



*IPAN's Vision: An Independent and Peaceful Australia*

*IPAN Patrons: Emeritus Professor Ian Lowe AO & Kellie Tranter Lawyer & Human Rights Activist*

14 February 2025

**Submission:**

To: The Submarine Rotational Force – West (SRF-West) Project, Department of Defence, Australian Government

Re: The SRF-West priority works at HMAS *Stirling*, Western Australia.

To whom it may concern,

The Independent and Peaceful Australia Network Inc. (IPAN) provides this submission on behalf of its 50 organisational and 200 individual members. 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, as a national organisation, is governed by a Coordinating Committee which has up to two representatives from each state and territory.

These Committee members, with many of IPAN's member organisations, are deeply concerned about the planned infrastructure upgrade and enhancement for HMAS *Stirling* to meet the requirements for conventionally-armed, nuclear-powered submarines. This upgrade is planned to accommodate visiting and rotational submarines and also Australia's own nuclear-powered submarines in the future.

IPAN has been vocal in its opposition to Australia's acquisition of nuclear-powered submarines. We regularly contribute submissions to national inquiries and consultations related to peace, defence and foreign policy matters. This includes raising concerns regarding nuclear energy, nuclear waste and nuclear weapons.

Over the past year alone, IPAN has written the following:

- Submission to the Senate Standing Committee on Foreign Affairs Defence and Trade Re: Australian Naval Nuclear Power Safety Bill 2023. IPAN also gave evidence at a public hearing for the Inquiry.
- Submission to the Australian Government, Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) re Australian Submarine Agency Licence Application to Site a Prescribed Radiation Facility known as the 'Controlled Industrial Facility'
- Submission to the Joint Standing Committee on Treaties regarding: The Agreement among the Government of Australia, the Government of the United Kingdom of Great Britain and Northern Ireland, and the Government of the United States of America for Cooperation Related to Naval Nuclear Propulsion
- Submission to the Federal House of Representatives Select Committee Inquiry into Nuclear Power
- Submission to the Northern Territory Department of the Chief Minister and Cabinet regarding the Territory Coordinator Bill 2024, which among other provisions, proposed that the Northern Territory Nuclear Waste Transport, Storage and Disposal (Prohibition) Act be on a list of Scheduled Acts in the Territory Coordination Act 2024, that could be exempt from an Environmental Protection Assessment (EPA).

Additionally, in 2022, IPAN released the findings of its own *People's Inquiry: Exploring the Case for an Independent and Peaceful Australia*<sup>1</sup>. A large number of the 280+ submissions included in this report raised concerns around storage of nuclear waste and the need for the Australian Government to sign and ratify the Treaty on the Prohibition of Nuclear Weapons (TPNW). Submissions to the Inquiry resulted from extensive public consultations and discussions involving

several thousands of people (through questionnaire responses, public meetings, group discussions, zoom meetings and webinars) from a wide range of civil society organisations. This followed the wide distribution on social media of a request for inquiry submissions.

IPAN thus has a member mandate to express concerns related to nuclear powered submarines, nuclear energy and nuclear waste and understands the importance of civil society organisations and community members speaking out on such matters.

IPAN notes that the Department of Defence has asserted the following in relation to SRF-West,

*'SRF-West is integral to Australia's acquisition of conventionally-armed, nuclear-powered submarines and ensuring Australia is sovereign ready to safely maintain, own, operate and regulate its own capability from the early 2030s. The planned priority works will upgrade maritime structures, and construct and operate a purpose built controlled industrial facility to support the maintenance of conventionally armed, nuclear-powered submarines.'*<sup>ii</sup>

The IPAN submission focusses on this assertion. While Defence requires the planned works to be assessed and approved as meeting the requirements of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), meeting approval under that Act will not in fact address or eradicate the most significant environmental risks.

IPAN firmly believes that the most significant environmental risk of the proposed works relates to the original rationale, which was to allow for the AUKUS Nuclear-Powered Submarine Pathway announced in March 2023 by the US, the UK and Australia (under the AUKUS agreement) and the subsequent increasing visits of US nuclear powered submarines to HMAS Stirling Naval Base, Garden Island (*Meeandip*) in WA's Cockburn Sound (Derbal Nara).

