

1 February 2024
Foreign Affairs, Defence and Trade Committee
PO Box 6100,
Parliament House
Canberra ACT 2600

**Submission to Senate Standing Committee on Foreign Affairs Defence and Trade
Re: Australian Naval Nuclear Power Safety Bill 2023**

Dear Committee Secretary

The Independent and Peaceful Australia Network (IPAN) welcomes the opportunity to contribute to this Senate Standing Committee concerning the Australian Naval Nuclear Power Safety Bill 2023, which sets the groundwork for AUKUS and nuclear submarines. IPAN is a national body comprised of peace organisations, faith organisations, trade unions and environmental and anti-nuclear groups. IPAN campaigns for an Australia that acts independently of foreign influences and alliances in the best interests of the Australian people, seeking and promoting peaceful and mutually beneficial relations with all countries.

IPAN and many of its member organisations have been closely monitoring the developments related to the AUKUS nuclear submarine plan. This Bill is of critical interest to IPAN, as it aims to create a regulatory regime to manage issues arising from Australia's stated intention to acquire nuclear-powered submarines. The high-level and low-level waste that would be associated with any nuclear submarine plan under AUKUS is of great concern to IPAN.

This submission outlines specific areas of concern in the Bill, highlights the negative impacts that will result for the local communities affected by the Bill and outlines reasons why IPAN believes that this Bill must be rejected.

Overview of Main Points in the Submission

- IPAN is concerned that the Bill will establish a new regulator (Australian Naval Nuclear Power Safety Regulator), who will report directly to the Minister of Defence rather than extending the role of the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), who reports to the Minister of Health. We believe that this aspect of the Bill fails to meet the fundamental principles of regulatory independence for nuclear waste and is widely out of step with international standards of nuclear safety and current regulation of nuclear waste in Australia. Independence is critical to the role of a regulator. We are also apprehensive about the transparency provisions in the Bill, many of which arise out of the lack of independence of the regulator. These provisions are inadequate.
- IPAN is concerned that the Bill opens a back door to Australia becoming the dumping ground for tonnes of high-level nuclear waste from the US and UK nuclear submarine fleets. Australia's lack of experience in management of significant radiological or nuclear emergencies is a significant concern. So too, are the very low-level expectations for inspectors managing nuclear safety and security, who are required merely to "have regard" to nuclear safety and security.
- Australia has a poor history with existing radioactive waste management and siting and IPAN highlights serious concerns about a lack of clear safety standards for nuclear waste. In addition, we are concerned that this Bill, which will allow the Department of Defence to decide where nuclear waste and nuclear submarines are stored and stationed, is silent about community consent and consultation on this issue.
- IPAN expresses grave concern for the communities in the vicinity of where nuclear submarines will be stationed and particularly about the fact that low level radioactive waste (including from US and UK submarines) may be stored at Defence sites in Australia. This submission notes, with concern, that absent from the Bill is any reference to the rights of First nations peoples, or to cultural rights and the need for free, prior and informed consent of local communities.
- IPAN also raises concern about the possibility that the Australian Naval Nuclear Power Safety Bill 2023 could override the Nuclear Non-Proliferation (Safeguards) Act 1987, and about the threat of the presence of a nuclear facility, in light of the threats that have arisen from the presence of nuclear facilities in other parts of the world.
- Our submission further cites data demonstrating a worrying erosion of the role of diplomacy by Australia in international affairs and a huge increase in defence spending in recent years.

For all of the above reasons and others outlined in the body of the submission, IPAN calls for this Bill to be rejected.

1. Specific areas of concern in the Bill

a. Reporting and Regulatory Independence:

IPAN wishes to highlight the issue that this Bill will establish a new regulatory body, the Australian Naval Nuclear Power Safety Regulator, who will report to the Minister of Defence (Division 6, Section 122). IPAN questions the rationale for a establishment of a new regulator rather than extending the role of the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), who report to the Minister of Health.

