

CHAPTER 10: RECOMMENDATIONS AND NEXT STEPS

RECOMMENDATIONS

Based on the findings set out in this report, the Commission recommends that the South Australian Government:

1. pursue the simplification of state and federal mining approval requirements for radioactive ores, to deliver a single assessment and approvals process
2. further enhance the integration and public availability of pre-competitive geophysical data in South Australia
3. undertake further geophysical surveys in priority areas, where mineral prospectivity is high and available data is limited
4. commit to increased, long-term and counter-cyclical investment in programs such as the Plan for Accelerating Exploration (PACE) to encourage and support industry investment in the exploration of greenfield locations
5. ensure the full costs of decommissioning and remediation with respect to radioactive ore mining projects are secured in advance from miners through associated guarantees
6. remove at the state level, and pursue removal of at the federal level, existing prohibitions on the licensing of further processing activities, to enable commercial development of multilateral facilities as part of nuclear fuel leasing arrangements
7. promote and actively support commercialisation strategies for the increased and more efficient use of the cyclotron at the South Australian Health and Medical Research Institute (SAHMRI)
8. pursue removal at the federal level of existing prohibitions on nuclear power generation to allow it to contribute to a low-carbon electricity system, if required
9. promote and collaborate on the development of a comprehensive national energy policy that enables all technologies, including nuclear, to contribute to a reliable, low-carbon electricity network at the lowest possible system cost
10. collaborate with the Australian Government to commission expert monitoring and reporting on the commercialisation of new nuclear reactor designs that may offer economic value for nuclear power generation
11. pursue the opportunity to establish used nuclear fuel and intermediate level waste storage and disposal facilities in South Australia consistent with the process and principles outlined in Chapter 10 of this report
12. remove the legislative constraint in section 13 of the *Nuclear Waste Storage Facility (Prohibition) Act 2000* that would preclude an orderly, detailed and thorough analysis and discussion of the opportunity to establish such facilities in South Australia.

NEXT STEPS

The findings and recommendations in this report represent the beginning of a new series of deliberations that will involve conversations, conclusions and ultimately decisions for the people of South Australia, their institutions and government.

MINING, FURTHER PROCESSING AND ELECTRICITY GENERATION

The expansion of uranium **mining** in South Australia will provide additional benefits to the state. Simplifying the existing regulatory approvals process, and enhancing the further integration and public availability of geophysical data, would help to realise those benefits.

Further processing of radioactive materials would not be viable in South Australia in the next decade. However, fuel leasing based on local used fuel storage and disposal services could create a competitive advantage sufficient to support multilateral entry into some of the global further processing markets in the longer term. Existing prohibitions on the establishment and operation of further processing facilities should be removed, to allow potential fuel leasing opportunities to be explored. This would require action from the Australian Government, which the state government should pursue.

The Commission has found that commercial **electricity generation** from nuclear fuels is not viable in South Australia under current market rules. However, it has found that nuclear energy has the potential to contribute to national emissions abatement after 2030. Given the need for significant decarbonisation of our electricity sector to meet future emissions reduction goals, the Commission has recommended the development of a comprehensive national energy policy, which enables all technologies, including nuclear, to contribute to a reliable, low-carbon electricity network at the lowest possible system cost.

MANAGEMENT, STORAGE AND DISPOSAL OF WASTE

The Commission's findings with respect to radioactive **waste storage and disposal** identify a substantial economic opportunity. If it is to be pursued, it calls for immediate action.

The Commission's key findings are that the disposal of used fuel and intermediate level waste (ILW) could be undertaken safely in a permanent geological disposal facility in South Australia. This would have the potential to deliver significant inter-generational economic benefits to the community. The key recommendation in this regard is that the South Australian Government pursue the opportunity to establish used nuclear fuel and ILW storage and disposal facilities in

South Australia consistent with the processes and principles outlined in this chapter.

The Commission appreciates that this is a complex task. It has learned of many failed attempts internationally to progress domestic used fuel disposal projects. The Commission has therefore outlined the steps it considers would need to be taken, both immediately and in the future, should the state government accept its recommendations.

The most important next step would be to engage with the South Australian community to establish whether it wants the government to develop a firm proposal for the storage and disposal of used fuel and ILW. Some South Australians will already have strong opposing or supportive views, which need to be respected. However, many others would require more information before they were able to form a view. This would involve a balanced discussion and debate, based on the understood facts with respect to risks and opportunities.

