

From Colin Mitchell (independent campaigner)

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Thank you for the opportunity to contribute to your inquiry into the site-selection process for a national radioactive waste management facility.

My submission is below:

Submission to the Senate Standing Committee on Economics
re the selection process for a national radioactive waste management facility

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I believe that the site selection process for a national radioactive waste management facility (NRWMF) is flawed because:

1) The notion of 'broad community support' is considered far too narrowly as applying only to the local community.

The NRWMF is a National project which could have environmental consequences extending far beyond the local community to encompass large areas of SA and beyond into other States of Australia, potentially effecting the whole nation. For example, leakage of radioactive material into the water table could spread over time causing disastrous effects on human and animal health, as well as agricultural crops. Also escape of radioactive material into the atmosphere could have similar negative consequences across wide areas of Australia and beyond. This is a decision which involves far more than the welfare of the immediate local community, rather the welfare of all the people of SA and all the people of Australia should be considered.

Recommendations: 'Broad community support' should extend to include the people of SA as a whole. Community opinion in other States of Australia should also be considered.

Community support should be gauged by multiple methods including wide-ranging telephone and internet polling, acceptance of petitions and public meetings in Adelaide and all other major cities and towns in SA.

This process should be carried out by an independent body, not controlled by the government organisations involved in the establishment of a NRWMF. (ie not controlled by ANSTO or ARPANSA).

The consultation process should be thorough, be conducted over a long period (suggest a year) and incorporate the provision of full and open information about the project, including plans for both the low-level waste disposal facility and the above-ground store for intermediate level waste to be co-located at the same site.

The establishment of a NRWMF should not proceed without overwhelming support from the population of SA – at least 90% - (as well as 100% support from the local community), because the consequences of an unwise decision, flaws in the design of the facility, accidental releases of radioactive material, or an inability to properly maintain the facility over hundreds or even thousands of years, could be extremely serious to present or future generations.

2) The site-selection process is also flawed because insufficient information about the proposed NRWMF has been provided to the communities consulted. There has been a lack of transparency and bias in the presentation of information.

1. Emphasis has been placed on medical isotope waste and there is insufficient information about the proposed co-location of intermediate level nuclear waste from Lucas Heights at the same site. The consultation process is deceitful because of the bias towards discussion of only the low-level waste and failure to properly inform the community about the co-location of Intermediate – level waste.

Recommendation: The co-location of Intermediate level nuclear waste should be mentioned every time the NRWMF is mentioned to avoid the false impression that this is only a low-level waste facility.

2. the communities have not been informed that the Intermediate-level waste to be co-located at the site is much more highly radioactive and has to be isolated for thousands of years compared with hundreds of years for low-level waste.
3. There are no plans presented for the “temporary” above-ground store to hold the intermediate-level waste.
4. The communities are not informed how the intermediate level waste is to be dealt with after “temporary” storage. There are no plans presented for long-term storage or final disposal of this waste.
5. The communities are not informed that the intermediate-level waste may be later disposed of in a deep geological disposal facility which may be built at the site of the NRWMF.
6. The communities are not informed that the construction of a deep geological disposal facility may lead to the importation of intermediate and high level nuclear waste from overseas in the future ie an international nuclear waste dump on the site (as advocated by government advisor Richard Yeeles in his submission to the recent Nuclear Fuel Cycle Royal Commission in SA “.....it is open to your Royal Commission to recommend that the South Australian Government actively pursue the State's further involvement in the nuclear industry with an initial focus on national and international radioactive waste management.....That as a demonstration of its strong interest in, and commitment to the further development of a safe and sustainable Australian nuclear industry, and as a first step in such further development, the South Australian Government

offers to host a national facility for the storage and disposal of Australia's own low and intermediate-level radioactive waste with the ultimate aim of securing Federal Government support for hosting an international radioactive waste management facility in South Australia.”

R.Yeeles, submission to Nuclear Fuel Cycle Royal Commission.)

7. By failing to properly inform the communities about the co-location of the intermediate level waste the consultation process leaves itself open to the charge of deceit and thus undermines trust in the process and the agencies conducting the process as well as the government.

8. Hazards of transporting nuclear waste over land/water are not being considered.

9. Communities are not informed that intermediate-level waste can be securely stored at Lucas Heights itself. There is no advantage to moving this waste to another location and in fact moving the waste increases the risk of hazardous spills.

10. Communities are not informed that there is not general agreement that a NRWMF is needed at all in Australia. They are not informed that there is a significant body of opinion that Australia's nuclear waste should stay where it is and that, in particular, the intermediate-level waste at Lucas Heights is best stored at Lucas Heights where there are the resources and expertise to store this waste securely as it has been for many years. They are not informed that there is a significant body of opinion that there is nothing to be gained from moving this waste across country to another location because it is not presently known how to safely dispose of intermediate or high-level radioactive waste for the thousands of years it remains dangerously radioactive.

Recommendation: the deficiencies in the information provided to communities mentioned above should be remedied. An independent community consultation body should be created which can provide full information on the proposed NRWMF in an open transparent manner including plans for the low-level facility and the intermediate-level above-ground store. This body should be independent from ANSTO or ARPANSA.

Colin Mitchell (independent campaigner)