up).....

Your comments:

on the process for developing a new fee structure

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on the flat minimum component

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on the environment management component

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on the load-based component

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on the split between the environment management and load-based components

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on the use of a fee cap, as well as the level of the fee cap (proposed at \$500,000)

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on the use of the factor 'proximity to residents' in the environment management fee schedule for some activities (note: please let us know if you think your fees will increase or decrease if we remove this factor, in order for us to analyse the results properly)

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Other comments:

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Attachment A: Environment management fee schedule

The EPA's preferred split between the environment management and load-based performance components is in the range of 30-40% load-based component, with 35% recommended as the starting point for consultation. At 35% load-based component, the value of the environment management component fee unit is \$348.

Table A 1 Draft schedule of environment management fees

Regulation reference	Prescribed activity	Characteristics	Fee units payable
1(1)	chemical storage and warehousing facilities	100 metres or less from watercourse**	20
		more than 100 metres but less than 500 metres from watercourse**	8
		500 metres or more from watercourse**	4
1(2)(a)(i)	chemical works— inorganic	soda ash plant	50
		uranium plant, where the main or a significant co-product is uranium	20
		other (i.e. not soda ash or uranium plant)	8
1(2)(a)(ii)	chemical works— organic	500 metres or less from residents [‡] and VOC emissions above 100 tonnes per year	20
		other (i.e. emissions below thresholds and/or more than 500 m from residents [‡])	8
1(2)(b)	chemical works— salt production	chemical works—salt production	3
1(3)	coke works	coke works	50
1(4)	oil refineries	oil refineries	50
1(5)(a)	petroleum storage	500 metres or less from watercourse**	8
		other (i.e. further than 500 metres from watercourse**)	3
1(5)(b)	petroleum production	1000 tonnes per year or more of VOC (volatile organic compound) emissions	50
		500 tonnes per year or more, but less than 1000 tonnes per year of VOC emissions	30
		other (i.e. emissions below 500 tonnes VOC)	8
1(6)	wood preservation works	other than LOSP (light organic solvent preservation)	30
		LOSP (light organic solvent preservation)	8
2(1)	abrasive blasting	mobile	4

** Watercourse is defined as a blue line on a 1:50,000 map for the purposes of the fee schedule

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

Regulation reference	Prescribed activity	Characteristics	Fee units payable
		other (i.e. not mobile)	3
2(2)	hot mix asphalt preparation	mobile	12
		other (i.e. not mobile)	8
2(3)	cement works	500 metres or less from residents [†] and emitting 100 tonnes per year or more of particulate emissions	50
		further than 500 metres from residents [†] and emitting 100 tonnes per year or more of particulates; or 500 metres or less from residents [†] and emitting less than 100 tonnes per year	30
		other (i.e. >500 m from residents [†] and <100 tonnes per year particulate emissions)	20
2(4)	ceramic works	glass works with 25 tonnes per year or more of particulate emissions	30
		brick works with 2 tonnes per year or more of fluoride emissions	12
		other (e.g. pottery)	4
2(5)	concrete batching works	concrete batching works	3
2(6)	drum reconditioning	drum reconditioning	3
2(7)	ferrous and non-ferrous metal melting	within 1000 metres of residents [†] and does not meet EPA guidelines on odour (EPA Guideline 373/06)	50
		within 1000 metres of residents [†] and meets EPA guidelines on odour (EPA Guideline 373/06)	20
		other (i.e. more than 1000 metres from residents [†])	8
2(8)	metallurgical works	metallurgical works	50
2(9)	mineral works	mineral works	12
2(10)	pulp or paper works	pulp or paper works	50
2(11)	scrap metal recovery	distance to watercourse** 50 metres or less	8
		other (i.e. further than 50 metres from watercourse**)	3

[†] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

** Watercourse is defined as a blue line on a 1:50,000 map for the purposes of the fee schedule

Regulation reference	Prescribed activity	Characteristics	Fee units payable
2(12)(a)	surface coating works—metal finishing	surface coating works—metal finishing	12
2(12)(b)	surface coating works—hot dip galvanising	surface coating works—hot dip galvanising	12
2(12)(c)	surface coating works—spray painting or powder coating	surface coating works—spray painting or powder coating	3
2(13)	wood processing works	100 metres or less from residents [‡] and emitting 50 tonnes per year or more of particulate emissions	20
		further than 100 metres from residents [‡] and emitting 50 tonnes per year or more of particulate emissions; or 100 metres or less from residents [‡] and emitting less than 50 tonnes per year of particulate emissions	12
		other (i.e. further than 100 metres from residents [‡] and emitting less than 50 tonnes per year of particulate emissions)	3
2(14)	maritime construction works	maritime construction works	3
2(15)	vehicle production	vehicle production	30
3(1)(a)	incineration—chemical wastes	incineration—chemical wastes	50
3(1)(b)	incineration—medical wastes, cytotoxic wastes, quarantine wastes	incineration—medical wastes, cytotoxic wastes, quarantine wastes	50
3(1)(c)	incineration—cremation	incineration—cremation	3
3(1)(d)	incineration—solid municipal waste	incineration—solid municipal waste	50
3(1)(e)	incineration—solid trade waste	incineration—solid trade waste	50
Note: For sewage treatment works or septic tank effluent disposal schemes listed below, licensees can drop a fee level if all discharge is sustainably irrigated to land			
3(2)(a)	sewage treatment works or septic tank effluent	wastewater 10,000 ML or more per year	50
		wastewater 20 ML or more but less than 10,000 ML per year	30

