Gil M Anaf

Response To:

Nuclear Fuel Cycle Royal Commission *18 May 2016*

Dear Sir/s,

Thank you for the opportunity to submit this response to your Commission of enquiry. On reading the Tentative Findings produced by the Royal Commission, I make the following observations in relation to specific points; these points, in the main, relate to the issue of a storage facility :

110. Many Aboriginal South Australians are generally cynical about the motivations of government, and its capability to deliver on commitments.

It seems important to me that, while the Findings acknowledge the reservations of Aboriginal groups, and refer to "sophisticated negotiating frameworks" used previously, no reference is made to the large power differentials that are inherent in such negotiating positions. This in my view, has the potential to further exacerbate dominant power structures and thereby further disenfranchise original land owners.

8. In Australia, the ability for nuclear power to contribute to emissions reductions before 2030 is affected significantly by the long lead time to make new capacity operational.

I would respectfully suggest that given very recent climate change modeling and predictions of more rapid global warming, the long lead times in themselves make this venture (of engaging in the nuclear cycle) irrelevant, given perceived risk.

42. Yet there can be no guarantee that accidents will not occur again. While the consequences are severe,….

It seems remarkable to me that, while it is acknowledged that accidents cannot be prevented, there is at the same time a disavowal of the extremity of the consequences of any accident involving this nuclear storage facility. The very nature of the risk, of extreme long term contamination of food and water supplies, and of aquifers, seems oddly denied, which is concerning.

63. The safe management, storage and disposal of Australian and international waste require both social consent for the activity and advanced technical engineering to contain and isolate the waste. Of the two, social consent

warrants in planning and development much greater attention than the technical issues.

As stated above, this point seemingly downplays the risks inherent in the venture, making the technology sound more persuasive than in reality it can be deemed to be.

77. Engineered barriers are designed to work in combination to greatly delay the exposure of the fuel to groundwater and ensure that if the radionuclides migrate into the natural environment, the level of radioactivity would be below that produced by natural sources.

Again and with respect, this is an astonishing assertion. This seems to exaggerate the expertise required to establish the facility to such an extent that even reference to "exposure" does not raise the very obviousissue of risk: ie, what on earth are we doing even considering any *possible* leakage? Are we really so expert that we can foresee and manage *any* leakage, with its attendant extreme risk?

78c. an arid environment in many parts of the state

As stated earlier, in light of the very rapid changes to climatic models which are now being debated, it seems illogical to make assumptions about geology and therefore, stability of man-made structures. It seems self-evident that no-one knows where climate change will take us.

78e. pre-existing sophisticated frameworks for securing long-term agreement with rights holders and the broader community.

Again, it is unclear what "sophisticated frameworks" really are, given the power differentials that are inherent in the dilemma of Aboriginal dispossession. My concern relates to the imposition of the perception of "the value" of monetary compensation for land used, while at the same time the legitimate cultural capital and interests of original land owners are devalued by the "framework".

88c. Financial assessments suggest such integrated facilities ……would be highly profitable in a range of scenarios…. Based on financial assessments, such a proposal is viable even assuming….the receipt of a significantly lower price for providing a disposal option for used fuel and intermediate level waste.

Is the community really meant to accept the imposition of a potentially rare, but catastrophic risk, even though it may be less profitable? This beggars belief, since the whole premise of this venture to establish a nuclear dump in SA seems based on the economic benefits which will accrue to the State. I reiterate the point that, in the event of a catastrophe, there is no reversing the process.

I also point out that the economic benefits have been questioned too, albeit in a partisan way. Nevertheless, these arguments should not be summarily dismissed, Ref: http://www.theguardian.com/commentisfree/2016/mar/11/fukushima-five-years-on-and-the-lessons-we-failed-to-learn?CMP=share_btn_tw

90. Further, because the society would carry the risks of the activity in the long term, it is entitled to the significant benefits. This does not mean the government would be precluded from sourcing appropriate private sector operational expertise.

In my view, the acknowledgement of "carrying risks" is not easily reconciled with the potential extremity of the risk involved. It therefore is highly questionable whether society *should* carry this risk, since it potentially also affects *future* generations who may well be burdened by decisions we make in the present.

That private expertise may be sourced too, seemingly ignores the probable (in my opinion) conflicts of interest that will necessarily arise when private profit agendas are pitted against the wider interests of original and subsequent land owners, and the rights of the citizenry.

In conclusion, having read the Tentative Findings of the Nuclear Fuel Cycle Royal Commission, I feel obligated to say that the style in which these findings are presented seem to me to seriously down-play, and minimise, the quite significant and potentially catastrophic scenarios the community is being asked to accept.

This defies common sense; the risks and burdens to current and future generations are much more significant than our short-term economic troubles. In regard to the latter, it is unclear how sustainable the economic benefits are, compared with maintenance costs.

Yours Faithfully,

Gil M Anaf
18-3-16