PORT ADELAIDE ENFIELD

Draft Australian Radioactive Waste Management Framework

City of Port Adelaide Enfield
Endorsed Submission

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Overview

The City of Port Adelaide Enfield is the host Council for the Osborne Nuclear-Powered Submarine Yard (NPSY) in South Australia, which is where Australia's SSN-AUKUS submarines will be built.

Council recognises the scale and the significance of the proposed Osborne NPSY development and its role in delivering on the initiatives of the AUKUS agreement. However, it is Council's role to seek to minimise any negative environmental and community outcomes from the development and to advocate for environmental and community (including economic development) benefits from AUKUS.

On 26 October 2026, Council Administration met with representatives from the Australian Radioactive Waste Agency (ARWA) and the project consultants, Nous Group, as part of a Local Government consultation session on the draft Australian Radioactive Management Framework (ARWMF). At this meeting, Council identified that the purpose and scope of the ARWMF was not clear and highlighted/ provided feedback on the following:

- The need to integrate transportation of radioactive waste materials into the ARWMF, including transportation of waste from and between sites of generation and temporary and permanent storage, as this is a key issue relevant to community safety.
- Clarification on types of radioactive and nuclear waste that the ARWMF applies to, including the distinction between intermediate waste generated from ANSTO operations and high-level waste generated from nuclear propulsion of the submarines and any other sources of high-level radioactive waste that the ARWMF may apply to.

Council has adopted a Decision-Making Framework for AUKUS to guide its strategic and operational input into the AUKUS project (see **Attachment 1**). The Decision-Making Framework was developed to ensure a consistent approach to any decisions that Council may have to make in relation to the AUKUS development and reflects the guiding principles, goals and role statements from Council's City Vision 2024-34. More specifically, the purpose and scope of the Decision-Making Framework is for Council to:

- Apply intergenerational principles to decision making to ensure current and future local communities, economies and environments are not adversely impacted and opportunities for direct State and Federal Government investment in community outcomes are maximised.
- Inform, involve and consult with the community in relevant decision making and advocate for this to occur in all decision making relevant to AUKUS that has a direct impact on the community.
- Advocate for economic, social and environmental outcomes, including infrastructure, employment and business opportunities and the protection and enhancement of and public access to the natural environment, including Mutton Cove, Biodiversity Park and the Port River and Barker Inlet estuary.

- Ensure decisions align with Council's City Vision 2024–2034 outcomes.
- Engage and partner with the community and local business to leverage the opportunities that are generated from AUKUS.

Council has previously considered the legislation for the development of the new legislative framework that will be regulating the nuclear safety of activities relating to the Osborne NPSY and the AUKUS submarines. At its Ordinary Meeting in November 2024, Council resolved the following:

- *opposition to the storage or disposal of radioactive waste in the AUKUS facilities at Osborne Naval Shipyard; and*
- *the position that any applications for licencing for the management, storage or disposal of radioactive waste at the AUKUS operations at the Osborne Naval Shipyard should be subject to comprehensive community engagement;*

The following comments from Council on the draft Australian Radioactive Waste Management Framework (ARWMF) reflect this position and are consistent with its Decision-Making Framework for AUKUS.

Recommendation 1

That in keeping with Council's resolution of November 2024, the storage of any radioactive/nuclear waste at the Osborne Nuclear-Powered Submarine Construction Yard (NPSCY) is prohibited.

Radioactive Waste Storage

An ongoing concern for the community is the potential for Osborne to be treated as a nuclear waste repository, particularly because Australia has no permanent solution for the disposal of low, medium or high level nuclear/radiative waste. Noting that the AUKUS agreement obligates Australia to manage is own nuclear and radioactive waste.

The draft ARWMF acknowledges that while Australia does not currently have any High-level waste (HLW) awaiting disposal, it is expected that the future decommissioning of Australia's conventionally armed, nuclear-powered submarines will produce spent nuclear fuel that will need to be managed.

While Council acknowledges the national importance of a coordinated framework for managing radioactive waste, the ARWMF must explicitly protect local communities from having facilities imposed upon them without their consent and without authentic social licence and transparent consultation.