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

Regulation reference	Prescribed activity	Characteristics	Fee units payable
	disposal schemes—discharge to marine waters	wastewater <20 ML per year	4
3(2)(b)	sewage treatment works or septic tank effluent disposal schemes—discharge to land or inland waters (Mt Lofty Ranges Water Protection Area)	wastewater 10,000 ML or more per year	50
		wastewater 20 ML or more but less than 10,000 ML per year	30
		wastewater <20 ML per year	8
3(2)(c)	sewage treatment works or septic tank effluent disposal schemes—discharge other than Mt Lofty Ranges Water Protection Area or marine	wastewater 10,000 ML or more per year	50
		wastewater 20 ML or more but less than 10,000 ML per year	20
		wastewater <20 ML per year	4
<p>Note: landfills complying with the technical specifications in the draft landfill guidelines can move down a fee level in the fee schedule. The levels are 50, 30, 20, 12, 8, 4, 3 or 1 fee units.</p> <p>Note: apply fees as listed under activity 3(2) above to a liquid wastewater treatment plant that is similar in function to a sewage treatment works</p>			
3(3)	waste depots (liquid waste)	open facility located 300 metres or less from residents [‡]	30
		open facility located more than 300 metres from residents [‡]	20
		enclosed facility further than 300 metres from residents [‡]	12
	waste depots (other than liquid waste)	landfill classification L	30
		landfill classification MB+	8
		landfill classification MB-	8
		landfill classification SB+	4
		landfill classification SB-	4
	recycling depot or transfer station	open facility located 300 metres or less from residents [‡] , with a crusher	20
		open facility located 300 metres or less from residents [‡] , without a crusher	8

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

Regulation reference	Prescribed activity	Characteristics	Fee units payable
		open facility located more than 300 metres from residents [‡] , with a crusher	8
		open facility located more than 300 metres from residents [‡] , without a crusher	4
		enclosed facility	3
		waste oil recycling facility taking less than 20,000 litres of waste oil per year	3
		battery collection and recycling facility only	1
3(4)	activities producing listed wastes	more than 250 tonnes per year	12
		more than 100 tonnes but not more than 250 tonnes per year	4
		medical waste only	1
		listed waste produced from metal finishing works or waste containing chlorohydrocarbons	8
		up to and including 100 tonnes per year	3
3(5)	waste transport business (Category A) per vehicle	waste transport business (Category A) per vehicle excluding the transport of 40 litres or less medical waste per trip	0.9
		waste transport business (Category A) per vehicle—transport of 40 litres or less medical waste per trip	0.3
3(6)	waste transport business (Category B) per vehicle	Waste transport business (Category B) per vehicle	0.3
4(1)	Brukung mine site	Brukung mine site	30
4(2)(a), (b) and (c)	discharge of stormwater to underground aquifers	discharge of stormwater to underground aquifers in the City of Mount Gambier or the Western Industrial Zone of the District Council of Mount Gambier or Metropolitan Adelaide	12
5(1)	cattle feedlots	cattle feedlots	4
5(3)	saleyards	facility located within South East region and volume of effluent 20 ML or more per year	12
		facility located within South East region and volume of effluent below 20 ML per year	4
		facility located outside South East region and volume of effluent 20 ML or more per year	8
		facility located outside South East region and volume of effluent below 20 ML per year	3
5(4)	piggeries	piggeries	8

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

Regulation reference	Prescribed activity	Characteristics	Fee units payable
6(1)(a)	abattoirs, slaughterhouses or poultry processing works—not poultry	100 ML per year or more wastewater and buildings and/or disposal areas within 500 metres of residents [‡]	30
		100 ML per year or more wastewater, OR buildings and/or disposal areas within 500 metres of residents [‡]	12
		less than 100 ML per year wastewater or all wastewater discharged to sewer, and buildings and/or disposal areas further than 500 m from residents [‡]	4
6(1)(b)	abattoirs, slaughterhouses or poultry processing works—poultry only	100 ML per year wastewater or more and buildings and/or disposal areas closer than 300 metres to residents [‡]	30
		100 ML per year or more wastewater, OR buildings and/or disposal areas within 300 metres of residents [‡]	12
		less than 100 ML per year wastewater or all wastewater discharged to sewer, and buildings and/or disposal areas further than 300 m from residents [‡]	4
6(2)	breweries	more than 20 ML of wastewater produced per year and wastewater management and disposal facilities located within 50 metres of watercourse ^{**}	30
		more than 20 ML of wastewater produced per year and wastewater management and disposal facilities located further than 50 metres of watercourse ^{**}	20
		up to and including 20 ML of wastewater produced per year and wastewater management and disposal facilities located within 50 metres of watercourse ^{**}	12
		all effluent disposed to sewer and wastewater management and disposal facilities within 50 metres of watercourse ^{**}	8
		other (i.e. less than 20 ML wastewater, wastewater management and disposal facilities further than 50 metres from watercourse ^{**} , not to sewer)	4
		all effluent disposed to sewer and wastewater management and disposal facilities located further than 50 metres from watercourse ^{**}	3

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'

^{**} Watercourse is defined as a blue line on a 1:50,000 map for the purposes of the fee schedule

