

NGO workshop

Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility

Tuesday 18 June 2013

Department of Energy and Climate Change, 3 Whitehall Place, London, SW1A 2HD

A special NGO workshop was held on 18 June 2013 as part of the DECC Call for Evidence on the review of the Managing Radioactive Waste Safely (MRWS) site selection process. The purpose of the workshop was to hear views, concerns and suggestions from NGOs about how DECC should take forward the siting process for a geological disposal facility, to gain an in-depth understanding of the issues and to debate and explore possible solutions. DECC was at an early stage in its consideration of how the site selection process can be improved. For clarification, DECC was not consulting on the policy of geological disposal, or on the principles of voluntarism and partnership. DECC continues to believe that a geological disposal facility in the long term, with interim storage now and for as long as is required, is the right approach.

The below note of the workshop provides an account of the key issues that were discussed at the workshop and has been agreed by participants.

In attendance

Varrie Blowers, Blackwater Against New Nuclear Group (BANGG)

Emma Gibson, Greenpeace

Pete Wilkinson, Communities Against Nuclear Expansion (CANE)

James Lloyd, National Trust

Ruth Balogh (West Cumbria & North Lakes Friends of the Earth)

Mark Higson (Chair), Chief Executive of the Office for Nuclear Development, DECC

Bruce Cairns, Office for Nuclear Development, DECC

Tom Yates, Office for Nuclear Development, DECC

Lucy Tanner, Office for Nuclear Development, DECC

Clare Bayley, Office for Nuclear Development, DECC

Baroness Verma and her private secretary were in attendance for part of the meeting.

Welcome and introductions

DECC made apologies for the short notice that was given for this workshop. Time became available in the Minister's diary and the date was arranged accordingly.

The workshop would be an informal meeting, intended to allow for a frank discussion. It was not a decision-making forum, but could provide pointers for further discussion, including at (but not limited to) future meetings of the NGO Forum.

It was agreed that rather than just brief bullet points, a reasonably detailed note of the workshop should be taken, to be circulated to attendees, if possible in time for the NGO forum scheduled for 3 July 2013, and to be made public in due course.

DECC remained keen to engage with NGOs and other stakeholders as part of its review of the Managing Radioactive Waste Safely (MRWS) siting process. There would be further opportunities to make comments to the Department in the run up to the proposed consultation, during the consultation itself, and throughout the implementation of a revised site selection process.

The responses to the call for evidence and subsequent meetings with stakeholders would help DECC officials understand the issues so that we are able to run a more effective public consultation in the autumn. The purpose of the workshop was to hear views, concerns and suggestions from NGOs about how the Department should take forward the siting process for a geological disposal facility, to gain an in-depth understanding of the issues and to debate and explore possible solutions. The Department was at an early stage in its consideration of how the site selection process can be improved.

DECC considered it important that the consultation be well planned and include events that present an opportunity for stakeholders and the public to input. At this stage DECC was proactively reaching out to interested parties to discuss issues and concerns. Suggestions for further such outreach would be welcomed.

For clarification, DECC was not consulting on the policy of geological disposal, or on the principles of voluntarism and partnership. DECC continued to believe that a geological disposal facility in the long term, with interim storage now and for as long as is required, is the right approach.

	Challenge/issue raised by NGO	DECC response	Action
1	<p>Government's continuing commitment to geological disposal is a false position when there remain so many uncertainties over the concept of GDF and its implementation. This has to be recognised and there has to be an open and transparent process for ongoing review of the evidence. There are many uncertainties that the Environment Agency do not have the information to address.</p>	<p>Safety is of paramount importance, and the UK's independent nuclear regulators will not grant any kind of licence, consent or other authorisation for a facility that does not meet the requisite standard(s) and safety case(s). The regulators will simply not allow waste to be emplaced in a GDF unless the relevant safety case is made but that can only be completed through ongoing research and, in due course, site-specific investigations. We recognise that communicating this fact is challenging.</p>	<p>The role of the regulator as independent judge of the feasibility of a GDF could be made clearer to help build confidence that a facility will not be built unless the safety case is made. RWMD could consider the profile of their issues register and their work to handle issues raised on it.</p>
2	<p>Government needs to change behaviours. It still appears [from the text in the CfE] that Government is pursuing an agenda in Cumbria. Government needs to speak with the people in west Cumbria to get their views, particularly those who have already volunteered their time and energy to the 3 year process.</p> <p>The early decision by Copeland Borough Council to express an interest was unfortunate. It meant that the MRWS process proceeded with undue haste. The MRWS process was not followed as envisaged in the 2008 White Paper.</p> <p>DECC would be welcome to come to Cumbria to talk to people who took part in MRWS. It would</p>	<p>DECC has spoken to officials from Copeland, Allerdale, and Shepway councils to try to understand what was good and what was bad about the experiences with the current site selection process. DECC is also trying to arrange discussions with other participants in the west Cumbrian Partnership. Moving forwards, DECC wants to be more proactive in engaging with communities outside of Cumbria.</p> <p>Arguably, the Government may not have put enough resource into looking more widely for other communities alongside the resource required to meet the needs of the west Cumbrian participants. DECC would like to engage with other communities to</p>	<p>DECC plans to establish a programme of wider engagement going forwards with a revised site selection process.</p> <p>DECC will continue to engage with former members of the west Cumbria Partnership to learn lessons from the current site selection process, and to gather thoughts on a revised site selection that we will be consulting on publicly.</p>

