



## **CORE CONSULTATIVE COMMITTEE ON WASTE (3C) RESPONSE TO SUBMISSIONS MADE ON THE EXHIBITED SHORT LISTED SITE – MSW039 (NEAR BRUCE ROCK)**

The Core Consultative Committee would like to thank all individuals/groups who provided comments on the Exhibited sites. This document summarises all submissions received that are specific to the MSW039 (near Bruce Rock) site and contains the 3C's responses to these. Any comments in submissions that are generic to all sites (i.e. are not site specific), have been summarised in a separate document titled "Response to Submissions on Non-Site-Specific Issues".

In order to analyse and respond to comments, submissions have been summarised and presented in tabular format with 3C responses to the issues raised also provided. To protect the privacy of submission writers, a unique code has been allocated to each submission. A letter will be sent to advise you of your code when the final summary of submissions document is released after the Cabinet decision has been made. Any submissions made by public authorities (e.g. Local and State Government Agencies) or broad stakeholder interest groups (e.g. the eight Representative Community Groups, clubs, churches, chambers etc) are publicly identifiable and are listed in the final table appended to the end of this report.

Table 1 contains comments relating specifically to the site selection criteria. The remaining tables relate to non-criteria specific factors.

These documents have been provided to State Cabinet in support of our advice on preferred sites.

**Table 1: MSW039 (Near Bruce Rock) - Summary of submissions against the Site Selection Criteria**

No.	Specific Factor	Criteria	Submissions	3C Response
1	<b>Flood plains</b>	<b>At least 500mm above a 100 year ARI floodplain.</b>	1. Agree the site is not within a large regional floodplain, however anecdotal evidence of sheet flow, surface water, erosion and water logging can be seen within the site and in areas adjacent. As per the Syrinx report, flood events especially those that have occurred recently highlight the site's ability to have huge sheet flows and areas inundated after high intensity rainfall events. (BRLC, BRRCG, NTN, CSA)	1. The possibility of sheet flow would need to be investigated during detailed site investigations undertaken as part of any formal environmental approvals processes. Site specific controls could be put in place to manage this issue if required.  <u>3C Conclusion:</u> The site meets this criterion.
2	<i>Natural Waterways/Wetlands/Marine Systems</i>	<i>Not less than 1000m from high conservation/ ecological value aquatic ecosystems, not less than 500m from a slightly too moderately disturbed systems and not less than 250m from highly disturbed aquatic systems.</i>	1. It is recommended a comprehensive study involving the identification, delineation and evaluation of wetlands in the AIP, Shire of Mt Marshall and Site MSW039 is conducted before the final site is selected. (DoE) 2. Aerial photography and hydrographic mapping indicates that non-perennial watercourses are located approximately 140m west, 700m north and 700m east and further studies will need to be conducted to confirm the locations of wetlands near the proposed precinct. (DoE) 3. Agree the site meets buffer requirements as no <i>permanent</i> water system exists in the wheat belt region. (BRLC, BRRCG) 4. The Syrinx report shows an ephemeral waterway runs through the site and acts as a main conduit for surface water during runoff events. As per the criteria, if a 250m buffer was put around this waterway, then the whole of the site would be unavailable due to its small size. (BRLC, BRRCG, NTN, CSA).	1. Noted, once a site has been selected, more detailed studies will need to be undertaken to identify the best location within the exhibited site for a precinct. 2. Noted. 3. Noted. 4. The 3C acknowledges the presence of this waterway, however, any impacts on this are covered under the desirable criteria, and as such the site cannot be removed from consideration on the basis of this waterway alone.  <u>3C Conclusion:</u> The site meets the essential component of this criterion but does not meet the desirable component.
3	<b>Groundwater</b>	<b>Not within Public Drinking Water Source Areas (PDWSAs) P1-P3 priority areas identified in published development plans.</b>		