The Radiation Health and Safety Advisory Council (RHSAC) in a 2022 letter to ARPANSA made their views on independence very clear, arguing that the independence of the regulator is a critical part of its effectiveness, stating:

The regulator should be independent of the operators and departments overseeing any aspect of purchase, manufacture, maintenance, and operation of the program” and that “The regulatory body should be independent in its safety related decision making and hold functional separation from entities having responsibilities or interests that could unduly influence its decision making.”ⁱ

IPAN is concerned that this Bill fails to meet the fundamental principles of regulatory independence for nuclear waste. In this Bill, the proposed Australian Naval Nuclear Power Safety Regulator reports directly to the Minister of Defence – but this is widely out of step with international standards of nuclear safety and current regulation of nuclear waste in Australia.

Principle Two of the (2006) International Atomic Energy Agency Fundamental Safety Principles sets out that:

An effective legal and governmental framework for safety, including an independent regulatory body, must be established and sustained.ⁱⁱ

In addition, the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) sits in the Ministry of Health to help ensure the bodies and sectors it oversees do not influence its operations and approach. The Radiation Health and Safety Advisory Council clearly outlined in internal advice provided to the ARPANSA CEO, in 2022, the importance of regulatory independence. What the Defence Minister is proposing in this Bill is both inconsistent and inferior to this approach.ⁱⁱⁱ

b. Transparency:

IPAN also believes that the transparency provisions in the Bill are inadequate, particularly in light of the concerns highlighted above in relation to the lack of independence of the regulator.

As the RHSAC has outlined:

Transparency to stakeholders is fundamental for the regulator to achieve credibility, trust and respect. The framework needs a mechanism that requires operators/licensees to make available relevant information that could have an impact on public health, safety and the environment, including nuclear and radiation safety management, discharges and emissions, incidents, near misses, and abnormal occurrences”.^{iv}

RHSAC have highlighted the need for the regulator to be independent from “the operators and departments overseeing any aspect of purchase, manufacture, maintenance, and operation of the program”. which is critical in ensuring that “the independent regulator can operate without influence, and with a strong voice”. RHSAC point out that “If a regulatory body cannot provide information on safety and incidents at licensed facilities without the approval of another organisation, issues of independence and transparency will arise”.^v

RHSAC have further stated that “Reporting arrangements should therefore enable the regulatory body to be able to provide safety related information to the Government and the public with the maximum amount of transparency”^{vi}.

c. Radioactive Waste Management – including Waste from Overseas

The UN Special Rapporteur on Toxics and Human Rights, Marcos A. Orellana, on his visit to Australia, in September 2023 documented evidence on nuclear concerns, including around radioactive waste management and other nuclear issues.

Mr Orellana stated the following:

The introduction of high-level radioactive waste into Australian territory, from nuclear-powered submarines under the new AUKUS plans, poses significant management challenges.^{vii}

IPAN is particularly concerned that the Bill opens a back door to Australia becoming the dumping ground for tonnes of high-level nuclear waste from the US and UK nuclear submarine fleets. This is a particular concern given that the bill defines an AUKUS submarine to include both UK and US nuclear submarines, meaning that material or equipment from these submarines can be maintained, stored or disposed of in Australia.

d. Expectations regarding Inspectors and managing Nuclear Safety and Security

IPAN is very concerned about the that the expectations for inspectors with regards to managing nuclear safety and security. In the Bill (Clause 92), an inspector is only required to “have regard” to nuclear safety and security – i.e.

“In exercising powers, or considering whether to exercise powers, under this Part, an inspector must have regard to nuclear safety and security”.

IPAN believes that this represents a very low bar of expectation on inspectors. IPAN believes that at the very least there should be an expectation on inspectors to fully comply with or act in accordance with the nuclear safety and security requirements – in line with the expectations on other groups of people covered by the Bill.

It also follows that the ability to investigate the actions of an inspector may be greatly compromised if they are not explicitly required to fully comply with nuclear safety and security requirements. Can they be accountable for breaching nuclear safety and security requirements that they are not explicitly required to comply with.

e. Over-riding of State and Commonwealth laws:

IPAN is also very concerned that this bill would override state and territory legislation that might conflict with where the Federal Government decides nuclear waste and nuclear submarines should be stored. Section 135 of the Bill (Division 2, Subdivision 3) states:

If a law of a State or Territory, or one or more provisions of such a law, is prescribed by the regulations, that law or provision does not apply in relation to a regulated activity.

f. Lack of community consultation regarding Designated Zones:

Australia unfortunately has a poor history with existing radioactive waste management and siting and IPAN is concerned that this Bill, which will allow the Department of Defence to decide where nuclear waste and nuclear submarines are stored and stationed, is silent about community consent and consultation on this issue.

