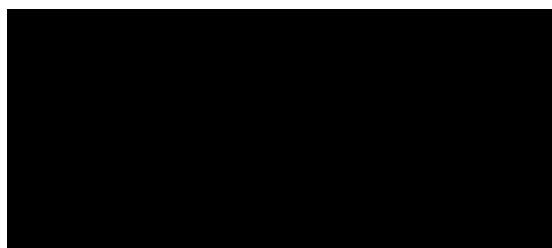


Australian Nuclear Science and Technology Organisation - Decommissioning of the National Research Cyclotron Facility, Camperdown

Parliamentary Standing Committee on Public Works

Submitter:

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Introduction

I make this submission to the Parliamentary Standing Committee on Public Works in relation to the proposed decommissioning and demolition of the National Research Cyclotron Facility at Camperdown.

Good public purpose filter

This submission applies the filter of good public purpose. In this context, good public purpose asks whether a proposal strengthens public capability, resilience, safety, efficiency, education, research, and long-term institutional value. It is a stricter test than asking only whether a proposal is administratively convenient or contractually available. A public work should not proceed merely because an agency has chosen a pathway, entered preliminary arrangements, or wish to clear a site. It should proceed only where the committee can be satisfied that the proposed course is the best present and prospective public use of the public resources, public capability, and public value at stake.

That approach is consistent with section 17 of the Public Works Committee Act 1969. The committee is required to consider the stated purpose of the work and its suitability for that purpose, the necessity or advisability of carrying it out, the most effective use of the money to be expended, and the present and prospective public value of the work. The Act also allows the committee to recommend alterations to the proposal to ensure the most effective use of the money to be expended.

The proposal is framed too narrowly

The central concern in this matter is that the proposal before the committee is framed too narrowly. ANSTO says the facility was placed in permanent shutdown in 2021, that staff were redeployed to Lucas Heights, and that under its lease it is required to decommission the facility, demolish the building, and return the site to Sydney Local Health District. ANSTO says the public value of the proposal lies in handing the land back to Sydney Local Health District, which may then use the land for community benefit. The estimated cost is \$17 million excluding GST, and the project is expected to run through to August 2029.

That is an intelligible administrative case, but it is not yet a complete public purpose case. A decision to demolish an existing specialised facility is irreversible. Once the cyclotron equipment is removed, the vaults dismantled, and the building demolished, the option value embodied in the site is gone. The committee should therefore ask not only whether decommissioning can be done safely, but whether demolition is actually necessary now, and whether ANSTO has demonstrated that preservation, retention, mothballing, partial reuse, or repurposing would produce less present and prospective public value than demolition. On the present material, that comparative case has not yet been made.

Existing public asset in a major health and research precinct

The committee should also note that ANSTO's own material shows this is not an inert or generic building. It is a two-storey brick building with a concrete basement. It contains laboratories, production areas formerly used for radiochemistry operations, workshops, four purpose built concrete vaults, plant areas, and office space. It sits at 81 Missenden Road within the Sydney Local Health District precinct between major health facilities, including buildings associated with Royal Prince Alfred Hospital, and on land of about 3300 square metres. Those features matter because they mean the public is not being asked merely to choose between a dangerous ruin and a clean vacant site. It is being asked to recommend the destruction of an existing specialist asset embedded in a major health and research precinct.

Concentrated radiological issue does not by itself prove demolition is necessary

ANSTO's own radiological investigations also cut against any assumption that only full demolition can now serve the public interest. ANSTO says its preliminary site investigation determined that the primary radiological hazard was confined to the vault rooms and that no residual radioactive material was expected in other areas of the facility. Its executive summary similarly says the residual radioactive material is confined to two concrete vault rooms, with no radiological hazards identified elsewhere in the building. That does not mean the site can simply be reopened without further

work. It does mean, however, that the committee should be slow to treat full demolition as the only reasonable course. If the principal radiological issue is concentrated rather than generalised, then alternatives to total destruction should be squarely tested.

Resilience, redundancy, and preservation of public optionality

Good public purpose also requires attention to resilience and redundancy. ANSTO's case is that functions have shifted to Lucas Heights. Even if that is accepted, concentration of capability in one location is not automatically superior to the retention of a secondary metropolitan capability, especially in a field involving specialised equipment, specialist staff, regulatory lead times, and the public importance of continuity in research and training.

The strongest redundancy argument here is not that Camperdown must replicate everything now done elsewhere. It is that preserving an existing facility within a dense health precinct retains public optionality. Once demolished, that optionality is lost and can only be rebuilt later at far greater cost, delay, and institutional friction. On a good public purpose analysis, preserving public option value is itself a form of public value.

