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IPAN's Vision: An Independent and Peaceful Australia

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

17 March 2025

Submission Re:

Draft Impact Assessment Report Submarine Construction Yard Strategic Assessment Osborne, South Australia (IAR). By the Defence proponent, the Australian Submarine Agency (ASA) 21 January 2025

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 Submarine Construction Yard planned for Osborne.

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*ⁱ. 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 the following from the Department of Defence Impact Assessment Report, Submarine Construction Yard Strategic Assessment, Osborne, SA

*In collaboration with the AUKUS partners, a new conventionally-armed nuclear-powered submarine, to be known as SSN-AUKUS, is planned to be built in Australia by the early 2040s. The preferred site for construction of this new submarine capability is located at Osborne on the Lefevre Peninsula, approximately 19 km north of Adelaide, in South Australia.*ⁱⁱ

1. Failure of community consultation

There has not been an appropriate level of assessment and engagement with the public on required emergency response measures and Evacuation Zones for nuclear reactor accidents. It is imperative that emergency Services (both civilian and community) police, fire, ambulance and hospital workers are fully informed about the health risks that they could face in an the event of an AUKUS military nuclear submarine nuclear reactor accident.

The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)ⁱⁱⁱ have made it abundantly clear that such first responders could face 'catastrophic conditions' However, both the SA Labor Government and the Federal Labor Government have failed to inform the first responders and the public. This is an unacceptable situation (see Appendix A below).

2. Risk of 'catastrophic conditions' in an AUKUS nuclear submarine reactor accident

The risk of catastrophic conditions in the in the event of an AUKUS nuclear submarine reactor accident is well accepted.

ARPANSA has recognised this potential for 'catastrophic conditions'^{iv}, as has the State Planning Commission^v in addition, the SA Sate EIS has recognised "high consequence events' in regard to the real potential for a serious AUKUS Nuclear submarine nuclear reactor accident at Osborne^{vi}. emergency Services workers could face...

In an even more severe AUKUS nuclear accident, emergency workers and designated shipyard workers will be exposed to dangerously high ionising radiation dose exposures of up to 500 millisieverts (mSv).

- The ARPANSA Guide states female emergency workers are to be excluded and Female workers who might be pregnant need to be excluded from taking actions that might result in an equivalent dose exceeding 50 mSv’.
- The ARPANSA Guide also authorises ‘actions to prevent the development of catastrophic conditions’ by civilian workers. ‘Category 1 Emergency workers’ may “receive a dose of up to 500 mSv’, a dangerously high ionising radiation dose exposure that is 500 times the maximum allowed civilian annual dose.^{vii}

In addition, for members of the local community (which would include many) they ‘may face evacuation and may require ‘decontamination’.^{viii}

Independent Campaigner David Noonan has outlined the following, which IPAN concurs with

‘The public have a right to full disclosure of health impacts in advance of Federal decisions and legislation and process to impose N-Sub nuclear accident risks onto our community. Federal Minister for Health the Hon Mark Butler MP has a ‘duty of care’ to order required health impact studies and to inform SA community of the extent of radiological health risks they face. Minister Butler has over-sight of the federal agency ARPANSA, a civilian nuclear regulator, that is responsible for preparing health impacts studies on potential nuclear submarine accidents.’^{ix}

The Federal Government needs to task ARPANSA to undertake ordering required health impact studies and to inform SA community of the extent of radiological health risks they face. IPAN does not believe that this task should be delayed, and subsequently given to a pending new non-independent military nuclear regulator reporting to the Defence Minister. We believe there would be an unacceptable ‘conflict of interest’ should this new regulator be given the above task.

3. Inadequacy of the Draft Impact Assessment Report - including failure to inform public re AUKUS nuclear submarine reactor accident risks

IPAN is concerned that the Draft Impact Assessment Report (IAR) has failed to inform the public over the significant risks and impacts consequent to the catastrophic conditions mentioned above, in the event of a serious AUKUS nuclear submarine nuclear reactor accident occurring at Osborne.

The known risks and adverse health effects that can result from ionising radiation exposure to workers and to the public must be openly communicated to community members and emergency services workers who may be impacted.

The Draft IAR fails to contemporary community standards and expectations for transparency and accountability and for a comprehensive assessment of how imposed AUKUS nuclear submarines at Port Adelaide would impact community wellbeing.

For example, it does not adequately inform the public on potential impacts; and it describes the AUKUS nuclear submarine (radioactive wastes planned to be stored at Osborne as “similar to hospital” wastes;

The IAR also does not adequately inform the public of the adverse health effects of ionising radiation exposure.

The IAR (6-41) states that: ‘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.’^x IPAN believes Information on potential sources of radiation must form part of the IAR requirements.

