

botany bay

canterbury

hurstville

kogarah

marickville

sandwich

rockdale

south sydney

sutherland shire

waverley

woollahra



SSROC

southern sydney regional
organisation of councils

4 August 2003

The Committee Manager
Joint Select Committee on the Transportation and Storage of Nuclear Waste
Parliament House
Macquarie Street
Sydney NSW 2000

Re: Inquiry into the Transportation and Storage of Nuclear Waste in New South Wales

The Southern Sydney Regional Organisation of Councils (SSROC) welcomes the opportunity to make a submission to the inquiry into the transportation and storage of nuclear waste in New South Wales.

This submission is subject to formal endorsement by the SSROC Board on 21 August 2003. SSROC will contact the Inquiry Secretariat immediately after that Board meeting should the region wish to modify this submission in any way.

SSROC would be happy to provide any additional material to support the points raised in this submission. Member councils of SSROC may be making individual submissions to the Inquiry.

Yours sincerely

Melissa Gibbs
Executive Director

Suite 4C, Hurstville House
34 MacMahon Street
Hurstville

PO Box 536
Hurstville NSW 1481

Ph: 02 9330 6455

Fx: 02 9330 6456

Email: ssroc@ssroc.nsw.gov.au

Web: www.ssroc.nsw.gov.au

I. INTRODUCTION

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of eleven local councils. Its aim is to achieve sustainable solutions to the challenges facing the southern Sydney region through the sharing of resources, co-operation in policy development and regional advocacy.

SSROC undertakes a wide range of continuing programs and special projects, utilising both local government resources and grant funding. SSROC has become a key element in the structure of governance in the southern Sydney region.

Councils represented by SSROC are:

- Botany Bay City
- Canterbury City
- Hurstville City
- Kogarah
- Marrickville
- Randwick City
- Rockdale City
- South Sydney City
- Sutherland Shire
- Waverley
- Woollahra

Together these eleven councils represent more than one million people.

I.2 SSROC's Position on the Treatment, Storage and Transport of Nuclear Waste

For many years, SSROC has strongly opposed the development of nuclear facilities at Lucas Heights, including the new reactor, primarily on the grounds that such activities are not ecologically sustainable. SSROC has been particularly concerned about the creation of a waste problem for future generations to inherit.

SSROC has repeatedly and strongly expressed its concerns about the treatment, handling and storage of nuclear waste at Lucas Heights via submissions to a range of Government inquiries and within Local Government circles more generally. Many of the issues raised in our submissions remain unresolved and SSROC welcomes the opportunity to place them before this current inquiry. SSROC's specific concerns are summarised in the following sections.

2. SPECIFIC COMMENTS

2.1 State Government Involvement in Decision Making

SSROC is concerned that the New South Wales and South Australian Governments have had no say in determining the development of the new reactor at Lucas Heights and the waste repository. The Intergovernmental Agreement of the Environment provides an agreed framework for a co-operative national approach to dealing with environmental and planning matters. SSROC believes that a major decision, such as the siting of a nuclear facility or the transport and storage of nuclear waste, should be made within the framework of that agreement, and should accommodate the interests and concerns of all spheres of government and the community. SSROC has offered to support any action the NSW Government may take in securing a greater role in decision making.

2.2 Waste Management Concerns

The following wastes are of concern to SSROC:

Low Level Solid Waste (LLSW)

The source of low level solid wastes across the Lucas Heights site and their ultimate storage in bins in a warehouse pending transport to the repository is of concern.

Low Level Liquid Waste (LLLW)

The source of low level liquid waste across the Lucas Heights site and its disposal are also of concern, specifically with regard to:

- The storage of the liquid waste in large storage tanks on the site and its eventual disposal into the sewer and eventual passage to the Cronulla Sewerage Treatment Plant (and then into the ocean);
- The solar drying of the solid residue in a concrete-lined evaporation pond for eventual storage in drums on the site

Long Lived Intermediate Level Waste (LLILW)

This includes highly radioactive liquid waste from molybdenum production which, after many years delay, is being solidified for safety purposes.

