Alcoa EPA assessment | A GUIDE

Photo: Jess Beckerling

Urge the EPA to fully assess Alcoa's Mining and Management Plans

STEPS

1. **Go to:** https://bit.ly/Alcoa-EPA-Aug
2. Scroll down and click on **'Complete this form to comment on the referred proposal'**
3. Respond to the questions as follows:

   1-4: Fill in your personal details

   5: Select **'Assess – Public environmental review'**

   6: Select **'Yes'** and skip to question 8

   8: Provide your reasons.

   We have set out some info to assist you. All the better if you have your own evidence to submit too. We also encourage you to read our 2022-2026 and 2023-2027 referrals, where we set out likely impacts, for more information to add.

   Alcoa's response to our referrals is available on the EPA's website too. The information is very sparse, and the mapping only represents Alcoa's view on what has and hasn't been referred before. Don't worry too much about the validity or otherwise of the polygons.

   If you want your submission to be confidential, say so in your submission content. Be aware that the EPA cannot assure that your comments won't be disclosed through FOI or other processes.
4. Check the box to consent to your submission being used in the EPA process.
5. Submit!

REASONS FOR A PUBLIC ENVIRONMENTAL REVIEW

- The ongoing and expanded mining outlined in Alcoa's Mining and Management Plans would have very significant impacts on the environment, climate, water and public health.
- The referral information provided is very limited. It is difficult to make sophisticated comments about the likely impacts without clear information about the locations and number of hectares the assessment would cover.

  However, there is sufficient information in the public domain to be certain that the proposal would have profound impacts and it is critical that these impacts are assessed by the EPA at the highest level.
- Highly risky and damaging clearing and mining activities are currently underway in the areas the EPA is currently setting a level of assessment for, and the impacts on the environment, climate and public health are likely to be the most significant of any current activities in the region.
- A Public Environmental Review should be conducted as soon as possible, and risks to public health, the environment and climate should be averted by clearing being stopped while the assessment is undertaken.
- This proposal should be considered together with the other Alcoa proposals for clearing and mining currently before the EPA, so that a full, cumulative, holistic and up-to-date assessment can occur, taking into account all of the historic, current and proposed future impacts.
- The EPA cannot assess this proposal as an Assessment on Referral Information because the referral information is completely inadequate for an assessment. Further, the very significant likely impacts, and high level of public concern warrant the highest level of assessment – a Public Environmental Review.
- The relevant EPA factors for assessment include at least; flora and vegetation, landforms, terrestrial environmental quality, terrestrial fauna, inland waters, air quality, greenhouse gas emissions, social surroundings and human health.

WAFA PROJECT NJF Northern Jarrah Forests

CLOSING DATE: 11.59pm, **Tuesday, 15 August 2023**

SIGNIFICANT IMPACTS RELATED TO EACH FACTOR INCLUDE:

Flora and vegetation

1. Alcoa proposes clearing many thousands of hectares of flora and vegetation including mature native forests in the highly biodiverse and ecologically sensitive Northern Jarrah Forests.
2. Rehabilitation is not returning a functional, self-sustaining and resilient ecosystem.
3. The IPCC has listed the Northern Jarrah Forests as an ecosystem at risk of climate collapse and recommends stopping clearing to improve resilience. This advice is serious and must be heeded.
4. Multiple species of endangered flora, including Federally listed species, exist within the areas Alcoa proposes to mine, and these populations must be protected.
5. Clearing results in hydrology changes with long-term severe impacts including at the whole of region level.
6. Loss of carbon in vegetation, and the vegetation's sequestration potential will not be recovered for centuries, if ever, with significant climate impacts.
7. Clearing of vegetation in close proximity to waterways, including drinking water dams, poses unacceptable erosion, contamination and turbidity risks, especially in light of poor rehabilitation rates and results.
8. Consumption of significant volumes of water – up to 3.7 Gigalitres per year – will have serious impacts on flora and vegetation and the ecological values that the flora and vegetation support.

Landforms

1. Clearing and mining on high gradient slopes in close proximity to drinking water dams and other competing land uses impinges directly on landforms and the integrity of the landscape.
2. The hiking and mountain biking communities, as well as local residents and visitors to the region, are increasingly impacted by disturbance and destruction of physical landforms and loss of environmental values, and this is a matter of significant public concern.
3. As for all other factors, the MMPs must be considered in the broader context of historic, current and proposed future disturbances as the impacts are more and more prevalent and difficult to avoid across the Northern Jarrah Forests.

