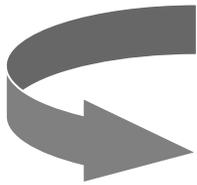


**COMMUNITY ALLIANCE FOR**



**POSITIVE SOLUTIONS INC. (CAPS)**

P.O Box 69, Yarloop, WA 6218  
9733 5011 or 0409370235  
Email: [caps6218@yahoo.com.au](mailto:caps6218@yahoo.com.au)  
Web: [www.caps6218.org.au](http://www.caps6218.org.au)

Hon. Donna Faragher JP MLC  
Minister for the Environment  
State Environmental (Ambient Air) Policy Submission  
10<sup>th</sup> Floor, Dumas House  
2 Havelock Street  
WEST PERTH WA 6005

3<sup>rd</sup> August 2009

**State Environmental (Ambient Air) Policy 2009**

**Stakeholder Comment**

Dear Minister

We thank you for the opportunity to make a submission and comment on this Draft Policy. You and your Department are to be acknowledged for revisiting this area, as we understand there has been no review of the Policy since 1985 and much has changed since then.

While the reduction of all emissions is an important goal for which we should strive, it should not come at a cost to the community.

In order to protect public health and the quality of the air we breathe, the best available technology should be utilised to achieve the lowest possible emission levels. The main aim should be to produce a balance between productive industry and the well-being of their neighboring communities.

Without the installation and proper maintenance of appropriate pollution controls and independent monitoring, the balance of power will continue to shift towards industry, as it has in the past, undermining the health and safety of neighboring populations.

Where there is potential for any negative impacts on residents' health, amenity and the environment, a precautionary principle should be applied, giving people's health and well-being the first priority. This avoids long, costly, and usually futile investigations and trials, facilitating action before further damage is done to those impacted.

**Yarloop**

**Waroona**

**Hamel**

**Harvey**

**Cookernup**

**Wagerup**

**Other  
Impacted  
Areas**

## **Buffer Zones.**

All Industry, new and existing, which have the potential to impact health through emissions and noise, should have a Government-set standard, non-residential buffer zone, not an informal, often erroneous, arrangement set by the industry, based on self-monitoring and computer modeling.

Where there is any dispute as to the impacts of emissions, the claims of local people - their evidence and testimony of negative impacts and health issues- should be given credence. Existing scientific proof-of-harm arising from industrial air, water and noise pollution can be used to substantiate these claims. Using the precautionary principle, buffer zones must be set up to protect these impacted residents.

Those residents remaining in the impacted area until the zoning is completed, or any who choose to remain as residents in the area, should be supported with the necessary services and financial assistance needed to maintain their quality of life. Any resident displaced by the buffer zone should be compensated on a like-for-like basis, allowing them to relocate without personal cost or loss.

All negotiations with impacted residents should be led by the Government, not industry, by giving specific powers to the DEC through a revision of the Environmental Protection Act.

All persons affected by industrial operations should be included in discussions and decision-making processes which may influence their future health and safety, quality of life and choices available to them.

The use of buffer zones alone will not guarantee complete safety for the environment and wider population, so monitoring of the air and water in the extended surrounding area of the industry should be mandatory. This would include testing for PM2.5 and sound levels along the country rail lines used by industry, in particular at passing loops where diesel engines idle for long periods. These areas may need their own buffer zones or pollution control measures.

## **Multiple Chemical Exposure**

More research is needed to identify the content of industrial emissions to pinpoint what chemicals are actually emitted, how they combine and react with each other, in what concentrations they are present, and their impact on human health.

Industry should not be allowed to self-monitor or appoint their own testing laboratories, allowing manipulation of findings and misinformation. All monitoring should be performed by independent consultants, appointed by Government / Community and paid for by Industry.

New guidelines for multiple chemical exposure need to be set e.g. a Hazard Index as in Recommendation 22 of the Standing Committee on Environment and Public Affairs Report

11. Consideration for long-term exposure of low levels of chemicals needs to be included in these guidelines, as well as impacts on individuals with Multiple Chemical Sensitivity.

Testing for PAH, Heavy Metals, VOC's and PM2.5 in industrial emissions needs to be a priority as these are considered the most hazardous to humans, animals and the environment.

### **Community Health**

Independent community health surveys focused on communities in the vicinity of industrial sites should include past, as well as present, residents. These surveys should be repeated on a regular basis to gauge the effectiveness of control measures.

Blood and hair analysis, performed every 3 to 5 years, should be done to monitor human and animal exposure to chemicals. Test results will assist to build a data base for comparison and to adjust exposure guidelines.

G.P.s and other health professionals must be educated to recognise and document the symptoms and side effects of chemical exposure, in particular Multiple Chemical Sensitivity (MCS), without fear of repercussions from the local industry.

A mechanism to protect residents and workers who are currently impacted below the new guidelines / benchmark needs to be developed.

A fund should be established to provide for the present and ongoing health needs of community members; this fund would provide the means to monitor community health, raise awareness through education, as well as to provide treatment for those impacted, a similar program as that offered to victims of asbestos exposure.

### **Community Participation**

If the cost of monitoring air and water contamination 24/7 is prohibitive, the Government should fund and train volunteers from incorporated community groups to do the work. Industry should support some of the on-going costs for these programs through donations.

New bodies need to be set up to replace those which currently oversee the licensing of industry. These groups should consist of an independent chair person or facilitator, 2 Government representatives, 2 industry representatives, and 6-8 community members, nominated and selected by the community, not by industry or government. The community members must reside in the affected community.

Community members should have access to independent consultants to interpret raw data and information concerning health, air, water and environment so they can make decisions with confidence. These independent consultants should be sourced by Government and paid for by Industry.

Industry representatives should not be a part of any decision-making process when the community group advises Government on the Industry's licensing conditions.

In the event that no common ground can be reached through the group process, the position of the community representatives should take precedence in the approval or rejection of any application. As the impacted party, the community should have the right to determine its future, not industry, as the community was there first.

The new groups should be open and transparent in their operation, and minutes of their meetings should be recorded by an independent person, with full minutes available through an approved medium.

Any breach of license conditions should be dealt with immediately and firmly, without fear or favour, regardless of the size of the company, and appropriate penalties should be applied to make sure the offending party does not offend again.

### **Ongoing Research**

There should be ongoing research into new technology such as the underground sequestration of residue to eliminate dust incidents, causing serious damage to both health and the environment, without polluting the water table. This technology might also be used to lock away chemical emissions. Further research in the area of noise reduction from both plant and rail transport should be encouraged by Government.

Yours sincerely

Vince Puccio  
Co-chairs Community Alliance for Positive Solutions Inc.

Merv McDonald AFSM