In setting out the following processes and principles, the Commission recognises, based on experiences overseas, that adaptability of the process is crucial. The importance of allowing the views of the affected community to be heard, to influence and to be reflected in any process cannot be overstated. The next steps are not prescriptions, but principled guidance that the Commission considers would be required at a minimum for progress to be made.

The immediate steps are for the state government to:

1. make public the Commission's report in full as soon as possible
2. define a concept, in broad terms, for the storage and disposal of international used fuel and ILW in South Australia, on which the views of the South Australian community be sought
3. establish a dedicated agency, overseen by an advisory board, to undertake community engagement to assess whether there is social consent to proceed
4. in addition, task that agency to
 - a. prepare a draft framework for the further development of the concept, including initial siting criteria
 - b. seek the support and cooperation of the Australian Government
 - c. determine whether and on what basis potential client nations would be willing to commit to participation.

The future steps, assuming the immediate steps lead the state government to proceed further, are for the government to:

1. pass legislation to facilitate and regulate the development of international used fuel and ILW storage and disposal facilities in South Australia
2. support the community development of a detailed project proposal, including a consent-based process for facility siting.

Each of these steps is discussed in more detail below.

APPLICATION OF THE NUCLEAR WASTE STORAGE FACILITY (PROHIBITION) ACT 2000

The *Nuclear Waste Storage Facility (Prohibition) Act 2000* contains, in section 13, a broadly worded prohibition on the expending of public money ‘for the purpose of encouraging or financing any activity associated with the construction or operation of a nuclear waste storage facility’ in South Australia.

Amendments recently made to section 13 introduce an exception that allows the use of public money ‘for the purpose of encouraging or financing community consultation or debate on the desirability or otherwise of constructing or operating a nuclear waste storage facility’ in South Australia.

That exception does not become law unless a recommendation is made by the Commission to conduct public consultation. In recommending the government pursue the opportunity to establish a disposal facility through a process of public consultation, it is anticipated that the exception will apply.

The Commission considers that the immediate steps outlined in this chapter are connected to fostering effective and informed community consultation and debate. In following the Commission’s recommendations, the government may at some point be accused of acting beyond the exception. The government quite properly may want to seek further information or greater detail about matters considered by the Commission in order to satisfy itself. It may also want to seek information in anticipation of a community request. It should not have to answer a legal question on each occasion as to whether its activity is ‘for the purpose of community consultation or debate’ or whether it otherwise falls outside section 13.

It would be preferable for the immediate steps to be undertaken free from any debate about whether expenditure of public money is lawful, through the repeal of section 13.

The prohibitions on the construction or operation of a nuclear waste storage facility (section 8) and on the importation of nuclear waste (section 9) would remain in force while the proposed immediate steps are undertaken.

IMMEDIATE STEPS

1. Make public the Commission’s report in full as soon as possible

Many people in the community will be interested in and seeking information on the Commission’s findings. There is a vast array of information and misinformation available publicly on matters relevant to its Terms of Reference.

The report of the Commission is intended to make a significant contribution to this body of knowledge from a broad range of reputable and reliable sources, including the integration and analysis of evidence specific to South Australia. It is also important that it be made public in its entirety as part of a continued commitment to transparency in decision-making. Such action would be critical for maintaining respectful community engagement based on the ready exchange of information.

2. Define a concept, in broad terms, for the storage and disposal of international used fuel and ILW in South Australia, on which the views of the South Australian community be sought

Following the submission of this report, it is for the government to decide whether and what further action it would want to take.

If it determines to proceed, the government would need to be clear with the community on what is proposed for any engagement to be meaningful, focused and substantive. It would allow the community to ask and have answered, in broad terms, questions about risks and opportunities.

Defining the concept does not mean there is a need to design or site any facility. Examples of the type of facilities and arrangements to allow the activity to be properly understood would be sufficient. For example, the concept could be based on, or draw elements from, the integrated storage and disposal facility addressed in Chapter 5: Management, storage and disposal of nuclear and radioactive waste.

In releasing the concept for further investigation and discussion, the government must explain its intent in seeking social consent. It should be prepared to provide information about the concept and its plans. It can explain its views of the systems and processes that it would establish in the event it had public support. It should also be prepared to correct misinformation about any of those matters. This does not mean the government would need to commit to developing a storage and disposal facility. The point of the release of a concept is to stimulate and facilitate discussion on that concept, which in turn could be changed by the ensuing deliberations.

3. Establish a dedicated agency overseen by an advisory board to undertake community engagement to assess whether there is social consent to proceed.