Regulation reference	Prescribed activity	Characteristics	Fee units payable
6(3)	composting works	within 500 metres of residents [‡] , and waste other than green waste only	20
		green waste only, and within 500 metres of residents, or waste other than green waste only and further than 500 metres from residents [‡]	12
		green waste only, and further than 500 metres from residents [‡]	8
6(4)	fish processing	discharge to marine or inland waters	8
		no discharge to marine or inland waters (i.e. discharge to land)	4
		discharge to sewer only, or no discharge at all	3
6(5)	milk processing works	effluent not discharged to sewer	12
		effluent discharged to sewer	8
6(6)(a)	produce processing works—deep fat frying, roasting or drying	produce processing works—deep fat frying, roasting or drying	4
6(6)(b)	produce processing works—more than 10,000 litres of wastewater (not to sewer)	olive processing	12
		other than olive processing	8
<p>Note: Rendering or fat extraction works can move down one fee level in the schedule if they achieve 90% or more reduction in BOD, 99% or more reduction in oil and grease and 95% reduction in suspended solids. The levels in the fee schedule are 50, 30, 20, 12, 8, 4, 3 or 1 fee units.</p>			
6(7)	rendering or fat extraction works	greater than 100 ML of wastewater produced per year, and 1000 metres or less from residents [‡]	30
		greater than 100 ML of wastewater produced per year, and further than 1,000 metres from residents [‡]	20
		100 ML or less of wastewater produced per year, and 1000 metres or less from residents [‡]	20
		100 ML or less of wastewater produced per year, and further than 1000 metres from residents [‡]	12
6(8)	curing or drying works	curing or drying works	3

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

Regulation reference	Prescribed activity	Characteristics	Fee units payable
6(9)	tanneries or fellmongeries	volume of wastewater greater than 10 ML per year and/or located 500 metres or less from residents [†]	12
		other (i.e. volume of effluent below 10 ML per year or all discharged to sewer, and located further than 500 metres from residents [†])	3
6(10)	wool scouring or wool carbonising works	wastewater discharge not to sewer	8
		wastewater discharge to sewer	3
<p>Note: Wineries meeting the technical EPA requirements for BOD, suspended solids and salt removal can move down a fee level in the schedule below. The requirements are: Implementation of treatment recovery system capable of removing >85% of BOD and suspended solids load, and implementation of salt recovery or salt removal systems removing >50% of EC or TDS load. The levels in the fee schedule are 50, 30, 20, 12, 8, 4, 3 or 1 fee units.</p>			
6(11)	wineries or distilleries in Mt Lofty Ranges Water Protection Area	more than 10 ML of wastewater produced per year and wastewater management and disposal facilities located within 50 metres of watercourse**	30
		more than 10 ML of wastewater produced per year and wastewater management and disposal facilities located further than 50 metres of watercourse**	20
		up to and including 10 ML of wastewater produced per year and wastewater management and disposal facilities located within 50 metres of watercourse**	20
		all effluent disposed to sewer and wastewater management and disposal facilities within 50 m of a watercourse**	12
		other (i.e. up to and including 10 ML of wastewater produced per year and wastewater management and disposal facilities located further than 50 metres from a watercourse**)	8
		all effluent disposed to sewer and wastewater management and disposal facilities located further than 50 metres of watercourse**	4
		wineries or distilleries not in Mt Lofty Ranges Water Protection	more than 20 ML of wastewater produced per year and wastewater management and disposal facilities located within 50 metres of watercourse**

[†] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

** Watercourse is defined as a blue line on a 1:50,000 map for the purposes of the fee schedule

Regulation reference	Prescribed activity	Characteristics	Fee units payable
	Area	more than 20 ML of wastewater produced per year and wastewater management and disposal facilities located further than 50 metres of watercourse**	20
		up to and including 20 ML of wastewater produced per year and wastewater management and disposal facilities located within 50 metres of watercourse**	12
		all effluent disposed to sewer and wastewater management and disposal facilities within 50 metres of watercourse**	8
		other (i.e. less than 20 ML per year wastewater, wastewater management and disposal facilities further than 50 metres from watercourse**, not to sewer)	4
		all effluent discharged to sewer and wastewater management and disposal facilities located further than 50 metres from watercourse**	3
7(1)	bulk shipping facilities	bulk shipping facilities	8
7(2)	railway operations	railway operations	8
7(3)(a)	crushing, grinding or milling chemicals or rubber	300 metres or less from residents [‡]	20
		greater than 300 metres but within 1000 metres from residents [‡]	12
		further than 1000 metres from residents [‡]	4
7(3)(b)	crushing, grinding or milling agricultural crop products	Mobile	8
		other (i.e. not mobile and not olive processing)	4
		olive processing	12
7(3) (c)	crushing, grinding or milling rock ores or minerals	300 metres or less from residents [‡]	12
		greater than 300 metres but closer within 1000 metres from residents [‡]	8
		further than 1000 metres from residents [‡]	4
7(4)	dredging	dredging (if suspended solids >25 mg/L)	1 fee unit per day
7(5)	coal handling and storage	coal handling and storage	3

** Watercourse is defined as a blue line on a 1:50,000 map for the purposes of the fee schedule

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

Regulation reference	Prescribed activity	Characteristics	Fee units payable
7(6)	earthworks drainage	earthworks drainage (if suspended solids >25 mg/L)	1/4 fee units per day
7(7)	extractive industries in watershed protection area	within 1000 metres of residents [‡]	8
		further than 1000 metres from residents [‡]	4
	extractive industries not in watershed protection area	1000 metres or less from residents [‡]	4
		greater than 1000 metres from residents [‡]	3
8(1)	aerodromes	aerodromes	3
8(2)(a)	fuel burning coal or wood (refer to Figure B.1 in Attachment B for the Adelaide airshed)	located within Adelaide airshed with emissions above 500 tonnes per year of nitrogen oxides	50
		located within Adelaide airshed with emissions above 30 tonnes per year and up to 500 tonnes per year of nitrogen oxides	30
		located outside Adelaide airshed with nitrogen oxide emissions above 500 tonnes per year	30
		located within Adelaide airshed with emissions below 30 tonnes per year of nitrogen oxides	12
		located outside Adelaide airshed with emissions between 30 and 500 tonnes per year of nitrogen oxides	12
		located outside Adelaide airshed with emissions below 30 tonnes per year of nitrogen oxides	4
		located within Adelaide airshed with emissions above 500 tonnes per year of nitrogen oxides	30
	fuel burning not coal or wood (refer to Figure B.1 in Attachment B for the Adelaide airshed)	located outside Adelaide airshed with emissions above 500 tonnes per year of nitrogen oxides	20
		located within Adelaide airshed with emissions above 30 tonnes per year and up to 500 tonnes per year of nitrogen oxides.	20
		internal combustion engines using diesel for greater than 25 hours per year	8
		located within Adelaide airshed with emissions below 30 tonnes per year of nitrogen oxides	8
		located outside Adelaide airshed with emissions more than 30 tonnes and up to 500 tonnes per year of nitrogen oxides	8

