

The Secretary
Senate ECITA References Committee
Parliament House
Canberra ACT 2600

20 August 2002

Dear Madam/Sir,

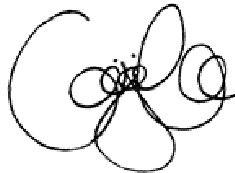
Please find enclosed **Medical Association for Prevention of War's** submission to the Inquiry into Environmental Regulation of Uranium Mining.

An extension for submission by 23 August was obtained on the 8 August.

Yours sincerely,



Dr Bill Williams MBBS
Deputy International Councillor



Ms. Giji Gya
Executive Officer
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Australian affiliate of International Physicians
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MAPW Mission Statement

MAPW, the Australian affiliate of the global federation, International Physicians for the Prevention of Nuclear War, affirms the mission statement of IPPNW as its own:

"IPPNW is a non-partisan international federation of physicians' organisations dedicated to research, education and advocacy relevant to the prevention of nuclear war. To this end, IPPNW seeks to prevent all wars, to promote non-violent conflict resolution and to minimise the effects of war on health, development and the environment."

**Submission to the Senate Environment, Communications, Information
Technology and the Arts References Committee**

**Inquiry into Environmental Regulation of Uranium Mining
August 2002**

Terms of reference:

The **regulatory, monitoring, and reporting regimes** that govern environmental performance at the Ranger and Jabiluka uranium operations in the Northern Territory and the Beverley and Honeymoon *in situ* leach operations in South Australia, with particular reference to:

- (a) the adequacy, effectiveness and performance of existing monitoring and reporting regimes and regulations;
- (b) the adequacy and effectiveness of those Commonwealth agencies responsible for the oversight and implementation of these regimes; and
- (c) a review of Commonwealth responsibilities and mechanisms to realise improved environmental performance and transparency of reporting.

INTRODUCTION:

The Medical Association for Prevention of War (Australia) has raised concerns about uranium mining on many occasions over the past two decades, and adopted a policy opposing the practice in Australia at its National Council meeting in 1987. Further detail on MAPW policy and position statements can be found at www.mapw.org.au

Major concerns include:

- **WEAPONS** - uranium fuels nuclear weapon. The distinction between the civil and military applications of nuclear technology have been described as more psychological than real and Australia's involvement in the mining and export of uranium contributes to the global stockpile of potential nuclear weapons fuel and fissile material available for diversion. This reality exists, and will continue to do so, despite the presence of both bi-lateral and multi-lateral “safeguards” regimes.
- **WASTE** - uranium mining is the starting point for the production of large volumes of highly toxic, long-lived radioactive materials. Despite decades of research, massive capital allocation and extensive industry assurances, there is no proven way to isolate and manage these wastes over the extended time periods that are required.
- **WELLBEING** – uranium mining subjects workers, the general public and the environment to significant potential health hazards, through radon gas and other radionuclide exposure. MAPW supports the growing international consensus that there is no safe level of exposure to ionising radiation.

This submission will focus on the latter concern, in particular the status of monitoring and regulation of uranium mining in Australia in relation to environmental effects.

OVERVIEW - SOUTH AUSTRALIA

MAPW's specific concerns in relation to the South Australian situation relate to the *predicted* and now *proven* incapacity of the operators of the in situ leach mining process to protect groundwater and to prevent leakage from the mine site and contamination of surrounding soils and aquifers.

Recent well-documented events reveal ongoing mine waste discharge into groundwater, undue secrecy by operators and government utilities, routine radiological leaks and failure of public reporting. (www.pir.sa.gov.au)

MAPW again draws attention to the fact that the operational Beverley acid ISL uranium mine operated by General Atomics of USA and the Honeymoon acid ISL mine proposed by Southern Cross Resources of Canada employ a technique not utilised in any other OECD country.

MAPW RECOMMENDATIONS - SOUTH AUSTRALIA

That the Commonwealth and SA Governments commit to

- enhanced protection of groundwater including the rehabilitation of affected groundwater to pre-mining standard;
- more rigorous control of radiological dispersals and leaks and enhanced reporting of such incidents, events and divergences;
- a halt to the direct disposal of liquid mine wastes to groundwater and a new public environmental assessment of the management of radioactive mine wastes;
- not support the proposed acid ISL operations at Honeymoon; and
- no future expansion of operations at Beverley.

OVERVIEW - NORTHERN TERRITORY

MAPW's specific concerns in relation to environmental management at the Jabiluka and Ranger uranium mines focus on long-anticipated hazards: hazards which have indeed eventuated, partly through management failures, but also owing to the inherently dangerous and unpredictable nature of the uranium mining process.

In the past twelve months there have been well-documented and significant releases of radiological contaminants into the surrounding fragile wetland ecosystems.

We draw attention in particular to recent events, including

- the non-disclosure of elevated uranium levels at Jabiluka,
- incorrect dumping of ore at Ranger and
- allegations of environmental mismanagement by a former employee at Ranger

These transgressions constitute long-term hazards to all biota in the vicinity, including humans. MAPW notes with alarm the substantial risks to the Mirrar people in particular, caused by the continuing dispersal of radiological contaminants into their country. Their country is effectively being employed by the mine operator as a giant 'sponge' to absorb and conceal the atmospheric, geological and hydrological radionuclides disturbed and disseminated by the mining activities.

Unfortunately for the generations who inherit Mirrar country, the concentrating attributes of the ecosystem and thus the food chain make Ranger and Jabiluka grave long-term health risks. The fact that such negative cumulative impacts may be hidden or less overt in the short-term provides an important further rationale for the application of the most rigorous standards and protection regimes.

Recent developments in radio-biology and cyto-genetics reaffirm longstanding suspicions that exposure to even low levels of ionising radiation constitute a real and present danger to de-oxy ribose nucleic acid (DNA) - the building block of life.

Monitoring and regulatory interventions have failed to adequately protect the environment and its inhabitants, indicating an endemic failure of the present regulatory regime.

MAPW RECOMMENDATIONS - NORTHERN TERRITORY

That the Commonwealth and NT Governments commit to

- an overhaul of the present environmental regulatory regime to provide greater transparency and independence and to facilitate clearer demarcation of authority and accountability;
- greater involvement of traditional Aboriginal owners in the establishment and oversight of any new environmental monitoring and reporting regime;
- a more active "on-ground" Commonwealth monitoring and regulatory role;
- enhanced reporting processes and the creation of comprehensive NT Freedom of Information legislation
- more statutory monitoring points at both operations and a greater frequency of monitoring;
- event-based monitoring, whereby weather events trigger immediate response monitoring;
- reduction of the so-called 'limit' for uranium concentrations detected in Kakadu National Park downstream of the operations be reduced from 5.8 parts per billion to 0.5 parts per billion;
- active rehabilitation of the Jabiluka mine site, including the re-encapsulation of the mineralised surface stockpile in the existing mine decline
- a comprehensive independent review of the adequacy of current rehabilitation plans and capital provision at Ranger.