HMAS Stirling is the intended home port of Australia's first nuclear powered submarines where it is proposed that: *'...from as early as 2027, AUKUS partners will have a rotational presence at HMAS Stirling of one UK and up to 4 US, conventionally armed, nuclear-powered submarines.'*<sup>iii</sup>

Related to this, we know that the US has a policy of neither confirm nor denying if nuclear weapons are on board its submarines, ships or other vessels or aircraft<sup>iv</sup>, which raises concerns for IPAN if nuclear weapons will be on submarines visiting or stationed at Australian ports. IPAN and its members totally object to foreign nuclear armed attack submarines/warships ever visiting Australian ports.

IPAN has major concerns about the whole AUKUS agreement and its implications, and has asserted publicly that it rejects the proposal to store radioactive waste at Garden Island or to host any nuclear-powered submarines in Cockburn Sound.<sup>v</sup>

### **The threat of Nuclear Facilities**

IPAN believes that Australia must learn from threats that have arisen in other parts of the world from the presence of nuclear facilities. As a submission from the Australian Conservation Foundation (ACF), to the 2022 IPAN People's Inquiry (Submission no. 427) highlighted, even in the absence of the Russian forces' use of nuclear weapons, the current conflict in Ukraine has seen 'the weaponization of nuclear facilities and the threat of an uncontrolled radiation release.'<sup>vi</sup> Put simply, Australia should not allow such a risk to be present on our shores.

### **Risk of HMAS Stirling being a nuclear target**

The permanent presence of US and UK nuclear-powered submarines would make HMAS Stirling a military target. According to submissions made to the IPAN People's Inquiry by Bob Boughton (Submission no. 388) and the ACF (Submission no. 427), the 2021 decision for Australia to obtain US or UK submarines is a very dangerous move. Putting nuclear reactors in vessels will make these vessels legitimate targets in any serious conflict and thus invite catastrophic radioactive pollution of the oceans.

At the least, these radiation risks would threaten Cockburn Sound, Shoalwater Bay Marine Reserve and the communities facing Cockburn Sound, Rockingham, Kwinana, Cockburn and Fremantle.

### **Lack of community engagement and consultation re siting of nuclear-powered submarines at HMAS Stirling**

In its 2024 Submission to the Australian Government, Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), re Australian Submarine Agency Licence Application to Site a Prescribed Radiation Facility known as the 'Controlled Industrial Facility,' IPAN highlighted the following:

*'There is no assurance the ASA has consulted with the Traditional Owners of Meeandip (Garden Island) and complied with A.29.2 of the UN Declaration on the Rights of Indigenous Peoples: "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 people without their free prior and informed consent."<sup>vii</sup>*

Absence of consultation with the Traditional Owners of Meeandip is totally unacceptable. It is absolutely remiss of the Australian Government to allow this to happen on an island of such national significance (see further comments below).

IPAN also highlighted this issue in its 2024 submission to the Senate Standing Committee on Foreign Affairs Defence and Trade Re: Australian Naval Nuclear Power Safety Bill 2023.<sup>viii</sup> This submission cited concerns about a lack of community consultation and consent. These concerns remain vitally relevant, given the impact on residents, the natural environment and the wildlife of Garden Island.

In a visit to Australia in 2023, Marcos A. Orellana, the Special Rapporteur for Toxics and Human Rights, 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'<sup>ix</sup>*

Particular concerns were raised about the ability of communities to refuse projects or even to be consulted adequately.<sup>x</sup> Community consultation should always be based on free, prior and informed consent and the absence of such a process is a serious oversight in the Australian Naval Nuclear Power Safety Bill 2023.

Ensuring appropriate community consultation is fundamental to any development concerning future nuclear waste management and regulation. This requirement was echoed by the Special Rapporteur for Toxics and Human Rights in his End of Mission report which noted the importance of Australia adopting free, prior and informed consent in relation to nuclear waste management sites.<sup>xi</sup>

### **Concerns re public health, safety and environmental risks of naval nuclear reactors and nuclear waste storage.**

Australia has a poor history related to existing radioactive waste management and siting. IPAN expresses grave concern for communities in the vicinity of proposed nuclear submarine ports, particularly with relation to the low level radioactive waste to be stored at HMAS Stirling. We stress that the storage of radioactive waste on an island of this nature is dangerous and deficient.

We also express our disquiet at the fact that there is no information available relating to the duration of the storage of low-level nuclear waste at HMAS Stirling. Given that Australia does not have a permanent nuclear waste storage facility, there are concerns that the HMAS Stirling storage might continue indefinitely.

