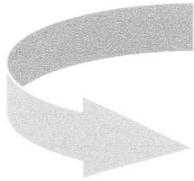


COMMUNITY ALLIANCE FOR



POSITIVE SOLUTIONS INC. (CAPS)

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Attn. Peter Knol, A/Team Leader
Swan Region, Kwinana Office
Dept. of Environment & Conservation
P.O. Box 454
KWINANA WA 6966

15th August 2011

Dear Peter,

ENVIRONMENTAL PROTECTION ACT 1986: REFERRAL OF A WORKS APPROVAL APPLICATION FOR COMMENT.

ALCOA WAGERUP REFINERY APPLICATION No. W 4985/2011/1

Thank you for referring this application to us for comment. In regards to this application, as to every other application to expand any areas of the Wagerup operation, we are totally opposed.

Over the years we have opposed all expansion because of the ongoing and unresolved pollution issues associated with the Wagerup refinery and the Residue Storage Areas are no exception. All that we have stated in the past is still very relevant and we request that it is taken into consideration when assessing this application.

Recent events have shown that Alcoa are still unable to manage their current Residue Storage Areas (RSA), which are a constant source of dangerous toxic dust emissions. They have been prosecuted for breach of licence in regard to these areas and there are a number of other complaints presently under investigation by the DEC (Dept. Environment and Conservation).

Court rulings have previously instructed ALCOA to undertake measures to reduce dust emissions with the understanding that the sprinkler system would be upgraded and the problem will be solved. This was with the presumption that the sprinkler system is used with so called 'best practice'. However, we have evidence that shows to the contrary.

Following successful prosecution in 2004, ALCOA was forced to undertake an upgrade of their sprinkler system to reduce dust emissions. However, further breaches occurred in 2006 which they pleaded guilty to in 2010, claiming the oversight was due to non completion of the upgraded system which was finally completed in 2010 at a cost, they claim, of \$39 million. Since December 2010 up until May 2011, ten toxic dust events have been witnessed and photographed. Note that these observations were of visible dust events and taken within daylight hours.

Yarloop
Waroona
Hamel
Harvey
Cookernup
Wagerup
Other Impacted Areas

The Alcoa document states that adding another 47ha to the existing area will reduce dust pollution. How? The surface area of accumulated toxic mud will increase therefore increasing the amount of dust emission. The same sprinkler spacing will be used along with other superficial measures such as grassing, mulching and tree planting embankments which have no impact on the actual mud lakes dust emissions.

This water hungry process is not only straining our precious water resources but also contaminating our groundwater. What consideration has been given to future water demands when the expansion proceeds ? Has the effect of climate change, our diminishing rainfall and subsequent lack of available water been addressed? The reliance on the application of water to suppress dust may not be a viable option in the coming years.

ALCOA's operating license prohibits visible dust crossing the boundary of the refinery and Alcoa have tried unsuccessfully through the Tripartite Group to have this condition removed. This information is easily accessed in the Wagerup Tripartite Group minutes on the DEC website. This is not the action of an environmentally concerned company and definitely shows a total lack of concern for the health and wellbeing of the surrounding communities

Further to this, Alcoa fail to engage in any meaningful community consultation and recently refused to allow CAPS Inc. consultants to visit the RSA, claiming all is well in these areas. This of course, disadvantages CAPS Inc. as it precludes us from accessing first hand, information to make a more informed comment on the application.

Where is the duty of care by government to protect its constituents from the environmental and health impacts from ALCOA's industrial practices? The Precautionary Principle should be applied. The expansion should not go ahead.

It has been brought to our attention that construction for the expansion has already been undertaken. Is this a fore gone conclusion that the expansion will go ahead?

We thank you for your attention and in anticipation.

Yours sincerely



Vince Puccio



Merv McDonald AFSM

Co- chairs Community Alliance for Positive Solutions Inc.

Cc:

Hon. Giz Watson MLC

Hon. Bill Marmion MLA

Hon. Eric Ripper MLA

Hon. Kim Hames MLA

Hon. Brendon Grylls MLA

Hon. Adele Farina MLC

Shire of Waroona