Terrestrial Environmental Quality

1. The clearing and removal of substrate associated with the proposal would significantly disturb and degrade soils, with significant impacts on the ongoing ecological integrity of the region.
2. Soil disturbance at such significant levels results in loss of soil carbon to the atmosphere, and reduced soil health and fertility.
3. Evapotranspiration rates of exposed soils is significantly higher relative to soils in intact forest ecosystems, impacting hydrology and reducing resilience of the immediate and surrounding areas to drought stress and climate impacts.
4. The removal of bauxite from below the jarrah ecosystems significantly alters the hydrology and the ecological integrity of the jarrah forests, exacerbated by reductions in rainfall and increasing temperatures.
5. The proposal risks the disturbance of acid sulphate soils and acidification of rivers and streams.


Photo: Jessica Human

Photo: Philippa Beckerling

Photo: Donna Chapman

Terrestrial Fauna

1. Alcoa's plans would result in the loss of excellent quality habitat for a number of terrestrial fauna species including rare, threatened and endangered species and Federally listed Matters of National Environmental Significance.
2. Habitat loss and increased mining and haulage activity would significantly impact multiple threatened and endangered species for whom this is critical habitat for their survival and recovery. These include Carnaby's, Baudin's and Forest Red-tailed Black Cockatoos; Quokkas; Brush-tailed Possums, Quenda, Chuditch and Brush-tailed Phascogales and depending on locations, possibly also Western Ring-tailed Possums, Red Phascogales, Woylies and Numbats.
3. The loss of an additional several thousand hectares of habitat and potable water sources for terrestrial fauna, and the additional impacts of mining and haulage activity, need to be fully understood and assessed through a cumulative impact assessment that considers past, present and reasonably foreseeable impacts to terrestrial fauna.
4. The proposal would be likely to result in loss of local populations, reduction is breeding success, reduction in overall numbers, health and resilience of species and impacts on biodiversity and ecological integrity of ecosystems.
5. Rehabilitation does not provide for these species in any tangible way, at least not in a relevant timeframe given the real and increasing extinction threat many of them face, and offsets cannot be considered a meaningful mitigation measure given that all remaining habitat is critical for many of these species' survival. Avoidance is the only way to prevent significant harm.

Inland Waters

1. There is a very real risk that mining in close proximity to drinking water dams and tributaries could result in contamination levels that render water undrinkable for up to 5 years.
2. Contamination by PFAS and hydrocarbons present major risks to public health, the aquatic environment and associated species and ecosystems.
3. Contamination of rivers and streams from haulage road run-off presents widespread risks across the mining and transport footprint.
4. It is likely that the proposal would cause a substantial reduction in surface water flow and the health and resilience of affected forest ecosystems; reduced quality of rivers and streams; changed groundwater flows and reduced water availability to flora and fauna; increased drought-stress water-logging and dieback exacerbation.
5. As for the other factors, to fully understand the environmental outcomes of this proposal, a thorough, holistic, cumulative impact assessment in the context of the other 9,273 ha that Alcoa proposes to clear, as well as the historic and other future foreseeable impacts, is required and a PER is warranted to provide for this.

Assess – Public environmental review

Air Quality

Dust and air-borne toxins from mine-sites, roads, conveyors and refineries impact visibility and air quality, and the toxins pose a significant risk to human and environmental health and warrant a thorough, holistic and cumulative assessment.

Greenhouse Gas Emissions

Only Scope 1 and 2 emissions estimates have been provided by Alcoa. It is critical that the Scope 3 emissions are also made available and fully considered by a robust and public assessment.

According to Alcoa's referral content document, over 240,000 tonnes of CO^2e in Scope 1 and 2 emissions would be released per annum.

It is unclear whether this figure includes carbon losses to the atmosphere associated with vegetation; mine site operations; haulage and reduced sequestration potential, or if it is just the figure associated with refineries.

All emissions as well as reduced sequestration of carbon dioxide and other GHGs must be considered as a part of a transparent, thorough, up-to-date assessment.

Social surroundings and human health

1. Clearing and mining in close proximity to drinking water dams pose a major risk of contamination to Perth and South West drinking water supplies.
2. Such a contamination event could result in the dam being off-line for up to 5 years and drinking water having to be supplied in some other way – adding to the environmental costs of water supply.
3. Benign activities like bushwalking are excluded from catchments to prevent a contamination event because of the need to protect human health and social surroundings.
4. It is insupportable for mining to be occurring in this highly sensitive environment.
5. The high level of public concern extends to the impacts on social surroundings more broadly – users of public forests avoid mined areas because the quality of the landscape is so poor.

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