Education and training

There is also a serious education and training argument. A facility of this kind, located next to a major hospital precinct and near major teaching and research institutions, has obvious potential as a practical site for education, workforce development, radiochemistry training, radiation safety training, engineering familiarisation, operational training, and decommissioning capability development. Even if ANSTO does not wish to recommission the cyclotron for production, that does not exhaust the public uses of the site.

A repurposed or partially retained facility could still serve the public by developing scarce scientific, technical, safety, and clinical capability. ANSTO's current submission does not appear to have undertaken any serious comparative assessment of those possibilities.

Research and development

The same applies to research and development. The present proposal proceeds as though the only relevant public value lies in clearing the site and handing it back. That is too narrow. A facility embedded within the Sydney Local Health District precinct has obvious prospective public value as a hospital adjacent and research adjacent platform for translational work, pilot projects, method development, training, and collaborative research.

I do not say the committee has before it sufficient evidence to direct recommissioning. I do say the committee has not yet been shown why these possible public uses should be extinguished now rather than examined properly first.

Commonwealth funding capacity is not the barrier

A further reason for caution is that the committee should not assume funding capacity is the barrier to a superior repurpose. The Commonwealth is the issuer of the Australian dollar. It is not financially constrained in the way a household, a business, a local council, a charity, a university, or a state government is constrained. Those entities must first obtain income, borrow, draw down savings, or sell assets before they can spend. The Commonwealth does not operate under that same monetary constraint in its own currency. The real questions are whether a repurpose would serve better public value, whether the necessary labour and specialist capability are available, whether regulatory approvals can be secured, and whether the use of real resources is justified. Funding should not be used as a reason to destroy an existing specialist public asset if another good public use is available.

In other words, the policy question is not whether the Commonwealth can find Australian dollars for a higher value public use. The relevant question is whether preserving and repurposing this facility would make better use of Australia's real resources, institutional capability, and public infrastructure than irreversible demolition. If the answer may be yes, then funding should not be treated as an excuse for premature destruction.

Lease obligations should not end the inquiry

The committee should also be cautious about accepting lease expiry and administrative preference as sufficient reasons for irreversible demolition. Lease obligations matter, but they do not answer the committee's statutory questions. The committee is not being asked merely to ratify ANSTO's preferred project management pathway. It is being asked whether demolition is suitable, necessary, cost effective, and of superior present and prospective public value. Those questions remain open.

If demolition is not the best public outcome, governments should explore alternatives including varying the lease, extending it, transferring responsibilities, or otherwise releasing ANSTO from the obligation to return the site in a demolished state. The existence of a contractual pathway does not relieve the committee of its duty to test whether that pathway serves the best public purpose. ANSTO's obligation should be treated as a matter capable of governmental resolution if a superior public use can be demonstrated.

Possible synergies with future nuclear capability

There is also a broader capability issue. Even if this site is not essential to any future nuclear industry in a narrow sense, it may still have real synergy with future nuclear related public capability. A retained or repurposed Camperdown facility could contribute to education, training, radiation protection culture, decommissioning expertise, translational medical research, and practical institutional literacy in nuclear related disciplines.

That is a serious public purpose consideration. If Australia intends to sustain or expand nuclear related capability in medicine, research, safety, regulation, decommissioning, or any broader future nuclear pathway, then destroying an existing specialised metropolitan facility without first testing its training and capability value would be shortsighted. The strongest claim is not that this site is uniquely indispensable. It is that demolition now may unnecessarily extinguish a public asset that could contribute to a future national skill base and institutional readiness.

No clearly defined superior successor use has been identified

There is a further problem with the current public value case. ANSTO says the land, once returned, will give Sydney Local Health District the opportunity to provide a range of social and economic benefits for the community. That is speculative and generic. Opportunity is not the same as a defined public purpose. The material publicly before the committee does not identify a concrete, shovel ready, fully funded successor project for this exact footprint that is ready to proceed upon demolition. On the present public record before the committee, the proposal is therefore not demolition in order to realise a clearly specified superior use. It is demolition first, with future possibilities to be determined later.

That sequencing is weak public administration and poor public purpose where an existing specialised asset still stands. The committee should require more than a general statement that the land may later be useful. It should require a clear comparative demonstration that demolition now produces greater present and prospective public value than retention and repurposing.

Conclusion

In my view, the committee should not recommend the expediency of the proposal in its current form. At minimum, the committee should require ANSTO to provide a comparative public value assessment of alternatives, including preservation, mothballing, partial retention, education and training use, research and development use, resilience or redundancy use, and any future nuclear capability use consistent with public purpose. It should also require ANSTO and Sydney Local Health District to identify whether there is a defined funded successor use for this precise site that clearly outweighs the public value of retaining and repurposing the existing facility.

If that case cannot be made, the committee should recommend that the proposal be altered so that demolition does not proceed beyond what is necessary for safety and regulatory compliance, and so that the Commonwealth preserves a facility that already exists and that may still serve substantial public purpose.