As the community engagement process to assess whether such social consent exists would be complex, it would benefit from being led by an independent advisory board, supported by a dedicated, multi-disciplinary agency.

The advisory board would set the strategic direction of the activities to be undertaken. Its independence would be critical if the process and outcomes were to withstand multiple election cycles. The board should be comprised of independent, trusted South Australian community leaders who, given the long-term nature of any development, must be (and be perceived to be) balanced and non-partisan. Its members also should have experience and skill in direct engagement with South Australia's diverse community. The board would need to maintain a culture of transparency and uphold the highest order of careful, measured and ethical conduct.

It would need to be supported by a dedicated agency of experts and administrators from relevant fields of nuclear safety, public health (particularly radiation), engineering, law, environmental science, commerce and economics, and community engagement. Not all of this technical expertise would be required on a full-time basis, and the composition of the agency would need to evolve over time. It would be assisted by the transfer of research information and knowledge from the Commission on technical, social and economic matters. The continuing focus of both the board and agency would be on the public communication of complex issues.

Task and functions

The primary task of the board and agency would be to conduct the process concerned with social consent.

The issue to be considered in the process of community engagement is whether used fuel storage and disposal should be engaged in and, if so, the principles that should govern its future development. The question for consideration is not, as the Commission has sometimes heard, whether the state should instead pursue this or a different economic opportunity. On the basis outlined in this report, used fuel storage and disposal would be economically self-sustaining. It does not present a choice between mutually exclusive options. In fact, the Commission's view is that the proceeds from the activity could support investment in other economic, social and environmental areas.

Assessing social consent should not be viewed in terms of shaping ideas or influencing opinion. The significant challenge exists in establishing the facts in relation to the concept, to the extent that the community and its government are able to make an informed judgement. This challenge arises due to:

- the extent to which people have the time needed to learn about and carefully consider such matters
- the need to build trust and confidence in the provision of information
- the existence of misconceptions, fuelled by misinformation, that influence public understanding and awareness.

Taking the above into account, the dedicated agency should assess the level and sustainability of social consent to proceed by undertaking the following approach.

Task 1: Prepare and publicise a framework that defines the objectives of the assessment process, and how these are proposed to be achieved. This would ensure that the process and purpose of community engagement are understood, and remain consistent.

Task 2: Undertake public engagement by providing information, establishing facts, addressing misinformation and narrowing the scope of discussion to relevant issues. The aim is to facilitate a process of learning for all South Australians, including government, rather than conduct an exercise in advocacy and promotion. This would not prevent it from publicly countering misinformation by challenging those who make unsupported claims.

In later stages, with the facts established, it would be appropriate for representatives of government and other community interests to take more active and public positions either for or against a specific proposition.

Based on the principles discussed in Chapter 6: Social and community consent, public engagement must be:

- face-to-face as far as practicable, with tangible examples or demonstration of concepts
- socially and geographically inclusive. Specific approaches would need to be developed to ensure the engagement of regional, remote and Aboriginal communities. This should occur as early as possible
- transparent, in that each individual's and organisation's involvement or contribution from the start of the engagement process is acknowledged, recorded and, where relevant, responded to
- factual, based on information from appropriately skilled and qualified people

- adaptable. As new and pertinent information is received, it must be incorporated into the community engagement process.

Task 3: Seek feedback from South Australians as to whether, based on the information provided, they would support the government in developing a firm proposal for the storage and disposal of international used fuel and ILW in this state. This step would be likely to evolve from the later stages of Task 2.

As the public engagement process progressed, and the community's and government's understanding and awareness of the risks and opportunities improved (including by incorporation of feedback from the parallel activities contemplated below), issues and principles of importance to South Australians would emerge.

There should be no arbitrary timeframe for the conclusion of the engagement process, although it is feasible that the balance of informed public opinion could start to become clear after six to 18 months of engagement. Given the activity would represent an economic opportunity that South Australia could accept or reject, the process would not need to be unnecessarily prolonged once the balance of opinion appeared clear and likely to be sustained.

4. Further task the dedicated agency to, concurrently:

- prepare a draft framework for the further development of the concept, including initial siting criteria**
- seek the support and cooperation of the Australian Government**
- determine whether and on what basis potential client nations would be willing to commit to participation.**

These activities, further outlined below, would in due course inform the social consent process.