The South Australian State Environmental Impact Statement (EIS) also fails to satisfy contemporary community standards and expectations for transparency and accountability and for a comprehensive assessment of how imposed AUKUS nuclear submarines at Port Adelaide would impact community wellbeing.

Given that an Environmental Impact Statement IES is the highest level of development assessment, required for projects deemed of environmental, social, or economic significance, or located in sensitive areas – communities that will be impacted by new development projects deserve that the highest order of rigour be applied.

These are prominent community concerns around public safety and risks and it is incumbent on Government(s) to listen to voices of concern within the community.

4. Meeting the requirements of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The Department of Defence requires that the planned works be subject to assessment and approval as per the requirements of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), in particular Part 10

Simply fulfilling the requirements of this Act does not address the full scope of the impact of the planned works and will still leave the environment exposed to significant risks.

IPAN disagrees with the assertion made by the Impact Assessment Report (IAR) that the application of mitigation measures to avoid or reduce potential impacts on the environment, that it ‘has been assessed that the impacts of The Plan are likely to be acceptable’.¹ While the assessment undertaken may comply with the need for the Minister to be satisfied that the potential impacts of The Plan are acceptable and consistent with the objectives of the EPBC Act – other risks remain, which are not covered by the requirements of the EPBC Act.

5. Minimising of the seriousness of Nuclear-submarine radioactive wastes to be stored at Osborne

The EPBC Act Draft ‘Impact Assessment Report’ (IAR), by the Defence proponent the Australian Submarine Agency (ASA), describes the Nuclear-submarine radioactive wastes to be stored at Osborne, including reactor coolant wastes and tritium contaminated water, as: ‘similar to those that occur in over 100 locations nationwide, including hospitals, science facilities and universities’.^{xi}

We believe this misrepresents the seriousness of the risks involved in this level of nuclear waste.

¹ *The Actions and Classes of Actions that are to be undertaken under The Plan, are generally consistent with those that have occurred on the Lefevre Peninsula, alongside the extensive areas designated for the conservation of migratory and threatened species, over the past 50 years. The Plan has been assessed to be consistent with the objectives stated in Part 1, section 3(1) of the Environment Protection and Biodiversity Conservation Act 1999, and the impacts are likely to be acceptable.* [EPBC Strategic Impact Assessment Report.pdf](#), 2025, p.viii

In addition, and central to our overall concerns, IPAN firmly believes that the most significant environmental risk of the proposed works relates to the underlying 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). The whole AUKUS deal brings with a whole new level of environmental risks – including the issues of striate of nuclear waste.

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 ^{xii}, 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.

6. United Nations Concerns regarding government perspective on toxics

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’ ^{xiii}

Particular concerns were raised about the ability of communities to refuse projects or even to be consulted adequately.^{xiv} It is not clear if the Australian Government intends on ensuring community consultation on the proposed Osborne site will be based on these principles of free, prior and informed consent and the absence of such a process is a serious oversight

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.^{xv}

7. 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 the proposed development. We stress that the storage of radioactive waste of this nature is dangerous and deficient.

8. 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’.^{xvi}

9. 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.’^{xvii} Put simply, Australia should not allow such a risk to be present on our shores.

10. 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^{xviii}, 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’^{xix} 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.

11. AUKUS arrangements continue the increasing militarisation of Australia

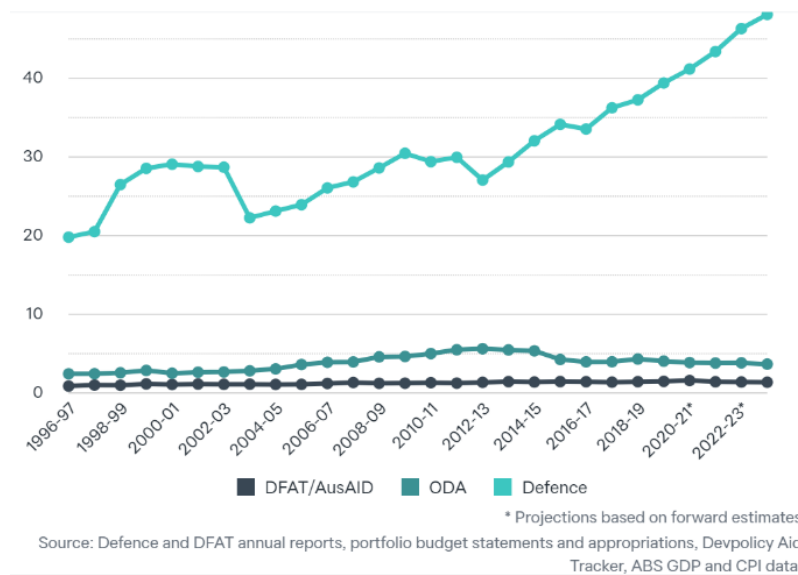
IPAN is concerned about the continuing militarisation of Australia, which is further reinforced by the AUKUS arrangements. These arrangements are of great benefit to US and UK weapons companies and of questionable benefit of any kind to Australia. The expenditure earmarked for AUKUS represents a huge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

12. Erosion of the role of Diplomacy

In addition, 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^{xx} 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, 70

For the reasons outlined above, IPAN has major concerns about the overall project proposed for Osborne and AUKUS as a whole – and it is our recommendation that the Submarine Construction Yard planned for Osborne **does not proceed**.