[‡] For the purposes of the environment management fee schedule, 'residents' is defined as 'residential zone'.

Regulation reference	Prescribed activity	Characteristics	Fee units payable
		located outside Adelaide airshed with emissions below 30 tonnes per year of nitrogen oxides	3
		internal combustion engines using diesel for less than 25 hours per year	1
8(2)(b)	fuel burning—stove enamel or baking or drying materials	fuel burning—stove enamel and baking or drying materials	3
8(3)	helicopter landing facilities	helicopter landing facilities	1
8(4)	marinas and boating facilities	marinas and boating facilities	3
8(5)	motor racing or testing venues	motor racing and testing venues	3
8(6)	shooting ranges	shooting ranges	1
8(7)	discharges to marine or inland waters	discharges of 100 ML per year or greater	20
		discharges of less than 100 ML per year but more than 10 ML per year	8
		discharges of less than 10 ML per year	4
Various activities	licensed site post permanent closure, when the scheduled activity of environmental significance is no longer taking place on the site	post-closure licence if requested by EPA	3

Attachment B: Load-based component

A licensee with emissions above threshold levels would need to pay a fee for each liable pollutant, calculated as:

$$\text{Pollutant load fee} = (\text{kilograms of pollutant emitted}) \times (\text{pollutant fee}) \times (\text{zone weighting})$$

The zone weighting is 1 except for the pollutant and zone combinations shown in Tables B.3 and B.4.

The air and water pollutant emission threshold levels are shown in Tables B.1 and B.2. The load-based component would only apply for emissions above the threshold levels shown in these tables.

Table B 1 Proposed air pollutant emission threshold levels

Pollutant	Emission threshold level per year
sulphur dioxide, nitrogen oxides	10,000 kg
particulates, volatile organic compounds	1000 kg
lead	100 kg

Table B 2 Proposed water pollutant emission threshold levels

Pollutant	Emission threshold level per year
temperature	10 MW ⁴
suspended solids, nitrogen, phosphorus, organic matter, zinc	1000 kg
lead, copper	100 kg

Table B 3 Proposed environmental zones and weightings for air pollutants

Zone	Pollutants	Weighting
Port Pirie	lead	30
Whyalla	particulates	4
Adelaide metro airshed	volatile organic compounds, nitrogen oxides	2
Port Pirie	sulphur dioxide	2
Mount Gambier	particulates	2

⁴ Megawatt

Table B 4 Proposed environmental zones and weightings for water pollutants

Zone	Pollutants	Weighting
Port River	nitrogen	3
Metro coasts	nitrogen	3
Port River	phosphorus	2
Metro coasts	suspended solids	2
Upper Spencer Gulf	zinc, lead, copper	2
Lake Bonney (SE)	organic matter	2

Note: All other pollutant/zone combinations have a weighting of 1.

Tables B.5 and B.6 show the fee per tonne of pollutant (excluding zone weighting) for pollutants discharged to air and water respectively, calculated using a 35% load-based component in the overall fee structure.

The fee per pollutant would vary with the load-based component percentage in the overall licence fee structure. Refer to Attachment 6 of the consultant's report for pollutant fees at 10-60% load based component.

Table B 5 Draft fee for pollutants discharged to air at 35% load-based component (LBC) in the overall fee structure

Pollutant	Fee at 35% LBC
sulphur dioxide, nitrogen oxides (\$/tonne)	3.7
particulates, volatile organic compounds (\$/tonne)	37
lead (\$/tonne)	369

Note: volatile organic compounds in the form of ethanol emissions from wineries were not included in the load-based component, as the main environmental issue for wineries is wastewater treatment and disposal. If ethanol emissions were included, this would result in less attention being given to wastewater treatment and disposal, which is contrary to EPA requirements for wineries.

Table B 6 Draft fee for pollutants discharged to water at 35% load-based component (LBC) in the overall fee structure

Pollutant	Fee at 35% LBC
temperature (\$/MW)	3.7
suspended solids, nitrogen, phosphorus, organic matter as BOD ₅ , zinc (\$/tonne)	37
lead, copper (\$/tonne)	369