Communities need certainty as to what the facilities required to manage and dispose of radioactive waste (and spent nuclear fuel) will comprise and where these will be located. Currently, approvals for regulated activities at Osborne are being granted without any clear

decommissioning plan in place, including confirmation of how the management, storage and disposal of spent nuclear fuel or reactors will be undertaken.

Site Decommissioning

Council considers that a detailed decommissioning strategy should be developed for the Osborne NPSCY prior to any approvals or licences for any regulated activity is granted. The decommissioning plan should include confirmation of how the management, storage and disposal of spent nuclear fuel or reactors will be undertaken.

Recommendation 2

A detailed decommissioning strategy/plan should be prepared (and made available for review) prior to the approval of a licence for a regulated activity at the Osborne NPSY. This plan should confirm how the management, storage and disposal of spent nuclear fuel or reactors will be undertaken, including the location of any storage facilities.

Transportation of Waste

The disposal process will not only include the final siting and storage of radioactive waste but also the transport and movement of this waste to the storage site. In relation to the Osborne NPSY, this will presumably include nuclear and radioactive Naval Nuclear Propulsion (NNP) waste materials and the importation of the nuclear propulsion reactors for installation in the submarines.

In terms of the transportation route that will be used to transport materials to and from the Osborne NPSY, radioactive and nuclear material will need to be transported either via the Port River (a legislated wildlife sanctuary) and/or Victoria Road (a key arterial road servicing critical energy and freight infrastructure for the state and residential areas). Detailed transport and movement plans therefore need to be developed that address and minimise potential hazards and safety impacts on local river systems, as well as transport networks that serve nearby businesses, industries, and communities.

Recommendation 3

The Australian Radioactive Waste Management Framework includes consideration of the transportation of radioactive waste and the potential risks to communities and the environment from this process as a key part of establishing fit-for-purpose disposal infrastructure for radioactive waste in Australia.

Radiation Protection

Council would like further information regarding the radiological protection controls that will be of relevance to the local community to protect the health and safety of the general public. Specifically:

- What are the exposure risks from the proposed nuclear-related activities at the Osborne NPSY and what controls will be put in place to manage public health and safety from these risks? This includes:
  - risks of exposure during the movement of nuclear/radioactive substances to and from the site
  - proposed storage of Low Level Waste
  - storage and testing of the nuclear power units
  - installation of the nuclear power units into the submarine, and its subsequent launch.

The same questions are also of relevance in relation to the potential risks to the environment and the radiological protection controls that will be put in place to mitigate these risks.

Recommendation 4

Detailed information should be provided on the exposure risks to the local community from the proposed nuclear-related activities at the Osborne NPSCY and what controls will be put in place to manage public health and safety from these risks, as well as impacts to the environment.

Major Hazard Facilities and Dangerous Substances

The Lefevre Peninsula in its northern reaches is highly exposed and vulnerable to future (2030 – 2100) coastal inundation due to the compounding impacts of sea level rise and land subsidence. Lack of mitigation (including resilient infrastructure investments) increases the potential for future disasters due to flooding.

There are a number of Major Hazard Facilities (MHF) in close proximity to the Osborne NPSY as well as sites storing dangerous substances in quantities slightly less than required for MHF classification. The potential for a cumulative hazard incident or high consequence safety failure at one of these sites could have significant impacts for the Osborne NPSY and surrounding area if the Osborne NPSY is storing even Low-level radioactive waste temporarily on site.

Recommendation 5

That the storage of any radioactive/nuclear waste at the Osborne NPSY is prohibited.

Public Consultation and Stakeholder Engagement

Role of Local Government

The draft ARWMF emphasises the importance of ongoing engagement with state and territory governments, regulators, industry, and communities but does not specifically refer to Local Governments within the draft Framework.

Local government is the level of government that is the most connected to the local community because it operates on a direct, daily scale that directly impacts residents' everyday lives and environments. Local Government is best placed to advise on the local issues in an area and its community, the key values and concerns of different community groups and how best to advise on delivering practical, enduring social licence outcomes for the local community, environment and economy.