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

Yours sincerely

Annette Brownlie
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Appendix A

Excerpt from:

Guide for Radiation Protection in Emergency Exposure Situations (2019) - The Framework, Radiation Protection Series G-3, p.6-7

[RPS G-3 Emergency Exposure Guide - PART 1,](#)

2.2 Goals for radiation protection in an emergency exposure situation Principle 9 of RPS F-1 (ARPANSA 2014a) specifies that arrangements must be made for emergency preparedness and response for incidents, accidents and malicious acts that may give rise to radiation risks. The GSR Part 7 (IAEA 2015) further establishes the requirements and outlines that the goal of emergency preparedness is to ensure that an adequate level of capability is in place within operating organisations, and at local, regional and national levels for an effective response. This capability relates to an integrated set of infrastructural elements that include, but are not limited to: authority and responsibilities; organisation and staffing; coordination; plans and procedures; tools, equipment and facilities; training, drills and exercises; and a management system. In a nuclear or radiological emergency, the goals of emergency response are to:

- save lives
 - regain control of the situation and to mitigate consequences
 - render first aid, to provide critical medical treatment and to manage the treatment of radiation injuries
 - avoid or to minimise severe tissue reactions (also known as deterministic effects)
 - reduce the risk of stochastic effects
 - keep the public informed and to maintain public trust
 - mitigate, to the extent practicable, non-radiological consequences
 - protect, to the extent practicable, property and the environment
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- prepare, to the extent practicable, for the resumption of normal social and economic activity, and return to normal operations to the extent it is possible and can be done safely.

The implementation of the system of radiological protection requires that the exposure situation is well understood through an assessment that considers all relevant aspects of the exposure. The information from the assessment will form the basis for decisions on actions (if deemed necessary). Such decisions need to be taken in a transparent manner. Stakeholders are regarded as an asset who will contribute knowledge to the process, and engagement with stakeholders contributes to informed decisions and the best possible outcomes.

ⁱ IPAN 2022, Peoples' Inquiry https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf

ⁱⁱ Impact Assessment Report Submarine Construction Yard Strategic Assessment Osborne, South Australia 21 January 2025, [page?](#)

ⁱⁱⁱ ARPANSA, 2019

^{iv} ARPANSA 2019, [RPS G-3 Emergency Exposure Guide - PART 1 Radiation Protection Series G-3 | ARPANSA](#) Part 1 p.45 & 64; Part 2, p. 18-19 & Table 3.1)

^v [Assessment Requirements - Environmental Impact Statement - Nuclear Powered Submarine Construction Yard](#)

^{vi} [Environmental Impact Statement](#) (p. 79 & 87)

^{vii} David Noonan 2024, [Labor imposes AUKUS nuclear submarines while failing to inform the affected SA community of the health risks they face in a potential reactor accident. Briefer by David Noonan, Independent Environment Campaigner, 29 July 2024, p.2.](#)

[Noonan-Health-Risks-in-an-AUKUS-N-Sub-Reactor-Accident-Briefer-29-July-2024.pdf](#)

^{viii} David Noonan 2024, p.1 (reference as per footnote vii)

^{ix} David Noonan 2024, p 1 (reference as per footnote vii)

^x Impact Assessment Report Submarine Construction Yard Strategic Assessment Osborne, South Australia 21 January 2025

^{xi} Impact Assessment Report Submarine Construction Yard Strategic Assessment Osborne, South Australia 21 January 2025 p, 3-19-20

^{xii} The Nuclear Information Project, Website 2024, <https://www.nukestrat.com/us/navy/hcnd.htm>

^{xiii} Orellana, M, 2023 chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.un.org/sites/un2.un.org/files/eom_-_08_sep_2023_-_final_.pdf

^{xiv} IPAN 2022 Peoples' Inquiry https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf

xv Orellana, M, 2023 chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.un.org/sites/un2.un.org/files/eom_-_08_sep_2023_-_final_.pdf

xvi IPAN 2022 Peoples' Inquiry https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf

xvii IPAN (IPAN), 2022 Peoples' Inquiry https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf

xviii https://ipan.org.au/wp-content/uploads/CHARTING-OUR-OWN-COURSE_softcopylinks.pdf

xix <https://www.australiaremade.org/>

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