No.	Specific Factor	Criteria	Submissions	3C Response
4	Groundwater	Groundwater should be maintained at least 5m below the surface.	<ol style="list-style-type: none"> <li>Investigations of depth to ground water and hydraulic conductivity should be carried out in the feasibility stage of development. (DA)</li> <li>Several areas of perched water table were found within the 5m limit and while this is not the main water table in the area it has an effect on local land issues. (BRLC, BRRCG)</li> <li>Sites within the regional drainage zone have bores with groundwater levels of 1.58m (M.Brown 2/3/2006). (BRLC, BRRCG)</li> </ol>	<p>1 Once a general site has been selected the 3C understands that more detailed studies will be undertaken to identify the best location within the exhibited site for a precinct. It is at that stage that detailed studies would be undertaken.</p> <p>2-3 While some areas of the site may have perched water table within 5m of the surface this is not the main water table. The site cannot be removed from consideration on the basis of desirable criterion alone.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
5	<b>Groundwater</b>	<b>Hydraulic conductivity of any soil (natural or engineered) above ground water shall ensure that the transport time of contaminants to groundwater is more than 2 years.</b>	<ol style="list-style-type: none"> <li>Investigations of depth to ground water and hydraulic conductivity should be carried out in the feasibility stage of development. (DA)</li> <li>Agree that the site could be engineered to meet this criterion; however a perched water table in high permeable sand layer also shows a high risk of groundwater contamination. There are areas in the south end of the site where localised inundation occurs after rainfall events, this can cause a rapid flow rate to enter localised surface water flows. (BRLC, BRRCG)</li> <li>Using the example of Syrinx report, 300 days would be the time limit placed on time to travel 30m. Due to the small site area any movement of 30m would start to have off site impacts and this is less than half the 2 year time limit stated in the criteria. (BRLC)</li> </ol>	<p>1. Whilst the soils of the site may have a high hydraulic conductivity, this criterion allows for engineered approaches to be used to ensure that the transport time of contaminants to ground water is more than 2 years. The 3C is confident that this criterion can be met.</p> <p>2-3 Agreed that a precinct could be engineered to meet this criterion.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
6	Constructed drainage systems e.g. storm water or road drainage	Not within 100m of an entry point of a constructed drain.	<ol style="list-style-type: none"> <li>Open drains and culverts do occur on the site with spoon drains leading from the road into the site and a culvert at road edge on the west side of the site to help a creek line cross the road. Implementing a 100m buffer around these drains would eliminate the site to a size of less than 20ha and would not be viable as a waste precinct site. (BRLC, BRRCG)</li> <li>Areas of constructed drainage do occur within Bruce Rock and within 6km of the site. This would restrict local farmers from being able to implement drains on their own property closer to the site for water management. (BRLC,</li> </ol>	<p>1. The intent of this desirable criterion was to mitigate any waters flowing from a precinct into surrounding areas.</p> <p>2. This criterion would not affect the ability of farmers to effectively manage surface or groundwater on their properties.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>

No.	Specific Factor	Criteria	Submissions	3C Response
7	<b>Hydrogeology</b>	<b>Should be located in an area where the hydrogeology can be readily monitored and managed with confidence.</b>	BRRCG) 1. This includes water (surface flows) used for stock and other agricultural uses and includes regional drainage into the Yilgarn River System. With extensive drainage increasing in the region travel times of groundwater has drastically increased and the Belka Valley system is located less than 6km north of the proposed site. (BRLC, BRRCG)	1. The intent of this criterion is to ensure that groundwater beneath a precinct can be monitored with certainty such that any potential spills can be detected and reliably remediated. The presence of agricultural drainage systems should not impact on the ability to do this at the site.  <u>3C Conclusion:</u> The site meets this criterion.
8	<b>Geological Stability</b>	<b>Located on stable ground; i.e., not in a seismically active area, areas susceptible to soil sinking, landslides or swelling, karst or sinkhole terrain.</b>	1. Current Building Regulations require standards to be met that suit an instable geological environment. (BRRCG) 2. John Flockart per comm. 8 <sup>th</sup> Feb 2006 stated that through his drilling business he has found high instability in the region and the presence of a large north-south fault line. This would require further investigation. (BRRCG)	1-2 The 3C determined that areas of high or very high seismic hazard, as defined by the Global Seismic Hazard Assessment Program (GSHAP), should be avoided. GSHAP describe areas with an acceleration coefficient of 0.24-0.4g as high hazard, and areas with an acceleration coefficient of >0.4g as very high hazard areas. The site has an acceleration coefficient of 0.08-0.09g, representing a moderate seismic hazard. Under this definition, this site is considered to meet this criterion.  <u>3C Conclusion:</u> The site meets this criterion.
9	Acid Sulfate Soils	Not located on soils with high acid sulfate generating potential.	1. Moderate soil acidification risk (30 – 50% risk of occurrence) (DoE) 2. Data is not available to make a determination that this site does not have acid-sulfate soils as gravel pit disturbance of the site may have caused leaching and sodic soil issues. (BRLC, BRRCG) 3. Drains in the region have had a huge problem with acidity with some drains in Bruce Rock having pH levels of 2.4. (BRLC, BRRCG)	1. This criterion is considered to be met because the soil acidification risk is moderate and not high. 2. The 3C has advice from the Department of Agriculture that agrees with the findings of the Syrinx Technical Report on the Bruce Rock site that “as the site is high in the landscape, not normally waterlogged and without marine or estuarine sediments, it does not meet any of the risk factors for acid sulfates soils”. 3. Noted, however the presence of acidity in drains in region does not indicate a high risk of acid sulphate soils occurring at the site. The site cannot be removed from consideration on the basis of desirable criterion alone.  <u>3C Conclusion:</u> The site meets this criterion.

