

RSF West priority works submission

According to the ABS census in 2021, on any given night in Australia there were 122,494 people sleeping rough. That number, given the current cost of living crisis, will have risen substantially in the past 3 years. If it is correct that part of the \$646 million urgent preliminary works is for the provision of accommodation for foreign military personnel and their families this is highly immoral.

There is a housing shortfall and shortage of construction workers in WA. The State government has committed \$200m for social housing, while private new builds continue. Given the region is suffering from worker shortages job creation from AUKUS, particularly in construction, is likely to bring new workers to the state putting further strain on existing housing stock – already running at a significant shortfall. This will impact on the rental market and more people will be forced onto the streets – to accommodate the 700 US defence personnel and an undisclosed number of UK defence personnel anticipated to be arriving from 2027. It is difficult to comprehend why so many are required to train the Australian defence personnel. Rather it establishes HMAS Stirling as a satellite US military base.

HMAS Stirling's geographical position, close to thriving residential and tourist communities as well as being located in a highly sensitive ecological environment, means that it is not a suitable location for a nuclear propelled submarine base, let alone a nuclear waste storage facility. There are considerable and significant social and environmental impacts in addition to making the area a prime military target.

Were the unthinkable to happen, and there be either an attack or an accident, the civilian casualties would be substantial.

Regarding the construction of the low level waste (LLW) storage facility, there are conflicting reports on what LLW actually means. Due to the lack of transparency on the contents of the licence application there is no certainty or assurance about the actual radioactivity of the nuclear waste to be stored.

The promotional brochure the ASA published for public comment for the CIF licence reads: “the low-level radioactive waste management activities are similar to those that occur in over 100 locations nationwide, including hospitals, science facilities and universities”. If this is the case, why does this waste need a special storage facility enabling long-term isolation?

Most hospital /science facility/university created nuclear waste is either very short lived waste (VSLW) or very low level waste (VLLW). After a decay period – generally a month or two - it can be placed in landfill.

By contrast, the proposed submarine waste, that generated by a nuclear reactor, is LLW – low level waste – which requires isolation from the environment for 300 years. It is understood that the bulk of the waste to be stored on Garden Island will come from cooling water from the reactors in addition to the PPE required to handle this liquid waste. It is also understood that the facility is proposed to have capacity to store waste generated over 30 years, essential given there is currently no alternative suitable

storage facility for the waste. Are there any other potential issues from longer-term storage? Isotope release through evaporation? What about ground stability for the storage tanks/other potential environmental impacts from climate change? None of these concerns have been publicly addressed.

There are two existing nuclear waste storage options in WA. Sandy Ridge is a private, commercial enterprise but is licensed to take low level radioactive waste from the Lucas Heights reactor in Sydney, as well as from defence facilities. There is also the Intractable Waste Disposal Facility at Mount Walton East.

If the waste to be stored on Garden Island is the same level as that from hospitals/universities etc, why can't it be taken to either of these facilities, rather than being proposed to be stored on Garden Island indefinitely because there is no Federal LLW facility? This is hard to understand unless the levels of radioactivity, and the required isolation period for the types of waste, are significantly different. Additionally, it is hard to comprehend how the CIF licence has been granted without a plan for final disposal of all the nuclear waste that the UAKUS submarines will produce.

There was also no mention in the ASA brochure of intermediate level waste (ILW). The Medical Association for Prevention of War (Australia) found out through questioning in Senate Estimates that ILW 'may' be stored at HMAS Stirling.

The ARPANSA report on consideration of public submissions published last week, Table 1, Point 4, says the licence limits prevent the CIF from being able to handle spent nuclear fuel or high-level radioactive waste but does not refer to ILW. This, with the Senates Estimates response is alarming.

Further, there are potential health risks to workers and the environment even without an accident but the public has not been given any information about how the risks will be mitigated and emergency responses to difference scenarios determined. There are currently no public accident scenarios reports for nuclear submarines based in, rather than visiting Australia. To go ahead with these works without such information is available is premature.

Finally, clause 26 of the Priority Works proposal states that 'Nuclear safety will be the paramount consideration', and that 'international good practice will be observed'. Why is the global standard of international BEST practice not being applied? Again there is a lack of information in nuclear regulatory documents about what 'good practice' actually means in this situation.

Until such time as the public has been provided with information that allows an informed response this consultation appears a tick box exercise and it would be impossible to support any part of the proposal.

Thank you for your attention.

Best wishes,

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