

Selection Process for a National Radioactive Waste Management Facility in South Australia

I am a fourth generation farmer in Kimba, South Australia. I have a strong understanding of the project being put forward for consideration, and whilst am not against the idea of the consolidation of radioactive waste into one facility, I do not believe it needs to be located in a food producing region. Personally, this process has been one of ongoing stress, additional workload and a steep learning curve into the political machinations of an Australian Government project. Please find following my response to the Terms of Reference of this Inquiry.

Response to Terms of Reference:

- B) How the need for 'broad community support' has played and will continue to play a part in the process, including;**
- a. The definition of 'broad community support', and**
 - b. How 'broad community support' has been or will be determined for each process advancement stage;**

The definition of 'broad community support' has been a moving target that has never been clearly defined in the Radioactive Waste Management Facility project. The hallmarks of a well-developed project include the establishment of standardised measurable milestones that allow all stakeholders to have a clear understanding of the path being traversed as well as clear acknowledgement that these milestones have or have not been achieved.

The constantly moving goal posts throughout this process has been an ongoing source of frustration to those of us trying to work within the Governments framework. Despite numerous requests, the Government has continued to refuse to provide clarity around what factors would be included in their consideration when determining if broad community support had been achieved; what weighting each of the factors would contribute to this outcome, or what the required result in percentage terms was necessary to allow this process to proceed to the next stage.

There has been an ongoing lack of clearly defined, factual, measurable targets that are defensible from both sides of the debate, accepted by both sides of the debate and not able to be influenced by the results put before it. The Minister advised that the vote would not be the only determining factor for progressing the Kimba site through to the second stage, however when looking at the statistics surrounding alternate factors it is hard to see where any other factor has been included. All media that I have seen surrounding Minister Canavans decision simply continued to reference the 57.4% in favour of progressing result of the vote.

Based on the data included in the "National Radioactive Waste Management Facility (NRWMF) Phase 1 Summary Report, Kimba 2017" showing the results of the community consultation on which the decision to progress to Phase 2 was made, written submissions received throughout this phase were seen to be 86% opposed to the facility.

Had both factors been taken into consideration equally, there would have been 35.7% approval rating to this project. Should we even provide a 20% weighting to the written submissions and 80% weighting to the vote, the outcome would achieve a 48.7% approval. None of this comes close to being "broad community consent".

Another area included in “broad community support” is supposedly the opinions of neighbours. In the first round of community consultation the definition of neighbour, was any property or person within a 10km radius. When the second round of community consultation occurred in December 2016 it was reduced to neighbours within a 5km radius, and at the time of the vote the definition of neighbour was those who immediately bordered the nominated parcel of land. This continuous shift in parameters appears to me to have occurred in order to reduce those included in the sample of neighbours, resulting the Department able to make the statement included in the “National Radioactive Waste Management Facility (NRWWMF) Phase 1 Summary Report, Kimba 2017” that “*Neighbour support around the proposed sites is strongly supportive*”.

This ongoing lack of defined measureables and the Ministers ability to make a decision as to what the pass mark is after the results have been declared is disingenuous.

D) Whether and/or how the Governments ‘community benefits program’ payments affect broad community and Indigenous community sentiment;

The removal of incentive payments would absolutely change the support levels found within a community. The idea of the Radioactive Waste Management Facility being sited in Kimba was promoted along the lines of “think what this money could do for us”. All the way through this process has been a money grab. There is anecdotal evidence of people saying that they would vote “Yes” to going through to the second round of this process in order to receive the \$2M Community Benefit Funds, with the plan to say “No” at the next vote. They have no intention of wanting the facility located at Kimba, but think they are playing a game whereby they can “get \$2M for nothing”.

There is speculation of strategies in play to prolong the Phase 2 process to ensure it pushes into the second financial year in order to gain a further \$2M.

For those of us who are against the location of this facility in the Kimba region, regardless of the funds thrown around, this is a difficult process. We are defending our position against the facility being located in our region, with genuine concern regarding our business and livelihoods, whilst community members are playing a game to access funding.

I also believe that the \$10M one-off payment included in the Act will be paid to the State Government has not been clearly highlighted throughout this process. Most people within the community believe the money will be coming to the community directly, with complete access to, and management of, the funds. When people discover this money is to be paid to the State Government, their opinion on the matter changes very quickly.

F) Any other related matters

The Code for Disposal of Solid Radioactive Waste provided by ARPANSA clearly states that the siting of a Radioactive Waste Management Facility should not be on agricultural land:

“Section 3.1.29 (a) the immediate vicinity of the facility has no known significant natural resources, including potentially valuable mineral deposits, and which has little or no potential for agriculture or outdoor recreational use.”

The National Radioactive Waste Management Facility, Nomination of Land Guidelines, November 2016 also clearly states in Attachment A, Section A8 under the Community Well

Being Objective the criteria: *“Is the site located within an area that is likely to be expanded upon for community or industrial use or for natural/agricultural use in the foreseeable future”*. The weighting to this criteria when taking site selection into consideration according to the guidelines was stipulated as “High”.

Both these documents show that the facility should not be located on agricultural land, and yet both nominated sites at Kimba are specifically located on farms. Directly next to farming country, and entirely neighboured by productive farms.

That this part of the ruling is not being enforced is beyond me. It would be apparent to most people that under best practice the production of food should be separated from the production or storage of nuclear waste. That it is not the case in other countries does not provide adequate reason as to why Australia should lower their standards with regards to this.

It is imperative that this part of the legislation is upheld and made mandatory, rather than being optional.