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Sent: Tuesday, 20 July 2021 1:13 AM
To: Committee, Public Works (REPS) <pwc@aph.gov.au>
Subject: Sub 16 :SUBMISSION TO AUSTRALIAN NUCLEAR SCIENCE & TECHNOLOGY ORGANISATION
INMEDIATAME LEVEL SOLID WASTE STORAGE FACILITY LUCAS HEIGHTS NSW

**Australian Federal Public Works Committee
c/o Parliament House
CANBERRA ACT 2600**

Dear Members of the Public Works Committee

**Re: Submission to the Australian Nuclear Science and Technology
Organisation Intermediate Level Solid Waste Storage Facility Lucas
Heights, NSW**

I want to raise some important issues in relation to the intention to store waste radioactive materials at a site near Kimba in South Australia

STORAGE OF RADIOACTIVE WASTE:

Safety experts advise that radioactive waste facilities should:

- * be located as close as possible to where they are generated
- * not be placed on land that is close to large populated areas, used for food production or near underground water supplies
- * not be above ground storage (is contrary to International Best Practice and to ARPANSA Committee Advice, and requires double handling and later transport to an eventual disposal site)

The Australian Nuclear Science and Technology Organisation (ANSTO) Nuclear Fuel wastes and Intermediate Level Waste require the isolation of nuclear wastes from the environment for 10,000 years according to the federal regulator ARPANSA. It's unlikely that once imposed on SA these highly hazardous nuclear wastes will ever leave SA -with SA becoming a permanent nuclear dumping ground.

Australia should also try to respect Aboriginal sites of significance, food growing areas and a state that has good green credentials.

TRANSPORT OF RADIOACTIVE WASTES: ,

International scientific and safety advice is that nuclear waste should wherever possible be stored at sites close to where the waste is generated. To transport such toxic waste could be very dangerous to many communities and the environment if there are accidents or spillage.

Required shipping and port handling of Nuclear Fuel Waste and road transport across Eyre Peninsula present significant unnecessary safety and security issues for SA - with the Port of Whyalla targeted by the federal government

CONSULTATION:

It is my understanding that the Barnjarla indigenous people on whose land this site is intended have not been consulted about the proposal and that the town is very divided about the placement of a radioactive dump there. Such a decision needs to have overwhelming community support - including its indigenous owners All South Australians should have a right to a say in the proposal before the final decision to have the facility there is made.

The proposed NRWFM (National Radioactive Waste Management Facility) store for ANSTO Nuclear Fuel Waste represents imposition on an unwilling State community, with clear Traditional Owner opposition and a divided farming community already adversely and unfairly impacted by this federal nuclear waste dump project.

The Federal Government has had many problems in getting communities to agree to its proposal and seems to be just dumping on the place of less resistance while ignoring advice from best scientific, agricultural and indigenous Australian sources.

RECOMMENDATIONS:

1. Store the federal Intermediate Level Radioactive Waste (ILW) onsite at the Lucas Heights reactor site.

Nuclear expertise from ANSTO shows that it has nuclear expertise, security resources and capacity for decades of extended storage which make it the best place to store until a best practice underground site becomes available. It does not make sense and is very unwise to undertake a risky transfer of Intermediate Level Radioactive Waste from its current secure storage at Lucas Heights to temporary storage elsewhere.

2. When other sites are required that there be full public discussion including input from top qualified and experience scientific and environmental expertise and local indigenous people to ensure they are put in the most effective and safe places.

3. In the future, we need to be looking at safer forms of energy production than nuclear and we also need to be researching alternatives to nuclear medicine to avoid amassing radioactive wastes that remain very dangerous to human beings and the environment.

Thank you for considering this submission.

Andrew (Andy) Alcock

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