

# ANALYSIS OF PUBLIC REVIEW OF LYNAS DOCUMENTS

**Atomic Energy Licensing Board  
Ministry of Science, Technology and Innovation (MOSTI)  
MALAYSIA**

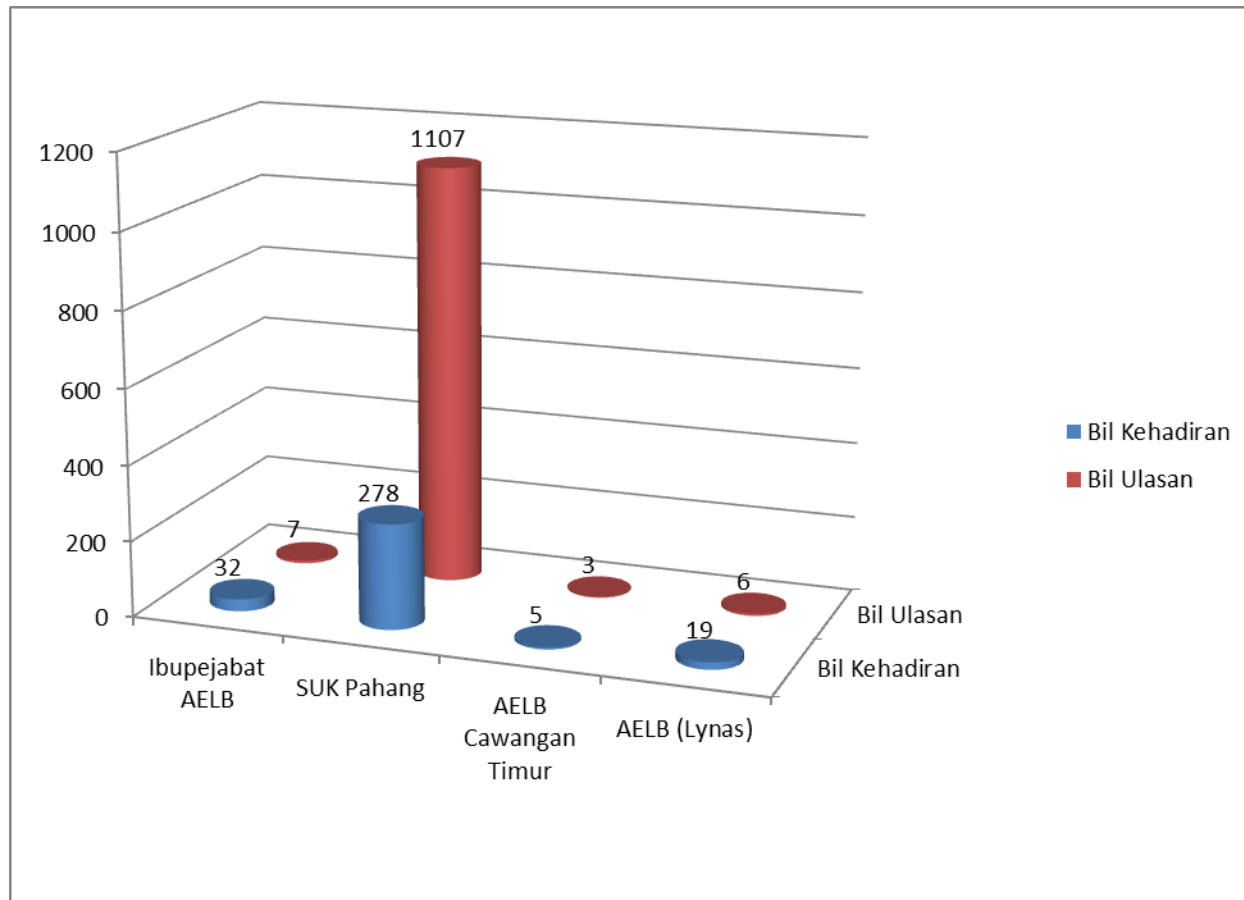
*Ensuring Safety, Security & Safeguarding Peaceful Nuclear Activities*