In his recent visit to Australia, Marcos A. Orellana also highlighted the deep disconnect that often arises between a government’s perspective on toxics and community narratives concerning the same. He stated:

Where the government sees efforts towards stronger regulations to address the risks of chemicals and pollution, communities and civil society denounce the capture of the State for the benefit of mining, oil, gas, agrochemical and other corporate interests^{viii}

Similar concerns about the contentious issue of nuclear waste storage were also highlighted by several submissions made to the IPAN led People’s Inquiry (2020-2021) - with concerns also raised about the ability [of communities] to refuse projects or even be consulted adequately.^{ix}

The absence of mention of provisions for community consultation, which we believe should be based on free, prior and informed consent is a serious oversight in the Bill. Addressing this is fundamental to any developments around the need for any future nuclear waste management and regulation. This is a requirement echoed by the Special Rapporteur for Toxics and Human Rights, when he wrote in his End of Mission report of the importance of Australia adopting free, prior and informed consent in relation to nuclear waste management sites.^x

While the establishment of free, prior and informed consent as a framework for consultation with affected communities, it is also critical that Article No. 29 and 30 in the United Nations Declaration on the Rights of Indigenous Peoples^{xi} is adhered to in all consultation processes.

Article 29.1. Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources. States shall establish and implement assistance programmes for indigenous peoples for such conservation and protection, without discrimination.

Article 29.2. States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent.

Article 29.3. States shall also take effective measures to ensure, as needed, that programmes for monitoring, maintaining and restoring the health of indigenous peoples, as developed and implemented by the peoples affected by such materials, are duly implemented.

Article 30 is also relevant

Article 30: 1. Military activities shall not take place in the lands or territories of indigenous peoples, unless justified by a relevant public interest or otherwise freely agreed with or requested by the indigenous peoples concerned.

Article 30: 2. States shall undertake effective consultations with the indigenous peoples concerned, through appropriate procedures and in particular through their representative institutions, prior to using their lands or territories for military activities.

The Australian Naval Nuclear Power Safety Bill 2023 is notable for the absence of any reference to the rights of First nations peoples, or cultural rights, or free, prior and informed consent. In relation specifically First Nations' People's land rights, concerns have also been expressed about the constant surveillance of a designated zone by the operators i.e. military. The lack of reference to the rights of First Nations Peoples, It is a major shortcoming of this Bill, and further reinforces why IPAN believe that the Bill should be rejected.

g. Existing Inadequate Radiation Safety Protection of the Australian Public

IPAN has serious concerns about the lack of clear safety standards for nuclear waste. For example, Clause 5 (The Dictionary), defines what is "reasonably practicable" concerning safety standards on nuclear waste and submarines – i.e.

(2)... in relation to a duty imposed on a person under subsection 18(1), 20(1), 22(1) or 24(1) to ensure nuclear safety, means that which is, or was at a particular time, reasonably able to be done in relation to ensuring nuclear safety, taking into account and weighing up all relevant matters.

These standards are taken verbatim from the Work Health and Safety Act (WHS Act) 2011¹. Nuclear waste is no ordinary industry like the everyday businesses covered by the WHSA 2011. The unique nature of radioactive waste and Australia's scant experience with high level waste means a very different approach needs to be taken. Managing nuclear waste disposal and storage is a very different matter to making sandwiches in a coffee shop.