No.	Specific Factor	Criteria	Submissions	3C Response
10	Topography	Not located in an area with a slope >4 %.		
11	<b>Threatened Flora, Fauna and Ecological Communities</b>	<b>Not within 500m of known habitats of threatened species of flora or fauna or threatened ecological communities except where the maintenance of threatened species or threatened ecological community values can be clearly demonstrated.</b>	<ol style="list-style-type: none"> <li>1. Although it is considered to be a significant and important remnant vegetation complex as habitat for native fauna and flora, it does not contain any DRF, threatened fauna or threatened ecological communities. There is however, evidence of established populations of common native fauna including echidna (<i>Tachyglossus aculeatus</i>). (DCLM)</li> <li>2. Disagree with 3C assessment, as evidence collected within limited site surveys showed evidence of EPBC threatened species. (BRLC, BRRCG)</li> <li>3. The site has not been properly surveyed since 1978. (BRLC, BRRCG)</li> <li>4. The site itself requires full surveys for both flora and fauna and it represents Vegetation Association 1023, which is completely under represented in the wheat belt with only 6.4% remaining of a previously predominant association. (BRLC, BRRCG)</li> <li>5. Significant species that the site has includes wedge tailed eagles, echidnas and Mallee Fowl. (BRLC, BRRCG)</li> <li>6. The Syrinx report also indicates scats from EPBC threatened fauna (<i>Isodon obesulus</i>, Southern Brown Bandicoot) which would remove the site as does not meet this essential criteria. (BRLC, BRRCG)</li> <li>7. As per the Syrinx report, many priority species have been found within 3 and 6km buffer zones. (BRLC, BRRCG)</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted, the 3C is aware the site contains intact remnant vegetation that provides habitat to native fauna.</li> <li>2-4 CALM have advised the 3C that "Although it is considered to be a significant and important remnant vegetation complex as habit for native fauna and flora, it does not contain any Declared Rare Flora, threatened fauna or threatened ecological communities". The possibility of DRF would need to be investigated during detailed site investigations undertaken as part of any formal environmental approvals processes should this site be recommended as a location for a HWTP.</li> <li>5. The Mallee Fowl is categorised as a vulnerable species, rather than a threatened species. CALM consider echidnas and wedge tailed eagles to be common native species, they are neither rare or priority species.</li> <li>6. CALM have advised the 3C that the Southern Brown Bandicoot is listed as priority 4 rare fauna, so is not technically listed as threatened, and that they have no record of it in the area.</li> <li>7. Refer to answer 1-3 above. This criterion relates to Declared Rare Flora, threatened fauna or threatened ecological communities within 500m of the proposed site not within 3 – 6km.</li> </ol> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
12	<b>Conservation Value</b>	<b>No negative impact on national parks, nature reserves, or areas under conservation covenants.</b>	<ol style="list-style-type: none"> <li>1. Although it doesn't contain any DRF, threatened fauna or threatened ecological communities it is adjacent to a Class A nature reserve with potential for off-site impacts. (DCLM).</li> <li>2. Fully vegetated, adjoins Jura Nature reserve and appears to have a high conservation value. (DoE)</li> <li>3. The site is adjacent to the Jura Nature Reserve. (BR14, NTN, CSA)</li> </ol>	<ol style="list-style-type: none"> <li>1-9 Site considered to be capable of meeting the criterion. However, the 3C has concerns that that the clearing of the site is could have a negative impact on the neighboring Jura Nature Reserve given the extent of clearing within the region and potential impacts on existing wildlife corridor that includes both the Jura Nature Reserve and the exhibited site.</li> </ol>

