

To: Dr Matilda Byrne,

Secretariat

[Public Inquiry into AUKUS](#)

Public input by David Noonan B.Sc., M.Env.St.

Independent Environment Campaigner

**Re: AUKUS nuclear submarines impose the potential for “catastrophic conditions” on Emergency Services workers and port communities.**

dear Dr Matilda Byrne

The ARPANSA [“Guide for Radiation Protection in Emergency Exposure Situations”](#) (2019) provides for civilian Emergency workers to face “*the development of catastrophic conditions*” in required Emergency response measures consequent to the potential for severe nuclear reactor accidents on US & UK military nuclear submarines (N-subs) in Australian ports and waters.

This Public Inquiry into AUKUS should consider the consequences AUKUS N-subs impose on the safety and welfare of the Australian public.

**No government can claim to have a social license for AUKUS N-subs while failing to inform affected community and Emergency services workers of the nuclear accident and ionising radiation health risks they may face:**

- N-sub risks include required Evacuation of local communities and urgent provision of stable iodine tablets for exposed children, and the attempted decontamination, medical treatment and ongoing monitoring for affected workers and members of the public.

Federal, WA and SA Labor Governments are all failing in their responsibility to prepare, resource and make public commensurate required ‘Emergency Response Plans’ for AUKUS nuclear reactor accidents, they fail to be transparent and fail to even inform community in advance of decisions that affect their welfare.

Please consider two articles: [AUKUS ‘impact assessment’ report ignores nuclear sub risks in SA | Pearls and Irritations](#) (28 Feb 2025) sub-headings: **Emergency services workers have a ‘right to know’** and **Catastrophic Conditions**; and [article](#) in “Nuclear Never Safe” Edition 149 Chain Reaction Magazine (April 2025, p.44-45) with a sub-heading: **“SA State Labor Government also in Nuclear Denial”**.

Federal provisions provide for civilian WA and SA Emergency services workers to face “*the development of catastrophic conditions*”, with designated Emergency services and shipyard workers to then be called upon to ‘volunteer’ to risk dangerously high ionising radiation dose exposures of up to 500 mSv,

The ARPANSA Guide states: “*Emergency workers may include workers employed, both directly and indirectly, by an operating organisation, as well as personnel of response organisations, such as police officers, firefighters, medical personnel, and drivers and crews of vehicles used for evacuation. ...*

*Emergency workers undertaking mitigatory actions and urgent protective actions on-site, including lifesaving actions, actions to prevent serious injury, actions to prevent the development of catastrophic conditions that could significantly affect people and the environment, and actions to prevent severe tissue reactions. ...*

*They may also receive a dose of up to 500 mSv for life saving actions, to prevent the development of catastrophic conditions and to prevent severe tissue reactions.”*

The health consequences of AUKUS nuclear accidents are so severe the ARPANSA Guide (2019) states female Emergency workers are to be excluded: “*female workers who might be pregnant need to be excluded from taking actions that might result in an equivalent dose exceeding 50 mSv*”. In contrast, the maximum public health and occupational ionising radiation exposure standard is set by ARPANSA at 1 mSv per annum.

As an Independent Environment Campaigner, I have provided a range of public Briefing papers on these AUKUS N-sub public safety risks, please consider:

- [“The EPBC Act ‘Impact Assessment’ Report on Federal imposition of N-Subs fails to provide answers to community’s ‘Right to Know’ on nuclear risks facing Port Adelaide”](#) (8 Feb 2025);
- [Basing US N-Subs at Stirling puts WA at risk](#) (Sept 2024);
- [Health Risks in an AUKUS N-Sub Reactor Accident \(David Noonan briefing paper, 29 July 2024\)](#).

I have spoken at community public meetings and supported affected community groups in areas in SA targeted for AUKUS nuclear risks and provided formal public Submissions to a range of government processes and ‘consultations’ since the public inception of the AUKUS nuclear agenda, please consider:

[“Public safety and trust in governance are compromised by the failure of ASA’s EPBC Act ‘Impact Assessment Report’ to respect community’s ‘Right to Know’ on AUKUS nuclear submarine accident risks and radioactive waste storage facing Port Adelaide.”](#) (27 Feb 2025)

To: 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)

As the proponent of N-sub, the [Australian Submarine Agency](#) ruled a range of lead community safety concerns as “out of scope” of this EPBC Act assessment, with “*potential sources of radiation*” to be held over for a (then) future non-independent military nuclear regulator to consider – with the military to effectively take over AUKUS public safety at Osborne, Port Adelaide and surrounding communities.

**Question:** Is it irresponsible and reckless OR just disrespectful and plain inept to impose AUKUS nuclear risks on community but only conduct partial assessments, fail to release nuclear accident studies, and limit ‘public consultation’ to only those aspects that suit Labor’s staged roll-out of the AUKUS nuclear submarine agenda?

Further, I have met with the Federal Health Minister the Hon Mark Butler MP (who has portfolio oversight of ARPANSA) in August 2024 and discussed these AUKUS public safety and nuclear waste issues in his Electoral Office at Port Adelaide as part of a concerned local community delegation comprising representatives of MAPW (SA) and the “Port Adelaide Community Opposing AUKUS” (PACOA).

I’ve handed Minister Butler briefing papers and a diagram showing ARPANSA Emergency Response Zones for a N-sub accident overlain on his Electorate centred on the Osborne Naval Shipbuilding Yard. Including an ARPANSA required “**Urgent Protective Action Zone**” of up to 2.8 km radius from the site of a nuclear submarine reactor accident within which the local population may face **Evacuation** - there was no commensurate response. Nor did my correspondence to the Minister in May 2024 (that I can provide to the Inquiry) on these AUKUS public safety issues affecting his Electorate receive a response.

In a Nov 2024 interview with the 7:30 Report Minister Butler [stated](#) residents would be consulted closer to when the facility would be established but stated the waste facility would go ahead even if residents did not want it, “*This is going to happen,*” he said, “*The government and parliament have decided that the future defence strategy of the country will involve nuclear-propelled submarines*” - with the community to be consulted later on...

This second public input to the Public Inquiry into AUKUS follows on from: “**AUKUS seeks to impose US origin High-Level nuclear materials while failing to even have a ‘process’ to deal with it**”, with aspects of my 30-year relevant background provided at p.8 of the attachment to that first input on 02 June.

**Please consider my request to provide discussion and related evidence on both these topic areas in a Hearing** - preferably in Adelaide on 16<sup>th</sup> July.

For further information, see papers at [Nuclear submarines for Australia?](#) (I avail of a FOE Australia website to facilitate public access to materials).

Thank you for your consideration to my public input, please feel free to contact on any aspect of these matters, Mobile 0414 519 419 (text is good).

Yours sincerely,

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Resident of Adelaide