In order to proceed, both the government and the public must understand the nature of the potential infrastructure proposed, the potential scope of operations, and the potential scale of risks and benefits. The government and South Australians would also want to understand how a location for any facilities may be determined, whether the federal government would support and facilitate any proposal, and what may need to occur to obtain greater certainty of commercial viability. This would require further analysis. The activities must be concurrent because their development would be mutually informed. For example, the position of client nations would be informed by the position of the Australian Government; similarly, the position of the Australian Government would likely be informed by the framework for further development and the views of potential client countries. The results of the analysis and other

information associated with the three concurrent strands of activity would need to be presented to the community.

a. Prepare a draft framework for the further development of the concept, including initial siting criteria

Social consent needs to be informed by an understanding of the principles and processes that would apply to ensure the safe implementation of a proposal, including initial siting criteria.

Determining the location of any proposed facilities would be a complex and potentially lengthy process, requiring detailed social and technical analysis and community consent. It would not be possible to undertake and conclude that process before broad social consent is achieved. However, it is possible in advance to be clear about the process and principles under which that process would be undertaken.

A draft framework for the further development of the concept, including initial siting criteria, should be prepared and released for comment. It would specify the geoscientific factors that need to be considered to ensure the safety of a geological repository. The initial siting criteria would specify factors in general terms that would be relevant to identifying in a preliminary way a suitable site for a geological disposal facility.

The framework would explain how those factors would be applied as part of a future process for seeking community consent for hosting the facilities contemplated in the proposal, along with a proposed process for undertaking more detailed site investigations.

The preparation of a draft implementation framework for further public discussion needs to be clearly distinguished from a process to seek consent to construct facilities at particular sites.

Such a framework, including initial siting criteria, have been developed in other countries that are seeking to progress domestic geological disposal facilities, including Canada¹, the United Kingdom² and the United States.³ Siting criteria may include a location that:

- has sufficient land area to accommodate the facilities
- is outside protected or sensitive environments or places
- at the depth of the facility, does not contain known groundwater resources suitable for drinking, agriculture or industrial uses
- does not contain economically exploitable natural resources
- is not in areas with known seismic, geological and

hydrogeological characteristics that would prevent the site from being safe, given the safety factors for a facility

This list is not intended to be exhaustive. The international approaches would provide a useful basis for developing criteria applicable to the South Australian context for consideration and discussion with the community.

b. Seek the support and cooperation of the Australian Government

The continued assistance of the Australian Government in a number of areas would be necessary to further explore the feasibility of international used fuel storage and disposal in South Australia. That assistance would be an extension of the facilitation and assistance the federal government has already provided to the Commission. It would be critical in sustaining an environment in the South Australian community where risks and benefits can be freely and fully discussed.

Given the Australian Government's international responsibilities with respect to non-proliferation, nuclear safety and nuclear security, such support would also be important to both Australian citizens and the international community. Federal assistance and support would be required to facilitate discussions between the South Australian Government and relevant nations and international organisations, including the International Atomic Energy Agency.

In addition, the public engagement process in South Australia would need to include information about the potential nature and form of regulatory arrangements for any proposed facilities. Some preliminary analysis is necessary on potential options for regulatory regime design, including consideration of safety regulation, environmental protection, transport safety and security, customs requirements, non-proliferation assurance and taxation implications. This would traverse both state and federal jurisdiction, and require active participation from and cooperation between authorities at both levels of government.

This support and commitment must be long term and sufficient to endure leadership changes and election cycles.

c. Determine whether and on what basis potential client nations would be willing to commit to participation.

A preliminary indication should be sought from potential client countries as to their interest in further discussions on their potential participation, along with identification of what they would require to be able to make a firm commitment.

The Commission has assessed the potential participation of client nations based on known and future inventories of used fuel and, in the absence of a market, on available proxies of

potential willingness to pay. In the absence of either a firm proposal or social consent, the Commission could not expect countries to indicate their commitment. Nonetheless, during its visits the Commission was informed that countries would be interested in further discussions on this issue.

To provide the South Australian community with more detailed information regarding economic viability and potential benefits, it is necessary to determine with more confidence whether potential client nations would be willing to use an international used fuel storage and disposal facility in South Australia. In doing so, it would be necessary to identify what will be important to such client nations before making an initial commitment.

What is needed at this point is an expression of interest in more detailed discussion. No party can or should be asked to make a commitment at this initial stage. The development of trust and openness is critical to the ongoing relationship that must be established with potential client nations. To the greatest extent possible within diplomatic constraints, formal expressions of interest should be able to be made available to the South Australian community, to inform the public engagement process.