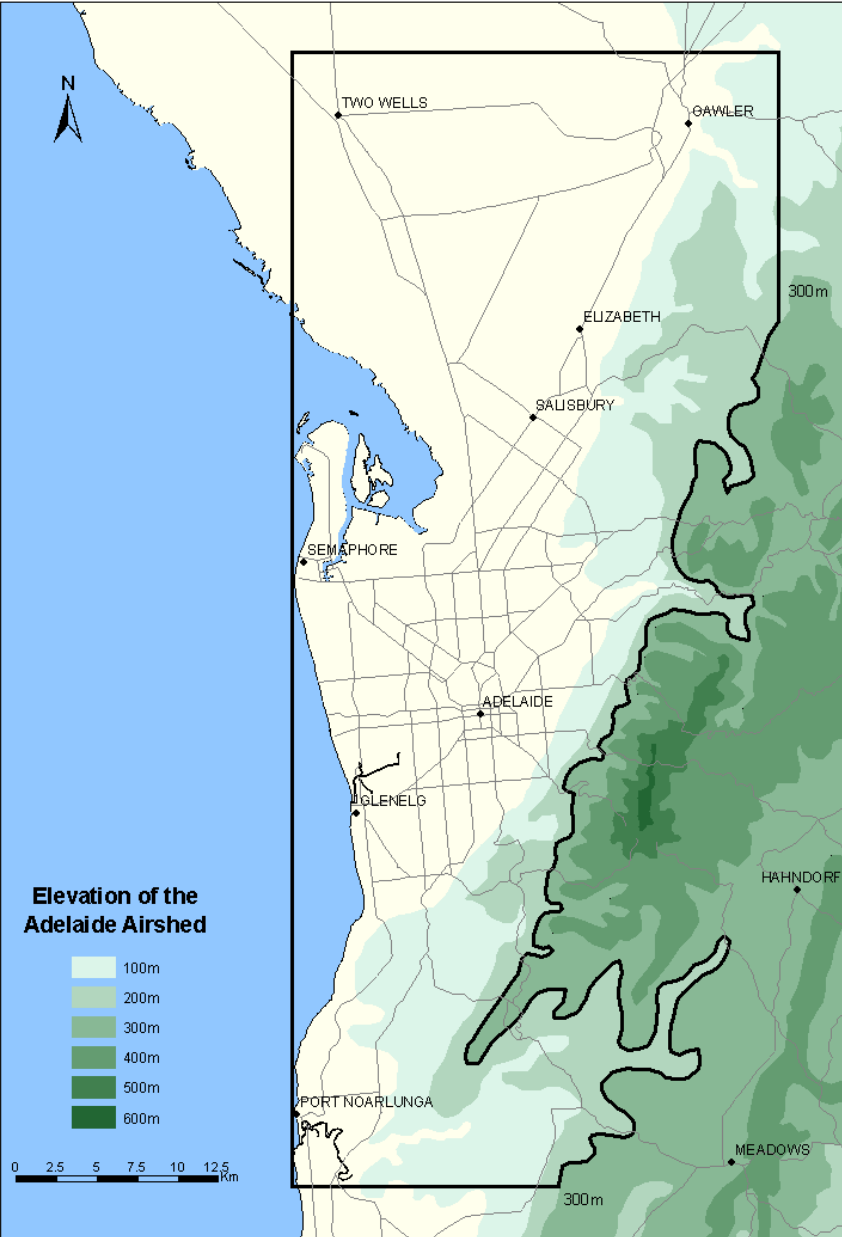


Figure B1 Topography of Adelaide and surroundings showing the Adelaide airshed

Attachment C: Examples of fee calculations

The flat minimum component is \$235, and applies to all licences.

The value of an environment management fee unit is \$348⁵.

Example C.1: Waste transporter (scheduled activities 3(5) and 3(6))

For a waste transporter, the licence fee would be the flat minimum fee of \$235 per licence and an environment management fee of:

- 0.9 fee units per vehicle for category A (listed waste), other than transport of 40 litres or less medical waste or
- 0.3 fee units per vehicle for category B waste and transport of 40 litres or less medical waste.

The environment management fee is given in the environment management fee schedule (Table A.1 of Attachment A) under scheduled activities 3(5) and 3(6).

From Table 1 in this discussion paper, the value of an environment management fee unit is \$348 (at a 35% load-based component).

For a hypothetical waste transporter with two vehicles carrying waste category A and 1 vehicle carrying waste category B, the fee would be:

$$\$235 + (0.9 \text{ fee units} \times 2 \text{ vehicles} \times \$348 \text{ per fee unit}) + (0.3 \text{ fee units} \times 1 \text{ vehicle} \times \$348 \text{ per fee unit}) = \$965.80$$

Example C.2: Winery (scheduled activity 6(11))

A hypothetical winery that:

- is not in the Mount Lofty Water Protection Area
- produces more than 20 ML of wastewater per year
- has its wastewater management and disposal facilities located more than 50 metres from a watercourse**.

The flat minimum fee is \$235 (applies to all licences).

From Table 1 in this discussion paper, the value of an environment management fee unit would be \$348 (at a 35% load-based component).

From the environment management fee schedule (Table A.1 in Attachment A), the environment management fee is 20 fee units. However, wineries that meet the technical EPA requirements for BOD, suspended solids and salt removal can move down a fee level in the schedule⁶ (implementation of treatment recovery system capable of

⁵ At 35% load-based component.

** Watercourse is defined as a blue line on a 1:50,000 map for the purposes of the fee schedule

⁶ The fee schedule consists of 50, 30, 20, 12, 8, 4, 3 or 1 fee units

removing >85% of BOD and suspended solids load, and implementation of salt recovery or salt removal systems removing >50% of EC or TDS load). For this example we will assume that the winery meets the technical requirements as listed above, and therefore moves down to 12 fee units.

Volatile organic compounds in the form of ethanol emissions from wineries are not included in the load-based component, as the main environmental issue for wineries is wastewater treatment and disposal. For this example, we will assume that this winery does not burn fuel (fuel burning might require a load-based fee, depending on the amount of pollutant emissions). So the licence fee for this hypothetical winery would be

Flat minimum fee + environment management fee = \$235 + (12 fee units × \$348 per fee unit) = \$4411

Example C.3: Waste depot (scheduled activity 3(3))

To calculate the fee for a waste depot, refer to '*Landfill facilities for domestic, commercial and industrial solid waste*'⁷. Refer to pages 5 and 6 of the guidelines to determine the classification based on disposal rates and site-specific conditions. The site may be classified as one of Class SB-, SB+, MB-, MB+ or L.