No.	Specific Factor	Criteria	Submissions	3C Response
			<ol style="list-style-type: none"> <li>4. Clearing of the land adjacent to the Jura Nature Reserve will have detrimental effects on the flora/fauna such as nesting sites will be reduced, less seeds for regeneration, less food for fauna, less cover for fauna and insects for protection from predators, kill flora, forced movement of fauna causing overcrowding in other nature areas. (BR14)</li> <li>5. The site is virgin Tamma land. (BR14).</li> <li>6. The CALM report of 1978 indicated the significance of the adjoining bushland to the Jura Nature Reserve (Reserve 27452) and suggested that the site become classed as a Nature Reserve. (BRLC, BRRCG)</li> <li>7. If the waste precinct was established the adjacent Jura Nature reserve would almost certainly suffer in some way, egg increased weed infiltration or pollution concerns from emissions and run off. (BRLC)</li> <li>8. Current zoning under the Local and State Government show the site as a gravel reserve. This has been classed as a public purpose reserve within the Bruce Rock Local Planning Scheme and as per the definition, Public purpose reserves are currently designated for conservation purposes. (Shire of Bruce Rock 2005). (BRLC, BRRCG)</li> <li>9. Conservation value is shown in the number, density and health of the vegetation and fauna. As such the LCDC think that clearing would be an extreme loss of such an underrepresented native vegetation association. (BRLC, BRRCG, NTN)</li> <li>10. A list of species found during a floral survey (November 2005, Mark Brown and Leanette Buegge) and bird species by Syrinx (8<sup>th</sup> Feb 2006) are attached and highlight the large diversity of species and large range for such a small area. (BRLC, BRRCG)</li> </ol>	<p><u>3C Conclusion:</u> The site is capable of meeting this criterion, however the 3C has some concerns about the potential for the site to impact on the neighbouring Jura Nature Reserve.</p>
13	<b>“Bush Forever” sites</b>	<b>Not within areas designated or proposed as ‘Bush Forever’ sites.</b>	<ol style="list-style-type: none"> <li>1. The site was given to the Shire and Government to remain as bush. (BR24)</li> <li>2. Please refer to the Syrinx Report as the LCDC agrees that while the criteria is met and the site is not currently a Bush Forever site, the location out of the metropolitan area should not exclude the site as it demonstrates the requirements of Bush Forever Criteria. (BRLC, BRRCG)</li> </ol>	1-3 Noted. However this criterion applies to the Perth Metropolitan area, and as such, does not apply to this site.

No.	Specific Factor	Criteria	Submissions	3C Response
			3. The density and ability of the site to act as habitat is a very important issue and the clearing of the site would be a loss to the ecological community of Bruce Rock. (BRLC, BRRCG)	<u>3C Conclusion:</u> The site meets this criterion.
14	<b>Public Acceptability</b>	<i>A minimum 3km buffer from the nearest sensitive land use, with a desirable buffer distance of 6km from the nearest sensitive land use.</i>	<ol style="list-style-type: none"> <li>Residents within a few km of site, no assurance there won't be a health risk. (BR22)</li> <li>We are concerned that the proposed site is only approximately 900m away from our home and will affect our quality of life and health with noise pollution and emissions. (BR418, BR420)</li> <li>The RCG would like to point out that within the 3km buffer zone is a young family with two children aged 5 and 3, extensive broad acre agriculture growing QA food products including wheat, barley, pigs, sheep and cattle. (BRRCG)</li> <li>There are homes and farms nearby. (Ind)</li> </ol>	<p>1-4. It is acknowledged that there are people living within 3km of the exhibited site. The 3km public acceptability buffer was negotiated between stakeholders to remove the potential for encroachment by areas zoned residential, hotels, motels and hostels, caravan parks, hospitals and nursing homes, schools and other educational establishments, shopping centres, some public buildings, and indigenous communities. This buffer is not related to the level of risk that may be associated with the establishment and operation of the precinct.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
15	<b>Heritage Value</b>	<b>No negative impact on sites of recognised cultural or historical significance.</b>	<ol style="list-style-type: none"> <li>There has yet to be a thorough investigation of the ethnographic and archaeological history of the site and this requirement needs to be met before this criterion can be agreed upon. (BRRCG)</li> <li>A search of the DIA sites register showed no recorded sites in the vicinity of the Bruce Rock site. (Ind)</li> </ol>	<p>1-2. Once a precinct site has been selected the 3C understands that more detailed studies for heritage significance will be undertaken. The 3C believes that it has sufficient information to indicate that the site can meet this criterion.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
16	Transport Routes	Must be within 25km of major transport routes or suitable railway lines.	<ol style="list-style-type: none"> <li>Although the York – Merredin Road is a State Road (MRWA), it could hardly be called a major transport route. A Value Management workshop conducted by Clifton Coney Group has identified that this road has many shortcomings especially in regard to width and roughness. (BRRCG)</li> <li>Railway lines, while being within the specified distance, is narrow gauge and not compatible with current standard gauge. (BRRCG)</li> </ol>	<ol style="list-style-type: none"> <li>Noted. Main Roads would be consulted and involved in an assessment of preferred transport routes if this site were recommended as a location for a HWTP.</li> <li>Noted. While using rail to transport waste to a precinct is an option, given the volumes of waste generated in Western Australia transport by rail may not be viable.</li> </ol> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
17	<b>Transport Routes</b>	<b>Any traffic on local roads must be within</b>	<ol style="list-style-type: none"> <li>Adequacy of the local road network to cope with additional demands needs further investigation. (DA)</li> <li>Trucks traveling to/from will pass through many towns –</li> </ol>	<ol style="list-style-type: none"> <li>Noted. Main Roads would be consulted and involved in an assessment of preferred transport routes if this site were recommended as a location for a HWTP.</li> </ol>