Recommendation 6

That Local Government is specifically identified within the Australian Radioactive Waste Management Framework for collaboration and engagement as follows:

Page 6 - Purpose *'…importance of ongoing engagement with state, territory and local governments…'*

Page 24 – Amend infographic to *'Engaging with states, territories and local governments'.*

Page 26 – *Engaging with states and territories - rename heading to 'Engaging with states, territories and local governments'*

Amend text as follows: 'States and territories have responsibility for policy, regulation and legislation regarding radioactive waste within their jurisdictions. Local Governments are the level of government that is most connected to the local community and represents their interests in achieving positive economic, social and environmental outcomes. The successful delivery of any new radioactive waste management facilities in Australia will require engagement with states, territories and Local Governments. It is important to build constructive relationships…'.

Community Engagement

As a result of the unusually long development timeframes for the Osborne NPSY, there often appears to be a level of complacency in relation to the urgency for developing a decommissioning and waste disposal plan for the AUKUS submarines and the radioactive waste that they will create. There is a real risk that development of a solution will keep being postponed in the hope that some breakthrough will occur at a future date and solve the problem. As the draft ARWMF states, there are no shortcuts and for a successful disposal program to be developed, consultation and engagement with Local Government and their communities should commence without delay.

Effective consultation must be meaningful, transparent, independently facilitated and timely i.e. early. The ARWMF should mandate a collaborative engagement process with local governments, First Nations traditional owners, residents and business owners during the development of the national radioactive waste policy by ARWA and in the development of plans for managing and disposing of radioactive waste. The consultation should also provide communities with full access to unredacted environmental, logistical, and safety impact assessments in the interests of transparency and building ongoing public trust throughout the lifecycle of the NPSCY.

Recommendation 7

The Australian Radioactive Waste Management Framework commits to a collaborative engagement process with local governments, First Nations traditional owners, residents and business owners during the development of the national radioactive waste policy by ARWA and in the development of plans for managing and disposing of radioactive waste.

Recommendation 8

The consultation should provide communities with full access to unredacted environmental, logistical, and safety impact assessments in the interests of transparency and building public trust.

Social Licence

The draft ARWMF describes social licence as the *'ongoing earned trust and approval of host communities and (our) stakeholders'* (page 20). Council considers that while trust is fundamental to achieving and maintaining social licence, social licence is also earned through responsible behaviour, transparency and accountability, including ethical practices, respect for local communities and respect for the environment. Procedural fairness and distributional fairness are critical to building and sustaining community trust.

Procedural fairness requires people to feel they are heard, respected and included in decision-making processes through genuine and transparent engagement and consultation, with the adjustment of plans to reflect local needs. Distributional fairness relates to the equitable distribution of project benefits and impacts across affected community groups.

Host communities bear most of the impacts of significant development projects while benefits can flow elsewhere. Social licence can help balance this by ensuring benefits are aligned with the scale of local impacts and help to address intergenerational disadvantage, economic protection and environmental remediation for affected communities.

The ARWMF needs to manage waste over many generations and it must therefore account for the long-term stigma and economic displacement it may cause to host communities, particularly those sites chosen for permanent radioactive waste storage.

Council has an importance role to represent its community, advocating to ensure projects are delivered in ways that reflect local values, avoid community harm and provide genuine benefits. Council's Decision Framework for AUKUS proposes that the creation of social licence for the AUKUS development, with a focus on maximising community benefit and addressing intergenerational disadvantage should include:

- Community development initiatives that strengthen community leadership and support engagement with impacted communities

- The provision of new and upgrades to existing community infrastructure and assets (inc. social infrastructure, traffic, active transport, open space, playgrounds, recreation).
- Economic development and visitor economy initiatives that generate investment in the local economy and community wealth building.
- Environmental and climate change initiatives.

Recommendation 9

The Australian Radioactive Waste Management Framework should strengthen the protections for local communities by broadening the definition of social licence to recognise procedural fairness and distributional fairness and ensure benefits are aligned with the scale of local impacts to address intergenerational disadvantage, economic protection and environmental remediation for affected communities.

Attachment 1: PAE Decision Making Framework for AUKUS



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PAE DECISION MAKING FRAMEWORK FOR AUKUS

September 2026 (Replaces the endorsed November 2024 Framework)

Purpose of Framework

To provide the essential guidance for Council's strategic and operational decision making to the AUKUS project.

Implementation of this Framework will include regular review and reporting to Council to ensure it reflects and delivers on the City Vision 2034 relevant strategic plans, and accords with the integrated and long-term approach to advocacy outlined in the PAE Advocacy Framework.