Given Australia's poor history with existing radioactive waste management and siting, it is so important, therefore that the framework does not allow 'national security' to mask inadequate radiation safety protection of the Australian public, weaken regulatory authority, or inhibit transparency on matters of Australian public safety. RHSAC have stated:

There are challenges in Australia's federated and fragmented radiation regulatory system particularly as it relates to emergency preparedness, interstate transport, and logistics; and radioactive waste which are key aspects of any future nuclear regulatory activities.^{xii}

¹ The WHS Act imposes a duty on a person to ensure health and safety that requires the person to eliminate risks to health and safety so far as is **reasonably practicable**, and if it is not reasonably practicable to do so, to minimise the risks so far as is reasonably practicable.

h. Lack of Australian experience in management of significant radiological or nuclear emergencies

In their 2022 letter to ARPANSA, RHSAC also highlighted the well-established emergency management arrangements that the Australian government have in place – and these are constantly being refined and enhanced as incidents are reviewed. It is of concern to RHSAC, though, that “nationally integrated emergency management arrangements do not exist for large scale radiological or nuclear incidents” meaning that “The infrequency of radiological or nuclear emergencies of significance within Australian jurisdictions means that the arrangements for this type of emergency have not been adequately tested, nor provided opportunity for reflection and review, limiting development and enhancement”.^{xiii}

RHSAC further make the point that “This limitation affects both national and state/territory emergency preparedness”, as reflected in the recommendations from the 2018 International Atomic Energy Agency (IAEA) Integrated Regulatory Review Service (IRRS) review. RHSAC makes the telling point that:

The national strategy for radiation safety acknowledges the limitations of emergency management arrangements in Australia. They are not fit for purpose for a future with nuclear powered submarines”.^{xiv}

i. Obligations for Foreign Naval or Government vessels

IPAN is also opposed to this Bill as it does not make clear what obligations will be required of foreign military vessels to ensure that they abide by the regulatory regime and the adequacy of emergency management capacity. In fact, the Bill states clearly that a foreign naval or government vessel cannot be investigated (Clause 6 (The Dictionary)).

j. Interaction between Australian Naval Nuclear Power Safety Bill 2023 and the Nuclear Non-Proliferation (Safeguards) Act 1987

Section 133 of the Australian Naval Nuclear Power Safety Bill 2023 describes that this new Act does not exclude the operation of the Nuclear Non-Proliferation (Safeguards) Act 1987, to the extent that the Nuclear Non-Proliferation (Safeguards) Act 1987 is capable of operating concurrently with this Act.

While the intention from the Government appears to be for the two acts to function concurrently, there are no assurances in the Bill, that the new Act would not override the Nuclear Non-Proliferation (Safeguards) Act 1987, if ever there was a situation where there was incompatibility between certain aspects of each Act. It is not unusual for a new act to override an older act – and it is critical that such assurances be provided in the instance of these two acts.

IPAN believes that this also represents a public interest policy concern, given that the Nuclear Non-Proliferation (Safeguards) Act 1987 for over 36 years has formed the legislative basis for the Australian Safeguards and Non-Proliferation Office (ASNO’s) nuclear safeguards and security activities across Australia. Significantly, the act gives effect to Australia’s obligations under a number of international treaties, including the Treaty on the Non-Proliferation of Nuclear Weapons (NPT). This Act helps safeguard Australia’s citizens and the authority of this act must not be compromised.

k. Concerns regarding the threat of Nuclear Facilities

IPAN is concerned about the threats that arise from the presence of nuclear facilities in other parts of the world. As the submission from the Australian Conservation Foundation (ACF) (Submission no. 427) highlighted in the 2022 IPAN People’s Inquiry Final Report, the current conflict in Ukraine has seen “the weaponization of nuclear facilities and the threat of an uncontrolled radiation release”, even if the Russian army does not use its nuclear weapons.^{xv}

Another contributor to the IPAN People’s Inquiry Report, Bob Boughton (Submission no. 388) along with the ACF (Submission no. 427) described the decision (in 2021) for Australia to obtain US or UK submarines as a very dangerous move, by putting nuclear reactors in vessels which will be legitimate targets in any serious conflict - because it invites catastrophic radioactive pollution of the oceans. The report further made the point that “conventional warfare is very destructive of the natural environment”, however “the potential of nuclear war is very many times worse”, with the “obvious conclusion is that we must develop more civilised ways of resolving disputes”.^{xvi}

