



Australian Government

Department of Climate Change, Energy,
the Environment and Water

EPBC 2024/10072

Mr Jakob Vujcic
General Manager, Regulatory and Governance
Australian Nuclear Science and Technology Organisation
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Further information required for preliminary documentation for the Decommissioning of National Research Cyclotron Facility, Camperdown, Sydney, NSW

Dear Mr Vujcic

I am writing to you about the proposal to decommission the National Research Cyclotron Facility (NRC Facility) at Camperdown, Sydney, NSW

On 19 February 2025, a delegate of the Minister for the Environment and Water decided that the proposed action is a controlled action and that it will be assessed by preliminary documentation.

Further information is required to assess the relevant impacts of the proposed action on the environment. Namely, the potential for existing soil and groundwater contamination (associated with historic land uses) and associated impacts during demolition on people and communities, and natural and physical resources.

I now request, under section 95A (2) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), further information as outlined in the attached.

Details on the assessment process for the project and the responsibilities of the proponent are set out in the [EPBC Act — Environment Assessment process](#) fact sheet. Further information on the [referral and assessment process](#) can be found on the department's website.

If you have any questions about the assessment process or the further information required, please contact the project manager, Arron Broom, by email to arron.broom@dcceew.gov.au, and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sarah Reachill'.

Sarah Reachill
Director
Canberra and Sydney Assessments Section

13 March 2025

Preliminary documentation additional information request

Decommissioning of the National Research Cyclotron Facility, Camperdown, NSW (EPBC 2024/10072)

On 19 February 2025, the proposed action to decommission the National Research Cyclotron Facility (NRC Facility) in Camperdown, NSW, was determined to be a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) due to likely significant impacts on the environment as it is a Commonwealth action (section 28).

It has also been determined that the proposed action will be assessed by preliminary documentation. This document specifies the information required by the Minister for the Environment and Water under section 95A of the EPBC Act, combined with the existing referral documentation, to adequately assess the impacts of the proposed action (the 'preliminary documentation').

1. Overview

The preliminary documentation consists of the referral documentation and the additional information requested in this document.

The preliminary documentation must enable the Minister (or delegate) or any other interested stakeholders to understand the impacts of the proposed action on the environment, as defined under section 528 of the EPBC Act. The preliminary documentation must be able to be read as a stand-alone document ('the main document') and include a table which clearly identifies where the requirements of this document have been addressed in the preliminary documentation and its appendices.

Any assumptions made in the main document must be clearly explained and justified. The extent to which the limitations, if any, of available information may influence the conclusions of the environmental assessment should be clearly stated.

If it is necessary to rely on any confidential material, please consult with the project manager on the handling of that material before submitting the draft preliminary documentation to the department for publication for public comment.

1.1 Relevant policies

The preliminary documentation must take into consideration:

- *Significant Impact Guidelines 1.2: Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies* (Significant Impact Guidelines 1.2).
- Other relevant EPBC Act policy statements and guidelines (see: [EPBC Act publications and resources - DCCEEW](#)).
- All relevant guidance documents for determining, avoiding and managing likely impacts on the environment.

2. Format and style

The preliminary documentation must be published by the proponent and made available for public comment. It is therefore important to the integrity of the EPBC Act assessment process that the preliminary documentation is presented in a way that is intelligible to the public, who may not be familiar with the history of the proposed action or with the technical aspects of its assessment. **Table 1** provides a checklist for appropriate formatting and style of the preliminary documentation.

The main document can include specific references to relevant sections within the appendices to avoid duplication (e.g. referral documentation). However, it should only be contextual information to support key claims, conclusion and commitments. Clear referencing must be used.

Table 1 Formatting and style checklist

Present in a standard format – the document(s) will be published in hardcopy (e.g. A4/A3 hardcopies) and electronic formats (e.g. PDF or Microsoft Word files).	<input type="checkbox"/>
Include all key claims, findings, proposals, and undertakings in the main document.	<input type="checkbox"/>
Include key supporting documents (e.g. referral, technical reports) as appendices.	<input type="checkbox"/>
Explain (or avoid) technical jargon and acronyms.	<input type="checkbox"/>
Use maps, figures, diagrams and/or photographs where appropriate to support textual information.	<input type="checkbox"/>
Present all maps, figures and diagrams at an appropriate size and scale – see the department's Guide to providing maps and boundary data for EPBC Act projects (2021).	<input type="checkbox"/>
Reference all supporting documentation (including websites) clearly and consistently (e.g. table, figure, section, appendix).	<input type="checkbox"/>
Ensure that other supporting documents are publicly accessible, with electronic links provided where possible.	<input type="checkbox"/>
If any information is not publicly available, it must be attached to the preliminary documentation as an appendix.	

