

30 June 2018

DELWP

Via [www.engage.vic.gov.au](http://www.engage.vic.gov.au)

Dear Sir/Madam

**SUBMISSION TO “CLEAN AIR FOR ALL VICTORIANS: VICTORIA’S AIR QUALITY STATEMENT”**

The Construction Material Processors Association (CMPA) is dedicated to the representation and service of its Members in the Victorian Earth Resources industry. The CMPA represents a broad spectrum of businesses that extract and process hard rock, gravel, sand, clay, lime, soil, and gypsum. CMPA members also operate recycling businesses.

CMPA members are typically small to medium sized family and private businesses, local government and utilities. Many are regionally based employers and service local construction, infrastructure and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2016/17, the sector supplied 57 million tonnes of construction materials to the market, at a value of approximately \$850 million. Small to medium quarries account for approximately half of this production.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria.

We thank you for the opportunity to comment on the above publication. CMPA supports the statement: “Victoria’s healthy air quality is a key reason for our quality of life and our state’s liveability” and the purpose: development of a “Victorian Air Quality Strategy in 2019 — a comprehensive approach to improving air quality and enabling a clean air future for Victorians”.

Please see the more detailed submission below.

I would be happy to discuss our submission further at your invitation.

Yours sincerely



Dr Elizabeth Gibson  
General Manager

Air Quality Statement	Page	CMPA Comment
What causes poor air quality?	4.	Missing from the statement is reference to gravel roads and infrastructure projects which have the potential to contribute dust to the atmosphere thereby creating exposure for the community.
Introducing a tighter air quality standard for particulate matter than that required nationally, in line with World Health Organisation recommendations	7.	Care should be taken to ensure that any “tighter air quality standard” is actually capable of being measured.
A general duty to minimise risks of harm to human health and the environment — including from air emissions.	8.	Gravel roads should be included in the general duty to minimise risk of harm.
... clarify government agencies’ roles and responsibilities in air quality management, and ensure accountabilities are understood and coordination is achieved.	9.	Supported
Renewing and expanding our (EPA) air quality monitoring network	10.	More sophisticated particulate air quality monitoring that can distinguish between abutting industries’ emissions. A study on particulate emission from gravel roads.
<ul style="list-style-type: none"> <li>Establishing an ‘exemplar industry’ program to promote and recognise best practice in business and industrial air quality management</li> </ul>	11.	<p>Supported</p> <p><b>CMPA Dust Management Guideline</b></p> <p>CMPA takes dust management in quarries very seriously and has been proactive by producing the CMPA “Dust Management Guideline” Issue 1, March 2016 which was reviewed by the Environment Protection Authority (Victoria) in addition CMPA conducted training workshops. The Guideline provides members with appropriate management practices required to minimise potential health risks or environmental impacts associated with airborne dust arising from extractive industry operations in order to meet the requirements of the Victorian Occupational Health and Safety Act 2004 and the Victorian Environmental Protection Act 1970.</p> <p>The scope of the Guideline covers the health risks and environmental impacts and their associated controls from both a workplace and community perspective.</p>