

**Urusetia EIA,
Bahagian Penilaian, Jabatan Alam Sekitar Malaysia**

E-mail: eiapenilaian@doe.gov.my, walj@doe.gov.my, kplota@aelb.gov.my, **rahimi@doe.gov.my****,** **mh@doe.gov.my**

Attn: **Director General, Department of Environment (DoE)
CC: Y.Brs. Hasmadi bin Hassan, Director General, Atomic Energy Licensing Board (AELB); En. Mohd Rahimi Bin Dollah and En Muhammad Hazwan Bin Hasan Basri**

**Dear YBrs. Encik Wan Abdul Latiff bin Wan Jaffar**

**SUBMISSION**

**Reject Lynas Rare Earths Radioactive Waste Unsafe Permanent Disposal Facility (PDF)
GEBENG, MUKIM SUNGAI KARANG, KUANTAN, MALAYSIA**

Aid/Watch has been following the Lynas issue since 2014 and works closely with civil society groups in Malaysia and Australia. We have researched and sought input from several experts including Dr Peter Karamoskos, a nuclear medicine physician and a public representative on the Radiation Health Committee of the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) since 2009; RMIT Environmental engineering Associate Professor Gavin Mudd who will put in his assessment separately and Mr Gerhard Schmidt, a toxic waste specialist formerly worked for Germany’s Oeko Institute and is now semi-retired.

We are deeply concerned with the serious deficiencies of Lynas’ proposal as revealed from its environmental impact assessment documents. We implore that the Department of Environment (DoE) rejects Lynas’ proposal on the grounds that the design life for the WLP waste is only for 20 years when at a minimal a 10,000-years design life for the permanent disposal facility is required to satisfy established international standard and IAEA guidelines. Failure to satisfy this criterion will leave Malaysia with a mega toxic legacy, leaving radiation hazards to burden younger and future generations of Malaysians and your healthcare and economic productivity, not forgetting the poor reputation Lynas will leave Malaysia with.

Further, the location proposed by Lynas for its PDF is a flood and fire prone low-lying and environmentally sensitive coastal wet tropical peat land, just 3km from the South China Sea. Climate change related sea level change modelling is predicting that the area will likely be inundated from 2100! This will cause even further exposure of the toxic and radioactive elements to contaminate the surface environment on top of the groundwater contamination.

In Australia, this would face public outcry and would never be considered, let alone expected to be accepted.

While we acknowledge that rare earth (RE) minerals are critical for renewable energy and the transition to a green economy, we advocate for all RE supply chains to be clean, just and fair. It is vital that solutions to address climate change do not replicate the negative impacts of the fossil fuels industry. Furthermore, advocates for climate actions, informed consumers and countries that are genuinely acting to reduce their greenhouse gas emissions would demand and expect green and low-emissions technology to also address industrial pollution problems effectively.

**The Public Health Association of Australia (PHAA)** has specifically developed a policy position on rare earths as follows:

*“Any rare earth element extraction operation in Australia should only take place under strict environmental guidelines recognising the potential long-term risks of environmental, worker and community exposures to the radioactive minerals coexistent in the ore.”*

AidWatch as an Australian organisation, expect Australian corporations operating in foreign jurisdictions to be held to at least the same standards that they would be in Australia.

Geopolitical pressure and the strong political support for Lynas as a non-Chinese producer of rare earths should not weaken the need for democratic governance, environmental protection and long-term integrity of the Malaysian landscape and environment; least of all to further marginalise and push radioactive and toxic hazards to local communities.

We urge the DoE to reject Lynas proposal for the reasons outlined above. Additionally, we have provided in-depth points to draw attention to issues of concerns for your perusal.  Please contact us if you have any question or require further clarification.

Yours sincerely,

  
Lee Tan Mara Bonacci
Policy Coordinator Research Coordinator
policy@aidwatch.org.au  research@aidwatch.org.au