

RESPONSE TO SUBMISSIONS MADE ON NON-SITE-SPECIFIC ISSUES

This document summarises all comments in submissions that are generic to all sites (i.e. are not site specific).

In order to analyse and respond to comments, submissions have been summarised and presented in tabular format with any 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.

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

Table 1: 3C Process

Issues Raised Regarding the Conduct of the 3C Process	Raised By
Some initiatives undertaken by FESA, DoCEP and DoE have 'overtaken' and addressed some of the issues associated with hazardous waste treatment in WA and the original intent of the 3C process to establish new and better waste treatment facilities has largely been met through the upgrade and consolidation of existing facilities.	CCI
Based on the lack of evidence suggesting that existing facilities cannot meet all legislative requirements in their current locations, the 3C should recommend that precincts be available for the establishment of new facilities when and if the market dictates that additional or different treatment capacity is required.	CCI
There have been a number of submissions criticising the 3C process and the conduct of the 3C and its advisors in undertaking this process and potential conflicts of interest of committee members.	A9, A50, A90, STAR, A78, A17, A93, A118, LCC, Kem1-2, Kem11-12, Kem119-120, Kem125, Kem153, Kem156, Kem158-161, Kem164-, 166, Kem169, Kem171, Kem206, Kem213, Kem219, Kem319, Kem322, Kem329, Kem330-331, Kem346, Kem349-350, Kem353-364, DS
Open and transparent process has permitted much needed public debate on issue.	ACE, Kem321
Thank you for the process and the extension of time for submissions.	Kem197
Concerned that no formal risk assessment has occurred, the bland statement that risk assessment is not required is not acceptable. Some submissions referred to risk assessments for impacts to agriculture.	Kem207, Kem339
We are not against recycling waste or a plant to try and manage toxic waste, but the very limited knowledge of what is to be managed and how is very worrying.	KAR474
WA Health believes that although the 3C process indicates that social and economic considerations have been taken into account in the development of the site and technology selection criteria the emphasis for these criteria has been placed on environmental conditions and these other considerations have not been given sufficient attention.	DoH
The Pilbara Development Commission is concerned at the level of the community disapproval surrounding the location of both sites. It is the view of the Commission, consultation at a community level needs to be undertaken in Karratha, Port and South Hedland, in an independent forum. This will better enable the 3C to clarify and judge the extent the development of a HWTP will impact the social, cultural and environmental issues of concern for the residents.	PDC

Issues Raised Regarding the Conduct of the 3C Process	Raised By
When determining the acceptability of the precincts, the impact on small business should be taken into account and in particular that the operations of local business should not be unreasonably interfered with.	SBDC
Believe that in the end this proposal is about money, not the best site, or best technology, or the environment including the potential to pollute groundwater, not the community, but money.	Kem348
Aboriginal consultation period was not adequate given: (i) the summer law period (December to March) when no “white fella business” is possible in the Pilbara and Goldfields (ii) Christmas breaks which occurred in the middle of the consultation period (iii) the communication processes that are required before consensus is achieved	Ind
Future community engagement with Aboriginal communities should occur through the established organisations already operating and communication with key people identified should be maintained by regular visits.	Ind
The Cabinet decision should be fed back through mechanisms that ensure that all Aboriginal groups/persons consulted during the consultation process are advised of the outcomes.	Ind
3C Response <ul style="list-style-type: none"> The 3C notes the opinions about the conduct of the 3C process and endorse the need to feedback to stakeholders. The 3C have received no evidence to suggest that current facilities meet with the Cabinet endorsed siting and technology suitability criteria. 	

