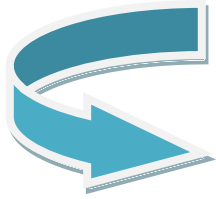


COMMUNITY ALLIANCE FOR



POSITIVE SOLUTIONS INC. (CAPS)

P.O Box 69, Yarloop, WA 6218
0409335011 or 0409370235
Email: caps6218@yahoo.com
Web: www.caps6218.org.au

Team Leader-Industry, Swan Region
Department of Environment Regulation
PO Box 33 Cloisters Square
PERTH WA6850

9thOctober 2013

**APPLICATION FOR LICENCE RENEWAL L6217/1983/14 ALCOA WAGERUP
SUBMISSION/APPEAL**

Dear Marko

GENERAL COMMENTS:

The devastating effects of the Alumina Industry on the local community has been documented to various Governmental bodies over the past 17 years. All of the relevant facts and figures, scientific data, research data and photographic evidence has been included and tabled on every occasion as required.

The Alumina Industry is known as one of the world's largest polluters and energy users that provide a meagre 1.65% in royalties to the State Government however, in recent times they have been responsible for the destruction of the South West Communities of Wagerup, Hamel and Yarloop, the deterioration of peoples' health and the Environment.

Their activities also contribute to Global Warming, contaminate Ground Water and use vast amounts of our drinking water, not recycled, water, not just for production but to suppress the ever-burgeoning dust problems associated with the Residue Storage Areas and the mine site. Due to these high levels of groundwater allocations, (the Alumina Industry being one of the major user of water), has lowered the water table below sea level, further impacting farming activities and reducing the State's food bowl.

Without immediate action, the State will be left with a Major Toxic Wasteland.

In order to prevent this immanent disaster, serious accountability must be sought and the following measures put in place as requirements for all future license applications and amendments:

Yarloop

Waroona

Hamel

Harvey

Cookernup

Wagerup

**Other
Impacted
Areas**

1. As a starting point, Alcoa must reduce their production to the 2005 level of 2.35 MTPA to comply with the license and until all issues have been addressed.
2. Allowing increased production to continue despite non-performance of conditions upon which the increase allowed has the effect of rewarding non-compliance.
3. A comprehensive health study must be undertaken, conducted by a suitably qualified and experienced person, independent of Alcoa and reporting directly to the Minister for the Environment, rather than the DoH or any other government department (as recommended by the EPA in 2005). The study must have a special focus on the number of people in the impacted area under 5 years of age, over 70 years of age and those with compromised health, as these are most vulnerable to the adverse effects of pollution. Those who have moved from the impacted areas should be included in this study. The health effects range from nose bleeds, headache and breathing difficulties to cancer.
4. Government should do all it can to ensure impacted residents are able to relocate away from the danger area.
5. Alcoa must comply with the 42 conditions set out in the Wagerup 3 approval, before increases or works approvals of any kind are considered.
6. Any production increases must be linked to Net Emissions reduction to benefit the Community & Environment.
7. The CSIRO Study on Meteorological & Dispersion modelling using TAPM for Wagerup December 2004 is based on 6.600 TPD. Current Production is 8400 TPD therefore a new study need to be undertaken, as the greater the production, the greater the impact. Also, the 2004 study is flawed and misrepresents the actual emissions from both the Refinery and RSA mud lakes.
8. The findings and recommendations of the 2006 DEC Winter Air Quality study must be part of any licensing conditions. Alcoa must explain why it has not followed through on the commitments made to the Government regarding this. Examples of his have been tabled to the relevant government bodies on many occasions.
9. All emission points and sources must be addressed and monitored to ensure a true and factual reduction in emissions. These include the cooling tower, slurry tanks 25A, Calciner 4 LVV and the southern part of the refinery (refer DEC Air Quality Winter Study 2006).
10. Alcoa should not be allowed to self-regulate; a totally independent regulator must be appointed (paid for by Industry), and this independent regulator must be able to access sites and make inspections without giving prior notice.
11. A major overhaul of the fines for breach of license and other offences is required to reflect the significance of these actions and their consequences to the environment and community, and to act as a proper deterrent to poor standards. Fines should be in the range of \$2.5m to \$25m, and \$100,000 per day until any breach or violation is addressed.
12. In all approvals the Precautionary Principle must be exercised. If there is any doubt, do not go ahead. CAPS has been lobbying for these legislative changes to be put in place, for the past 17 years.

13. Land use compatibility: past mismanagement of land use by Alcoa and the State Government has led to division, loss of property values, destruction of towns & communities, loss of social fabric, health and environmental issues. Therefore, a condition of future license amendments and conditions must be dependent on the declaration of a formal buffer zone of a minimum 10k radius and a proper exit strategy put in place with appropriate compensation for those who need to move, or who have already left the area at a loss, due to the current industrial and land management practices. The relocation and compensation of residents must be achieved using a single formula to protect people and property values.
14. Industrial noise emissions must form a condition of any license and appropriate compensation paid to persons displaced due to failure to comply with set Noise Limits. Noise from associated heavy rail traffic needs to be monitored and addressed to ensure reduced impact on the population along the line.
15. RSA dust particles/particulate matter and refinery emissions monitoring stations need to be relocated in order to more accurate measures.
14. New exposure guidelines need to be established for chemical emissions, PAHs, heavy metals, and toxic dust particulate matter PM2.5 and less must be addressed.
15. Any self-reporting by Alcoa must be independently verified, not accepted as fact.
16. A full study of the chemical cocktail produced by the Bayer process needs to be conducted to ascertain the effects of mixing a plethora of chemicals and how they react in combination to impact on humans, animals and the ecosystem. The specific contaminants which result should be the basis of further study and should include consideration of synergistic and cumulative effects of contaminants' interaction and admixture.
17. More research is required on the effects of high level Pollution and Greenhouse Gas Emissions from the Alumina industry on Climate Change .
18. All studies, monitoring and compliance regulation should be funded unconditionally by Alcoa and all reports made to a third party independent of both Alcoa and Government Departments.
19. **All complaints whether made direct to Alcoa or to DER need to be advertised in the local paper (not just the complaints made to Alcoa only).**

As an all volunteer, non-profit community-based organisation with limited funds, we request the Appeal Fee be waived, as the right of appeal and access to natural justice should not be denied on the grounds of socio-economic status

Yours sincerely

Vince Puccio
Co chairs Community Alliance for Positive Solutions Inc.

Merv McDonald AFSM

Cc: Hon Colin Barnett MLA, Hon Albert Jacob MLA, Mr Jason Banks, Mr Murray Cowper
MLA, Mr David Templeman MLA Hon Robin Chapple MLC, Appeals Convenor