The presence of nuclear-powered submarines will also lead to the risk of a radiation leak. Very real concerns therefore exist about the environmental, ground water and climate change impacts. A decision to store nuclear waste will impact on Garden Island residents (population 772), the island's wildlife and plants, cultural heritage and general natural environment. There will be even greater concern if high level nuclear waste is accepted at some time in the future.

### **Nuclear war the biggest existential threat to humanity and the planet**

The IPAN People's Inquiry report highlighted that while 'conventional warfare is very destructive of the natural environment,' "the potential of nuclear war is very many times worse.' The 'obvious conclusion is that we must develop more civilised ways of resolving disputes'.<sup>xii</sup>

### **Further loss of Australian sovereignty**

IPAN believes that the AUKUS arrangements concerningly reinforce Australia's current subservience to the USA and the UK. Australia should instead take active steps to become more independent in terms of defence and foreign policy. One of the key messages from IPAN's People's Inquiry was for genuine independence from the US and a peaceful foreign policy for Australia.

IPAN's Peoples' Inquiry Chair Kellie Tranter, in her Executive Summary<sup>xiii</sup>, stated the following:

*'[The Inquiry Report] calls for our nation to create space for debate when matters ought to be contested, and to be confident and mature enough to strive for a genuinely independent and peaceful foreign policy for Australia' (IPAN 2022, p.9)*

*'Australia's involvement in world affairs at the behest and under the diktats of the US is not consistent with popular Australian views on the role of a peaceful participant cooperating in the consensual solution of world problems. For too long this country has facilitated US hegemony – absolute power over the rest of the world – and engaged in an alliance 'deeply rooted in US self-interest.' We have thus forsaken our independence. Australia is fighting in and invariably losing wars in which we have no direct interest, and for which there is little popular support and even less moral justification. This has been at huge personal and financial costs that are detrimental to the interests of the Australian people.' (IPAN 2022, p.9).*

Such concerns are shared by many others across the country. The Australia Remade movement has a 'vision for the best version of us' which was developed from hundreds of conversations with Australians from across the country. This movement has nine pillars that make up their vision. Pillar 9 calls upon Australia to be 'a proud contributor to a just world'<sup>xiv</sup> whereby:

*'We stand on our own two feet as we develop a fair and just approach to working with other countries. We do not blindly follow others, no matter how powerful.'*

It is of great concern to IPAN that Australia continues to follow US foreign policy and thus moves even further away from standing on our own two feet in terms of foreign and defence policy. Instead, we lock ourselves into having to support the US in any future wars in which they engage. IPAN believes that proposed submarine arrangements point to a massive military build-up which is a preparation for a war against China.

IPAN totally opposes Australia involving itself in yet another US-led war.

### **AUKUS arrangements continue the increasing militarisation of Australia**

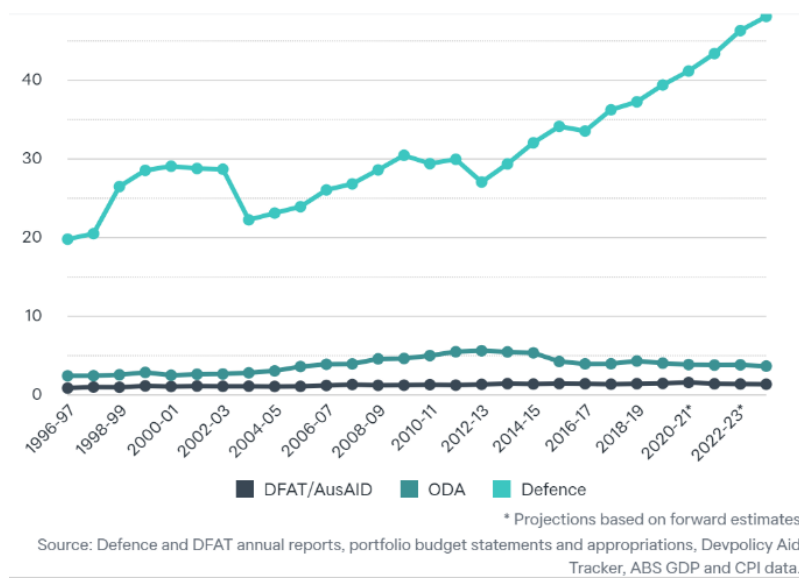
IPAN is concerned about the continuing militarisation of Australia, which is further reinforced by the AUKUS arrangements. These arrangements are of great benefit to US and UK weapons companies and of questionable benefit of any kind to Australia. The expenditure earmarked for AUKUS represents a huge lost opportunity in terms of monies that could be allocated to increasing and improving the country's diplomatic processes and solutions.