FUTURE STEPS

If, following the activities contemplated above, the South Australian Government determines there is sufficient social consent to proceed further, the following future steps are likely to be required.

1. Introduce legislation to facilitate and regulate the development of international used fuel and ILW storage and disposal facilities in South Australia

The ultimate authority for the activity would come in the form of the approval by the South Australian Parliament of facilitative legislation. Such legislation would need to remain in place without substantive amendment beyond electoral cycles in order to provide the necessary certainty and stability for the safe and efficient development of viable international used fuel storage and disposal facilities in this state.

A significant first step would be the establishment of an independent, government-owned statutory authority to initially develop, and potentially implement, a proposal for an international used fuel storage and disposal facility. The powers and functions, constitution, decision-making process and oversight of the authority would need to be made clear. Consideration should be given to the establishment of an expert board to oversee and provide strategic direction to the authority.

Legislation also would be required with provisions that:

- repeal existing prohibitions to the activity being undertaken, or other provisions that inhibit both a proposal being developed
- identify the principles necessary to guide the development of a proposal, which ought reflect the results of the public engagement process undertaken as part of assessing social consent
- establish initial frameworks for regulation of the development and implementation of a proposal, without addressing the detail of regulation necessary for later stages of any project. This would reflect the results of the joint Commonwealth–State cooperative analysis contemplated above
- identify the principles applicable to the protection and future use of any profits received from the operation of those facilities through, for example, a State Wealth Fund. While any profits would not be realised for many years, the establishment of guiding principles within legislation would be likely to assist in maintaining public support for the project.

2. Support the community development of a detailed project proposal, including a consent-based process for facility siting:

- a. The authority should seek to identify communities with an interest in learning more about hosting a facility**
- b. The authority would continue to visit interested communities to provide further information**
- c. Interested communities should organise their desired decision-making framework**
- d. The authority and a community may commence negotiations**

The development of a proposal would require significant and detailed geological, engineering, commercial, legal, and regulatory analysis, as with any large infrastructure project. However, based on international experience, the area of most complexity is likely to be identifying appropriate sites for the facilities and their associated infrastructure. This aspect differentiates the development of projects related to the storage and disposal of nuclear waste from other infrastructure projects, and is therefore addressed in some detail here.

Interested groups within communities must be able to seek information related to hosting a facility, without any obligation or commitment to proceed, and at an agreed pace. The authority must be suitably resourced and prepared

to engage with communities at this pace, including if a community wants to proceed quickly. Given the diversity of South Australian communities and their specific circumstances, the community consent process must evolve over time for each community. Although thresholds for continued investment can be developed, the process should be undertaken without the imposition of arbitrary timeframes or fixed criteria.

An appropriate community consent process would be influenced by the outcome of the proposed immediate steps outlined previously. It is therefore inappropriate to attempt at this point to suggest a precise course of action. However, based on the findings and discussion in Chapter 6: Social and community consent, the following steps might be contemplated and modified in the particular circumstances.

a. The authority should seek to identify communities with an interest in learning more about hosting a facility

The authority should initially provide information (including through public meetings) to all South Australian regions on the siting and community consent process. In doing so, the authority may also meet with local organisations or individuals with an interest in learning more. Consideration should be given to establishing a visitor centre in a central location to allow interested members of the public to access information and ask questions.

Engagement at this early stage should focus on information associated with the process that would be undertaken to determine community consent, and key considerations for the siting of infrastructure (including generic or, if appropriate, host-rock-specific siting criteria), approaches to management of risks and principles for community benefits.

In addition to being provided with information on the community consent process, communities would be invited to consider whether they wanted to learn more about hosting a facility. There should be no criteria for accepting such an invitation: one or more individuals or organisations in a community could ask to learn more. Such a request would not be binding on any community, and would not take the form of any prescriptive registration of interest or nomination.

b. The authority would continue to visit interested communities to provide further information

The authority would commence a longer-term engagement with all those people or organisations interested in learning more about hosting a facility, taking into account the principles discussed in Chapter 6. The way in which this information would be provided could be determined in consultation with the individuals or organisations, which

could involve a meeting with one or more individuals or organisations at one time. These may be requested in the context of an existing organisation's business or operations, and as such not be public meetings. This may apply similarly to individuals.

Taking this into account, all materials and information provided during this stage must also be made publicly available on a readily accessible platform (website or similar) to maintain transparency of this process.