Controlling provision

3. Commonwealth action (s28)

The environment is described in section 528 of the EPBC Act. Based on the information available in the referral, the proposed action is likely to have a significant impact on:

- The environment due to the potential for existing soil and groundwater contamination (related to historic land uses) and associated impacts during demolition.

Insufficient information was provided within the referral documentation to address the above matters.

The potential for contamination to be present in the soil and groundwater at the NRC Facility site has not been fully investigated. For example, the Due Diligence Contamination Assessment Report (GETEX Pty Ltd, 2022) submitted with the referral did not include an assessment of groundwater beneath the site.

There remains uncertainty regarding *legacy* contamination associated with historic land uses at the site (prior to the NRC Facility) and nearby, which could have resulted in contamination of land and groundwater by a range of substances including heavy metals, salts, and hydrocarbons.

Based on the department's review of historic land uses that have occurred on or near the site, potentially contaminating activities, that may have impacted soil and / or groundwater at the site, include, but are not limited to the following:

- Hospitals/chemist pharmaceutical
- Refrigerants/air conditioning
- Battery manufacturing and distribution
- Automotive parts manufacturing, automotive repair and service stations
- Chemical manufacturing, importers and distribution
- Electrical or electronics component manufacture
- Leather works, hide curing, felt processing
- Iron or steel works, metal processing/coating, electric and oxy welders
- Plastic manufacturing, engineering and moulders
- Wood preservation works
- Textile operations
- Printing works and manufacturing
- Charcoal manufacturing
- Work depots, transport depots or loading sites
- Imported fill material.

In addition, the site occurs within an area identified as being listed as a 'Delicensed Activity still regulated by the New South Wales Environment Protection Authority'.

The presence of the materials identified in the referral information (Due Diligence Contamination Assessment Report, GETEX Pty Ltd, 2022), industrial waste coke for example, are an indicator of potential site contamination.

Please note, under the *National Environment Protection Council 1994 Act* (NEPC Act) and its Schedule (the 1992 Inter-Governmental Agreement on the Environment (IGAE)), the Commonwealth has responsibility for the management of living and non-living resources on land which the Commonwealth owns or which it occupies for its own use (Schedule s 2.2.3). The object of the NEPC Act is to ensure that people enjoy the benefit of equivalent protection from air, water or soil pollution and from noise (NEPC Act 1994: s 3).

The *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM 2013), a statutory instrument made under Division 2 of the NEPC Act, establishes a nationally consistent approach to the assessment of site contamination, to ensure sound environmental management practices by the community, which includes regulators, site assessors, environmental auditors, landowners, developers and industry (ASC NEPM 2013: s 5 [1]).

3.1 Further Information required

The preliminary documentation must provide the following information to inform the assessment of the proposed action under the EPBC Act:

- 1) Further investigations on soil and groundwater contamination, conducted in accordance with the requirements set out in Schedules A and B of the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM 2013) and the National Water Quality Management Strategy, are required and should include a Preliminary Site Investigation (PSI) report that includes a detailed site history, conceptual site model (CSM), and:
 - a) If required, a Sampling Analysis and Quality Plan (SAQP) and Detailed Site Investigation (DSI) that includes a refined CSM and an appropriate risk assessment.
 - b) If required and prior to demolition, a site-specific risk assessment and a Remediation Action Plan (RAP).
- 2) Site contamination assessment objectives should be designed to ensure that the entire site is suitable for all future uses following the decommissioning and demolition.
- 3) An NSW EPA accredited site auditor should be engaged during these activities.
- 4) The preliminary documentation should include details of the measures to be implemented by the proponent to avoid and reduce any potential soil and groundwater contamination impacts at the site and on the broader environment, including people and communities.

Other considerations

4. Economic and social matters

In accordance with section 136 of the EPBC Act, the Minister (or delegate) must consider economic and social matters in deciding whether to approve the proposed action.

The preliminary documentation must provide information about the expected long- and short-term economic and social impacts of the proposed action, both positive and negative. This must include, but not necessarily be limited to, the points outlined in **Table 2**.

Table 2: Economic and social matters checklist

Consideration of negative impacts (e.g. disruption to traffic, disturbance of hazardous materials etc.)	<input type="checkbox"/>
Consideration of positive impacts (e.g. employment opportunities, community benefit, site development opportunities etc.).	<input type="checkbox"/>

Estimated capital value and ongoing economic value, using specific dollar or other numerical values where relevant.	<input type="checkbox"/>
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Details of any stakeholder consultation since the referral of the proposed action and in the preparation of the preliminary documentation.	<input type="checkbox"/>
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