

1 August 2003

**Submission
No 444****City Solutions**
Caring for our Community, its
facilities and assets

Mr Ian Thackeray
Committee Manager, Joint Select Committee on the
Transport and Storage of Nuclear Waste
Parliament House
Macquarie Street
SYDNEY NSW 2000

Reference: C00081
fg:dd

Dear Mr Thackeray

**Subject: Submission to the Joint Select Committee on the Transport and
Storage of Nuclear Waste**

Thank you for allowing Blue Mountains City Council (BMCC) the opportunity to express its views to the Joint Select Committee on the Transport and Storage of Nuclear Waste.

BMCC is concerned about the potential impacts of current Federal Government nuclear waste plans on our community, economy and environment. Council is opposed to any moves that would see increased amounts of nuclear waste created or transported through the Blue Mountains. Council is also highly opposed to any moves to locate a national storage facility for higher-level radioactive wastes in NSW.

BMCC believes that the Federal Government's plan is not an acceptable or effective way to address Australia's radioactive waste problem and that it places an unnecessary, unsafe and unreasonable burden on the people of NSW.

Blue Mountains City Council first became a nuclear free zone in 1982 and is a member of the Australian Local Government Nuclear Free Zones Secretariat. The environment of the Blue Mountains needs to be protected as it is World Heritage Area listed and the Sydney Drinking Water Catchment.

Consultation

With an issue as significant as the transport and storage of nuclear waste, BMCC strongly asserts that there needs to be a substantial level of local and regional consultation through communication forums, such as the two planned for Sydney on 11 September and one in country NSW on 24 September. BMCC is of the view that the Blue Mountains and other communities along the entire proposed route should have access to additional local forums. The general community has not had the full risks and consequences of the proposal adequately explained. Information must be provided to the community on a clear basis, which details the practical public safety and environment protection implications of the proposals. A clear overview of waste categories, the physical forms of the waste (solid, liquid or airborne) and implications for a low-level repository and intermediate-level store should be prepared.

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Emergency Management

As a general comment, there appears to be a clear tendency by the Commonwealth Government and the Australian Nuclear Science and Technology Organisation (ANSTO) to downplay the potential hazards associated with the transport of nuclear waste.

Nuclear materials, their processing and particularly their transport, do create an increased level of risk. That risk should be clearly quantified adequately managed and transparently communicated to the community. The community have a right to know the level of risk they are being exposed to and what response measures are in place to deal with any risk events and situations.

It appears that there is no adequate disaster plan prepared if an accident were to occur while nuclear material was being transported. If there were to be a spill it would be left to the NSW State Government and the local government in which it occurred to undertake the cleanup operation.

Generally the Commonwealth Government needs to put in place increased emergency response capability to deal with Commonwealth sourced radioactive waste. Such capability needs to be adequate to fully address transport accident response should there be a radioactive spill at all points of proposed route. BMCC seeks a clear funding commitment by the Commonwealth to ensure that adequate incident response systems are in place. Of particular concern is the lack of information regarding risk management / incident response and potential impacts of an accident on:

- Floodplain issues
- Water supplies
- Catchment management issues
- Health impacts
- Economic and Social impacts
- Environmental impacts
- Heritage issues including Aboriginal Heritage
- Places with no or insufficient hazardous response capability

Some Long Life 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 radiotoxicity of these lasting well beyond the 200-year institutional life of the Repository. This raises concerns about the long-term safety of the site and needs to be addressed as well.

Waste Transport

Blue Mountains City Council is strongly opposed to the transport of nuclear waste within the local government area boundaries except for isotopes or other radioactive materials that are used in medical treatment or research. Less than 4% of all radioactive waste is from medical and industrial uses. The majority originates from the Lucas Heights Nuclear Facility in Sydney. This facility does not have a radioactive waste management plan as is required. There is no adequate method to protect Blue Mountains residents in the event of an accident involving the transport, storage, processing or disposal of uranium or other radioactive materials.

Transportation of nuclear waste further increases the risk of radioactive contamination. It is our understanding that the Federal Government has no obligation or intention to inform local governments, residents or emergency services of the plan

to transport nuclear waste through their area. This raises serious concerns about the preparedness of emergency services to respond in the event of an accident.

- Road transport is a dangerous form of transportation with many variables.
- The planned transportation routes pass through many communities and agricultural regions.
- No insurance cover provides for accidental radioactive contamination.

Transportation of radioactive waste through the Blue Mountains World Heritage Area and the catchment for the Sydney Drinking Water supply could tarnish New South Wales clean, green image and have a negative impact on the tourism industry in the Blue Mountains.

It has been stated that 132 truckloads are required to clear existing backlog of waste. This will be followed by 4 truckloads a year to move ongoing waste generation. This does not include the higher level radioactive waste generated that is currently without a permanent storage solution or the future decommissioning of the existing and future reactors.

The highway through the mountains has a well established history of trucks overturning.

BMCC is not satisfied that full consideration has been given to the establishment of appropriate handling and transport facilities. This includes management of radioactive waste for transport on NSW roads to and from repositories and at point of entry for overseas sourced waste, where shipping delivers radioactive waste. Specifically, some of the issues which have not been fully considered include: the appropriateness of the types of containers to be used, the inspection procedures, provisions for ensuring security and the provision of adequate training for those handling / transporting nuclear waste.

BMCC notes a lack of certainty regarding quantities and frequencies and radioactivity of waste being transported, and therefore uncertainty regarding potential human and environmental exposure.

There is a lack of transport security considerations including theft / sabotage and use for terrorism incidents.

With respect to transport security and accident the possibility of house contamination needs to be considered with respect to solid materials as well as the issue of indemnity to houses contaminated during transport. There needs to be a clear provision of direct indemnity for damage / contamination of private and public property along the transport route.

Conclusion

The Commonwealth proposal falls well short of the standard that would be applied to private hazardous industry development in NSW and has serious implications for NSW services and the public.

Federal Science Minister the Hon Peter McGauran stated: "The transport of radioactive materials is governed by strict regulations and codes of practice which are consistent with international regulations. Because of these strict regulations the risk associated with the transport of radioactive materials including waste is far less than that associated with the transport of other hazardous materials such as flammable and corrosive substances" This comparison does not afford a great deal of comfort to councils and communities who wish to be exposed to **no risk whatsoever** from the transport of nuclear waste.


The fundamental issue is the right of communities, and the local councils representing them, to have an absolute assurance that there will be no social, economic or environmental impacts arising from the transport of nuclear waste across their local area. Until these assurances can be given, councils and communities have expressed a wish to see the precautionary principle applied to this issue.

In summary, Blue Mountains City Council has serious concerns about the potential for environmental and health impacts, as well as the potential social and economic impacts, that may result from transport of nuclear waste across their communities.

We ask the Commonwealth Government to abide by the wishes of the local community and respect the Blue Mountains as a Nuclear Free Zone.

I thank you for the opportunity to provide this submission. The Mayor of Blue Mountains City Council, Jim Angel, invites the committee to meet in the Blue Mountains.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Tony Martini', with a long horizontal line extending to the right.

Tony Martini
Group Manager, City Solutions