# PUBLIC CONSULTATIVE COMMITTEE

NO	MEMBERSHIP
1.	Prof. Dr. Aishah Bidin (UKM) - Chairperson
2.	Dr. Idris Besar (Pakar Bebas)
3.	Prof. Dr. Ng Kwan Hoong (UM)
4.	Prof. Dr. Jamal Othman (UKM)
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6.	Dr. Abuyamin Salam (UiTM)
7.	Prof. Madya Dr. Nahrul Khair Alang Md Rashid (UIAM)
8.	Dr. Fatimah Mohd. Amin (EPU)
9.	Dr. Majahar Abd. Rahman (DOSH)
10.	Pn. Halimah Hassan (DoE)
11.	Dr. Chong Chee Keong (MoH)
12.	Prof. Dr. Abu Hassan Hasbullah (UM)

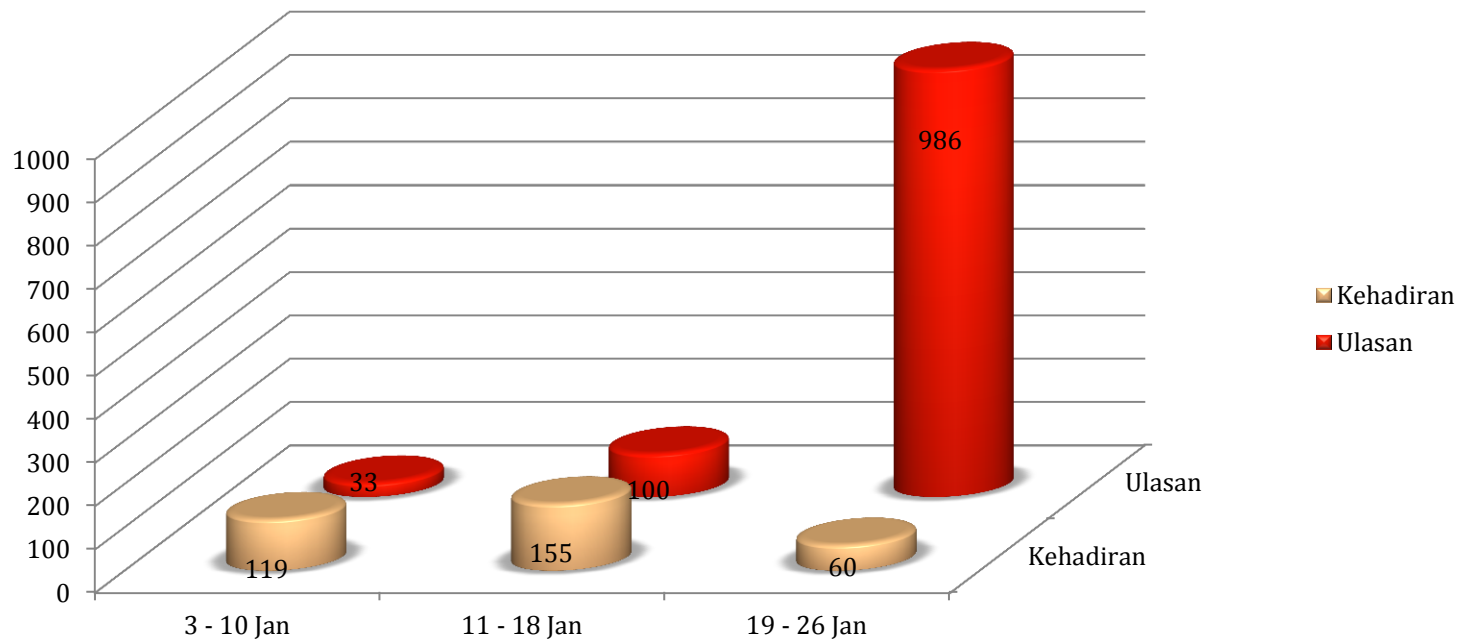
# PUBLIC REVIEW OF LYNAS'S DOCUMENTS

Lynas TOL application documents were displayed for public viewing from **3 January to 26 January** at 4 different locations