Table 2: Site Selection Issues

Issues Raised on the siting of waste treatment facilities and precincts.	Raised By
The Kwinana Industrial Estate and its associated buffer area is a suitable location for the establishment of waste treatment facilities and any real risks associated with the operation of a hazardous waste treatment facility can be more than adequately mitigated by existing buffer distances to sensitive land uses at the Estate or engineering.	CCI
Essential Criterion 3 “Groundwater (PDWSA) should be titled “Public Drinking Water Source Area (PDWSA)” as PDWSAs are not necessarily groundwater, they can also be surface water supplies.	DoE
Suggested site should be at least 50km away from residential and town sites – e.g. in the hill country in CALM areas such as Dwellingup, back of Wagerup in mine sites, Bruce Rock or Avon Valley.	Kem5
If we need a dump, this should be in the middle of Australia, transport costs should not be an issue, as this should be built into disposal costs.	Kem297, Kem317, Kem332, Kem351, Kem352
Transport toxic waste by rail, slowly, at night to an area remote from growing population areas, e.g. Northam or York areas or further in a North Easterly general direction.	Kem307
As highlighted by Bellevue and Brookdale, there is too much that can go wrong with the placement of these dangerous sites near areas of population.	Kem327
Source of waste – Southwest produces a small amount – more generated in Metropolitan area. This does not make sense.	Kem207
No system is fool proof, accidents do occur. NO system can contain/control every possible type of accident despite best practice practices being followed. Even the most thorough maintenance does not guarantee that there will not be a machinery/infrastructure failure and the human ‘element’ which can at times upset and bypass even the most strictly regimented systems (remember the Exxon Valdes disaster in Alaska?)	Kem298, Kem309, Kem332-333, Kem351
The uncompromised health and survival of all life, be it vegetation, animal or human must be paramount over the materialistic financial gain of industry and ‘big’ business.	Kem2A
3C Response: <ul style="list-style-type: none"> The only nominated site in the Kwinana Industrial Estate did not meet all of the essential site selection criteria. The 3C notes the submissions suggesting preferable regions for precincts and those noting the risks of precincts. 	

Table 3: Site Selection Criteria

Issues General Issues Raised on the Site Selection Criteria	Raised By
The 'Golden Hour' for emergency treatment is not a criterion.	Kem33
Health should be a criterion.	Kem5
It is not appropriate for volunteers to be involved in hazardous waste emergencies. Should ensure that any potential waste precinct is well separated from built up areas with suitably trained emergency response team available.	SoH
Some of the Desirable Criteria should have been Essential Criteria. Restricting comment to the site selection criteria is unnecessarily too narrow.	SoH, Kem27, Kem153, Kem156, Kem158-161, Kem164-166, Kem175, Kem190, Kem191A, Kem197, Kem202, Kem206, Kem208, Kem217, Kem318, Kem322, Kem329-331, Kem343, Kem349-350, Kem353-364.
The essential criteria are not extensive enough.	Kem33
Disappointed by 3c's narrow, legalistic interpretation of compliance with essential criteria and the compartmentalization of the factors critical to ground water integrity.	Kem191B
<p>3C Response:</p> <ul style="list-style-type: none"> The 3C notes the concerns with the site selection criteria. These criteria were developed through broad stakeholder consultation and represent a consensus view across stakeholder groups. These criteria were endorsed by State Cabinet in August 2004 as the basis for the 3C to identify suitable sites for hazardous/industrial waste treatment precincts 	

Table 4: Environmental Issues

Issues Raised on Environmental factors that are outside the Site Selection Criteria	Raised By
Soil, air and water samples should be taken prior to the establishment of any precinct	A85
Suitable routes for transporting hazardous wastes to the HWTP should be carefully considered. No hazardous waste should be transported through wellhead or reservoir protection zones (accidents/accidental spills) unless no alternative exists.	DoE
A new EPA assessment would be required before a precinct could be established.	STAR, A82
Seismic activity should be assessed locally, not globally The scale of an earthquake cannot be predicted therefore any facts and figures on risk are of no value	A91; A118
In addition to the QA program, ongoing monitoring of soil, air quality and water quality should be undertaken by the site and assessed against National guidelines.	MMRCG
Problem of birds landing on evaporation ponds with potential to spread pollution to other areas.	A6
Government inability to guarantee and/or identify what environmental and health implications there would be for people, animals and produce that live and grow adjacent to such a plant.	A50, A78
All sites will need to ensure animals are excluded from evaporation ponds.	Ind, Kem315, DCLM
The precinct could potentially be a target for terrorism (with the aim of polluting the river so that Perth and communities adjacent to the river will be affected).	Cal
The effect of clearing vegetation off the selected sites on local salinity levels will need to be assessed for most of the sites.	Ind
During the last 5 years 57% of all hazardous materials incidents have been transport related. Of these incidents, 62% have occurred in the country regions of WA.	FESA
<p>3C Response:</p> <ul style="list-style-type: none"> 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 provide a level of environmental protection. Once a general site has been selected, more detailed studies will need to be undertaken through formal environmental approvals processes to identify the best location within a site for a precinct and to ensure any technologies selected operate in a precinct are built and operated to provide for environmental protection. 	

