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Joint Standing Committee on Treaties  
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**Agreement between the Government of Australia and the Government of the Russian Federation on Cooperation in the Use of Nuclear Energy for Peaceful Purposes, Sydney, 7 September 2007**

Dear Secretary

The Wilderness Society welcomes the opportunity to provide comment on the Australia-Russia Nuclear Agreement. We do not support the Agreement and suggest it is not in our national interest to pursue the agreement. Additionally we believe that, as it stands, the proposed Treaty might seriously undermine the Australian Government's nuclear disarmament and non-proliferation objectives.

Given the Treaties Committee's purpose to review all treaty actions proposed by the Government before action is taken which binds Australia to the treaty, we urge the Committee to report to the Parliament that the Treaty should not be entered and that the Australian Government should take steps to ensure that some of the proposed actions do not take place.

The aim of the Wilderness Society is to protect, promote and restore wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth. We take action to support this aim internationally. The Wilderness Society is particularly concerned with the devastating impacts of nuclear weapons and nuclear waste on human life and ecosystems. All life on Earth is potentially affected by the nuclear industry, as well as current and future generations. The Wilderness Society supports measures for a nuclear weapons free world and therefore, supports the nuclear disarmament obligations of signatories to the Nuclear Non-Proliferation Treaty, as well as moves to establish a Nuclear Weapons Convention.

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### **Promotion of nuclear power**

The preamble of the proposed treaty states that the Parties are: “DESIRING to promote their cooperation in the use of nuclear energy for peaceful purposes”. This is outside stated Australian Government policy in that Australia does not use nuclear energy and should not promote nuclear energy. The Wilderness Society does not support nuclear power and believes any increase in nuclear power world wide inevitably increases proliferation risks.

### **Australia should not supply uranium to a nuclear weapons state**

We do not support the export of uranium generally, and we are especially concerned at the supply of uranium to a nuclear weapons state such as the Russian Federation which is clearly breaching its obligations under the Nuclear Non-Proliferation Treaty to disarm itself of nuclear weapons.

Nuclear weapons are still part of the Russian defence system. According the *Bulletin of the Atomic Scientists*, May-June 2008, Russia has the largest nuclear arsenal in the world with 5,192 operational nuclear weapons and over 8,800 in reserve. In addition Russia is in the process of modernizing its nuclear defence capabilities and highlighting the importance of nuclear weapons as part of its defence strategies.

<http://thebulletin.metapress.com/content/t2j78437407v3qv1/fulltext.pdf>

It is sometimes argued that the uranium provided to a nuclear weapons state does not support the state's weapons program as the uranium can be directed to civilian nuclear purposes. However, in practice the additional uranium, even ostensibly directed for civilian purposes, assists nuclear weapons development by adding to the 'critical mass' of the state's nuclear industry, with synergies between civilian and military nuclear programs on research and development, workforce training and career options and waste treatment and storage.

### **The Agreement should not include technology cooperation on nuclear matters not supported by the Australian Government**

Given the Australian Government's clear and stated opposition to a domestic nuclear power industry and other involvement at the higher level of the nuclear fuel cycle such as enrichment, as well as management of international nuclear waste, we see no benefit or need for Australia to establish a broad framework for cooperation between Australia and Russia on these matters. The Agreement should therefore explicitly rule out technology cooperation on:

- nuclear weapons;
- reprocessing;
- enrichment;
- nuclear power;
- nuclear fuel supply systems; and
- management of spent fuel and radioactive waste.

### **Multi-lateral nuclear fuel supply**

The Treaty and the National Interest Analysis is silent on the proposed future role of the International Uranium Enrichment Center (IUEC) in Angarsk Russia, as a multi-lateral nuclear fuel cycle supplier, with the longer term possibility of being responsible for the management of radioactive waste from the spent fuel that it provides. Yet it appears that Australian uranium may be processed there and it has been reported that Russia has invited Australia to join into the work of the Centre.

We do not support the various proposals for multi-lateral control of the nuclear fuel cycle to reduce the spread of uranium enrichment and plutonium reprocessing capabilities.

