

Joint civil society groups comment to the National Radioactive Waste Management Project.

March 11, 2016

Our groups represent many Australians across different regions and sectors who share a common desire to advance and realise responsible radioactive waste management in Australia.

We write to provide formal comment on the approach taken to facility siting in the revised national radioactive waste management project (NRWMP) that was established following the end of the protracted and fiercely contested plan to develop a national radioactive waste facility at Muckaty in the Northern Territory.

For over two decades, successive Australian governments have sought to manage Australia's radioactive waste inventory through the development of a co-located remote central dump and store at locations chosen by the Commonwealth without adequate consultation or clear community consent.

This approach has repeatedly failed to win social license and has been characterised by division, contest and the inability to realise a site.

Our organisations welcome the commitment repeated through the course of the NRWMP to date not to impose a facility without broad community support.

It is our view that this essential project pre-condition has not been realised at any of the six sites currently being considered.

The approach taken on radioactive waste management prior to the formation of the NRWMP saw a polarisation of views and a lack of the consensus and discourse required to realise lasting solutions.

We believe it is essential that these failures are not replicated in the current process and urge you to recognise, respect and reflect the deep community unease and opposition at each of the sites currently under active consideration.

Radioactive waste management is a complex issue but our organisations do not believe it is by nature an intractable one.

Many civil society stakeholders including national environment, public health, trade union and Aboriginal organisations support a public, independent and evidence based assessment of the full range of radioactive waste management options in Australia that would include, but not be solely restricted to, the remote centralised site model.

We believe that both the perception and practise of fairness, trust and transparency are preconditions to achieving a credible and lasting radioactive waste management solution.

While the NRWMP process has seen some return of stakeholder confidence, this could be rapidly eroded if a community that does not support the siting of any future national facility is chosen for further consideration and assessment.

We also believe that there is no compelling radiological or public health rationale for prematurely advancing any site selection.

Recent months have seen the secure return of reprocessed spent nuclear fuel waste to ANSTO's Lucas Heights facility and we understand there is currently a process in train to further upgrade storage facilities at ANSTO.

We urge you to defer any further siting consideration for a single management facility and to instead advance responsible radioactive waste management through the processes outlined below.

We have a real opportunity now to advance an inclusive, credible and lasting solution to a complex and long contested area of public policy and we urge you not to undermine this by seeking to progress the consideration of sites that do not enjoy broad community support.

Recommendation:

We believe that extended interim storage of radioactive waste at ANSTO – which is already the site and source of most of Australia’s higher level radioactive waste – would provide the time and opportunity required to build on the foundation work of the NRWMP and Detailed Business Case process.

Coupled with an independent and robust assessment of the full range of radioactive waste management options, we would also support a joint federal-state process to audit the adequacy of existing waste storage facilities and address any deficiencies, identify legacy sites that may be retired and provide an accurate analysis of current and future waste streams and volumes.

The vast majority of Australia’s radioactive waste is currently stored at secured and defined Commonwealth facilities at Lucas Heights (NSW) and Woomera (SA).

Both of these facilities have confirmed they have the capacity to continue appropriate storage of this material for many years, providing an opportunity to revisit this policy arena in order to realise the most effective, equitable and lasting outcome.

Yours sincerely,

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Arid Lands Environment Centre- Jimmy Cocking
Australian Conservation Foundation- Dave Sweeney
Australian Council of Trade Unions- Ged Kearney
Australian Nuclear Free Alliance- Rebecca Bear-Wingfield
Beyond Nuclear Initiative- Natalie Wasley
Conservation Council of South Australia- Craig Wilkins
Conservation Council of Western Australia- Piers Verstegen
Environment Centre of the Northern Territory- Ian Harris
Environment Victoria- Mark Wakeham
Friends of the Earth Australia- Dr Jim Green
Friends of the Earth Brisbane- Franklin Bruinstroop
Greenpeace Australia Pacific- Dominic Rowe
Nature Conservation Council NSW- Kate Smolski
Nuclear Free Queensland- Robin Taubenfeld
People for Nuclear Disarmament WA- Judy Blythe
Public Health Association of Australia- Peter Tait
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