

From: [Simon Perrin](#)
To: [airpollutioninquiry](#)
Subject: Air pollution enquiry submission
Date: Tuesday, 30 March 2021 4:09:22 PM
Attachments: [A. Responsible Authority Responses to notifications of health risks at WEPC including Failure to Protect .pdf](#)
[B. Failure to protect community copy 3.pdf](#)
[C. Mining - Sub71 Edited.pdf](#)

This submission is on behalf of the Bendigo and District Environment Council Inc (BDEC Inc.)

In this submission we wish to highlight the failure of Regulatory Authorities to control airborne pollution of the carcinogen Inorganic Arsenic.

Attached are the responses, by the CEO of the Environment Protection Authority and the CEO of Earth Resources Regulation (Department of Jobs Precincts and Regions), to a detailed letter containing the evidence that offsite migration of Soluble Inorganic Arsenic was occurring from the Woodvale Evaporation Pond Complex (WEPC) 16km North West of Bendigo - see Attachment A "Responsible Authority Responses to notifications of health risks at WEPC including "Failure to Protect" “.

Included in that file is another EPA letter dismissing BDEC's concerns (raised back in 2018) regarding the offsite airborne migration of the same carcinogenic dust from the WEPC site.

It will be noted in that the responses to the claims made in the "Failure to Protect" letter were not refuted in any reply. Indeed Dr. Wilkinson (EPA) states there where apparently “no new concerns raised” suggesting this migration of a potent carcinogen into a populated community was known. But still no action taken or required.

The Committee will note the emphasis given to the pending 53V audit in the the 2018 EPA reply. However following the presentation of that 53V Audit in June 2018, the 53V recommendations have simply been ignored. This failure formed the basis of BDEC's “Failure to Protect” letter in March 2020.

The Offsite contamination by airborne Soluble Inorganic Arsenic into the populated community of Woodvale has been occurring since the year 2000 as evidenced by Arsenic measurements in nearby residential water tanks.

It was not until 2016 that actual measurement of the Arsenic component in the actual airborne dust arising from the WEPC commenced. This measurement was triggered by

pressure from the Community members of the "Bendigo Gold" Environmental Review Committee following the "Senversa" Water Tank and Soil Sampling Report, Woodvale. That Senversa Report was completed in 2015.

The Senversa report revealed Arsenic was present in 78% of domestic water tanks and average Arsenic content of surface soil was elevated (compared to subsoil) within one kilometer of WEPC. This could only have occurred by airborne spread of Inorganic Arsenic arising from the WEPC site itself. The documentation that Inorganic Arsenic IS Airborne is presented in the Appendices of Attachment B "Failure to Protect" letter sent to the CEOs.

The Third attachment is an edited BDEC Inc submission to a Senate inquiry (C. Mining-Sub71 edited). It has been edited to limit content to outline the background history of the WEPC. It also illustrates historically, how Responsible Authorities have failed in their Duty of Care when it comes to Airborne pollution. Even for long recognised carcinogens. Soluble Inorganic Arsenic has been recognized as a carcinogen for over 40 years and is likely as potent a carcinogen as Asbestos..

Contained within that Senate document (page 8) is a website link that describes yet another Airborne contamination event, this time at Costerfield in Victoria. That contamination event at the Costerfield mine site involved the deliberate creation of airborne mist which contained Lead. Once again "Airborne Contamination" in a populated Community.

Lead is a known potent neurotoxin in children, causing intellectual impairment and behavioral disturbances. That event was NOT disclosed to local health practitioners! In fact the Lead contamination was only publicly declared in 2016, 2 years after the event. BDEC will leave the committee to speculate why the Responsible Authorities, including the Department of Health, chose such an approach when it is questioned if there is ANY safe level of Lead exposure for children.

BDEC Inc believes these examples further highlight the complete failure of the Responsible Authorities to deal with Airborne Pollution involving potent human toxins in populated areas. We cannot speculate as to motives of those Regulatory Agencies when faced with such clear episodes of airborne contamination.

Yours Sincerely

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