



CORE CONSULTATIVE COMMITTEE ON WASTE (3C) RESPONSE TO SUBMISSIONS MADE ON THE EXHIBITED SHORT LISTED SITE – KAL024 AND KAL025 (NEAR KALGOORLIE)

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 KAL024 and KAL025 (near Kalgoorlie) 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: KAL024 and KAL025 (near Kalgoorlie) - Summary of submissions against the Site Selection Criteria

No.	Specific Factor	Criteria	Submissions	3C Response
1	Flood plains	At least 500mm above a 100 year ARI floodplain.		
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>	<ol style="list-style-type: none"> 1. It is recommended that a comprehensive study involving the identification, delineation and evaluation of wetlands in the vicinity of the proposed HWTP in the Goldfields is conducted before a final site is selected. (DoE) 2. Site KAL/024/025 is located approximately 1 km west and 2km east of a palaeochannel salt lake system. The salt lakes form a complex geometry of interlinked lakes and natural drainage channels. (DoE) 3. There are a number of natural watercourses that run through the area. Potential seepage into this watercourse will require investigation in relation to subsurface directional flows. Any subsoil seepage does have the potential to affect surrounding and down stream vegetation. (DCLM) 	<p>1-2. Based on information already obtained the 3C believes there is sufficient land within the site to meet this criterion. The 3C understands that once a site has been selected more detailed studies will be undertaken to identify the best location within the exhibited site for a precinct.</p> <p>3. Agree.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
3	Groundwater	Not within Public Drinking Water Source Areas (PDWSAs) P1-P3 priority areas identified in published development plans.		
4	Groundwater	Groundwater should be maintained at least 5m below the surface.	<ol style="list-style-type: none"> 1. There is a lack of information available on groundwater. (DoE) 2. Groundwater is likely to be saline with a depth being variable so may require further investigation. (DA) 	<p>1-2. Noted. Once a general site has been selected the 3C understands that more detailed studies will be undertaken as part of any formal environmental approvals processes. However, the 3C believes that it has sufficient information to indicate that there is enough land within the site that can meet this criterion.</p> <p><u>3C Conclusion:</u> The site meets this criterion.</p>
5	Groundwater	Hydraulic conductivity of any soil (natural or engineered) above		

No.	Specific Factor	Criteria	Submissions	3C Response
		ground water shall ensure that the transport time of contaminants to groundwater is more than 2 years.		
6	Constructed drainage systems e.g. storm water or road drainage	Not within 100m of an entry point of a constructed drain.		
7	Hydrogeology	Should be located in an area where the hydrogeology can be readily monitored and managed with confidence.	<ol style="list-style-type: none"> 1. Kalgoorlie Consolidated Gold Mines have a bore field on the proposed site which they draw water from for mineral processing. This may be an issue in relation to groundwater management (both quality and quantity) at the site. (DoE) 2. The hydrogeological studies suggest the impact on the local aquifers and two actively-used adjacent bore fields would present risks to water quality and soil contamination issues. (KRCG) 	<ol style="list-style-type: none"> 1. Noted, however the technology suitability criteria used by the 3C and endorsed by Cabinet aim to eliminate or minimise emission to air, land or water from the precinct so it is unlikely the precinct will affect the quality of groundwater in the vicinity of the precinct. Further it is not envisioned the precinct will require significant access to groundwater for its operation so would be unlikely to impact on the quantity of groundwater available to Kalgoorlie Consolidated Gold Mines. 2. The 3C notes these concerns but believes that the groundwater can be managed at the site, provided detailed studies are undertaken to identify the correct placement of monitoring bores based on an improved understanding of preferential groundwater flow directions. <p><u>3C Conclusion:</u> The site meets this criterion.</p>
8	Geological Stability	Located on stable ground; i.e., not in a seismically active area, areas susceptible to soil sinking, landslides or swelling, karst or sinkhole terrain.		
9	Acid Sulfate Soils	Not located on soils with high acid sulfate generating potential.		

No.	Specific Factor	Criteria	Submissions	3C Response
10	Topography	Not located in an area with a slope >4 %.		
11	Threatened Flora, Fauna and Ecological Communities	<i>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.</i>	1 There are no known habitats of threatened species of flora or fauna or threatened ecological communities within 500m of KAL024/025. Impacts on existing vegetation complexes will require further assessment to determine likely detrimental effects, if any. (DCLM)	1 Noted. The 3C understands that once a site has been selected more detailed studies will be undertaken, including those related to flora and fauna to identify the best location within an exhibited site for a precinct. <u>3C Conclusion:</u> The site meets this criterion.
12	Conservation Value	No negative impact on national parks, nature reserves, or areas under conservation covenants.	1 The sites are not near to, or likely to impact on, any CALM-managed estate or conservation covenant sites. (DCLM)	1 Noted. <u>3C Conclusion:</u> The site meets this criterion.
13	“Bush Forever” sites	Not within areas designated or proposed as ‘Bush Forever’ sites.		
14	Public Acceptability	<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>		
15	Heritage Value	No negative impact on sites of recognised cultural or historical significance.	1. Two native title claims are pending. (KRCG) 2. No archaeological surveys have yet been carried out over the site. (Ind) 3. A large seam of good quality quartz was noted in the area and it was suggested by people consulted that there may be sites around the swampy areas and drainage features on KAL024/025. Taken together with the site location there is a reasonable likelihood of artefact scatters occurring on this parcel of land. (Ind)	1. Noted. 2. Noted. 3. Noted. The 3C recognize that it is extremely important to protect significant sites of Indigenous and European heritage (whether registered or not) from impacts arising from industrial development. It is understood by the 3C that more detailed studies will be undertaken to identify the best location within an exhibited site for a precinct during the approvals phase. It is at this stage that detailed studies would be undertaken. <u>3C Conclusion:</u> The site meets this criterion.

