

## **The EPBC Act ‘Impact Assessment’ Report on Federal imposition of N-Subs *fails to provide answers to community’s ‘Right to Know’ on nuclear risks facing Port Adelaide:***

*Initial Brief by David Noonan Independent Environment Campaigner 8 Feb 2025.*

The Federal [Impact Assessment Report](#) “SUBMARINE CONSTRUCTION YARD STRATEGIC ASSESSMENT OSBORNE, SA” (IAR, 21 Jan 2025) clearly does not intend to answer lead community concerns over N-sub nuclear reactor accident risks and radioactive waste storage at Osborne, Port Adelaide.

A deluge of Federal Gov doc’s, a IAR of 200 pages with [Appendices](#) of 750 pages, are out for ‘*public consultation*’. The *proponent* Australian Submarine Agency (see [ASA web](#)) are to run four Public Information ‘*Drop-In*’ Sessions over 19 – 22<sup>th</sup> Feb. Public input is due in by cob the 17<sup>th</sup> March.

However, the Federal Gov has ruled a range of lead community concerns as “*out of scope*” of this ‘Strategic Assessment’, see **IAR Section.6 Impact factors 6.16 Radiation** (p.6-40 to 6-44).

The management facility for radioactive waste at Osborne, and the disposal pathway for such radioactive waste, “*is considered outside the scope of the Strategic Assessment*” (p.6-41).

The IAR says: “*Information on potential sources of radiation has been provided to inform, however does not form part of the Strategic Assessment as these sources will be managed via separate environmental assessment processes and approvals as necessary.*”

The IAR **Radioactive waste management** section (p.3-19 to 3-21) says: “*The facility is to be designed to have the capacity to manage radioactive material over the 50-year Strategic Assessment timeframe.*” N-sub radioactive wastes may accumulate and stay ‘stored’ at Osborne for decades...

The IAR also mis-represents N-sub radioactive wastes to be stored at Osborne, as: “*similar to those that occur in over 100 locations nationwide, including hospitals, science facilities and universities*” (3-20), and “*similar to the waste generated by hospitals and research facilities around Australia*” (6-41).

**Key health and safety issues are excluded from this EPBC Act public consultation.** ASA (p.6-43) is to conduct a separate ‘Environmental Radiological Assessment’ to license impacts at Osborne. The IAR (at 6-44) says: “*No nuclear actions are included within the Actions or Classes of Actions of the Plan.*”

Impacts of commissioning and operation of the ‘power module’ (the nuclear reactor) “*is considered outside the scope of this assessment*” (p.3-19 & 6-41) - to be held over for a military nuclear regulator.

**The Federal Labor Gov are in denial over N-sub nuclear reactor accident risks.** The word ‘*accident*’ does not even appear in this 200-page IAR. This is a multi-year Federal Gov failure to study and make public required nuclear accident Emergency response measures and Evacuation plans at Osborne.

See a 2-page [Briefer](#): “**Labor imposes AUKUS nuclear submarines while failing to inform the affected SA community of the health risks they face in a potential reactor accident**” (29 July 2024).

Brief sub-heading: ‘SA Emergency workers may face “*catastrophic conditions*” at a N-Sub accident.’

It is disrespectful of the Federal Gov to continue to push N-sub accident risks onto community across Lefevre Peninsula and Port Adelaide while only conducting partial impact assessments and limiting ‘*public consultation*’ to only those aspects that suit Labor’s roil out of the AUKUS N-sub agenda.

The Federal Gov are also now seriously misleading community and misrepresenting nuclear health and safety risks, see IAR **Effects of Radiation** p.6-41 and Figure 34 *potential health effects* p.6-42.

**SA State Gov ‘impact’ assessment for the Osborne Submarine Yard concludes ‘No significant effects’ on community wellbeing, but fails to release nuclear accident studies:**

The SA State Gov has released a “Submarine Construction Yard [Environmental Impact Statement](#)” (EIS, Nov 2024, 427 pages, plus 22 x ‘Technical Report’ Appendices) for ‘consultation’ to 17 March. This EIS process has a ‘YourSAY’ webpage, a [Plan SA](#) webpage, and a proponent’s [Australian Naval Infrastructure](#) (ANI) page that promotes the three ASA ‘Drop-In’ Info Sessions over 19 to 22 Feb.

The EIS claims “*there is no risk to people or the environment of radiation exposure*” (EIS [Summary](#) p.9) from ‘nuclear-powered propulsion systems’ on-site testing of N-sub nuclear reactors at Osborne.

The EIS Ch.23 ‘**Social Impact Assessment**’ concludes there are “*No significant effects*” on community wellbeing (EIS [Summary](#) p.36-37), and no danger to people or property across an ‘*immediately impacted community*’ who live or work in North Haven, Largs Bay and Semaphore; or in the ‘*wider community*’ within Greater Adelaide who it is said ‘*may feel some real or perceived broader impacts*’.

These claims and concocted conclusions derive from an abject failure to recognise the effects and impacts of a potential N-sub nuclear reactor accident, with required Evacuation Zone planning. The word ‘*evacuation*’ appears 3 times in the 400-page EIS – all to do with flood risks not reactor risks!

**Why have key public safety accident studies still not been made public for N-sub at Port Adelaide?**

Even a visit by a nuclear-powered submarine to a port in Australia requires Emergency response planning that sets Evacuation Zones for potential nuclear reactor accidents (see a 2-p [Briefer](#)).

**The SA Premier Hon Peter Malinauskas MP is effectively targeting Osborne Port Adelaide for N-sub nuclear reactor accident risks**, just as Opposition Leader Peter Dutton MP targets Port Augusta for his nuclear power reactor accident risks and impacts: see [David Noonan’s Public Submission No.261](#) (14 Nov 2024, 10 pages) to an ongoing Federal “[Inquiry](#) into nuclear power generation in Australia”.

The **EIS 4.12 Nuclear-powered propulsion systems and radiation exposure from accident** (p.85-88) says (p.85) that it has assessed: “*the process to transport, receive, secure, store, install, test and commission a nuclear-powered propulsion system*”, and: “*radiation exposure pathways to workers, the public and non-human biota during construction and operation (including incident scenarios)*”.

**The EIS admits** (p.87): “*A loss of fuel element integrity within the power unit, while highly unlikely, could result in a radiological release direct from the NSRP into the atmosphere*”, and cites: “*a number of scenarios that could lead to a radioactive release from the Power Unit have been extensively modelled by the NSRP Design Authority*”, but fails to make these public safety studies public.

**At this late stage, it is unacceptable for the SA Gov to fail to consult the public on N-sub nuclear reactor accident Emergency response measures including required Evacuation Zone planning.**

This EIS also assesses N-sub generation and storage of radioactive wastes at Osborne but concludes “*No significant waste management effects have been identified*” (see [Executive Summary](#) p.28-29; [EIS Ch.16 Waste Management](#) p.262 to 288; and [Appendix 1.11 Waste Management](#) 44 pages). The EIS cites a ‘Low-Level’ radioactive waste category that can require waste isolation for up to a 300 year period.

**The EIS further admits** (p.87): “*Loss of control of any liquid or solid waste could result in the release of radioactive material and therefore pose a hazard to individuals and the environment. ... An aquatic release into the Port River could result in a wider spread of contamination, and would be dependent on quantity of the release and the tidal flow at the time of the release.*”

**For further information**, see FoE Australia webpage: <https://nuclear.foe.org.au/nuclear-sub/>