No.	Specific Factor	Criteria	Submissions	3C Response
		<p><b>acceptable congestion and safety limits.</b></p>	<p>threat to country life style, health, property values etc. (BR22, BR418, BR420, BRRCG)</p> <p>3. The condition of these roads is not suited to such an increase in heavy vehicle usage. (BR418)</p> <p>4. The York – Merredin Road section from Bruce Rock is under enormous pressure due to it needing road works due to width of road. It's a wide and heavy load route, grain trucks, school bus route (Although the York – Merredin Road is a State Road (MRWA), it could hardly be called a major transport route. A Value Management workshop conducted by Clifton Coney Group has identified that this road has many shortcomings especially in regard to width and roughness. (BRRCG)</p> <p>5. There are a number of problems associated with transport to this site including road narrowness, other sensitive road uses and inappropriate rail gauge. (Ind)</p>	<p>2. It is estimated that if all of the hazardous wastes currently treated in the State were directed to a precinct, that there would be between 10 and 20 truck movement per day. The movement of controlled wastes on the road are regulated under the Environmental Protection (Controlled Waste) Regulations. The transport of dangerous goods is done in accordance with the existing suite of procedures flowing from the Australian Code for the Transport of Dangerous Goods by Road and Rail, associated dangerous goods regulations and emergency response procedures would apply.</p> <p>3-5 Refer to response 1 to criteria 16, above.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
18	Emergency Services	<p>Within approximately 25 minutes of adequate off-site emergency services including medical and firefighting facilities.</p>	<p>1. FESA is unable to support any of the exhibited sites in the south-west because of:</p> <ul style="list-style-type: none"> <li>• increased risks to the community associated with the transport distances</li> <li>• the expectations placed on local volunteers where no permanent career services are located (except Kemerton).</li> <li>• the expectations placed on volunteers placed along transport routes.</li> <li>• The additional cost burden that may be placed on FESA in the Provision of emergency services in isolated regions; and</li> <li>• in finding local community members to volunteer for hazardous materials response. (FESA)</li> </ul> <p>2. With no emergency services located nearby that are equipped to handle an accident or emergency with the precinct, we feel our family and business have been placed at risk. (BR418)</p> <p>3. At present there is not an emergency service unit in the wheatbelt that would be able to attend and contain an incident at this site within the 25 minute response time. (BRRCG)</p>	<p>1-5 It is acknowledged that the site is not within 25 minutes of an existing adequate offsite emergency services. This was set as a desirable criterion rather than an essential criterion in acknowledgement that on-site emergency services could be provided if required. The need for this can be better ascertained during formal assessment processes once specific treatment proposals have been put forward.</p>

