

Senate Standing Committees on Economics
PO Box 6100
Parliament House
Canberra ACT 2600

Melbourne, 1 April 2018

Submission to the Senate Inquiry on the 'Selection process for a national radioactive waste management facility in South Australia'

Dear committee,

Thank you for the opportunity to make a submission in response to the above inquiry. In this submission, I wish to point out the inappropriateness of the site selection process for a national radioactive waste management facility at Kimba and Hawker in South Australia.

In 2015, when the current voluntarist approach to the National Radioactive Waste Management Project (NRWMP) was in its early phase calling for land nominations to site Australia's low and intermediate level radioactive waste management facility, I conducted a study on international best practices for such siting processes. Please thoroughly consider my research findings in the attached report.

In my research, I found that a number of characteristics have internationally proven to be crucial for the success and integrity of a voluntarist approach. The NRWMP is lacking in most of these.

Interestingly, in the cases I looked into, siting has only been successful in communities where *a repository can be co-hosted with other nuclear facilities*. These are communities with a nuclear history of some sort, such as hosting a nuclear reactor or intermediate storage facilities for radioactive waste. Even when other communities had shown initial interest in hosting a radioactive waste facility, they ended their engagement in the siting process quite early on. This shows that it is much more likely for a repository to be hosted by a 'nuclear community', which partly roots in it already being familiar with the risks and benefits involved and thereby being much more comfortable to make an informed decision. An already existing positive relationship with the respective nuclear operator can furthermore contribute to a community showing interest.

Australia currently has a limited number of nuclear activities and stores its radioactive waste materials in numerous intermediate storage places, most of them very small. Only the site of the Australian Nuclear Science and Technology Organisation's nuclear reactor and larger radioactive waste storage facility at Lucas Heights would reflect this experience. This is also where the majority of Australia's radioactive waste is already stored. It would therefore provide the opportunity of simply improving on the current facilities and not having to transport the existing waste to a remote facility, thereby reducing risky and unnecessary transport of dangerous materials.

To be a truly voluntary process, community and public opinion has to be effectively taken into account by the respective decision making institutions and reflected in decisions. This means that *commitments to not impose a repository on any community have to be observed*. Showing respect towards informed decision-making necessitates providing local communities and the wider public with the necessary time and information. This is an essential factor to build trust towards the implementing agency.

Furthermore, a truly voluntary process acknowledges the role of the communities by engaging with them throughout the *whole duration of the repository project*. This should not be limited to the siting

process but extend to the construction, operation and closure phases of the project. As the case of Belgium shows, communities can engage on issues such as the facility design and wider community implications e.g. facility monitoring and socio-economic projects. The *early provision of information is essential*, providing the community and wider public with the possibility to commission studies, reports and expert opinions. This encompasses an extensive *assessment of environmental impacts and of alternative methods and siting options* as major references to base a meaningful siting decision on for both the implementing agency and the community.

These provisions enhance *transparency and accountability* and help *build a more trusting relationship* with the community. They raise the chance of a successful siting process as it is based on an informed decision and allows communities to feel more confident. *Indigenous communities and Traditional Landowners* play a central role in the siting process in some countries. Their consent and close engagement is critical in Australia where Traditional Owners are directly affected by the sites currently progressed. Furthermore, community engagement should also *encompass neighbouring communities*, which might be affected by the project.

A *non-restrictive timeframe* should be applied in siting processes, providing all stakeholders with sufficient time to *make informed decisions*. In the international case studies this has shown to require years. When the community feels comfortable to make a decision on the matter, a *test of community support* should be taken to establish its position. Similarly, the *right-to-veto* the government's or operator's siting decision should also provide the community with the final say on hosting a facility or not. In general, *a community should be able to leave the siting process at any time if wished*. As the UK example shows, this was one of the main factors communities wanted ensured when consulted on how to improve the siting process and has further proven to be a key feature of all the siting processes, making engagement really voluntary.

All the international examples enabled community engagement through *providing funding to use according to their own needs* to engage effectively on the issue. Additionally, some countries provide *benefit packages for communities* participating in the process and/or hosting the planned facility as a way to compensate for the efforts and risks associated and further drive local development, apart from the economic benefits already associated with the project such as employment, improved infrastructure and know-how. In case of any provisions in this respect, *it is important that communication on funding or contributions is very clear from the beginning* and that it does not compromise the position of the community on the issue and can be handled *independently from nuclear operators or facility proponents*.

In the case of Australia community engagement is completely carried out and funded by the NRWMP and aimed at supporting the understanding of the project, instead of providing room for engaging on the issue. This transactional approach does not allow for the community to engage in ways it finds meaningful.

The main concern regarding the continuation of the site selection process, however, is the community opposition, which has been apparent for both the Barndioota site near Hawker as well as Kimba.

In the case of Barndioota, the local Adnyamathanha community at Yappala station, just kilometres away from the site, has been very vocal in its opposition to the siting from the beginning. With this site, the government chose, after pursuing Coober Pedy from 1998 to 2004 and Muckaty in the NT from 2005 to 2014, to not only once again target an Aboriginal community but also a culturally highly significant site. The proposed property is part of a songline and hosts many cultural sites, including the beautiful Hookina springs, a sacred women's site for the Adnyamathanha. The local community remains actively connected to the maintenance and preservation of the land and is

documenting and preserving their culture and history through recording traditional heritage sites and artefacts and mapping storylines in the area. The proposal is seen as an attack on their cultural beliefs, history and heritage.

The terms of reference of this inquiry clearly note the Government's statement that it will not impose such a radioactive waste facility on an unwilling community. If the government is serious about its voluntary intentions and wants to be successful in the siting of the facility, it is paramount not to proceed with the shortlisted sites at Hawker and Kimba as they very clearly do not fulfill the essential criteria of community support. Attempts to 'convince' the local community of potential benefits of hosting the facility should be avoided under all circumstances, and the informed decision, which communities have taken, respected.

I hereby call onto the Minister to dismiss the Hawker and Kimba site nominations and reconsider all options available, including co-hosting the radioactive waste management facility at an already existing nuclear site.

Thank you for the opportunity to make this submission.

Kind regards,

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