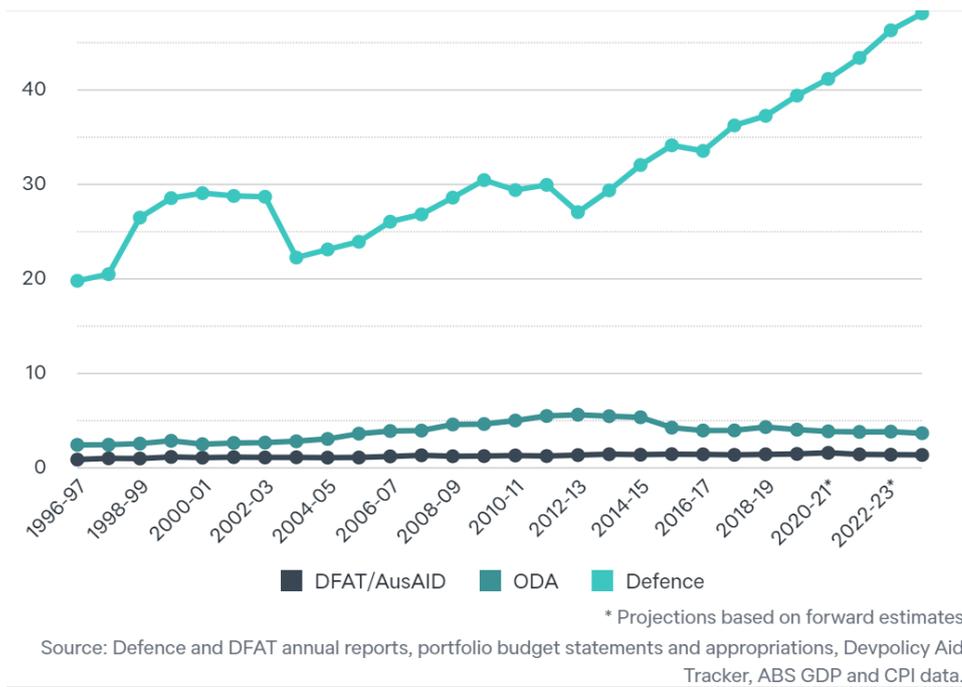
Due to the above concerns, IPAN is very opposed to the Bill. Additionally, IPAN wishes to raised specific concerns for the communities surrounding the two “designated zones” identified so far.

I. Erosion of the role of Diplomacy

IPAN has broad concerns about the direction of AUKUS and the acquisition of nuclear powered submarines, further entrenching the involvement of the ADF in the military operations of the USA and now the UK as well. At the same time we have seen a decrease over recent years in the resourcing of diplomatic within the bureaucracy of the Department of Foreign Affairs and Trade. The graph below reveals the enormous increase in defence spending over the last 25-30 years, in particular since the very significant spike in 2012/13; while there has been a decline in spending on diplomacy since around 2014/15.

In 1996/96, annual defence spending^{xvii} sat at around \$20 billion as against approximately \$3 billion on diplomacy (defence being around 6-7x higher) but it is now around \$50B compared with approximately \$5B (2022/23 figures, defence spending around 10 x higher than).

Change in Expenditure on Defence vs Diplomacy in Australia: 1996-97 – to 2022/23*



Source: The Interpreter, Lowy Institute, 7 October 2020

IPAN notes with concern, that in the Minister’s Second reading speech, he referred to the fact that “Submarines are warships and will be Australia’s most significant strategic asset.” IPAN sees this as reinforcing our concerns that diplomacy is increasingly being relegated below warfare as a response to resolving international conflicts. **IPAN would strongly argue that Australia’s most strategic asset should be diplomacy.**

2. Concerns re the impact on the local communities affected by the bill

According to the recently introduced Bill, the regulator will operate within “designated zones” with the first two designated zones specified in this Bill being HMAS Stirling at Garden Island (WA) and Osborne Naval Shipyard (SA).

a. Impact on the local community - Garden Island in Western Australia, home of the Royal Australian Navy's largest fleet base, Fleet Base West (HMAS Stirling)

IPAN has significant concerns about the Bill in relation to the community (population of 772^{xviii} on the Garden Island base along with its cultural heritage as well as the Island’s plant and animal and plant life. The Noongar peoples reportedly tell of walking to these islands in their Dreamtime.

