

8 September 2017

Emma Barnet
Environmental Planning Officer
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Barnet

**MODIFICATION TO THE WESTON ALUMINIUM DROSS RECYCLING FACILITY
DA 86-04 01 MOD 12 AND LEC 10397 of 1995 MOD 10**

We have reviewed the environmental assessment for this project and the agency comments from NSW EPA and OEH. HNE Population Health relies on assessment of likely pollutant exposures to the local community to predict potential health impacts. The comments from NSW EPA and OEH indicate that the current environmental assessment is inadequate to assess potential exposures and human health impact.

The main issues associated with the current environmental assessment relate to uncertainty about the potential emissions from the facility due to changes and variation in future feedstock – i.e. changing from metal to pharmaceutical and illicit drug processing. OEH and EPA emphasise the importance of using trial feedstock data to predict future risk and identifying and ensuring international best practice with regard to medical waste processing.

We support OEH's recommendation for a formal human health risk assessment to be conducted. However, where OEH request that the proponent "justify the level of HHRA undertaken with respect to the EnHealth guidelines" and demonstrate the acceptability of cumulative risk, we would also request that this be undertaken in collaboration with the community. Local community concerns should drive the HHRA and assessment of acceptability or risk.

Community collaboration should be undertaken within the broader context of the multiple proposals for waste processing in the area. This may require council or another agency to facilitate consultation across multiple waste related development proposals.

Lastly, a consideration for the efficient exhibition and review of development applications. Complex environmental assessments such as these sometimes require sequential assessment by agencies. Health awaits NSW EPA and OEH assessment of air modelling and emissions data before assessing potential health impacts. A 30 day exhibition period will often be inadequate for two agencies to sequentially review the assessment as it requires both agencies to complete their assessment in only half the allotted time or for the second reviewing agency to submit their comments after the closing date for comments. We would appreciate your consideration of options to address the need for sequential review in such settings.

Yours sincerely



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