Table 5: Definition Used for Buffer Zone

Issues raised on the Suitability of the 3km buffer and Impacts that could occur within the buffer (refer to the following table for comments on potential economic impacts in buffers).	Raised By
Expand “sensitive land use” criterion to include: (i) primary/rural producers, and (ii) family homes	TON, A6, STAR A117, BR418, MM80, MM444
Sensitive land use appears to ignore the human factor, sensitive land use is not only a large gathering of people but also, should include single farmhouses and families, Quality assured food production and off site water use.	BRRCG
Residents in buffer zones should be given regular Government funded medical examinations.	A85
A Quality Assurance program should be developed for stock or crops in area surrounding the precinct, this program should include regular testing of the produce.	MMRCG
3km buffer not based on risk or science based assessment	CCI
I believe some siting criteria used by the 3C are inappropriate. This is a major problem with the process. An example is buffer zones, 3km is not enough distance from dwellings and communities.	M468
<p>3C Response:</p> <ul style="list-style-type: none"> 3C note the concerns relating to the current definition of “sensitive land-use”. 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>The technology suitability criteria require that emissions are eliminated or minimised to provide a level of protection for the community and the environment, including farming practices. It is these criteria, rather than the 3km public acceptability buffer, that are designed to protect all land uses, including agriculture and individual farm houses from possible effects and emissions.</p>	

Table 6: Socio Economic Issues and Potential Economic Impacts within Buffer Zones and Surrounding Areas

Issues Raised Related to Socio Economic Issues and Potential Economic Impacts within Buffer Zones and Surrounding Areas	Raised By
All farming enterprises have a right to remain viable – proposed precinct presents uncertainty. Financial and compensation implications to property owners and their families (both property value and ongoing commercial production).	A39, STAR, A78, A85, A92A50, A117, BRRCG, MM80, BEDA
Value of land within buffer zone and in surrounding areas will be devalued.	A117, B55, BRLC, BRRCG, MM80.
Unknown pollutants from precinct would limit opportunities to visit and consume goods from family properties.	A78
Precincts represent a threat to Quality Assurance for surrounding farms. Will the quality of the produce from surrounding farms be compromised by leachate or airborne pollutants.	LMCG, MMRCG, MM453, BEDA, SOMM,
A precinct/waste dump could be detrimental to the region and discourage workers applying for jobs in other businesses adjacent to the precinct and in the region.	A19, A50, STAR, A78, SON, A85
Insurance rates for all businesses will skyrocket.	A82
No community benefit by establishing a precinct at the exhibited site.	A117
Farming practices include Aquaculture – precinct would prohibit this practice	A39, A90
<p>3C Response:</p> <ul style="list-style-type: none"> The 3C have brought concerns related to the potential economic impact of precincts to the attention of Cabinet and have recommended that Cabinet undertakes a baseline study of the value of any neighbouring properties and to develop a program to offset any financial impacts that could result from precincts in the event that any impacts occur. 	

Table 7: Site Monitoring Committees

Issues Raised Regarding 3C Discussion Paper on Site Monitoring Committees	Raised By
Endorse properly funded community monitoring through real time mechanisms.	NTN; CSA
3C should brief and consult with community and help to build community capacity to participate in community monitoring activities.	NTN; CSA
Community oversight committees should have broad community representation – the composition of which could vary between sites – and should include immediate neighbours (both industry and community), the broader community (number of reps to be agreed), local government, regulator(s), local development commissions or industrial estate advisory boards and waste treatment facility operators.	CCI
Membership should also include Aboriginal representative from each major group associated with a precinct. One or two reserve members should also be appointed to ensure that contact and communication are retained at all times with the surrounding Aboriginal (and other) groups.	Ind
Community monitoring groups should be formally established with fixed term representation from each stakeholder group; defined terms of reference which are reviewed by the committee and establishing agency each year, and have the capacity to appoint an independent chairman.	CCI
In view of the heavy demands made on the time of Aboriginal people for consultations on various developments, some form of payment (sitting fee) should be made.	Ind
In the case of the Goldfields and Karratha, representative from each of the relevant native title claimant or socio-linguistic groups should be invited to participate on the ongoing management committee(s).	Ind
Should be acceptable level of public accountability in the monitoring of a precinct.	SoH
Who will police the operator of the treatment precinct, the DoE, community committee or DoCEP?	Kem120
Fear that privately run businesses may not stick to the rules.	Kem120
Concern about the precinct not complying with license conditions.	Kem1
The establishment of ‘watch dog’ committees for each of the precincts with some real powers other than just ‘advisory’ and that this be secured in any precinct legislation.	CSA
Concerns about the transparency of the monitoring of a Hazardous Waste Treatment Precinct.	SoDard
During the operation of the site, mechanisms for constructive engagement between the site and the local community should be explored.	MMRCG
Should be acceptable level of public accountability in the monitoring of a precinct.	SoH
Aboriginal communities want to be involved in monitoring committee.	Ind
3C Response: <ul style="list-style-type: none"> The 3C notes the factors raised relating to site monitoring committees. The 3C has forwarded advice to Cabinet recommending that Site Monitoring Committee’s with broad community representation are formed as outlined in the separate 3C discussion paper on this matter. 	

