Submission to the Australian Radioactive Waste Management Framework Consultation

Peter Griffin
Dulwich Hill, NSW

Introduction

The Draft Australian Radioactive Waste Management Framework (Draft) is the comprehensive and updated product of Australia's long historical policy progression toward the safe and satisfactory storage of nuclear waste, namely "Establishing fit-for-purpose disposal infrastructure will enable Australia to manage both current and future waste safely and securely, reduce ongoing risk and liability, and avoid passing an undue burden to future generations."

It lists the categories and safe storage needs of each category: Low Level (LLW) Intermediate Level (ILW) and High Level (HLW) and is frank about the difficulties and incomplete (and therefore unsatisfactory) status of the storage realities of each category in Australia.

The executive summary includes: "The Australian Government recognises that establishing disposal facilities depends on building and maintaining public trust, including with First Nations rights holders and Traditional Custodians of Country."

This issue of Social Licence has been instrumental in the faltering of all previous attempts to secure permanent safe storage site(s) for even LLW. The agenda for permanent storage of all three categories sets a high bar indeed.

This commentary does not attempt to cover all details of the Draft. Rather it asserts that, notwithstanding its comprehensive nature, a waste management framework alone does not provide for adequate safe nuclear waste storage.

Scope

The category of the Scope calls in "all current and future Commonwealth radioactive waste, including waste generated through Commonwealth programs and joint ventures to which the Commonwealth is a party … the framework recognises that Commonwealth disposal facilities may provide a disposal pathway for other Australian waste holders, including state, territory, and private sector entities, supporting national consistency and potential efficiencies in radioactive waste management …"

The Scope is clear that Australia is responsible for the safe (permanent) disposal of nuclear (HLW) waste of Australian decommissioned submarines from the AUKUS agreement. It is not responsible for safe storage of HLW from decommissioned US or UK submarines.

However, the successful construction of HLW storage anywhere in Australia has not even reached the stage of selecting a suitable site. It must be said that the issue of HLW can be said to be teetering on a knife edge in one (Finland) of five international countries.

Finland has an operating licence granted with final inspections pending radioactive waste emplacement.

Four others are behind with no firm expected date of completion:

- **Sweden** (construction underway)
- **France (**Licensing and regulatory process, construction not yet completed)
- **Switzerland** (Site selected, licensing process underway) and
- **Canada** (site selected, environmental assessment underway).

(*Source: World Nuclear Association and European Commission*)

Australia has several key obstacles in its path. Apart from site selection (all attempts over many decades have failed on the issue of Social Licence), the AUKUS agreement is obliging Australia to think hard and wish even harder.

The framework is there with best practice and ideal outcomes well formulated. However, it would take an extraordinary achievement to have the necessary storage facility to accommodate the residue from AUKUS submarines with so many unknowns still to be settled.

Finally, The Australian Naval Nuclear Power Safety Bill 2023 also allows for the US and the UK to dump high-level nuclear waste in Australia.

Needless to say, there is no storage facility for this waste.

From Temporary Storage to Permanent Disposal

If it is true that "the Australian Government is progressing a national approach to move from temporary storage to permanent disposal" (Executive Summary), then many hard questions remain moot.

For one thing, both LLW and Intermediate Level Waste already exists as a by-product of nuclear-powered submarines: "The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) approved a licence for the Australian Submarine Agency to establish a Controlled Industrial Facility at HMAS Stirling on Garden Island, Perth, to manage low-level and intermediate-level radioactive waste from AUKUS-related submarine operations." (Source: Australian Radiation Protection and Nuclear Safety Agency)

Apart from the ubiquitous storage of LLW in over 100 locations around Australia, the continuing contemporary intermediate level radioactive waste from AUKUS related submarine operations lends a kinetic urgency to the locating and development of Near Surface Disposal (NSD) facility – a disposal facility that is located at surface or within tens

of metres below the surface, suitable for the disposal of less hazardous radioactive waste streams. The time for that facility is NOW.

Secondly, under the Draft's heading 'The need for timely action on disposal' it is stated that:

"The Australian Government recognises that:

- **Disposal is deliverable**: Permanent disposal, whether through NSD or DGD, is a proven, internationally accepted solution being delivered around the world. This demonstrates that safe disposal is achievable."

While it is true that Finland (alone) has gone through all the necessary steps prior to radioactive waste emplacement, the final step has not been taken and no long-term proven success has been achieved anywhere on earth relating to mined earth geological repositories at very deep levels.

In other words, the claim that "safe disposal is deliverable" is at best premature (by a very long shot) or, in the worst-case scenario, simply UNPROVEN.

AUKUS and Democracy

The AUKUS agreement had its formulation in complete secrecy and was announced by former Prime Minister Scott Morrison on September 15, 2021. In less than 24 hours, Opposition leader Anthony Albanese had signed onto the arrangement.

The announcement that the AUKUS agreement and all that goes with it (including the unresolved issues surrounding nuclear waste storage) makes a farce of any pretence to uphold both Democracy and Sovereignty – all in the one package.

In my view, the process is a betrayal of the Australian people in which Australia is clearly not calling the shots.

As a business plan with unresolved major issues, the commitment to the AUKUS agreement clearly ignores and overrides the first principle of the Waste Hierarchy which is: **The most effective way to manage radioactive waste is to avoid generating it**.

The action associated with this principle is**: Planning, design, process optimisation, and use of alternative materials or technologies that eliminate radioactive waste generation**.

In my view, the biggest, momentous military procurement process in Australian history is leading Australia into a blind alley with no escape option. Instead of planning, we have wishful, even magical thinking, as if our grandchildren will devise solutions to problems which the current generation has both created and passed on unresolved.

Peter Griffin

13 November 2026