## Erosion of the role of Diplomacy

IPAN notes the worrying erosion in recent years of the role of Australian diplomacy in international affairs and a huge increase in defence spending. In this light, IPAN has significant concerns about the direction of AUKUS and the acquisition of nuclear-powered submarines which merely entrenches 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 marked decrease in resources allocated to diplomatic processes 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 and the concomitant decline in spending on diplomacy since around 2014/15.

In 1996/96, annual defence spending<sup>xv</sup> sat at around \$20 billion against approximately a mere \$3 billion on diplomacy (defence being around 6-7x higher). These statistics are now around \$50B compared with approximately \$5B (2022/23 figures, defence spending around 10 x higher than). See Graph below.

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



Source: *The Interpreter*, Lowy Institute, 7 October 2020 <sup>xvi</sup>

IPAN notes that in his second reading speech on the Australian Naval Nuclear Power Safety Bill 2023, the Minister referred to the fact that: ‘Submarines are warships and will be Australia’s most significant strategic asset.’ <sup>xvii</sup> Such a statement simply reinforces IPAN’s concerns that diplomacy is increasingly being replaced by warfare as a response to resolving overseas conflict. IPAN contends that Australia’s most strategic asset is and should be diplomacy.

For the reasons outlined above, IPAN has major concerns about the overall project proposed for HMAS Stirling and AUKUS, particularly the impending Environment Protection and Biodiversity Conservation assessment. The only way to protect the environment and conserve the biodiversity of the HMAS Stirling site on Garden Island is to cancel and not proceed with the Submarine Rotational Force – West (SRF-West) Project.

**RECOMMENDATION: That the Australian Government cancel and not proceed with the Submarine Rotational Force – West (SRF-West) Project.**

Thank you for considering the matters of concern we have raised in this submission.

Yours sincerely



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*i* IPAN 2022, Peoples' Inquiry [https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE\\_softcopylinks.pdf](https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf)

*ii* Submarine Rotational Force – West Infrastructure Project | About | Defence

*iii* Submarine Rotational Force – West Infrastructure Project | About | Defence

*iv* The Nuclear Information Project, Website 2024, <https://www.nukestrat.com/us/navy/ncnd.htm>

*v* IPAN 2024 Submission to the Australian Government, Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) re Australian Submarine Agency Licence Application to Site a Prescribed Radiation Facility known as the 'Controlled Industrial Facility'

*vi* IPAN (IPAN), 2022 Peoples' Inquiry [https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE\\_softcopylinks.pdf](https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf)

*vii* Note: This submission will soon be available on the IPAN Website

*viii* IPAN 2024 Submission 2024, chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/<https://ipan.org.au/wp-content/uploads/IPAN-Submission-1-Feb-2024-Australian-Naval-Nuclear-Power-Safety-Bill-2023.docx.pdf>

*ix* Orellana, M, 2023 chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/[https://www.un.org/sites/un2.un.org/files/eom\\_-\\_08\\_sep\\_2023\\_-\\_final\\_.pdf](https://www.un.org/sites/un2.un.org/files/eom_-_08_sep_2023_-_final_.pdf)

*x* IPAN 2022 Peoples' Inquiry [https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE\\_softcopylinks.pdf](https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf)

*xi* Orellana, M, 2023 chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/[https://www.un.org/sites/un2.un.org/files/eom\\_-\\_08\\_sep\\_2023\\_-\\_final\\_.pdf](https://www.un.org/sites/un2.un.org/files/eom_-_08_sep_2023_-_final_.pdf)

*xii* IPAN 2022 Peoples' Inquiry [https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE\\_softcopylinks.pdf](https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf)

*xiii* [https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE\\_softcopylinks.pdf](https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf)

*xiv* <https://www.australiaremade.org/>

*xv* Department of Defence and Department of Foreign Affairs and Trade, cited in Lowy Institute 2020

*xvi* Lowy Institute 2020, <https://www.lowyinstitute.org/the-interpreter/budget-skewed-priorities>

*xvii* Australian Naval Nuclear Power Safety Bill 2023, Second Reading, 16 November 2023

<https://parlinfo.aph.gov.au/parllInfo/search/display/display.w3p;query=ld%3A%22chamber%2Fhansard%2F27181%2F0041%22>