No.	Specific Factor	Criteria	Submissions	3C Response
			<p>4. FESA have also indicated (although contained within their own submission) that they would not endorse the siting of a paid and equipped emergency services team in Bruce Rock or Merredin. (BRRCG)</p> <p>5. Anecdotal evidence after the Bellevue disaster indicates that volunteer emergency services are not to respond to these situations. (BRRCG)</p>	<p><u>3C Conclusion:</u> The site does not meet this criterion.</p>
19	Proximity to waste generating areas	Within 150km from where 80% of the waste it treats is generated.		
20	Land Ownership	Located on State Government owned land.	1. Agree, that this criterion is met, although this land was handed back to the government and at the request of the previous owner that the land not be cleared (letter from previous owner attached). (BRRCG)	<p>1. Agreed</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
21	<b>Legislative Jurisdiction</b>	<b>Within the jurisdiction of Western Australian legislation, policies or regulations; i.e., not on Commonwealth land.</b>	1. A reference to the road map indicates total travel distance from Perth of 241kms to the proposed Bruce Rock site. (FESA)	<p>1. Noted, however this criterion is desirable and not essential to the sites suitability.</p> <p><u>3C Conclusion:</u> The site does not meet this criterion.</p>
22	Equity/ employment	Within a reasonable commuting distance of a centre providing adequate facilities for a skilled workforce and their families.		
23	<b>Services</b>	<b>Ability to provide adequate access to water, telephone and</b>	<p>1. Has a reasonable potable supply of water (100mm main) in the vicinity of the site. (WC)</p> <p>2. Our phone lines are quite often out of order and usually take up to seven working days to repair. (BR418)</p>	<p>1. Noted.</p> <p>2-4. The 3C acknowledges that the level of infrastructure at the site is currently constrained. However the ability to provide adequate services exists.</p>

No.	Specific Factor	Criteria	Submissions	3C Response
		electricity.	3. We are in the process of upgrading our electrical transformer as at the moment the power supply is struggling to run the vacuum cleaner and microwave on full power, our home (and the sit) is also at the end of the power line. (BR418) 4. Although all services could be provided, this could be said for any site within country WA. The issue will be cost, certainly major infrastructure upgrades will be required for both the supply of water and power. (BRRCG)	<u>3C Conclusion:</u> The site meets this criterion.
24	Climate/ landform	Not in an area prone to frequent temperature inversions.	1. Evidence, both anecdotal (Syrinx report) and scientific (Australian Greenhouse Office 2002) show that frost days and climate inversions occur with frequency at the site location. (BRLC, BRRCG) 2. The Syrinx report shows the site and Bruce Rock as a whole include the factors that lead to fog and inversions occurring. (BRLC)	1-2 The 3C acknowledges that the site is susceptible to temperature inversions and this criterion has not been met.  <u>3C Conclusion:</u> The site does not meet this criterion.

## NON SITING CRITERIA MATTERS – MSW039 (NEAR BRUCE ROCK)

**Table 2: MSW039 (Near Bruce Rock) - Socio-Economic Issues**

Issue	Raised By
Public opinion in Bruce Rock – 100% against a waste treatment facility at this site.	BR24, BBRCG
Agricultural area – production of foodstuffs. Any spill could be detrimental to soil and water table.	BR22
The Butler family has farmed the land adjacent to the proposed site for 3 generations.	BR418
We are unsure of the effect emissions may have on our crops.	BR418, BR420
We doubt we could sell our grain if there is a chance it may be contaminated.	BR418, BRLC
It has taken us many years and a lot of hard work to become a quality assured piggery and many abattoirs will no longer accept pork that is not quality assured and audited regularly. If the proximity of the proposed site affected our quality assurance we would be disappointed.	BR418
At present land values in our area are approximately \$450 – 550 an acre. We are concerned that if we wish to sell in the future it would be a greatly reduced value to what the land is worth. Who would want to buy a farm adjacent and adjoining (on 3 sides) a HWTP?	BR418
Wholly against the proposed Bruce Rock site being used for hazardous waste.	BR420
Two school buses pass the site from two different areas twice daily carrying precious young future generations.	BR420
Public meetings for this issue have attracted up to 80 residents with a strong feeling, this makes up a sizeable proportion of our small population.	BRRCG
The community has received support of it's disapproval of the proposed site. Support has been received from Federal and State Ministers, community members and diverse stakeholders including CEO's of councils on possible transport routes.	BRRCG
Opposition to the sites selection as a potential location for a HWTP was emphatic and unanimous.	Ind
Site drainage is apparently directly connected to a water source used in food production.	Ind
The townspeople of Bruce Rock are opposed to the development and also object to the location of the proposed workforce in Merredin.	Ind
<b>3C Response:</b>	
<ul style="list-style-type: none"> <li>The 3C notes concerns raised by stakeholders.</li> <li>It is understood that people's perceptions of living, or farming near an industrial park, or a waste treatment facility, may result in a lower sale price for their property.</li> </ul>	

