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**Attachments:** [Submission\\_Anglesea.pdf](#)

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Content of submission (you can choose multiple): Anglesea

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20 July 2015

Dear Board of Inquiry,

**RE: Submission relating to the Anglesea mine**

Environment Victoria is one of Australia's leading independent environment groups. With over 40 member groups and tens of thousands of individual supporters, we've been representing Victorian communities on environmental matters for over 40 years.

Thank you for the opportunity to make a submission to the Inquiry's investigation into the Anglesea coal mine. In this submission, we are only responding to the Inquiry's terms of reference for Anglesea:

*11. Sustainable, practical and effective options that could be undertaken by the mine operator to decrease the risk of fire arising from or impacting the Anglesea Mine for the 2015/2016 summer season, noting the impending closure of the mine on 31 August 2015.*

We submit the following to assist your investigation on this matter.

1. Lessons from the first Hazelwood Inquiry

Evidence presented at the 2014 Hazelwood Inquiry helped the Board of Inquiry and the broader public develop an extensive understanding of effective fire prevention measures that can be employed in coal mines. It was widely accepted that the most effective fire prevention measure is to ensure the coal is not exposed to the air, thus preventing it from being able to burn. Either through full rehabilitation of the site or through putting a clay cap over exposed coal, mine operators are able to significantly reduce the fire risk in a coal mine. This risk is also reduced in a way that limits reliance on (a) avoiding human error and (b) the operation of automated systems, which could fail.

Having said that, Alcoa's management of the site does not conclude once it ceases to mine and burn coal. The Board of Inquiry should ensure that Alcoa retains an active presence on site that is capable of dealing with a fire emergency, should it occur, even if the probability of such an emergency is considered to be low.

2. Reducing the fire risk

The Board of Inquiry should ensure that Alcoa takes measures to ensure the risk of fire in the summer of 2015/2016 is as low as possible. Alcoa has already indicated that it intends to cover exposed coal with 1 metre of overburden by August 31. Independent



mine rehabilitation experts and coal fire risk experts should be consulted to ensure that the manner in which the overburden might be applied is adequate to reduce the fire risk. If this proposal goes ahead, its implementation should be assessed by independent auditors.

The Board should also consider what fire risk reduction measures are already in place at Anglesea in the ordinary operation of the mine and power station. For example, are there pipes for supplying water to fire-fighters? If maintaining these measures for six to eight months after the closure of the operation is found to materially reduce the risk of fire, the Board ought to recommend that these measures are kept in place.

The assessment of fire risk should acknowledge that weather forecasts indicate a strong El Niño weather pattern for southern Australia for the remainder of 2015, bringing hot and dry conditions that could (a) increase the fire risk, and (b) increase the consequences if a fire takes hold.

### 3. Link between fire risk reduction intervention and successful rehabilitation plans

While we encourage the Board to recommend fire risk reduction measures that keep the Anglesea community safe, it is crucial that whatever decisions are made to reduce fire risk for the coming summer do not lead to interventions that reduce Alcoa's ability to successfully rehabilitate in the medium/long term.

If, for example, Alcoa decides to cover exposed coal with 1 m of overburden, this needs to be reconciled against any proposed or potential rehabilitation outcomes for the site. Moving large volumes of earth is a serious undertaking, and if it needs to be done, it should ideally be performed so that it meets the dual goals of reducing immediate fire risk AND contributing to a longer term rehabilitation plan that meets community expectations.

Any limited activity that is carried out to reduce the fire risk in the summer of 2015/2016, however, must not be considered to constitute a rehabilitation plan. Successful rehabilitation of the Anglesea site (which is, by virtue of the Terms of Reference, outside the scope of the Inquiry's investigation) requires much more than reducing the risk of fire.

Environment Victoria notes that there is a separate process underway addressing broader rehabilitation requirements at Anglesea, involving Alcoa and state government agencies. In the same way that the Latrobe Valley community will be allowed to participate in a transparent review of rehabilitation plans for the Yallourn, Hazelwood and Loy Yang mines through this Inquiry, it is important that the Anglesea community is afforded the same opportunity and level of transparency through the Alcoa/government





process. The imminent closure of the Anglesea mine and power station does not reduce the community's interest in the future of the site. As the residents are the people who will live with the consequences of rehabilitation decisions, it is essential that their views are central to the decision making process.

We would welcome the opportunity to discuss our submission in further detail if it would assist the Board.

Regards,

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