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SUBMISSION

REJECT LYNAS RARE EARTHS RADIOACTIVE WASTE PERMANENT DISPOSAL FACILITY IN KUANTAN, MALAYSIA

Dear YBrs. Puan Norlin binti Jaafar,

I am writing to you as I am concerned about the potential impact of Lynas Rare Earths' proposed radioactive waste dump at Bukit Ketam in Kuantan and the impacts it will have on water, ecosystems and human health.

Lynas has been granted a 12-year tax break and is now expecting Malaysians to accept its radioactive waste. The waste belongs to Australian miner Lynas who has profited from the cheap operation costs in Malaysia under lax regulatory conditions. There was little to no community consent to letting the Lynas Advanced Materials Plant (LAMP) operate in Gebeng/Kuantan because of the hazards of its toxic waste and pollution.

Permitting the public only to view volumes of EIA documents for an hour in the public arena is against **proper public participation, consultation and consent in the approval process.**

I therefore implore Jabatan Alam Sekitar (JAS/Department of Environment) to reject the environmental impact assessment (EIA) submitted by Lynas for its radioactive waste dump at Bukit Ketam in Kuantan.

Additionally, I would like to raise the following problems for your attention:

1. The amount of Water Leach Purification (WLP) waste in the permanent disposal facility (PDF) is huge. Over 1 million cubic metres or 1.5 million tonnes in wet weight (2021 EIA, Page 5-9) or equivalent to 21,226 40-ft containers or 300,000 5-ton elephants. This waste is contaminated with harmful radioactive materials, toxic heavy metals and chemicals, which can accumulate over one's lifetime and be passed down to future generations.

2. There is no safe dose of exposure to radiation. The permitted levels of radiation exposure for workers and the public have steadily dropped from detailed cancer and genetic impact studies.

3. The proposed waste dump is in a water catchment. The PDF location is in the water catchments of the Bukit Ubi and Semambu water treatment plants that supply water to 90% of Kuantan's population.

4. The company awarded the construction contract is a government-linked company (GLC) with no experience in radiation safety and protection or toxic waste management.

5. The waste dump contradicts the current Kuantan Local Plan 2035, located in the Bukit Kuantan Forest Reserve. This is a Rank 1 Environmentally Sensitive Area (ESA). Change to this land-use Plan cannot be done, without prior public participation and consultation.

6. The EIA revealed that the final effluent discharge will still contain radioactive Thorium-232, Uranium-238 and toxic heavy metals. This is in violation of the Water Services Industry Act which specifically prohibits the contamination of potable water with radioactive substances.

7. The Atomic Energy Licensing Board (AELB) of Malaysia has lowered the standard for Lynas' radioactive waste against established international classification standards and guidelines. It leads to poor management, increased maintenance costs, increased radiation exposure and negative impacts on health and the environment for Malaysia in the long run.

8. The proposed waste dump is in close proximity to another proposed mega industrial toxic waste facility. This is known as the Multi-category industrial scheduled wastes disposal site (MCISWDS). Current world best practice is that radioactive waste must be isolated to prevent exposure and contamination to the biosphere.

9. The modelling used in the EIA is based on an overly optimistic scenario. It has not taken into consideration the long-term changes/degradation or climate change induced extreme weather events which are likely to impact the environment in a wet, erosion and landslide prone landscape.

10. Lynas' has a responsibility to remove its radioactive toxic waste from Malaysia. This was promised by the former Najib Razak government. Why is the Department of Environment (DoE) even contemplating carving out a forest reserve to make a toxic waste dump so close to our water supply?

11. The consultation process has been inadequate. Superficial and tokenistic community consultation has misled people with information that grossly underestimates the risks and hazards of the project.

I acknowledged that rare earth minerals are critical for renewable energy and the green economy, however, all supply chains must be clean, just and fair. This is not possible in the case of the Lynas LAMP or proposed radioactive dump.

Radioactive waste IS NOT safe for people, not safe for communities, and not safe for the environment.