**Table 3: MSW039 (Near Bruce Rock) - Environmental Issues**

Issue	Raised By
The site is worthy of preservation in its own right – natural vegetation.	BR14
Clearing within the Shire of Bruce Rock was prohibited by regulation gazetted under the <i>Soil and Land Conservation Act 1945</i> in 1991.	DA
This site is located in an unvested and well vegetated Crown reserve that is representative of the remaining 7.1% of the original native vegetation within the Shire of Bruce Rock.	DCLM
The proposed site would require clearing of an intact patch of Beard Vegetation Association 1023, of which only 6.4% percent remains from the original approximately 1,600,000 hectares.	DCLM
The thought of clearing a good patch of remnant vegetation and ruining the natural wildlife corridor appalls me.	BR418
The LCDC believes clearing such a dense area of scrub would go against the environmental ethic that it has tried to foster over the last 20 years.	BRLC
So little pristine vegetation is left within the Shire, this few acres must be left for future generations to view.	BR420
In 1990 and 1991 the LCDC in conjunction with the Shire Council of Bruce Rock passed in council a “Tree Preservation Order” that clearing within the Shire of Bruce Rock on all open or public land was now banned.	BRLC, BRRCG
National Tree Day 2002 planted out realigned road system on Belka South Road across from the 3C site.	BRLC
Site is adjacent to the Jura Nature Reserve which could suffer from contamination and the current site acts as a road buffer and wildlife corridor.	BRRCG

Issue	Raised By
In large rainfall events the main flow from this area leaks into the Belka valley system which forms part of the larger Avon River Basin.	BRLC, BRRCG
Clearing of the site for a HWTP would have extreme affects on the localized water table, especially perched water tables above the clay layer. It is well known that clearing vegetation leads to a decrease in water use and rising water tables.	BRLC, BRRCG
Priority flora and fauna known within 2km of the site.	BRRCG
ACE does not support the development of the Bruce Rock site for a precinct. As one of the few remaining vegetated areas in that part of the wheatbelt it would be unreasonable to clear the site for a precinct when other sites are available. The conservation quality of the remnant vegetation and the presence of Mallee fowl nests at the site should be sufficient evidence that the spirit of the conservation criteria have not been met.	ACE, CSA
The Bruce Rock site is a lush and intact parcel of bushland. It is likely to have significant biodiversity and conservation values.	Ind
Clearing of this bush block could have further implications on local salinity problems.	Ind
The site visit indicated a large population of birds and the same could be said for reptiles, insects and possibly some larger mammals.	Ind
<b>3C Response:</b> <ul style="list-style-type: none"> <li>Any clearing of native vegetation at precinct sites would have to meet all the requirements of the clearing regulations.</li> <li>The combined site selection criteria and technology suitability criteria are some of the most stringent criteria for any type of industrial facility. When implemented together, these criteria should ensure the risks of impacts to waterways can be managed.</li> </ul>	

**Table 4: MSW039 (Near Bruce Rock) – 3C Conduct and Process**

Issue	Raised By
Private land owners in the district would be amenable to the development being located on an alternative site to avoid further clearing of native vegetation in a shire with very low levels of remaining vegetation.	DA
The process of announcing Bruce Rock as a site and the way the community was informed has and still causes concern. The first the community knew of the issue was on the ABC Radio.	BRRCG
The first meeting and nominated date for submissions were in the middle of harvest. Wheat belt towns are very busy during harvest and post harvest due to the holiday period.	BRRCG
<b>3C Response:</b> <ul style="list-style-type: none"> <li>The 3C notes the comments on the conduct of the process.</li> </ul>	

**Table 5: MSW039 (Near Bruce Rock) - Miscellaneous**

Issue	Raised By
DPI's responsibility has no management order over this reserve. No objection at this stage.	DPI
A Natural Epiphany was provided to the 3C as part of a submission made by a local artist – submitted to bring a different point of view to the 3Cs narrow criteria.	BR14, BR420
A Gregorian Chant that uses the form of The Creed but substitutes the original words for the Latin names of some of the plant species that can be found on the site.	BR14
A hypothetical planning scenario in relation to the Bruce Rock site has been compiled by Mr. J Mitchell, EHO, for the shire of Bruce Rock. This was included in the Bruce Rock representative Community Group submission.	BRRCG
<b>3C Response:</b> <ul style="list-style-type: none"> <li>The 3C notes the comments both for and against a precinct at the Bruce Rock site.</li> </ul>	

