

Mike Rowe
Director General
Department Water and Environmental Regulation
Locked bag 33,
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WA 6850

13th December 2017

Via Email: info-der@dwer.wa.gov.au

Dear Mr Rowe

ALCOA OF AUSTRALIA LTD – NEW WORKS APPROVAL W6104/2017/1 – PUBLIC COMMENTS

We refer to the timing for public comments in relation to Alcoa's application for a new works approval at its Wagerup Alumina Refinery. The public comment period closes on 15 December 2017. At the same time, the Department of Water and Environmental Regulation (DWER) has also asked for public comments on Alcoa's noise application and Alcoa's licence review. The public consultation periods for all three of these matters close on 15 December 2017.

There has been, and continues to be, a high degree of public interest in Alcoa's Wagerup facility. We are disappointed that DWER has compressed the public consultation periods for these issues to the same date.

The documents for the works approval application are approximately 70 pages long and CAPS have not yet had the opportunity to review these in detail. We ask for an extension of time to review these documents, particularly in light of Alcoa's potential expansion activities.

In the event that an extension of time is not granted, then CAPS wishes to lodge its objection to DWER determining the works approval application at this time. CAPS requests that DWER defers its determination of the works approval application until:

- Alcoa's noise application has been assessed and determined; and
- Alcoa's licence review has been completed and any appeals determined.

CAPS do not consider it appropriate for DWER to assess further major changes to Alcoa's Wagerup facility given that DWER has not completed its risk assessments in relation to the facility's current operations. Approving further major works will only complicate DWER's assessment and make it increasingly difficult for stakeholders to comment.

We look forward to receiving your response to our request that we are afforded an extension of time, and that in any event DWER defers its assessment of the works approval application.

Yours sincerely



Vince Puccio

Chairman: Community Alliance for Positive Solutions Inc

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