

HOLD ALCOA TO ACCOUNT, AGAIN...



CLOSES: 9 December 2024

Alcoa's plan to clear 1,800 ha of the Northern Jarrah Forest (NJF) is now before the Environment Protection and Biodiversity Conservation (EPBC).

We only have until 9 December to call for the proposed clearing to be assessed under the federal environment act.

This is a very quick and early stage in the process of assessment where a decision is made about whether or not to fully assess environmental impacts.

It is critically important that we say YES, this is a proposal that must be considered a CONTROLLED ACTION and be assessed at the highest level under the EPBC Act.

1. Please go to: bit.ly/ONeil-EPBC
2. Click on 'Make Comment'
3. Fill in the required fields including your full name and email. The title for your comment can simply be 'Huntly/O'Neil Mine Controlled Action'.
4. Answer **YES** to 'do you consider this a controlled action?'
5. Give reasons why you consider it a controlled action. The EPBC looks at **Matters of National Environmental Significance** (MNES). We've summarised the referral documents and given you some suggestions on the following page. Your reasons can be simply inserted in the text box or you may wish to upload them and any supporting information as a document.
6. Answer the remaining questions on updates, confidentiality and privacy and the declaration.
7. Add documents if you wish.
8. Submit

Background

US company Alcoa stopped mining bauxite in the O'Neil area between Jarrahdale and Dwellingup in 2014. The company wants to return to O'Neil because delays in the assessment processes for its larger, Huntly Mine expansions (6,700 ha) have resulted in ore shortages for its Pinjarra Alumina refinery.

Rather than amend its 2022 EPBC referral for the Huntly Mine expansions, Alcoa has opted instead to lodge a separate referral for O'Neil in the hope of an earlier determination.

The proposal will involve 1,800 ha of clearing, predominantly original Jarrah forest for mining – with a much smaller area of rehabilitation of up to 11 years-of-age to be disturbed for infrastructure.

The Jarrah forest is described as 'regrowth' from logging, less than 70 years old. Vegetation in the larger mine area (not simply that to be cleared) is 'predominantly 91.2 per cent) in 'Excellent' condition. It is within the NJF 'that has a high native fauna diversity, providing habitat for approximately 240 terrestrial vertebrate fauna species' (*referral document*). The proposal borders small pockets of old growth forest which could be impacted by the edge effects of clearing.

Following page has the reasons for Alcoa's plans for the O'Neil area to be a 'controlled action'.



'YES' to a Controlled action

Guide created by WA Forest Alliance.





Photo: Philippa Beckerling

Photo: Kerem Kanadikirik

Photo: Jinni Wilson

Photo: Philippa Beckerling

Some reasons why the proposal is a controlled action:

Alcoa has declared two MNES:
Threatened Species and a Ramsar Wetland.

THREATENED SPECIES

By clearing habitat, the mining will directly impact 5 threatened fauna species (Baudin, Carnaby's and Forest Red-tailed Black Cockatoos, Quokka, and Chuditch) and another 2 indirectly (Woylie and Numbat).

Alcoa's mining avoidance strategy is a sham as it specifies areas with no mineable bauxite: granite outcrops, swamps and valley floors, habitats of groundwater dependent ecosystems and previously rehabilitated areas, which would not be mined anyway. No forest ecosystems are to be avoided.

Alcoa claims to be 'working toward the goal of no net loss of biodiversity for new sites and major expansion projects' (*referral document*, emphasis added). In this, 'ecosystem restoration plays a key role' in this.

The company states it manages biodiversity loss risks 'by developing clear and measurable targets or indicators against which Alcoa and our stakeholders can assess our effectiveness' (*referral document*).

Statements of vision and processes are not enough: actual rehabilitation outcomes need further, independent assessment.

Various scientists have called into questions Alcoa's targets and indicators for effectiveness of rehabilitation, finding the rehabilitation itself falls well short of the goal of a self-sustaining forest ecosystem.¹

Further proof is that, after 60 years, Alcoa is yet to have any rehabilitation signed off by the WA Government as successfully completed.²



The scientific community is clear: it is not a lack of knowledge but a lack of ecological fabric to create a jarrah forest that is the issue.



– Professor Kingsley Dixon

WETLANDS OF INTERNATIONAL IMPORTANCE

O'Neil is within the catchment of the Peel Inlet that is part of the Peel-Yalgorup System Ramsar wetlands of international importance. Scientists warn the Peel-Harvey estuary is already 'showing signs of trouble'.³

Alcoa's claim that mining only has unlikely indirect (not direct) impacts on the Peel-Yalgorup system because it is 40-50 km upstream requires independent assessment.

ABORIGINAL HERITAGE SITES OF SIGNIFICANCE

One unregistered Aboriginal archaeological site partially contained within the Development Envelope has been lodged with Department of Planning, Lands and Heritage (DPLH).

¹ Campbell, T. et al. 2024. Standards-based evaluation inform ecological restoration outcomes for a major mining activity in a global biodiversity hotspot, *Restoration Ecology*, e14236. Also: Standish, R. et al. 2021. Beyond species richness and community composition: Using plant functional diversity to measure restoration success in jarrah forest. *Applied Vegetation Science* 24: e12607 and Stantec. 2023. *Alcoa Jarrah Forest Rehabilitation – Peer Review*, Prepared for GHD, November 2023. (Alcoa Mining Management Program 2023-2027, Appendix 6).

² Milne, P. 2023. Alcoa in WA: 60 years, 28,000 hectares of forest cleared, zero rehabilitation completed. *WAtoday*, March 15.

³ Valesini, F. et al. 2019. Balancing estuarine and societal health in a changing environment: Summary Report ARC Linkage Project LP150100451