Table 8: Monitoring/Regulation

Issues Raised Regarding Concerns with the Monitoring and Regulation of Precincts	Raised By
Concerned about the fact that nobody comes to monitor these operations once they have been established.	M69
Comprehensive monitoring, including plant performance, environmental baseline monitoring, quarterly and annual environmental monitoring, monitoring following any incidents covering air, surface and groundwater, soil, agricultural produce as well as plant performance should be instituted.	MMRCG
The plant should be regularly audited, with at least one audit per annum, undertaken by an impartial body, with results made public.	MMRCG
We urge the 3C to ensure that the level of operational regulation of precincts be much higher than that currently required under Part V of the EP Act 1986, (which combined with the DoE cultural problems will not provide adequate regulation and risk mitigation) and suggest adoption of European Union standards such as BAT and BEP (Best Available Techniques and Best Environmental Practice).	CSA
Government Departments and private enterprise alike have little regard for what happens once waste facilities have been established, as is evident by what happened at Bellevue.	M69
I have been deeply involved in the Mt Walton waste site where the guidelines set out allowing it to go ahead have fallen by the wayside over the years.	M69
Regulation of new hazardous waste treatment precincts will remain for the community and organisations who follow this process.	ACE, CSA
Non government operators in precinct could cut operational and guidelines corners.	A82

Issues Raised Regarding Concerns with the Monitoring and Regulation of Precincts	Raised By
<p>3C Response:</p> <ul style="list-style-type: none"> The 3C concur with concerns about the need for precincts to be tightly regulated. The 3C have provided detailed advice to State Cabinet on this matter. 	

Table 9: Establishment of Precincts

Issues Raised on Regulatory impacts of establishing precincts and any implications of these on existing waste operators	Raised By
Prefer that 3C engage in broad stakeholder consultation on the draft precinct model and the provision of publishable advice to Government on the model.	NTN, CSA
Existing treatment facilities should not be required to close as is proposed by the 3C interpretation of their role. Furthermore all facilities, new and existing, should be regulated consistently and where necessary, existing facilities be required to upgrade (potentially with assistance) to an emissions and operational standard comparable to new facilities that might establish in precincts.	CCI
Suggest that the 3C <u>does not</u> recommend to Government that existing hazardous waste treatment facilities should be required to relocate to the proposed precincts.	CCI
The definition of hazardous waste should be disentangled from a requirement to locate the treatment of hazardous waste in nominated locations.	CCI
In a whole of Government process, LandCorp as a key stakeholder supports the 3C process in examining the suitability or otherwise of the sites (Avon, Kemerton, Mungari & Boodarie) against the stated criteria for a waste treatment plant site. However it should be noted that all these sites were identified to be set aside for future strategic industrial development. If the establishment of a HWTP results in the balance of the estates being sterilized for the purpose it was established, then it is LandCorps view this is a sub optimal outcome.	LC
There needs to be a priority to introduce strong legislation to protect any Hazwaste treatment site from unsuitable technologies and uncountered expansion. Allowing a “slipping of standards” in the future would be completely unacceptable.	KAR473
Locating the site in a dedicated industrial zone would enable FESA or local proponents to most easily establish a comprehensive emergency response unit.	KAR473
Do not support any site in the South West region due to additional cost burdens may be placed on FESA in the provision of emergency services to isolated areas, expectations being placed on volunteers in area around sites and along transport routes and the increased risk to the community associated with the transport distances.	FESA
It should be emphasized that in the event of a major incident in any of the proposed locations, or along the associated transport routes, an effective response may require additional resources from Perth, and depending on the location of the incident, these resources could take a number of hours to respond.	FESA
If one or more sites that are grouped in the north-east sector, namely Mt Marshall, Bruce Rock and Northam, are selected, it will mean hazardous wastes generated from the rest of the south-west region such as Bunbury will have to move north and then through the Perth metro area to reach the HWTP.	FESA
The European Waste Guidelines definition of hazardous waste (including waste oil) should be implemented.	CSA
Establishment of all 3 precincts to prevent any one region becoming the State hazardous waste treatment ‘area’. The principle of regional treatment of regional waste must be followed or the process will have no credibility.	CSA
A separate road should be built for all the hazardous waste trucks.	Kem36
There should be no doubt that such a waste treatment facility is necessary in the immediate future. That has to be accepted as extremely important. Producers of waste must be encouraged or even forced by legislation to use such a facility. Community, read government, will have to be prepared to be involved in the organisation of such things as pickup points for an effectively run transport system, preferably rail, to get waste to a safely positioned facility. There will be expense incurred no doubt, but the probability is that in the long term it could well be cheaper not to have to pay for remedies from past mistakes.	Kem334
The concept of a stand alone hazardous waste sites away from the community is supported.	CFH, B55, ALPSH, Kem334, DCEP
In any truly democratic society it is not the government’s legitimate role to force its will on any section of the community it governs.	Kem346
Aboriginal employment opportunities expected in all phases of precinct developments ie. from site works through to operation - at least half of available jobs should be kept for Aboriginal people.	DIA through Nyaarla
Aboriginal tenders for various aspects of the precinct development should be given a weighting in the selection process.	DIA through Nyaarla