At this time, it would be appropriate to undertake a preliminary assessment of site suitability. This would assess the location against the initial siting criteria, and therefore indicate whether it might proceed to be assessed in more detail. Such action should only be undertaken in close consultation with all local community interests engaged in the process.

c. Interested communities should organise their desired decision-making framework

In time, a community may want to start planning how it could organise itself to begin the process of considering consent, and how a proposed project might apply to their specific circumstances. A community would need to consider not only risks and opportunities associated with hosting a nuclear facility, but also how it might make decisions in relation to these. No arbitrary criteria or limitations should be placed on communities in their contemplation of how they might organise themselves to begin a process of discussing consent.

These processes are critically important, involve complex considerations, and must evolve over time. It is also possible that some communities may have trusted and functional pre-existing structures that allow these processes to proceed more quickly. While some elements can only be undertaken by that community, there is a role for the statutory authority to understand the nature and progress of such discussions. It is possible that elements of this process may require resources and other support, for example, assistance with hiring venues to host community discussions or the provision of skilled facilitators to help resolve difficult matters. The authority would be responsible for providing this support, on the basis there was some level of support in that community to take these next steps.

d. The authority and a community may commence negotiations

A community may reach a point where it is sufficiently organised and informed that it wants to commence more formal negotiations regarding the siting of infrastructure and

associated matters of risk management and benefit. This would include, as a start, allowing the authority to undertake more detailed technical investigations of a particular site to better understand whether it has the geological, hydrogeological, chemical and mechanical characteristics necessary to ensure safety.

It is important that the authority does not start negotiating until communities are ready to do so. While there are varied and complex matters of risk and potential opportunities associated with a project to consider, there are equally important and complex considerations related to how a particular community is represented, how information is provided and disseminated, who from the community makes decisions, and how decisions are made.

However, neither should the process be unnecessarily prolonged. The establishment of a nuclear waste storage facility is a matter of choice for a community. To this end, it is reasonable for the authority to determine thresholds for continued investment. These thresholds should be explained to the community.

It would be an important first step for both parties (the authority and the community, through their nominated representatives) to agree on principles for the negotiation process. This would include fundamental aspects of how meetings would be conducted and outcomes recorded and disseminated, but would also consider potential options for mediation should negotiations stall, the basis on which the community representatives are authorised to negotiate and make decisions, and how the final agreement, if reached, would be recorded and enacted.

At the appropriate time, a package of benefits would need to be negotiated with a potential host community in exchange for hosting a site. From the outset it should be acknowledged that there would be a substantial package of community benefits. These negotiations must incorporate the ability for a community to influence how the project is developed, to take account of local knowledge, needs, circumstances and aspirations.

A community deciding to undertake such a negotiation would need to be suitably resourced to do so. This support could include coordination and administration, independent scientific advice to assess matters related to siting and associated project risks and management, advice related to developing an appropriate package of benefits, and assistance in disseminating information in the community. Such resourcing is potentially significant. Before providing resources, the authority would need to be satisfied that there is a suitable commitment to consider hosting a facility, and a level of genuine local community support.

It is possible that the authority might, in time, be negotiating with more than one community and be at different stages of negotiations with each as it does so. It is also possible that the negotiation process would not identify a location with appropriate geotechnical characteristics or a local community willing to host the proposed infrastructure. This must be understood and acknowledged by all parties throughout the process.

CONCLUSION

Unlike nations with domestic nuclear power industries, Australia need not find a solution for the safe, long-term management of used nuclear fuel. Australia has no immediate or future domestic requirement for used fuel storage and disposal facilities. The immediate issue facing South Australians is whether, on balance, it considers the potential opportunities to be of sufficient benefit, and the potential risks to be manageable, so as to support the further and more serious investigation of the commercial development of such a project in this state. The Commission's firm conclusion is that this opportunity should be actively pursued, and as soon as possible.

NOTES

- 1 National Waste Management Organization, *Moving forward together: Process for selecting a site for Canada's deep geological repository for used nuclear fuel*, NWMO, May 2010, <https://www.nwmo.ca/>
- 2 Department for Environment, Food and Rural Affairs et al. (Defra), *Managing radioactive waste safely: A framework for implementing geological disposal*, A White Paper by Defra, BERR and the devolved administrators for Wales and Northern Ireland, Defra, June 2008.
- 3 US Department of Energy (DoE), *General guidelines for the preliminary screening of potential sites for a nuclear waste repository*, 10 Code of Federal Regulations Part 960, 2003.