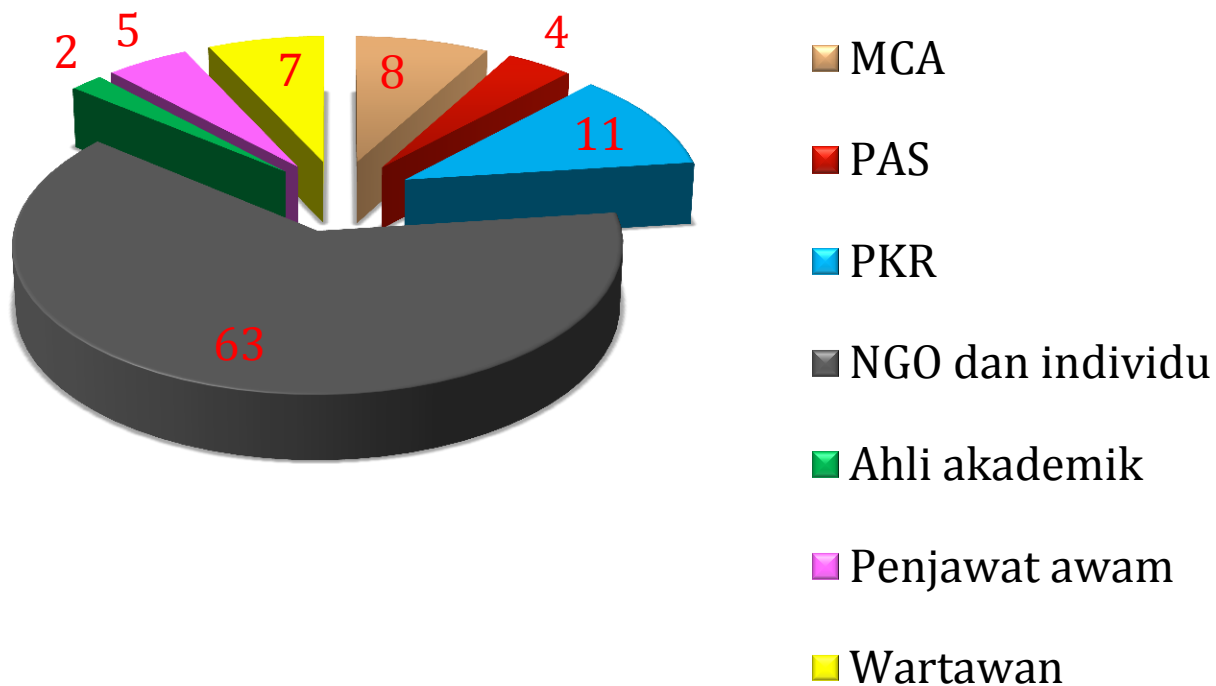
# STATISTICS OF ATTENDANCE - WEEKLY

Number of attendance and public review received by week

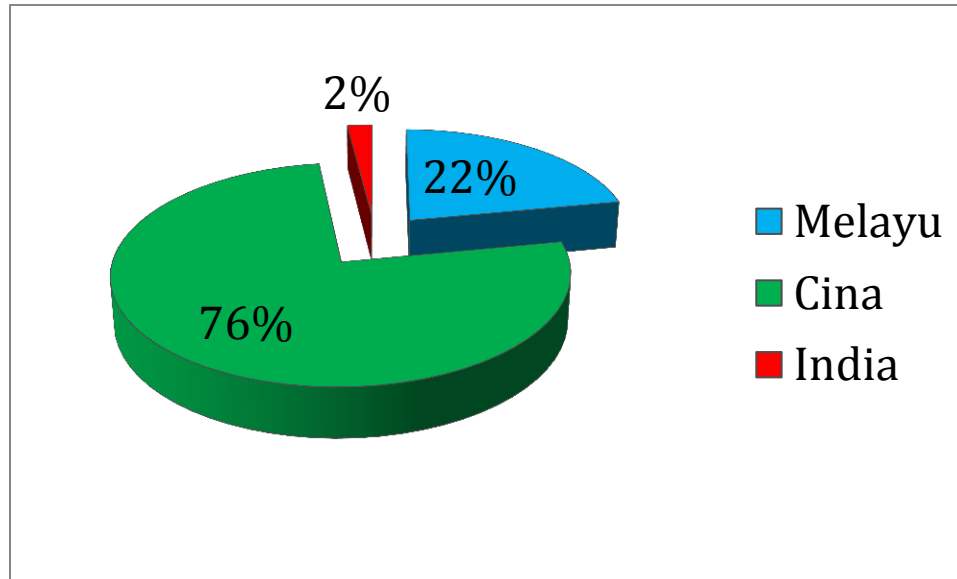


# STATISTICS OF ATTENDANCE

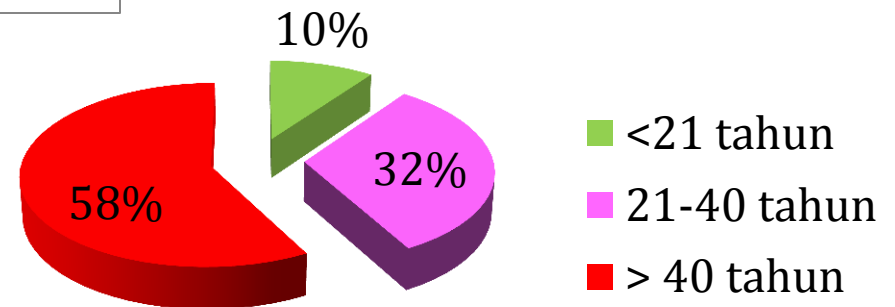
## Percentage of attendance by group



# STATISTICS OF ATTENDANCE



Percentage by race

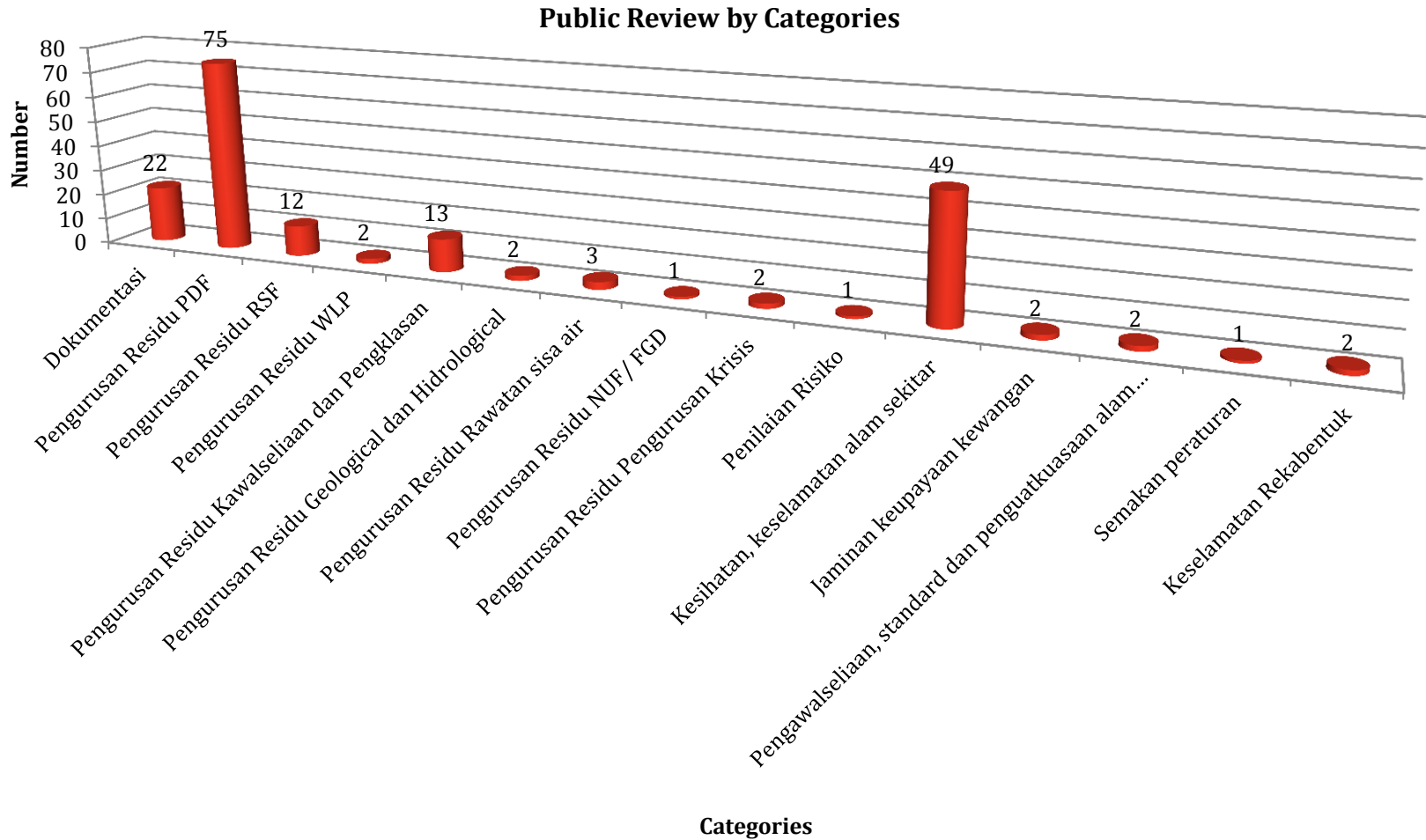


Percentage by age

# SUMMARY OF PUBLIC REVIEW

No	Note	Number of Comment	Issue
1.	The same unsubstantiated comment being repeated by different persons	756	Determine the location for PDF before TOL is issued
2.		159	Concern on the radioactive waste disposal in Pahang
3.		3	Concern on the safety and health and pollution to the environment
4.	Other different comments	205	Various aspects of concern as specified in the next slide
	Total	1,123	

# SUMMARY OF PUBLIC REVIEW





# ANALYSIS OF PUBLIC REVIEW

NO	ISSUE	PUBLIC REVIEW	ANALYSIS BY JKPA
1.	<b>Residue management</b>	Concern on the RSF and PDF, suitability of location of the PDF, waste water/ effluent discharged to river, radioactive waste classification and reuse/ recycle of residue	Need to have PDF as a conditions of TOL, compliance with the law, national and international standards and best practices, require special control by the relevant authorities, and self-regulation