**Table 6: MSW039 (Near Bruce Rock) - Transport**

Issue	Raised By
Increased road transport and the possibility of accidents and spillage on rural roads is a concern, this would have a huge impact and the lack of FESA ability to service the routes that would be used would increase the likelihood of irrevocable damage to areas of the environment.	BRLC
Both the Mt Marshall and Bruce Rock sites require access via smaller trunk roads. All these roads should be surveyed and reported for additional risks before any final decision is made with respect to site selection. Some additional risks could include narrow bridges, flood ways, level crossings, all weather capability, as well as additional traffic that may be associated with mine sites and seasonal grain haulage.	FESA
<p><b>3C Response:</b></p> <ul style="list-style-type: none"> <li>The movement of controlled wastes on the road are regulated under the Environmental Protection (Controlled Waste) Regulations. The transport of dangerous goods is done in accordance with the existing suite of procedures flowing from the Australian Code for the Transport of Dangerous Goods by Road and Rail, associated dangerous goods regulations and emergency response procedures would apply.</li> <li>Noted. Main Roads would be consulted and involved in an assessment of preferred transport routes if this site were recommended as a location for a HWTP.</li> </ul>	

### Key to Summary of Submissions Tables

Code	Received from
ACE	Alliance for a Clean Environment
ALP-Asb	Australian Labor Party Australind Sub-Branch
ALPSH	Australian Labour Party, South Hedland Sub Branch
BCC	Binningup Church of Christ
BCA	Binningup Community Association
BEDA	Bencubbin Economic Development Association
BGPA	Botanic Gardens and Parks Authority
BRLC	Bruce Rock Land Conservation District Committee
BRRCG	Bruce Rock Representative Community Group
CCI	Chamber of Commerce and Industry
CfH	Care for Hedland Environmental Association Inc.
CoB	City of Bunbury
CSA	Contaminated Sites Alliance: Mirrabooka Action Group
DA	Department of Agriculture
DCEP	Department of Consumer and Employment Protection
DCLM	Department of Conservation and Land Management
DoE	Department of Environment
DoEH	Department of Environment and Heritage
DoH	Department of Health
DOIR	Department of Industry and Resources
DPC	Department of the Premier and Cabinet
DPI	Department for Planning and Infrastructure
DSL	Dampier Salt Ltd
FESA	Fire and Emergency Services Authority
Kem338	Facilitation Group of the Kemerton Community Committee

<b>Code</b>	<b>Received from</b>
HC	Heritage Council
Ind	Indigenous Community Liaison as provided via Nyaarla Projects Pty Ltd in their report Aboriginal Community Liaison (May 2006)
KCCFG	KCC Facilitation Group (majority response)
KIPCC	Kemerton Industrial Park Coordinating Committee
KNS	Kalgoorlie Nickel Smelter & Concentrator – Nickel West
KRCG	Kalgoorlie Representative Community Group
LC	LandCorp
LCC	Leschenault Catchment Council
Kem200	Leeuwin Environment
LMCG	Lake McDermott Catchment Group
LPA	The Leschenault Progress Association
MMRCG	Bencubbin Waste Treatment Precinct Reference Group
MR	Main Roads
NTN	National Toxics Network Inc
OIC	Office of the Information Commissioner
PAN	Pollution Action Network
PDC	Pilbara Development Commission
PG	Pilbara Greens Local Group
PHCCI	Port Hedland Chamber of Commerce and Industry Inc
Kem329	Riverlinks Child Care and Community Centre
SBDC	Small Business Development Corporation
SIPH	Soroptimist International Port Hedland
Kem345	Shire of Capel
SoC	Shire of Coolgardie
SoDard	Shire of Dardanup
SoH	Shire of Harvey Council
SoMM	Shire of Mt Marshall

<b>Code</b>	<b>Received from</b>
SoN	Shire of Northam
SoR	Shire of Roebourne
STAR	STAR Alliance
Kem342	South West Environment Centre Inc.
TKAN	The Kemerton Action Network
ToN	Town of Northam
ToNS	Town of Northam Supplementary Submission
TPH	Town of Port Hedland
WAI	Wedgfield Association Inc
WC	Water Corporation
Kem40	Wildflower Society of WA Inc.
A17	Wheatbelt Development Commission
WCS	Wetlands Conservation Society