



Friends of the Earth Adelaide
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SUBMISSION ON THE TERMS OF REFERENCE FOR THE ROYAL COMMISSION INTO THE NUCLEAR FUEL CYCLE

To the Attorney-General Department
submissions@agd.sa.gov.au

Friends of the Earth Adelaide urge you to consider the following Terms of Reference to be included for the Royal Commission into nuclear energy. The Royal Commission will be undermined if it does not include the following Terms of Reference:

1. Balanced and fair representation in the Royal Commission

- (a) provision must be made for qualified anti-nuclear people on the royal commission, so all evidence is public; including
- (b) funding for anti-nuclear people to make their case (since the industry will be spending lots of money presenting their side).

2. Environmental impacts of uranium mining in South Australia

The terms of reference should explicitly look at:

- (a) long term worker health and safety (why are no lifelong records of exposure kept);
- (b) Roxby's record of tailings dam collapses/breaches;
- (c) damage to underground aquifers and the loss of biodiversity;
- (d) net economic subsidy of mining and exploration, as opposed to actual income for the state (rather than big mining companies).

3. Enrichment

The Terms of Reference should include any requests from industry for subsidies industry to build and operate any enrichment facilities, as well as power and water requirements, worker health, transport safety and security, and waste management.

4. Nuclear waste

The Royal Commission must look widely at nuclear waste management in South Australia, including uranium tailings. The Commission should examine proposals to host international nuclear waste and status of the waste industry globally.

5. Nuclear waste dump

- (a) the commission should examine the full cost of maintaining and guarding a waste-dump for 30, 50, 100, 1000 years or more, factoring in real world cost experience of testing potential waste dump sites;
- (b) South Australia's legacy contaminated nuclear sites include Maralinga, the Port Pirie Uranium Treatment Complex, and Radium Hill. There are unresolved concerns over the status of these sites in relation to public health and environmental impacts, and the Royal Commission provides an opportunity to finally resolve these issues.

6. Nuclear Power

The economic analysis should:

- (a) compare cost of nuclear energy to renewable energy, in terms of real world, not theoretical estimates;
- (b) proper analysis of cost of building a power plant, including the cost of water, electricity etc, versus the returns to the state and taxpayers (not the big companies);
- (c) potential cost of an accident during transport or storage, and cost of cleanup;
- (d) the record of the global nuclear industry's optimistic predictions and its failure to live up to those predictions (in relation to issues such as global demand, global capacity, construction costs, facility start-up dates, technological difficulty, and safety);
- (e) the reasons for the nuclear industry's failure to live up to its predictions and the likelihood that that pattern will be repeated in Australia.

7. Climate Change solutions and Renewable Energy

The Terms of Reference should include

- (a) an analysis of alternative energy sources to address the challenge of climate change, including the potential for growth in renewables and other low carbon technologies;
- (b) compare nuclear reprocessing/power generation (including insurance!) to solar thermal plants; to large solar PV arrays; to building windfarms; to adding storage to the grid;
- (c) consider probability of major floods/droughts from climate change displacing assumptions of dry, geological stability, and
- (e) the developmental status and economic viability of proposed technologies (in light of past failures to accurately estimate costs and delivery times).

8. Negative impact on other export industries

The terms of reference should include a thorough analysis of the opportunity costs of a further embrace of the nuclear cycle, including the impact on our clean and green food and wine reputation, and the tourism and international student markets, particularly if South Australia were to host an international repository for high-level nuclear waste

9. Insurance, financial risk, public liabilities and subsidies;

The terms of reference should include:

- (a) A comprehensive examination of the potential liability of the SA Government in the case of an incident or accident;
- (b) tax-payer subsidies required to support each proposed role in nuclear energy (in light of past failures to accurately estimate costs and delivery times);
- (c) risks of transport of radioactive materials, both within Australia and on the high seas.

10. Proliferation of nuclear weapons

The terms of reference should address the nuclear proliferation and global and regional security implications of Australian involvement in nuclear fuel cycle activities. Progress in halting proliferation, spread of nuclear technology, terrorist attacks etc should be reviewed.

11. International Geopolitical response

The terms of reference should also include likely foreign government reactions to each proposed role in the nuclear energy cycle.

12. Public participation

Friends of the Earth Adelaide call upon the royal commission to canvass public attitude to each proposed role in nuclear energy, nationally, regionally, and locally and to ensure an appropriate public participation process is undertaken before any decisions are finalised.