

HON Stephen DAWSON MLC
Minister for Environment; Disability Services
C/o Office of the Appeals Convenor
Level 22, Forrest Centre
221 St. Georges Terrace
PERTH WA 6000

15th December 2017

Via Email: Minister.Dawson@dpc.wa.gov.au

Dear Minister

Alcoa Wagerup Alumina Refinery – R17 Noise Assessment - L6217 - Submission

CAPS wish to make the following submission in relation to the application by Alcoa for a Regulation 17 approval to exceed noise levels from the Wagerup Refinery.

1. Validation of Noise Modelling

CAPS submit that all noise modelling which is being assessed by DWER and which has been assumed by DWER to be correct must be validated.

CAPS submit that validation of noise modelling must be done independently of Alcoa.

2. Noise impacts not location constrained

CAPS submit that the assessment of noise impacts must not be constrained by the historical locations set out in the previous Regulation 17 approvals. Noise impact assessments must be determined for all sensitive receptors which are likely to be, have reported to have been (via complaints) impacted by excessive noise from the Wagerup Refinery.

3. Binding commitments

CAPS submit that any commitments made by Alcoa in its noise amelioration/management plan must be legally enforceable binding commitments. CAPS notes that Alcoa's previous noise amelioration plan was general, and lacked specific commitments and details.

4. Noise monitoring regime

CAPS submit that Alcoa should be required to undertake a comprehensive real-time noise monitoring program to ensure ongoing compliance with any approvals. CAPS also request that all noise monitoring data is published by DWER for the community to be informed of the noise emissions from the Wagerup facility.

5. Independent baseline cumulative noise impact assessment

CAPS notes that at the same time as Alcoa's noise application, DWER is also assessing an application for the construction of an Oxalate Bioremoval Facility. CAPS also note that Alcoa may expand the Wagerup facility by constructing the expansion to Unit 3.

The documentation referred to be DWER on its webpage and in correspondence to CAPS is unclear as to exactly what Alcoa has applied for, and the extent to which Alcoa's operations have or have not changed since the approval granted in 2012. There is no clear correlation between previous noise reports and studies with any changes to the Wagerup facility (infrastructure and operating changes).

Accordingly, CAPS submit that thorough independent baseline cumulative noise impact assessments at sensitive receptors must be undertaken to ensure that the impacts of current operations are clearly understood and properly assessed.

CAPS request that any Regulation 17 approval be constrained to the current status of the Wagerup facility operations. This is to ensure that the impacts of any future changes are thoroughly assessed.

Yours sincerely



Vince Puccio

Chairman: Community Alliance for Positive Solutions Inc

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