Application of City Vision 2024–34 Guiding Principles



EQUITY AND BELONGING

Apply intergenerational principles to decision making to ensure current and future local communities, economies and environments are not adversely impacted and opportunities for direct State and Federal Government investment in community outcomes are maximised.



PARTICIPATION

Inform, involve and consult with the community in relevant decision making and advocate for this to occur in all decision making relevant to AUKUS that has a direct impact on the community.



SUSTAINABILITY

Advocate for economic, social and environmental outcomes, including infrastructure, employment and business opportunities and the protection and enhancement of and public access to the natural environment, including Mutton Cove, Biodiversity Park and the Port River and Barker Inlet estuary.



INTEGRITY

Ensure decisions align with the City Vision 2024–2034 outcomes.



TRANSFORMATIVE

Engage and partner with the community and local business to leverage the opportunities that are generated from AUKUS.

Application to City Vision 2024–34 Goals



Thriving Community

Advocate for investment in community infrastructure and initiatives in the areas impacted by the development



Prosperous Economy

Advocate for opportunities for local business and investment in local training and employment opportunities and support co-investment in local infrastructure



Clean And Green City

Advocate for investment in the local circular economy, climate risk mitigation and environmental protection.



Places For People

Advocate for planning for and investment in placemaking outcomes, including the State Government led preparation and delivery of an integrated masterplan for the Lefevre Peninsula

Council's Roles

LEADER:

Identifying, setting direction, planning and advocating for the needs and aspirations of the impacted communities (for issues within Council's direct control).

FACILITATOR:

Assisting others to meet the needs of impacted community by providing opportunities to remove barriers, which may prevent community needs being met.

ADVOCATE:

Lobbying and advocating for impacted communities, particularly with other spheres of government, to ensure the needs and aspirations of the community are being met (for issues outside of council's direct control but that Council can influence).

INFORMATION RESOURCE:

Providing a resource for the community and other stakeholders seeking information.



Priority Actions

- Apply the Framework to Council's response to the following activities:
  - Determining Council's role in creating social licence for the AUKUS development with a focus on leveraging to maximise community benefit and address intergenerational disadvantage and advocating for direct investment by State and Federal Government and the AUKUS program partners in the following priorities:
    + Community development initiatives that strengthen community leadership and support engagement with impacted communities
    + Implementation of the PAE Social Infrastructure Plan's Western and Port Precinct's action plan
    + The provision of new and upgrades to existing community infrastructure and assets (traffic, active transport, open space, playgrounds, recreation) in keeping with the priorities of the PAE Integrated Transport Strategy, Walking and Cycling Plan and open space and recreation plans
    + Economic development and visitor economy initiatives that generates investment in the local economy and community wealth building (in keeping with the priorities of the PAE Prosperous Economy and Economic Development Plan and Investment Attraction Framework)
    + Environmental and climate change initiatives in keeping with the priorities of the PAE Living Environment Plan, Climate Response Plan, Urban Greening and Biodiversity Plan and Integrated Water Plan
    + The state government led 'major project' assessment process for the development (under the Planning and Design Code)
    + The public release of the findings from the state government led master planning for the Lefevre Peninsula and broader region (which factors in local infrastructure provision, housing and employment land use and supply and transport planning)
    + The recommendations from Council's submission of August 2026 on the proposed Osborne State Development Area (and any other Council endorsed recommendations that follow in the planning process for the Osborne SDA
    + The federal government led development of nuclear safety legislation for the AUKUS development and maintaining Council's policy position to oppose the storage and disposal of nuclear waste on the AUKUSsite and within the Osborne State Development Area
    + Establishing new and strengthening existing collaboration and strategic alliances with the Western Australian council's and relevant UK and US local authorities involved in AUKUS developments on shared advocacy priorities
    + In the formulation of any policy positions relevant to the AUKUS development.
- Engage with impacted communities when developing relevant positions and responses.
- Promote the Framework and its associated outcomes on PAE's website and prepare FAQ's to support any engagement activities using the Participate PAE platform.
- Inform local MPs and relevant government agencies of the Framework and its application.
- Ensure adequate organisational processes, systems, and resources are in place to support the delivery of the Framework.