



Mr Vince Puccio and Mr Merv McDonald
Community Alliance for Positive Solutions Incorporated
PO Box 69
YARLOOP WA 6218

Vince Merv
Dear Mr Puccio and Mr McDonald

ALCOA WAGERUP BUFFER ZONE AND HEALTH ISSUES

I refer to the detailed document (the 'Submission') you provided to me when we met in Yarloop on May 8 2015. Although there has been a long delay in providing this response, you have raised many of the matters individually in correspondence to me on a number of occasions since our meeting.

The (unsigned) Submission prepared by member/s of the Environmental Defender's Office Western Australia (Inc) has been assessed by members of the Environmental Health Hazards Unit. It was clear to the assessing Department of Health (DOH) officers, that a great deal of work had been invested in the document.

Following the assessment, I have a number of comments as follows;

- A significant number of the issues raised in the document are well known to the DOH and have been addressed on a number of occasions: your group will already have a series of responses from my office providing detailed information on these matters.
- The information was known at the time the Carpenter Government agreed to the expansion proposal. There is little information which has not previously been considered by DOH officers, or which has contributed to high level agency discussions.
- The Submission does not consider exposure assessment information, including the ambient air concentrations found at community receptors and the probability, frequency and duration of exposure. As a result, the extent of community health risk from emissions has not been validated.
- There are a number of statements and conclusions which are not supported. As an example, Page 8 Section 3.4(a) infers that 'chemical hypersensitivity' and Multiple Chemical Sensitivity (MCS) are similar conditions; however this is not the case.

- A statement that “as a general rule, all sensitizers are carcinogens also”, is a conclusion not made in the reference provided.
- The document suggests a “causative link” between Refinery emissions and community health issues. However, this claim is based only on a self-reported correlation between emissions and complaints, i.e. there is no scientific validation providing sufficient evidence to support this statement.
- A request is made for additional contaminants to be included in air quality testing. However, it is acceptable practice to limit emission testing to agents of significant environmental or health concern, or to specific ‘marker’ agents that represent a number of emissions and add weight to the decision making process.
- Although I have addressed the issue of the buffer of 5km imposed voluntarily by Alcoa in previous correspondence to your group, I should reaffirm that there is no evidence in this Submission, or in other documents, which provide sufficient evidence to allow me to consider requesting intensification of the existing buffer arrangement.
- The Final Report: Adsorbed organic species on Respirable alumina particles (CRC Care 2009) is quoted. However, I have addressed this Report separately in previous correspondence and additional comment here would appear redundant.
- All Works Approvals or Licence amendments are independently reviewed by the appropriate Government Departments. The DOH is an integral part of this review process and therefore able to adequately raise any issues with the licensing agency/ies.

In summary, the Report is not sufficiently robust to enable me to reach an alternative opinion than that I have conveyed to you on previous occasions.

Yours sincerely



Professor Tarun Weeramanthri
ASSISTANT DIRECTOR GENERAL
PUBLIC HEALTH DIVISION

22 October 2015