No.	Specific Factor	Criteria	Submissions	3C Response
16	Transport Routes	Must be within 25km of major transport routes or suitable railway lines.		
17	Transport Routes	Any traffic on local roads must be within acceptable congestion and safety limits.	1. A new access from the Goldfields Hwy might be required. (MR)	1. Noted. <u>3C Conclusion:</u> The site meets this criterion.
18	Emergency Services	Within approximately 25 minutes of adequate off-site emergency services including medical and firefighting facilities.	1. Kalgoorlie has a permanent fire station, they would require back up from FRS volunteers. (FESA)	1. Noted. <u>3C Conclusion:</u> The site meets this criterion.
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. The site falls within land subject to the <i>Nickel Refinery (Western Mining Corporation Limited) Agreement Act 1968</i> . Under this agreement Nickel West is entitled to purchase additional land adjacent to the smelter site if it can demonstrate the need. Nickel West also has first right of refusal if the State intends to sell it to another party, provided it can demonstrate need. Land adjacent to the smelter boundary has an important role to play in future operations. While Nickel west does not require land adjacent to the smelter immediately, it is highly likely that it will in the future. Should the KAL024/KAL025 site be selected as the location for future waste treatment facilities, the smelters future operations would be constrained, with significant economic and social impacts on the local community. (KNS)	1. Agreed. However the site is located on State Government owned land and therefore the criteria is deemed to be met, but the existence of the <i>Nickel Refinery (Western Mining Corporation Limited) Agreement Act 1968</i> is noted by the 3C. <u>3C Conclusion:</u> The site meets this criterion.
21	Legislative Jurisdiction	Within the jurisdiction of Western Australian legislation, policies or regulations; i.e., not on Commonwealth land.		
22	Equity/ employment	Within a reasonable commuting distance of a centre providing adequate		

No.	Specific Factor	Criteria	Submissions	3C Response
		facilities for a skilled workforce and their families.		
23	Services	Ability to provide adequate access to water, telephone and electricity.		
24	Climate/ landform	Not in an area prone to frequent temperature inversions.		

NON SITING CRITERIA MATTERS – KAL024 AND KAL025 (NEAR KALGOORLIE)

Table 2: KAL024/025 (near Kalgoorlie) - Socio-Economic Factors

Issue	Raised By
Kalgoorlie Nickel Smelter (KNS) is located in close proximity to the site. There are concerns that SO2 emissions from KNS could lead to ambient SO2 concentrations at the site which may be in excess of health standards.	DOE, DCLM, KRCG, NTN, CSA, ACE
The site is within DPI's responsibility. This reserve was created specifically as a requirement of Clause 5 of the Nickel Refinery (Western Mining Corporation Ltd) Agreement Act no 76 of 1970. Any proposal to consider an alternate use for this land will need to be referred to BHP Billiton for consideration of their future use of land in accordance with clause 5. There is also no dedicated access to this reserve.	DPI
The Nickel Smelter has a State Agreement Act for future expansion.	KRCG, DPI)
Mineral tenements are currently held over the entire site, and it is an active exploration and prospecting area.	KRCG
A quarantine station is to be built within two kilometers of the site.	KRCG
The Kalgoorlie sites is much better than Mungari because there are no, or very little southerly winds in this area, hence little chance of pollution.	CSA
There is the expectation that at the very least some effort will be put into securing employment for local indigenous businesses and in training people to undertake some of the jobs associated with the plants operations, regardless of where it is sited on the Goldfields.	Ind
Information on the water requirement of the facility and the affect this would have on the Goldfields was requested.	Ind
<p>3C Response:</p> <ul style="list-style-type: none"> • The 3C notes the potential issues that a precinct located at this site would be in the buffer zone of the Kalgoorlie Nickel Smelter, which could raise OH&S issues for workers and visitors to the precinct. • The 3C notes the The existence and requirements of the <i>Nickel Refinery (Western Mining Corporation Limited) Agreement Act 1968</i> and potential implications this could have on establishing a precinct at this location. • The 3C expect the DoIR would consult and liaise with tenement holders in relation to existing and pending exploration leases on behalf of the Government if the site was recommended as the location for a precinct. • It is expected that a precinct would require approximately 4,000 litres of potable water per day. Water used for washing down equipment could come from recycled treated water produced onsite. Where the potable water would come from would depend on the final site selection and discussions with the Water Corporation, but it is likely to be provided from the local scheme water supply. • 3C have recommended to Cabinet that Indigenous training support options should be a condition of any leases being granted to tenants in precincts. 	

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

Code	Received from
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

Code	Received from
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