Issues Raised on Regulatory impacts of establishing precincts and any implications of these on existing waste operators	Raised By
Planning for Aboriginal employment should commence immediately as time will be needed to train and develop a competent workforce.	DIA through Nyaarla
Aboriginal people, as the carers of land, are punished if the land is not looked after.	Ind
3C Response:	
<ul style="list-style-type: none"> The 3C notes the views put forward by CCI against requiring hazardous waste treatment facilities to relocate to precincts and against requiring hazardous waste to be treated in nominated locations (presumably precincts). It further notes the Cabinet decision of 18 April 2005 to endorse: “the following key factors, which will form the basis for consultation on a precinct model (detail surrounding these to be refined through consultation and presented to Cabinet for final endorsement....)” <ul style="list-style-type: none"> a. Legislation to create designated precincts, protect buffers and ensure that hazardous wastes must be treated in precincts; b. A preference for Government to own and develop precincts with land provided on long-term leases to private operators c. That Government may provide some incentives to facilitate the relocation of industrial waste treatment companies to precincts” 3C notes the issues raised in submissions calling for indigenous employment issues to be addressed and has forwarded these issues to Cabinet for their consideration. 	

Table 10: Compliance with Technology Suitability Criteria

Issues Raised about the future compliance of facilities in precincts with the technology suitability criteria	Raised By
The local community does not have faith that the 3C can keep its promises in regards to the treatment technologies to be used at the precinct and types of waste streams to be treated there because Governments and organisations that control sites such as this change over time.	M468
The establishment of a HWTP is a foot in the door that will allow other toxic industries to follow. Potential for expansion of the site is a concern. Assurances are needed to prevent the expansion which would likely compromise the essential and desirable criteria.	M468, SoH, Kem303, Kem195
If the waste precinct is of low toxicity risk why does it have to be so remote. Once the Government have built this precinct it won't be long before it will be upgraded to take even more toxic waste hence the remoteness from Perth is important.	MMRCG, MM460
Concerned that future State or Federal Governments will expand the types of waste treated and processes used. In favour of the project as presented in its present form. Want a guarantee there will be no dumping of toxic, or radioactive waste in the precinct.	BEDA, MM458, MM462
There is a lack of legal jurisdiction over the technologies that will ultimately be used in the precinct. There is a lack of faith that promises regarding clean proven technologies that comply with the technology suitability criteria will be used.	CFH, PG, B404, B406, B407, B413, B43, B410, B409, B408, B45, M468
If the waste facility is to be established in WA, then it should operate on a totally closed system, ie: there should be no emission or losses through any means by ground, air and water. If any ponds or dams are to be used they need to be 100% enclosed/covered, thus avoiding any pollution to the environment via emissions, odours or seepage.	M468
There is a strong “fear of the unknown” in our local community with concerns over the actual technologies that would be established, their outputs and the potential for accidents in transporting wastes or within the treatment precincts.	KAR473
Concerns about the operation of specific technologies in precincts such as evaporation ponds.	LC&MW, M468, Kem146, Kem188, Kem315, Kem310, Kem311
3C should continue to participate in hazardous waste program by providing publishable advice on the conformance to the technology of all industry bids to establish facilities in precincts.	NTN, CSA
The strict criteria (as detailed by TAP member Trevor Bridle) for water discharges to any waste water evaporation pond at any precinct which installs ponds should be implemented.	CSA
The combination of chemicals being treated – no one can guess the impact these compounds will have on air quality, short and long term health of people, - examples are from the Kalgoorlie plant.	KEM1, Kem218