Such proposals might sound attractive from a non-proliferation perspective and they have been on the table at various times since 1946 – starting with the 1946 *Acheson-Lilienthal Report* prepared for the US State Department to advise on US policy on nuclear safeguards on an international scale concluding that :

*“There is no prospect of security against atomic warfare in a system of international agreements to outlaw such weapons that relies only on inspections and similar methods. The reasons are not merely technical, but primarily the insuperable political, social, and organizational problems involved in enforcing agreements between nations each free to develop atomic energy but only pledged not to use bombs.”*

They therefore recommended that all nuclear materials [including mined uranium] and technology go under the control of a proposed international agency and that the US provide its nuclear weapons secrets to Russia on the basis that both agree not to develop more weapons. The US via the Baruch Plan did not pursue this part of the proposal and also insisted on unequal inspection rights – consequently the negotiations with Russia failed.

[http://www.mbe.doe.gov/me70/manhattan/international\\_control.htm](http://www.mbe.doe.gov/me70/manhattan/international_control.htm)

All subsequent multi-lateral nuclear fuel / technology proposals have also not come to fruition for various legal, political, technical reasons and there is no resolution of these issues around the current Russian multi-lateral nuclear fuel cycle proposal.

The Wilderness Society is particularly concerned that multi-lateral nuclear fuel supply proposals will only serve to further exacerbate the tensions between nuclear haves and have-nots which already exist within the Nuclear Non-Proliferation treaty. Multi-lateral nuclear fuel supply initiatives propose that a select few countries will have access to advanced nuclear technology while barring that access to others. This does nothing to address the issue of non-co-operative states, nor changing strategic alliances over time, in turn leading to weakening rather than strengthening non-proliferation objectives.

Multi-lateral fuel supply and return of spent fuel will also greatly increase the traffic of nuclear materials with all the attendant risks of nuclear proliferation; diversion and loss of nuclear materials; accidents; catastrophic attack on facilities, and; currently unknown risks.

Finally, the various multi-lateral fuel supply proposals seem to be premised on a move towards new generation nuclear reactors using plutonium or MOX as fuel – hence creating increased plutonium stocks and increased plutonium commerce. Existing plutonium levels are already at unacceptably high levels. Alternatively the proposals are based on an assumption of developing new ‘proliferation-resistant’ nuclear fuel that are not yet even at an operational research stage.

Given the novel and uncertain nature of these proposals, any involvement in multi-lateral nuclear fuel supply facilities should be fully open and transparent and subject to the most rigorous consideration of their security and environmental implications. This is not currently the case with the various multi-lateral nuclear technology proposals. None have been the subject of any form of public inquiry or independent policy scrutiny in Australia.

We are also concerned that any participation in such a venture, at either a Government or corporate level – BHP Billiton or Rio Tinto – could be a first step in Australian involvement, with a longer term objective of Australia becoming a regional nuclear fuel supplier and an international nuclear waste dump at some stage into the future. The steps taken by Australia in the proposed treaty are the same steps that would be taken by a government and a country with a long-term ambition to be a nuclear fuel supplier and possibly providing an international high-level nuclear waste dump.

We draw the Committee's attention to the statement by Rosatom deputy head Nikolay Spasskiy on 18 September 2007 expressing hope that the Angarsk IUEC would serve as a model for similar international enrichment centers in Africa and Latin America. While not implicating Australia, it is clear there is intent to develop regional international enrichment centres. The Director of the Australian Safeguards and Non-Proliferation Office, John Carlson, has previously flagged that Australia could become a nuclear fuel supply nation to the Asian market, including Indonesia. (Radio National Breakfast 30 October 2006

<http://www.abc.net.au/rn/breakfast/stories/2006/1776525.htm>)

It would be most deceptive for Australian uranium suppliers and /or the Australian Government via this treaty to become technologically capable of enrichment via participation in the Russia IUEC, while maintaining a public facade of opposition to a domestic enrichment industry in Australia.

We believe that all fissile material must be placed under international IAEA control under a framework which is based on a timed phase-out of reprocessing and enrichment.

