



Submission
No 354

Liverpool City Council

Your Reference:
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Contact:
Date:

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Ms T. Martin
9821 7743
25 July 2003

Ian Thackeray
Committee Manager
Joint Select Committee on the Transportation of Nuclear Waste
Parliament House, Macquarie Street
SYDNEY NSW 2000

Dear Mr Thackeray

RE: Transport of Nuclear Waste through Liverpool City Council

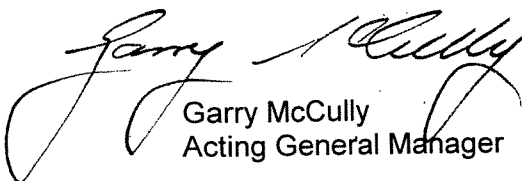
Liverpool City Council has declared itself a Nuclear Free Zone and is strongly opposed to the transport of nuclear waste in New South Wales, particularly through this, and other highly urbanised Council areas. A Motion of Urgency was passed at the Council Meeting of 14th July 2003, stating,

"That Liverpool City Council strongly opposes the transportation of nuclear waste in the Liverpool Local Government Area"

There exists a range of issues that are of concern and these are outlined in a submission to the Joint Selection Committee, attached. These concerns highlight the need for the Committee to take the concerns of the community and local Councils very seriously, particularly given the very serious nature of the risks associated with the transport of nuclear waste.

The Liverpool community stands by its commitment as a nuclear free zone and remains opposed to transport of nuclear waste.

Yours faithfully



Garry McCully
Acting General Manager

Joint Select Committee on the Transportation of Nuclear Waste

Liverpool City Council urges the Committee to consider the following serious concerns with the transport and storage of nuclear waste.

- Liverpool City Council is on the New South Wales Option One transport route, meaning that nuclear waste would be transported by road directly through the council area. There is no requirement for the Commonwealth Government to consult with Council nor the community regarding these routes. The routes have been identified in the *Environmental Impact Statement – National Repository*. The EIS notes that only community members in Port Augusta (SA), Mildura (Vic), Broken Hill and Dubbo (NSW) have been approached for direct consultation. This is not in keeping with the principles of Ecologically Sustainable Development (ESD), which requires full community participation, and which have been adopted by both the State and Commonwealth Governments.

Any activity, should involve full participation of the whole community, particularly one that is of such high risk.

- The EIS notes that rail transport has inherently lower accident risk levels than road however rail transport will not be examined due to higher cost. This is not in keeping with the principles of ESD, which requires decisions to be made in full consideration of social and environmental issues, not only economic. The social impacts of any accident during rail travel would be far lower than by road through dense populations.
- Liverpool City Council is a stated Nuclear Free Zone and has strongly opposed the transport and storage of nuclear waste in the region as well as the facility at Lucas Heights. Council has made submissions to the NSW Parliament regarding this opposition (for example, letter dated 7th April 1999). Council has supported other councils also opposing nuclear issues (Campbelltown Council, January 1998; Blue Mountains City Council November 1999).
- The waste types produced by the facility and to be transported to the National Repository are classified as Intermediate Level. However, against International standards they are High Level (the most radioactive). This is a serious difference and should be addressed immediately. However, Council can find no further information than describes the form (solid, liquid), radiation type (alpha, beta, gamma), nor chemical nature which will impact on the risk levels associated with its transport. The chemical nature of the material could also have significant environmental impacts (such as fluorine, which is highly active).
- There has been no resolution regarding council liability should there be an accident during transport through the LGA. No Commonwealth nor State legislation addresses this issue. No insurance is available due to the extreme nature of an accident – NRMA Insurance has stated that it would not have the funds to cover a single accident no matter how remote the risk would be. An example arose when an isotope was dropped during transport from Queensland and a public dispute between ANSTO and the EPA could not resolve liability for the incident. Councils cannot be held liable for the transport of waste through their council areas and this must be stated implicitly.

- No detailed Risk Assessment has been undertaken as part of the EIS; nor has disaster planning been undertaken for the proposed transport routes. The Risk Assessment should include consideration of environmental, social and economic impacts. Local Emergency Services Officers and Committees have been refused access to information allowing them to undertake emergency planning.
- Statistics indicate that only around 1% of the nuclear waste is from medical facilities; a further 4% is owned by the State government. This refutes the common argument that this type of waste is required for medical purposes.
- ARPANSA states that the ALARA (as low as reasonably achievable) objective for the public is 20 microSv per year. Below this level they do not have to demonstrate that ALARA principle has been met. However, in the case of accident or spill the level immediately surrounding the spill site may face levels far higher than this. In the instance of a road vehicle accident, no matter how rapid the response rate, the likelihood of exposure of high.
- Most areas, if not all, do not have an appropriate response team within an appropriate response time, and the transport would have to be accompanied by a response team to reduce the effective dose as this is time dependant. However there does not appear to be any indication of this occurring at this stage.
- Given the level of risk, transport of nuclear waste by road through urban and environmentally sensitive areas is not appropriate.

Liverpool City Council has researched information from a range of sources including advice from a Doctor of Physics at University of New South Wales and ARPANSA.

