Josephite S.A. Reconciliation Circle

on Kaurna Land ... Solidarity, Justice, Advocacy, Reconciliation



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PO Box 57, Kent Town, South Australia 5071

To: Parliamentary Standing Committee on Public Works

Inquiry: "ANSTO Intermediate Level Solid Waste Storage Facility Lucas Heights, NSW"

Public Submission by the Josephite SA Reconciliation Circle

The Sisters of St Joseph South Australia (SA) Reconciliation Circle and their Associate Members welcome the opportunity to make **a** Public Submission to the Inquiry: "ANSTO Intermediate Level Solid Waste Storage Facility Lucas Heights, NSW"

In summary: Our members see as key the need for the Public Works Committee to actively encourage ANSTO to modify their storage facility for Intermediate Level Waste to keep the nation's highest level of radioactive waste – intermediate long lived waste – on site until the final deep geological storage site is ready to receive it.

Our members include those who have been involved since 1998 with the vexed question of the federal government's determination to store the nation's highest level radioactive waste – intermediate long lived radioactive waste- in above ground temporary storage, with no planned final site.

Since 2015, these and other more recent members have been concerned and have taken action about the federal government's latest plan to transport such waste to either the Flinders Ranges SA or the Kimba region SA. In this we have had good cause to stand with both the Traditional Owners: the Adnyamathanha in the Flinders Ranges and the Barngarla in the Kimba region.

Of course as South Australians we are also speaking for ourselves and many other South Australians concerned with various worrying aspects of the present federal government's plans, including the inherent safety issues of such dangerous waste for communities along the transport routes (yet to be determined or at least yet to be publicly released.)

We have noted in the federal budget the allocation of \$59.8 million to ANSTO. The PWC Inquiry should consider that proposed *indefinite storage* of ANSTO nuclear fuel waste and ILW in SA is untenable and compromises safety and security in SA. We respectfully remind the Committee that ANSTO's premise to transfer ILW into *indefinite storage* in regional SA is contrary to International Best Practice (IBP) and does not comply with ARPANSA Committee advice.

It is well known that the Dr Carl-Magnus Larsson former head of the regulator body ARPANSA has stated publicly on June 20^{th} 2020 that 'there is ample room at ANSTO for decades to come.'

Duty of Care As members of government the Public Works Committee will be well acquainted with the principle of 'duty of care.' Department officials seemingly have chosen an arbitrary number of 100 years for the proposed transported highly dangerous material to be left above ground with no definite contingencies to safeguard such.

Burden on Future Generations: Our members put it to the Committee that the present plans are simply 'kicking the can down the road' leaving a task for future generations that our present federal government is simply not willing to take on itself. And further that once transported and 'stored' there is no guarantee at all that the highly toxic material will not **simply remain where it is.**

Time frame. Clearly there are few Australians alive today who were born in 1921. One hundred years is beyond the knowledge of most of us. The fact that the ILW and other Lucas Heights material are by ANTSO'S own admission, **toxic for an unimaginable 10,000 years,** means that it is extremely irresponsible policy to be complicit or even advocating for such material to leave the direct care of ANSTO's expertise and high security to be simply stored above ground on farming land, half way across the country from the nation's nuclear experts.

ANSTO'S highly dangerous nuclear fuel wastes as well as their Intermediate Level Nuclear Waste need radiation shielding, safe expert handling and high security – and of course isolation from adults, children, animals and the environment lands and ground waters. This will not happen in the proposed above ground facility – even for 100 years.

Recommendation: We put to members of the Public Works Committee: that the present allocation of funding to ANSTO for safe and secure storage include the capacity to modify their storage facility to enable on site continuous storage of ANSTO's own nuclear fuel waste and long lived intermediate level radioactive waste until such time as a permanent best practice underground final suitable storage site is found and completed.

We thank you for receiving and noting our submission.

Michele Madigan Josephite SA Reconciliation Circle 27th July 2021