In the context of the proposed Treaty we recommend that it explicitly exclude the processing or use of Australian uranium at the IUEC, or any multi-lateral nuclear fuel facility, as well as specifically exclude Australian participation as a member or partner in the IUEC.

### **Reprocessing**

The Agreement will allow Australian uranium to be reprocessed. The Wilderness Society does not support reprocessing as it leads to the production of plutonium. We recommend that rather than provide legitimacy to ongoing reprocessing Australia should seek an immediate moratorium on, and a timetable for the complete phase-out of, nuclear reprocessing for civil and military purposes.

### **Radioactive waste management**

Despite over 50 years of nuclear research and development there is no agreed safe method of disposing of the highly radioactive waste generated by nuclear reactors and / or enrichment facilities. Russia, as with all countries, does not have a solution to the current nuclear wastes that it has currently produced let alone any future expansion of its nuclear activities.

According to Greenpeace Russia, there are no mechanisms in place in Russia to convert the highly toxic wastes created by enriching uranium into a form suitable for safe storage, nor is there a site identified for waste storage, nor are funds allocated.

It is irresponsible of Australia to export uranium for foreign use when there is no viable nuclear waste management plan in place.

### **Environmental issues**

The enrichment facilities at Angarsk are located within 95 km of Lake Baikal a UNESCO World Heritage site containing 20 per cent of the world's surface freshwater. It is biologically diverse with 2,565 animal species and sub-species and 700 plant species of which 80 per cent of its living organisms are unique to the lake. The lake's basin covers an area of 570,000 square kilometers. It is the oldest lake on earth, at some 25-30 million years of age as well as being the deepest lake on earth with a depth of 1,637 metres.

Russian environmental groups are concerned that the highly radioactive wastes created at the enrichment facility will have impacts on the lake, either via ongoing leakages from day to day operations or from accidental release from the enrichment site or arising from a transport accident along the lake's shore.

The Wilderness Society believes that Australia should not be part of polluting activities overseas especially when it will not allow those activities domestically. The proposed Treaty should include provision for the highest level of environmental safeguards, at least to the level of those that apply in Australia.

**Nuclear power is not an appropriate way to address climate change**

We reject the analysis in the National Interest Analysis regarding the potential of an expansion of nuclear power in Russia in mitigating future greenhouse gas emissions not only in Russia but globally. It is not a substantive analysis as it does not adequately address the full environmental and economics of an expanded nuclear power industry in Russia to meet increases in energy needs, against other potential energy sources such as renewable energy and energy efficiency measures; or other options.

We draw your attention to the publication September 2005 *Nuclear Power No Solution to Climate Change* <http://www.melbourne.foe.org.au/documents.htm> – jointly prepared for Friends of the Earth, the Australian Conservation Foundation, Greenpeace, the Medical Association for the Prevention of War, the Public Health Association and the Climate Action Network. In summary the report notes:

- Even if we doubled nuclear power capacity by 2050 it would still only reduce greenhouse gas emissions by 5%
- Nuclear power's role in reducing greenhouses gas emissions is limited as it mainly provides electricity – which is less than one-third of global greenhouse emissions. In addition it is a very slow response – it will take at about ten years to deliver additional electricity
- Nuclear power is a still a higher greenhouse emitter than most renewable energy sources. Greenhouse emissions from nuclear power will increase as the industry moves to the use of lower grade uranium ores.
- Uranium is itself a non-renewable finite resource and will run-out at some stage in the near future
- Nuclear power is expensive and has been heavily subsidised
- Nuclear power has ongoing proliferation risks and lacks acceptable disposal options for the long-lived radio-active waste it generates
- The real solution to climate change is energy efficiency and renewable energy.

In conclusion we urge the Committee to recommend that the Parliament does not support the Agreement between the Government of Australia and the Government of the Russian Federation on Cooperation in the Use of Nuclear Energy for Peaceful Purposes in its current form, and without significant amendment as outlined above.

Yours sincerely



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The Wilderness Society Inc