Issues Raised about the future compliance of facilities in precincts with the technology suitability criteria	Raised By
<p>3C Response:</p> <ul style="list-style-type: none"> The 3C concur with concerns about the need for precincts to be tightly regulated. The 3C have provided detailed advice to State Cabinet on this matter. The 3C has recommended the formation of site monitoring committees to provided greater confidence of industry compliance. 3C notes concerns raised on evaporation ponds and agrees with the submission that any ponds should conform to strict criteria, such as those detailed in TAP member Trevor Bridle’s report to the 3C (Draft proposed discharge criteria and Management/monitoring issues for evaporation ponds – Dec 2004). 	

Table 11: Technology

Issues Raised about technologies that should or should not be permitted in precincts.	Raised By
Incineration should be included in the technologies for hazardous waste treatment and facilitated through the outcomes of the 3C process.	CCI
Used oil treatment should be excluded from needing to go to precincts as existing facilities are currently well managed and are appropriately located.	CCI
The 3C made an error when they determined that sites should be precluded from further consideration if landfills occurred within potential precincts or their buffer zones.	CCI
We wish to make plain our view that, in general, the technologies employed at the existing TWM plant do not meet the 3C’s technology suitability criteria and that the management of the TWM site does not conform to best practice. Shifting the existing TWM operations to Mungari as a <i>de facto</i> /surrogate HWTP would be totally incompatible with the 3C process.	NTN, ACE, CSA
<p>3C Response:</p> <ul style="list-style-type: none"> The 3C notes the comments regarding incineration, used oil operators and allowance for landfills in buffers that were raised in submissions. Cabinet has made previous contrary decisions on these factors. Under prior Cabinet decisions, all facilities that establish in precincts must comply with the technology suitability criteria. 	

Table 12: Cleaner Production

Issues Raised calling for cleaner production and/or treatment closer to source.	Raised By
Instead of choosing a small town as a site for treating societies and industries waste, the 3C should be forcing industry to find solutions that minimize their waste and pollution.	M468
If it is OK why cart it 600km for nothing – treat it in the city where it is created.	LMCG, Kem183
Producers of hazardous waste to take responsibility for the waste.	A83, A85, A19, A96, A99, A100, A101, A102, A106, A107, A108, A109, A110, A111, A112, A113, A114, A115, A116, Kem221, Kem352
The public should be informed of where toxic waste comes from and what products are the contributors.	Kem221
That these plants are still required and no other way has been found to treat toxic waste is an issue, I believe that requires serious and immediate investigation. The issue of any waste dump/processing plant, being the daddy of them all, to be landed in our backyard, let alone the destruction of MORE forest, flora and fauna habitat is an atrocity.	Kem306
Products that result in toxic waste should be clearly labelled and the costs incurred should be met by the purchaser and producer.	Kem221
<p>3C Response:</p> <ul style="list-style-type: none"> It is the 3C preference that wastes be treated on site by waste generators in preference to being transported to a precinct for treatment. However, this is not always possible, and the need for off-site treatment at a dedicated facility will persist for the foreseeable future. 	

Table 13: Representative Community Groups and Their Consultants

Representative Community Groups and their Consultants	
The reports of the RCG consultants vary in quality and some conclusions do not assist with the task of commenting on the potential sites. It is a pity that some consultants chose to develop their own criteria for site selection, when the process that involved community and industry stakeholders came up with some very clear and accepted criteria that were endorsed by government.	PAN
Technical Assistance Grant has empowered communities and the practice should be adopted more broadly by government.	ACE, CSA, PAN
Express my concern that the DEP has seen fit to spend significant public funds on the appointment of a consultant who is obviously and publicly outspoken in his opposition to the proposed project. I have no problem with the use of consultants but in all my years dealing with Government and the DEP it was always my understanding that the DEP were supposed to impartially assess such projects and advise on how they could be made environmentally acceptable – NOT support a campaign of total and at times inaccurate opposition.	Kem177
<p><u>3C Response</u></p> <ul style="list-style-type: none"> The 3C note the comments for and against the use and conduct of the technical experts for the representative community groups. 	

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
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

Code	Received from
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
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	Wedgefield Association Inc
WC	Water Corporation
Kem40	Wildflower Society of WA Inc.
A17	Wheatbelt Development Commission
WCS	Wetlands Conservation Society