For this example we'll take a waste depot that receives around 5000 tonnes of waste per year (i.e. medium size), and is in an area with a high risk of water flowing into the waste (i.e. B+ site). Therefore, this is a MB+ site.

From the environment management fee schedule under activity 3(3), the environment management fee is 8 fee units. From Table 1, the value of an environment management fee unit is \$348 (at a 35% load-based component).

The flat minimum fee is \$235 (applies to all licences).

It is possible that a load-based fee may apply, depending on the amount and type of pollutants discharged (e.g. burning landfill gas). However, the emissions from many landfills in South Australia fall below the emission thresholds in Tables B1 and B2 of Attachment B. For this example, we'll assume that the load-based fee does not apply.

Therefore, the fee for a MB+ waste depot would be:

Flat minimum fee + environment management fee = \$235 + (8 × \$348) = \$3019

In the same way, the fee for a small (SB+ or SB-) waste depot would be:

Flat minimum fee + environment management fee = \$235 + (4 × \$348) = \$1627

⁷ EPA Draft Guideline: *Landfill facilities for domestic, commercial and industrial solid waste*, 2005 <www.epa.sa.gov.au/pdfs/landfill_facilities.pdf>

Example C.4: Hypothetical large licence with multiple emissions

Let's take a hypothetical licence with the following activities:

- 3(4) activities producing listed waste—producing less than 100 tonnes of listed waste per year
- 8(2)(a) fuel burning
- not coal or wood
- located in the Adelaide airshed
- emissions around 200 tonnes per year of nitrogen oxides

The flat minimum fee would be \$235 (applies to all licences).

To calculate the environment management component, look up the fees in the environment management fee schedule (Table A.1 in Attachment A):

- 3(4) activities producing listed waste less than 100 tonnes and not from metal finishing or containing chlorohydrocarbons: eight fee units.
- 8(2)(a) fuel burning, not coal or wood, located in the Adelaide airshed and emissions above 30 tonnes per year and up to 500 tonnes per year of nitrogen oxides: 20 fee units

The highest environment management fee is for 'fuel burning' at 20 fee units, therefore this is used in the calculations. From Table 1, the value of an environment management fee unit is \$348 (at a 35% load-based component).

Therefore, the environment management fee is $(20 \text{ fee units} \times \$348/\text{fee unit}) = \$6960$.

For the load-based component, list the pollutants that are emitted. For this example, we'll assume:

- 200,000 kg nitrogen oxides
- 4,000 kg sulphur dioxide
- 10,000 kg particulates.

The pollutants are emitted in the Adelaide airshed. First, check whether the pollutant emissions are above the threshold levels in Tables B1 and B2. Sulphur dioxide is below the emission threshold of 10,000 kg, and therefore is not included in the fee calculation. Nitrogen dioxide and particulate emission are included as they are above the threshold levels.

Next, check if any of the remaining pollutant emissions fall in a zone as shown in Tables B3 and B4. The nitrogen oxide emissions fall within the Adelaide metro airshed and a zone weighting of 2 applies. For the remaining pollutant(s), the zone weighting is 1.

From Tables B5 and B6, the fee is \$3.7 per tonne nitrogen oxides and \$37 per tonne particulates.

The load-based fee would therefore be:

$$\begin{aligned} & \text{nitrogen oxides (200,000 kg} \times \$3.70 \text{ per tonne} \times 2 \text{ (zone weighting))} \\ & + \text{particulates (10,000 kg} \times \$37 \text{ per tonne} \times 1 \text{ (default zone weighting))} \\ & = \$1480 + \$370 \\ & = \$1850 \end{aligned}$$

The total licence fee is therefore:

$$\begin{aligned} & \text{(flat minimum component) + (environment management component) + (load-based} \\ & \text{component)} = \$235 + \$6,960 + \$1,850 \\ & = \$9045 \end{aligned}$$

This example shows that only the highest environment management fee applies and how load-based fees are calculated.

Attachment D: How to calculate a licence fee

The licence fee is a composite of the flat minimum component, the environment management component and the load-based component.

