Public Health Association of Australia
submission on the draft EIS for the
Rehabilitation of the Former
Rum Jungle Mine Site

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Preamble

The Public Health Association of Australia

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public’s health in Australia.

The PHAA works to ensure that the public’s health is improved through sustained and determined efforts of the Board, the National Office, the State and Territory Branches, the Special Interest Groups and members.

The efforts of the PHAA are enhanced by our vision for a healthy Australia and by engaging with like-minded stakeholders in order to build coalitions of interest that influence public opinion, the media, political parties and governments.

Health is a human right, a vital resource for everyday life, and key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people’s health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

All members of the Association are committed to better health outcomes based on these principles.

Vision for a healthy population

A healthy region, a healthy nation, healthy people: living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health for all.

The reduction of social and health inequities should be an over-arching goal of national policy and recognised as a key measure of our progress as a society. All public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.

Mission for the Public Health Association of Australia

As the leading national peak body for public health representation and advocacy, to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.
PHAA Response to the draft EIS for the Rehabilitation of the Former Rum Jungle Mine Site

The PHAA is grateful for the opportunity to comment on the draft EIS for the Rehabilitation of the Former Rum Jungle Mine Site.

The PHAA has been a member of the Rum Jungle Stakeholder Action Group (RJSAG) over approximately the last 5 years and has contributed to the consultation process involving the rehabilitation of the Rum Jungle site and its satellite site Rum Jungle Creek South (RJCS).

In general, the PHAA is pleased with the efforts being undertaken to rehabilitate the Rum Jungle Site.

The PHAA’s main concerns relate to the Rum Jungle Creek South site.

It is noted that on page 1-2 that:

*Rum Jungle Creek South (RJCS), an additional satellite site in the Rum Jungle Uranium Field, is currently held by Coomalie Community Government Council (CCGC) and is excluded from the project as no future rehabilitation works are currently planned for this site.*

The PHAA note that remediation works have recently been carried out at RJCS commencing in late 2019. Prior to this and during the RJSAG consultation process the PHAA had expressed concern that there was a significantly elevated radioactive area identified at RJCS close to the main public recreation area. The PHAA advocated for fencing to exclude the public from this area and signage to inform the public about the ongoing elevated radioactivity in the area.

The PHAA is of the understanding that the latest remediation works are expected to reduce the radioactivity of the area to within acceptable limits and therefore the NT Government has decided to date that signage and fencing is not required.

PHAA notes that the original rehabilitation works on the Rum Jungle Mine Site in the 1980s were considered relatively effective at the time but over the 30 or so years since there has been degradation and increasing radioactive hazard re-emerging at the site.

PHAA consider it important that there be ongoing monitoring of the radioactivity at the RJCS post the latest rehabilitation works so that an increase in radioactivity can be detected early and addressed before significant public exposure occurs. The PHAA think it would be appropriate to include RJCS in the Rehabilitation of the Former Rum Jungle Mine Site project so that the same framework for assessment, operations and site monitoring could be afforded to it as to the rest of the Rum Jungle Mine Site.

Additional to the PHAA’s concerns about RJCS, it is noted on pages 6-17 to 6-19 that there has been an elevation in uranium levels at a downstream zone on the Finniss River which is close to an area of human habitation. This poses a potential health risk for these people.

*The Zone 6 gauge GS150204 concentrations are counter-intuitive in that this site is well downstream of Rum Jungle and the values obtained at this point are higher on average than the Zone 5 FRdsMB site upstream. It would be expected that through further catchment dilution further downstream that Zone 6 values would be lower than Zone 5 values. The results are contrary to this logic and may indicate that there are other catchment wide uranium sources or an evapo-concentration cycle is taking place.*
PHAA submission on the draft EIS for the Rehabilitation of the Former Rum Jungle Mine Site

Noting the uncertainty as to the cause for this anomaly, the PHAA considers that the downstream areas of the Finniss River require ongoing monitoring and potential further remediation and that the EIS should ensure that this is clearly set out.

The PHAA appreciates the opportunity to make this submission and the opportunity to provide constructive recommendations.

Please do not hesitate to contact me should you require additional information or have any queries in relation to this submission.

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