Dear Sir/Madam,

Call for Public Environmental Review on the proposed establishment of Perdaman Urea Plant and Wesfarmers, Coogee Chemicals and Mitsubishi Methanol Plant on the Burrup Peninsula

Thank you for the opportunity to comment on this proposal. We provide this letter as a submission on behalf of Australia ICOMOS and the Australian Association of Consulting Archaeologists Inc. (AACAI).

The International Council on Monuments and Sites (ICOMOS) is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has nearly 700 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia. We have a particular interest in Australia’s world heritage sites. The Australian Association of Consulting Archaeologists Inc. (AACAI) is a National representative body that promotes professional standards and strong ethics in archaeological and heritage practice and advocates for heritage protection across Australia.

Both ICOMOS and AACAI are calling for a Public Environmental Review (PER) into two projects proposed to be established on the Burrup Peninsula of Western Australia: the Perdaman Urea Plant and the Wesfarmers, Coogee Chemicals and Mitsubishi Methanol Plant.
ICOMOS and AACAI believe it is in the vital interest of the State and the Nation that the development plans for these two projects undergo a Public Environmental Review (PER). This is due to the environmental, social and cultural impacts that this plant is likely to generate.

Specifically, the Burrup Peninsula and the surrounding archipelago contain highly significant Indigenous rock art which is inscribed on the National Heritage List and is currently the subject of a proposal to nominate to the World Heritage List. The Dampier Archipelago was included on the National Heritage List in 2007 as, ‘one of the most exciting collections of rock art in Australia. The richness and diversity of this art is remarkable, with sites ranging from small scatters to valleys with literally thousands of engravings’ (Dept of Environment and Energy).

The cumulative effects of substantial industrial development and emissions in this area, which has been occurring for some time, require that ongoing monitoring and assessment be undertaken in order to manage and conserve these values effectively. In particular, the impacts of new facilities and subsequent surges in emissions and pollutants could result in additional physical damage to the petroglyphs. The potential World Heritage Listing of the Dampier Archipelago, which recognises Outstanding Universal Value, may also be impacted by this proposal.

Australia ICOMOS and AACAI strongly support a best practice approach that would require any potential proposals for new projects within close proximity to significant Aboriginal sites, a National Heritage place and a potential World Heritage property, to undergo assessment via a Public Environmental Review. It is essential that any new developments considered for the Burrup Peninsula take into account their potential impacts on the cultural heritage significance of the Dampier Archipelago. For this reason, Australia ICOMOS and AACAI strongly recommend that the EPA undertake a Public Environmental Review of the Perdaman Urea Plant and Wesfarmers, Coogee Chemicals and Mitsubishi Methanol Plant proposals.

Australia ICOMOS and AACAI further recommend that in view of the potential significant impact of the project on the Dampier Archipelago National Heritage place and potential World Heritage listing, the proponent should refer the project to the Commonwealth Minister for the Environment on the basis that it should be designated a "controlled action" within the meaning of the (Commonwealth) Environment Protection Biodiversity Conservation Act.

Australia ICOMOS and AACAI collectively agree that the PER must be undertaken for these three reasons:

1. There is an urgent need to understand, evaluate and reduce the cumulative effects of pollutants and all emissions and their likely impact(s) on the cultural heritage of the Burrup and Dampier Archipelago and the rock art within it.

2. The proposed developments are on land identified as having outstanding cultural and scientific significance to Australia, being in the Dampier Archipelago (including Burrup Peninsula) National Heritage Listed Place.

3. The new impacts from industry would likely negatively impact upon a successful outcome to the recently initiated process for World Heritage Listing of the Burrup National Heritage Listed Place.
Thank you again for your consideration of the views of Australia ICOMOS and AACAI in this important issue.

Yours faithfully,

[Signature]

Helen Lardner

Vice President, Australia ICOMOS

[Signature]

Jo Thomson

Chair, AACAI – WA Chapter