Spent Reactor Fuel

Spent reactor fuel is stored in water ponds, which were recently contaminated and remain so today. Spent reactor fuel is also stored below ground holes in which water infiltration has caused fuel corrosion and radioactivity release into the holes.

2.3 Special Areas of Radioactive Waste Management

Special areas of radioactive waste management are of interest including:

Long Lived Intermediate Level Wastes

Some Long Lived Intermediate Level Wastes, including uranium and plutonium, are to be included in the inventory to be sent to the so-called Low Level Repository, despite the toxicity of these lasting well beyond the 20 year institutional life of the Repository.

The Little Forest Burial Ground

Solid waste at The Little Forest Burial Ground was formerly buried in poor containment and includes radioactive plutonium, and toxic non-radioactive beryllium.

Emergency Response

SSROC is concerned about the adequacy of the emergency response equipment required at the site to clean up liquid and solid radioactive waste spills (which have occurred at the site in the past).

Transport Facilities and Containment Measures

There is concern about transport facilities, including radioactive waste containment used for transport to and from ports where shipping takes or delivers radioactive nuclear waste materials. There is also great concern about the transport of such wastes on NSW roads.

2.3 Transport and Storage Issues at the Repository

Security

SSROC is concerned that the claim that security at the South Australian repository will be adequate is based upon occasional inspections and a fence. This claim ignores the fact that such approaches in the outback have failed in the past.

Transport Security and Indemnity

The possibility of house-contamination is not considered with respect to solid materials. Neither is the issue of indemnity to houses contaminated during transport.

Impact of Affected State Governments

Despite not being parties to the EIS and assessment and approval processes, the South Australian and New South Wales Governments will be responsible for transport accident clean-up operations in the event of a spill. We know that in many towns along the route, appropriate emergency response equipment and facilities are simply not available. It is highly inappropriate for local communities, State and Local

Governments to bear this responsibility and cost, particularly as they have had no say in the decision making process.

Availability of Public Information

We note that consultation with affected communities along the transport route was restricted mainly to major towns. Even when consultation did occur, residents were largely unaware of the proposal and its impact. It is therefore reasonable to assume that residents have not had the full risks and consequences of the proposal adequately explained, particularly in areas outside of major towns.

3. POSSIBLE SOLUTIONS

SSROC has not had the opportunity to explore possible solutions to the many issues raised in this submission (which will no doubt also be reflected in submissions made by other parties). However, SSROC would be pleased to work with the Committee and other key stakeholders to canvass possible solutions. A possible way forward might be a forum of stakeholders to “brainstorm” practical solutions, and SSROC would be pleased to assist in convening such a forum should the Committee wish to pursue this suggestion.

4. CONCLUSION

SSROC has concerns about the current generation, storage and disposal of radioactive waste at Lucas Heights. Specifically, SSROC would like the Committee to explore in further detail the following issues:

a. **The role of the State Government in the decision making process**

The Intergovernmental Agreement on the Environment provides an agreed framework for a co-operative national approach to dealing with environmental and planning matters. SSROC believes that decisions such as the siting of a new reactor and the transport and storage of nuclear waste should be made within the framework of that agreement, and the New South Wales Government should take action to secure a greater role in such decision making. SSROC would offer its strong support to any action taken by the NSW Government in this regard.

b. **The impact on the State of New South Wales**

The Commonwealth’s assessment falls well short of the standards that would be applied to hazardous industry development under the NSW planning system. This is of particular concern, because it is the good folk of New South Wales who will bear the costs of any emergency arising from the proposal.

c. **Specific concerns**

The concerns include:

- aspects of environmental impact,
- costs and benefits,
- security,
- potential impacts on indigenous and non-indigenous Australians

d. **Possible solutions**

SSROC would be pleased to play a role in assisting the Committee to develop appropriate solutions to the issues raised as part of this Inquiry.