Garden Island is significant with the whole Island included on the Commonwealth Heritage List for its natural values, being a limestone outcrop covered by a thin layer of sand accumulated during an era of lowered sea levels.^{xix}

The Island is home to the rare tammar wallaby (*Australian Government Department of Agriculture, Water and the Environment*) as well as being a haven for birds in addition to quite a few carpet pythons. The tammar wallaby is a model species for research on marsupials, and on mammals in general, with significance for research, with its genome sequenced in 2011. Being classified as a Class-A nature reserve means it is the most protected type of Crown land in the state.

Garden Island has been described as being not just a naval base but “an ark for rare species and keeper of colonial history”.

^{xx}IPAN is aware that the Australian Navy has taken measures to enhance the natural habitat, and thus helping to ensure that native animals on the island are currently protected^{xxi}. The presence of nuclear submarines at the island, however, means that this protection could not continue to be guaranteed.

While the population of Garden Island are all part of HMAS Stirling, and as Department of Defence employees may have a favourable view regarding the establishment of Garden Island as a ‘designated zone’ for housing nuclear submarines, the population is still vulnerable to the risks of leading to exposure to the dangers posed by nuclear facilities (like any other community in the same situation).

However, consultation (or lack of) with First Nations groups and residents and workers from Rockingham, Kwinana, Cockburn and Fremantle, remains a critical issue. Members of these communities will also be directly impacted by public health and safety regulation pertaining to ‘AUKUS’ submarines on rotation or home ported at HMAS Stirling. The wider WA community should also be given a say regarding the declaration of Garden Island as a designated zone.

Of further cause for concern, as revealed in a FOI request by former Senator Rex Patrick, the Defence Department has confirmed that, from 2027, Australia will also take low-level nuclear waste from US and UK submarines rotating through HMAS Stirling^{xxii}. That this low level radioactive waste will be stored at defence sites in Australia is of great concern, given Australia’s poor history with existing radioactive waste management and siting.

The concerns noted above about a lack of community consent and consultation in the Bill will significantly impact the residents, the natural environment and the wildlife of Garden Island with HMAS Stirling becoming a designated nuclear zone, leading to exposure to the dangers posed by nuclear facilities. This is an unacceptable situation and it is totally remiss of the Australian Government to allow this to happen without any level of community engagement and consultation, and on an island of such national significance.

b. Impact on the local community - Osborne Naval Shipyard in South Australia

Similarly, IPAN is concerned for the residents of Le Fevre Peninsula due to the Bill resulting in the Osborne Naval Shipyard becoming a designated nuclear zone. The risks that would emanate from HMAS Osborn Naval Shipyard will be even greater given the higher population across the Le Fevre Peninsula who will be exposed to dangers posed by nuclear facilities, especially with the lack of clear safety standards on nuclear waste and submarines in the Bill.

Again, this is an unacceptable situation, with the same concerns regarding a lack of community engagement or consultation. Given the risks to the communities who will be directly impacted by this Bill IPAN believes that this Bill must be rejected.

3. Other areas in Australia that is prescribed by the 20 regulations to be a designated zone

IPAN and its member organisations also have concerns regarding the projected Eastern seaboard base earmarked for either Wollongong, Newcastle or Brisbane. The likely impacts on these city communities are significant. For example currently there is a major renewable energy wind project being planned for the sea around Wollongong. There are now real concerns withing that community that this critical project will be completely cancelled by the need for a military perimeter around the base if Port Kembla is chosen.

This is another reason why IPAN believes that this Bill must be rejected.

Thank you for considering the range of concerns we have raised in relation to this Bill

Yours sincerely



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ⁱⁱ International Atomic Energy Agency, 2006

ⁱⁱⁱ Radiation Health and Safety Advisory Council (RHSAC), 2022

^{iv} Radiation Health and Safety Advisory Council (RHSAC), 2022

^v Radiation Health and Safety Advisory Council (RHSAC), 2022

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^{xix} Rottnest Island Authority, Retrieved 22 January 2021

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