2.	<b>Health, safety and the environment risk assessment</b>	Concern on radiation effect to human health and safety and the impact to the environment	Emphasis on sustainable manufacturing taking into account the safety and health of public, workers and the environment
3.	<b>Documentation</b>	Too technical and limited time to review the documents	Lynas should prepare executive summary of each document, summary of the waste management plan, provide the document in any other languages etc

# ANALYSYS OF PUBLIC REVIEW

NO	ISSUE	PUBLIC REVIEW	ANALYSIS BY JKPA
4.	<b>Financial security</b>	Financial security to manage any radioactive waste/ contaminated material	Implement/ enforce financial security to the licensee
5.	<b>Standard, control and enforcement of the DoE</b>	Lack of confidence towards the authority	The authority need to do enforcement more effectively and frequently
6.	<b>Design safety</b>	Concern about the safety of the building design	The relevant authorities need to verify based on their expertise
7.	<b>Risk assessment</b>	Implementation of Risk Management	Requirement is in place under the Act 514 (Occupational Safety and Health Act 1991) and Act 139 (Factories and Machinerics Act 1967)
8.	<b>Review of regulations</b>	Old regulations still being enforced (e.g. regulation year 1972)	Relevant regulations available need to reviewed
9.	<b>NIMBY (Not In My Back Yard)</b>	Refuse to accept Lynas	Need awareness program with emphasis on economical, political and social factors

# RECOMMENDATION BY JKPA

- The application for Temporary Operating License (TOL) by Lynas recommended to be approved subject to several conditions. If the conditions are not met, TOL must be suspended, or cancelled and not recommended for the next license application.
- Prior to the issuance of the TOL, Lynas is required to submit a letter of undertaking that it will accept return of any residue generated by its factory in Gebeng to its original source.
- The recommendation for approval, however, is subject to the company fulfilling these five conditions:
  - Lynas is required to submit to AELB details of the plans and location of a proposed permanent disposal facility that will manage the residue, if any, generated by the factory;
  - This requirement must be complied with regardless of any alternative proposal Lynas may make for the management or disposal of the factory residue (eg. recycling, conversion into products that can be sold, etc);
  - This submission must be made within 10 months from the date the TOL is issued;
  - Lynas must agree to provide security deposit to the Government; and
  - AELB has the right to appoint an independent expert assessor to evaluate Lynas' compliance with the safety and good practices requirements.

# *Thank you*



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