	<p>signal DECCs intent to learn from the MRWS process in Cumbria</p>	<p>enter into a dialogue on MRWS. The invitation for communities to express an interest in the MRWS process of course remains open, and any changes to the current approach on site selection will be subject to Ministers' views and to consultation.</p> <p>We recognise the need to learn lessons, hence the review. The way forwards will be informed by actual experience.</p>	
3	<p>The CoRWM1 report set out credible proposals for how the long-term management of radioactive waste should be implemented, and while Government has followed much of CoRWM's policy advice it has neglected some elements.</p> <p>Fundamentally the principles behind MRWS are heading in the right direction. However, the interpretation of how it should be implemented is important and should be clarified. Confidence in the programme [on issues such as right of withdrawal, guarantees of community benefits, through openness and transparency] needs to be established.</p>	<p>DECC notes the advice that we should be mindful of CoRWM's work and recommendations.</p> <p>As part of the review we are also looking at options to bring confidence to the process on issues such as RoW and community benefits.</p>	<p>Alongside existing CoRWM1 reports, current CoRWM will be consulted during development of consultation.</p>
4	<p>More attention needs to be paid to interim storage. Nuclear communities should not be taken for granted.</p> <p>We need an integrated programme for managing</p>	<p>Much of our expenditure (through NDA) is on the construction and improvement of new and existing interim storage facilities. We accept we need to communicate better</p>	<p>DECC/RWMD to consider communications around interim storage.</p>

	<p>all radioactive waste safely where interim storage is given as much weight as geological disposal. Interim storage is long-term even if a GDF can be built as it will be some time before a GDF is established.</p>	<p>the work that the UK is currently undertaking on interim storage.</p>	
5	<p>Stakeholder engagement with the public and communities is important to communicate information about waste management and geological disposal. Consulting with SSGs and LAs is not the same as consulting with communities.</p> <p>An intensive, extensive and inclusive engagement process on MRWS is required – a “Rolls Royce programme”. CoRWM started off well on this.</p> <p>To date the process has been too remote, Government need to consider how to get people involved. Currently participation is divorced from the decision making. The process should address uncertainties, enhance confidence, and recognise that vagueness about specific sites cannot be sustained, since this is what concerns most people. A public engagement programme is important for this.</p>	<p>We recognise that we need to undertake more engagement with stakeholders and the public to understand issues and concerns and to develop confidence in the process. The review of the MRWS site selection process gives us an opportunity to do this. The Call for Evidence is a starting point to understand what has worked and what hasn't in the current MRWS process and how we can approach engagement and site selection in a better and more inclusive way.</p>	
6	<p>Government need to manage new build elements in a more sensitive way to address ethical questions. There should be a separate process for the management of waste from a new build programme.</p>	<p>Comments noted.</p>	

	<p>Disposal is not designed to accommodate retrieval. If retrieval is offered to a community, then a national policy change from disposal to underground storage is required</p> <p>Communities must know what they are signing up to in terms of the inventory for disposal.</p>		
7	<p>If safety is priority then Government should find the best geology and geography as the correct starting point. Volunteering should follow from this. With regard to high-level criteria, ruling out areas solely on the basis of risk of future intrusion for minerals and water (as did the MRWS process) is inadequate.</p> <p>CoRWM recommended screening first before asking for volunteer communities. Need to look at experience that has gone on elsewhere internationally. Geology played an enormous part in those countries at an early stage.</p> <p>Investigation of geology lay at the heart of the deep disposal concept and openness and transparency must be demonstrated to a high degree of credibility.</p>	<p>We are considering the approach to geology as part of the current review of the site selection process, including how we approach communities and provide more information about geology at an earlier stage in the process. But geological composition at depth is much less clear than at the surface – and only detailed investigation (including hydrogeology and hydrochemistry) will reveal whether a specific site is suitable or not. There is a limit to what can be claimed with certainty at a high level initial step.</p> <p>Baroness Verma commented in favour of engaging communities constructively before assessing geology, and agreed that broader and deeper engagement was required.</p>	
8	<p>Social impacts are important. However wider impacts such as environmental impacts also need</p>	<p>Comments noted.</p>	

	<p>to be considered.</p> <p>Other screening beyond geology should be considered. Decision making and the planning process need to be considered together. There are many examples of good approaches to spatial planning that we can learn lessons from. The process needs transparency and openness, it is not possible to have an appropriate conversation with a community without having a clear proposal</p>		
9	<p>Communities and DMBs need to be better defined/who are the decision makers etc. Communities and DMBs are not the same thing.</p>	<p>Agreed – we should give more clarity about roles and responsibilities within the decision-making process.</p>	<p>DECC will aim to address this issue in the consultation</p>
10	<p>Nirex inquiry documents and documents from the work of the MRWS Partnership in Cumbria should be made available on DECC website</p>	<p>Agreed that need to think about archive of documents as part of the evidence base. Need official home for these.</p>	<p>DECC to consider how we make documents publicly accessible</p>