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Copy to:

The Hon Ged Kearney MP
Assistant Minister for Health and Aged Care
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Dear Dr Hirth

MAPW is writing in relation to ARPANSA's statement outlining its response to the public submissions on the Australian Submarine Agency's (ASA) application for a siting licence for a Controlled Industrial Facility (CIF) as part of the works at HMAS Stirling in WA for US and UK submarines.

We believe that ARPANSA's response fails in a number of important respects to adequately address the serious concerns raised in relation to the proposed facility, and we are seeking actions to help rectify this unsatisfactory situation.

The most egregious and astonishing failing in the consultation process was the withholding from the public of the ASA application itself, which was then compounded by the withholding of the 165 public submissions received on the matter. There is no place for secrecy in matters of public health and safety, and ARPANSA itself acknowledged the level of public interest in this matter. While ARPANSA's website refers to accountability as one of its values, ARPANSA is not displaying accountability to the Australian people.

Rather than having access to ASA's application, the public were able to see only the agency's public relations materials. As stated in MAPW's submission, those materials were not only devoid of most of the necessary information, but they also contained false statements (see below) that were clearly designed to downplay legitimate concerns about nuclear waste at HMAS Stirling.

ARPANSA stated in an email message to those who made a submission "Overall, there were no submissions that justified alteration of ARPANSA's finding that the application provided sufficient evidence of the radiological safety of the proposed facility." How could this

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possibly be judged when the application was kept secret? It's like declaring the result of a football game played with invisible goalposts.

Indeed, as noted below, it was very disturbing to discover in Senate Estimates, extremely close to the closing date for public submissions to ARPANSA, that storage of intermediate level waste was also included in the application.

We ask you to:

- ***explain the reasons for which you withheld both the ASA application and the public submissions regarding it, and to***
- ***publish the application and all submissions that you received on this matter.***

The following specific points are from ARPANSA's tables of responses to matters raised by submitters:

- **Table 1. 1 "The information released for public comment":**
ARPANSA stated that the document provided for the public by ASA contained accurate information. This is not true. ASA incorrectly stated that *"the low-level radioactive waste management activities are similar to those that occur in over 100 locations nationwide, including hospitals, science facilities and universities."* The two are not comparable, hospital radioactive waste having a vastly shorter half-life than nuclear reactor waste (even low-level waste), as outlined in MAPW's submission to you on this matter.

We ask you to correct this in all ARPANSA communications on this matter, require ASA to cease making this false claim, and advise the relevant government ministers and state and local government bodies of this correction.

- **Table 1. 3 "Final disposal of radioactive waste in Australia":**
ARPANSA's apparent unquestioning acceptance of the Australian government's "commitment" to find a final disposal site for the radioactive waste is totally unsatisfactory for a regulator. An intention to solve a problem is merely an intention, not a solution. The decades of unsuccessful attempts to solve this problem should not be so lightly disregarded.
- **Table 1.4 "Waste inventory, including concerns that high level waste from AUKUS partner countries could be accepted at the facility":**
ARPANSA's response states that the CIF could not handle high level waste (for example from US or UK nuclear submarines), but it omits to mention intermediate level waste. The possibility of ILW being stored at the facility was revealed in Senate Estimates on 6 June, and yet ARPANSA appears to have ignored this possibility.

We ask you to state categorically that there is no licence for the storage of intermediate level waste at the facility, and it must not be stored there.

- **Table 2. 2 “Acceptance of AUKUS spent fuel from nuclear-powered submarine programs”:**

ARPANSA states that this is outside the scope of the current licence application. Such a salami-slicing approach that ignores much bigger problems of radioactive waste management, for which the current proposal is paving the way, merely pushes problems down the track. It is a reckless imposition on future generations.

- **The final section “ARPANSA’s assessment of the licence application”:**

ARPANSA states that in its assessment of a worst-case nuclear accident at the site, the radiation doses off-site would be negligible. However there is no indication of what sorts of accidents at the facility ARPANSA has considered. The reference given ([here](#)) is only general information on radiation protection in emergency situations; there is nothing about accidents at the specific facility under consideration.

We ask you to publish the accident scenarios at the proposed CIF that ARPANSA studied, and the results of those studies. These scenarios should include intermediate level waste scenarios, unless this waste is categorically excluded, as ILW storage is a significantly higher risk proposition.

The final section also states that “there is evidence to demonstrate that the facility can be constructed, operated and decommissioned in a way that provides assurance of [radiological safety]”. The process of decommissioning of the CIF must surely involve final disposal of its nuclear waste.

We ask you to set out the evidence that demonstrates that full decommissioning of the CIF - including final disposal of its nuclear waste, to provide a cradle to grave approach - can be conducted safely.

Thank you for your attention to these important matters, and we look forward to an early response from you.

Sincerely



Dr Sue Wareham OAM
President, MAPW Australia

Dr Margaret Beavis OAM
Vice-President, MAPW Australia