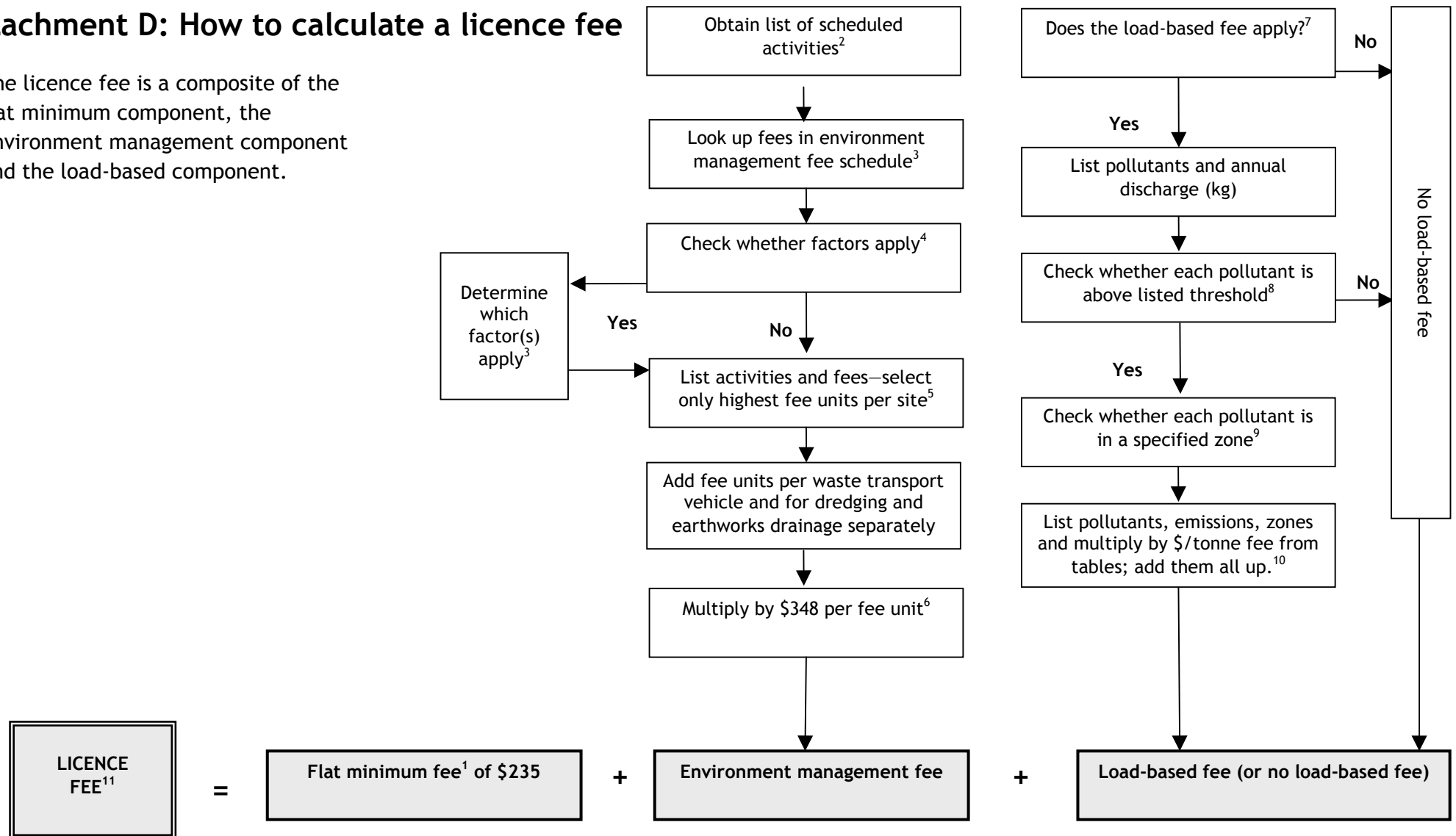


Figure D1 Calculating the licence fee

Notes:*Flat minimum fee*

1. The flat minimum fee is \$235 per licence.

Environment management fee

2. Obtain a list of scheduled activities from the front page of the licence.
3. Look up fees in the environment management fee schedule found in Attachment A of this document.
4. For some activities, the fee is the same for all licences – for example, all concrete batching works would have three environment management fee units. However, for other activities there are factors to differentiate regulatory effort. For example, for activity 2(11) scrap metal recovery 50 metres or less from a watercourse, the environment management fee would be eight fee units, and three fee units if it is further than 50 metres from a watercourse. 'Watercourse' is defined as a blue line on a 1:50,000 map for the purposes of the fee schedule.
5. List all the activities per site and the fee units that apply, and select only the highest one per site. Waste transport, dredging and earthworks drainage are treated separately and need to be added to the highest fee. This may be the only fee if this is the only activity on the licence.
6. Multiply fee units by \$348 (at 35% load-based component) per fee unit to obtain the environment management fee. Note that the value of the fee unit depends on the split between the environment management component and the load-based component in the overall fee structure. Refer to the discussion on the split, and to Table 1 of this discussion paper and Attachment 6 of the consultant's report for the value of the fee unit at different splits.

Load-based fee

7. In general, if a licensed site is required to report to the National Pollutant Inventory (NPI), the load-based component may apply. However, this is not always the case, as the load-based component includes pollutants such as suspended solids, organic matter and temperature as heat added, which do not require reporting to the NPI.
8. For each pollutant, check if the amount discharged (kg or MW per year) is above the thresholds listed in Tables B1 and B2. If it is below the threshold, it is not included in the load-based fee.
9. For each pollutant above its threshold, check if it is in one of the zones listed in Tables B3 and B4 in Attachment B. If it is in a special zone, multiply the fee by the zone weighting in the tables; otherwise, multiply by the default zone weighting of 1.
10. Calculate the load-based fee for every pollutant: load-based fee = amount discharged (tonnes or MW) x fee \$/tonne or MW (from Tables B5 and B6) x zone weighting (from Tables B3 and B4, or default zone weighting of 1). Add the fees to obtain the load-based fee.

Total licence fee

11. Add the flat minimum fee, the environment management fee and the load-based fee together to obtain the total licence fee.

Attachment E: Changes in licence fees by activity group

Figure E1 and Table E1 show the estimated changes in licence fees by activity group—that is, the change in total licence fees for all licences for that main activity. The graph and table don't show the change for individual licences. So, for some waste depot licences, the proposed fees may decrease, while for others they may increase. However, as a group, the fees would increase (at 35% load-based component). For a discussion of the changes in licence fees, refer to section 8.4 of the consultant's report.

For more information on proposed fees at different percentages load-based component, refer to Attachment 7 of the consultant's report.

Figure E1 Major changes in fees from 2005/06 by activity groups

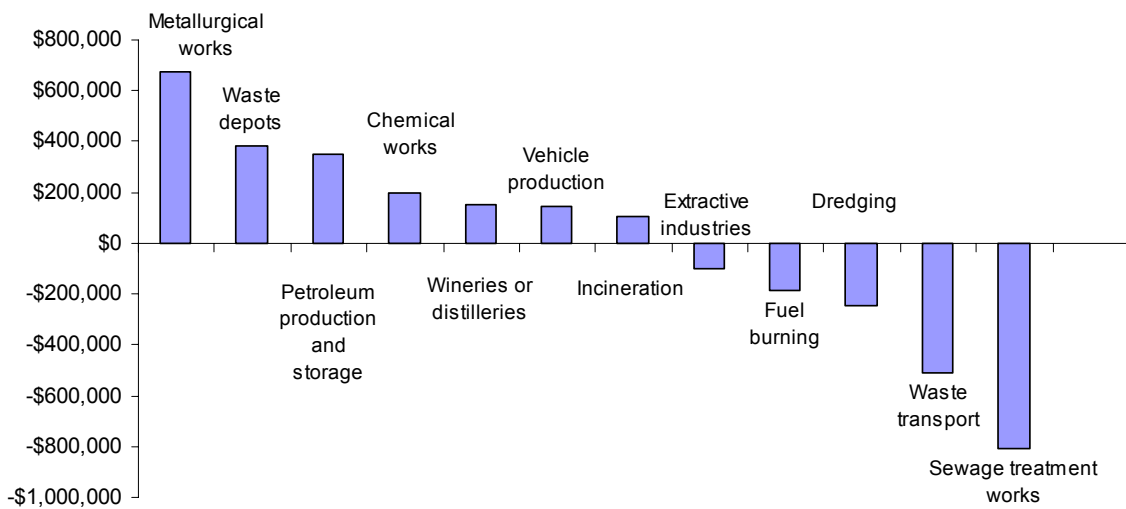


Table E1 Change in total fees for all activity groups⁸

Regulation reference	Activity group	Change in fees from 2004/05
1(1)	chemical storage and warehousing	-\$15,521
1(2)	chemical works	\$182,453
1(4)	oil refineries	\$8,432
1(5)	petroleum production and storage	\$324,434
1(6)	wood preservation works	-\$17,476
2(1)	abrasive blasting	-\$64,210
2(2)	hot mix asphalt preparation	-\$14,319
2(3)	cement works	-\$4,674
2(4)	ceramic works	-\$17,813
2(5)	drum reconditioning works	\$4,119
2(6)	concrete batching works	-\$2,586
2(7)	ferrous and non-ferrous metal melting	\$31,365
2(8)	metallurgical works	\$765,843
2(9)	mineral works	\$2,202
2(10)	pulp or paper works	-\$38,927
2(11)	scrap metal recovery	-\$9,882
2(12)	surface coating works	\$36,048
2(13)	wood processing works	-\$5,117
2(14)	maritime construction	-\$2,170
2(15)	vehicle production	\$137,436
3(1)	incineration	\$104,417
3(2)	sewage treatment works or septic disposal	-\$828,886
3(3)	waste depots	\$382,755
3(4)	activities producing listed wastes	\$51,786
3(5)	waste transport (Category A)	-\$319,645
3(6)	waste transport (Category B)	-\$190,894
4(1)	Brukung mine site	-\$19,941
4(2)	stormwater discharge to underground aquifers	-\$34,322
5(1)	cattle feedlots	-\$12,383

⁸ At 35% load-based component.

Regulation reference	Activity group	Change in fees from 2004/05
5(3)	saleyards	-\$2,501
5(4)	piggeries	\$52,318
6(1)	abattoirs/slaughterhouses/poultry	-\$92,630
6(2)	breweries	-\$3,485
6(3)	composting works	\$64,055
6(4)	fish processing	\$52,303
6(5)	milk processing	-\$10,883
6(6)	produce processing	-\$29,349
6(7)	rendering or fat extraction works	-\$13,014
6(8)	curing or drying works	-\$2,762
6(9)	tanneries or fellmongeries	-\$8,362
6(11)	wineries or distilleries	\$152,980
7(1)	bulk shipping facilities	-\$25,425
7(2)	railway systems	-\$8,528
7(3)	crushing, grinding or milling	\$7,031
7(4)	dredging	-\$247,906
7(6)	earthworks drainage	-\$44,421
7(7)	extractive industries	-\$102,368
8(2)	fuel burning	-\$195,393
8(3)	helicopter landing facilities	-\$152
8(4)	marinas and boating facilities	\$13,763
8(5)	motor racing and testing venues	\$2,364
8(6)	shooting ranges	\$372
8(7)	discharges to marine or inland waters	\$9,470

Attachment F: Information for the EPA to calculate your potential licence fee under this proposal

Name:

Address

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Phone Fax

E-mail

Licence number:

Licensed activities (refer to the front page of your EPA licence):

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Environment management component:

For each activity, please look it up in the Environment Management Fee Schedule in Attachment A of this discussion paper, and fill in the factors that apply to you. If you're unsure, please contact your licence coordinator or the project officer on 8204 1096 to discuss this.

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Load-based component:

Do you discharge any of the pollutants in Tables B1 and B2 of Attachment B above the threshold emissions levels shown in the tables? If so, please list the pollutants and the amounts discharged (in kilograms).

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Does a zone weighting apply to any of your discharges? Please list the area(s) in which you discharge (e.g. Adelaide metro airshed)—refer to Tables B3 and B4 in Attachment B for a list of zones.

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Please fax this form to 8124 4674 or e-mail to bettina.venner@epa.sa.gov.au. Remember to include your contact details so that we can fax or e-mail the results back to you.