

**Consultation on the implementation of changes to the Paris and Brussels
Conventions on nuclear third party liability**

24 January 2011 - 28 April 2011

**Responses from Members of Parliament, Government Agencies and Local
Authorities**

Caroline Lucas MP

Norwich Green Group City Councillors

Nuclear Free Local Authorities

Scottish Environmental Protection Agency

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Consultation on Paris and Brussels Conventions on Nuclear third party liability
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Ref: OTH.N0007.AW.28.04.11

Date: 28th April 2011

To whom it may concern,

Please accept this letter as my response to the Government's consultation on the implementation of changes to the Paris and Brussels Conventions on nuclear third party liability. I have three principle points to make.

Firstly, I believe that this consultation should be withdrawn until the causes and consequences of the Fukushima incident are fully understood, and that the relevant learning points are acted upon. Secondly, I believe that the principle thrust of the consultation, which outlines the provision of public funds to meet the costs of a nuclear incident that exceed the proposed operator's cap, amounts to a significant public subsidy for nuclear power operators. Finally, I am concerned the consultation is so complex and technically detailed that many people who may have wished to respond will find it extremely difficult to do so. Given the particularly high levels of public concern following the nuclear disaster in Japan, I do not believe that it is acceptable to limit the likelihood of responses in this way, whether intentionally or not.

I also do not believe that the Government has given sufficient consideration to the Fukushima nuclear disaster, which will have a significant impact on our understanding of nuclear third party liabilities. I note that the 72 nation Convention on Nuclear Safety (of which the UK is a member) recently agreed that it would not review international nuclear safety arrangements until the Fukushima incident was firmly under control¹. The Convention's statement made clear that "the lessons-learned process cannot be completed until sufficient additional information is known and fully analyzed" and announced that it will not meet to review the breakdown of safety systems at Fukushima until August 2012. The owners of the Fukushima plant

¹ Bloomberg 14th April 2011: <http://www.bloomberg.com/news/2011-04-14/nuclear-regulators-delay-study-of-fukushima-lessons-until-2012.html>

themselves recently stated that it will take at least another 9 months before the incident is fully and completely under control. It is, therefore, deeply concerning that this 3rd party liability consultation is being undertaken in the context of both a UK nuclear safety review that will publish an interim report in May and a final report in September, and of a longer term review of safety at Fukushima. I therefore call on the Government to abandon this consultation, at least until the impact of the Fukushima incident is fully understood and any changes that need to be made as a result have been implemented.

I am completely opposed to the proposal to cap nuclear operators' liability at £1bn, with any remaining costs of an incident falling on the tax payer. The estimated clean-up costs of the Fukushima incident are many times higher than this, and the acceptance of public liability for nuclear disasters is, in my opinion, a clear breach of the Coalition Government's commitment that new nuclear power plants will not receive any public subsidy. As the consultation makes clear, it is very unlikely that the nuclear power operators would be able to insure themselves for the level of liability the Government is proposing, or that they would be able to meet the costs of any incident from their own funds. Therefore, without the financial support that the Government is proposing, nuclear power would not be viable in the UK. What clearer example of a public subsidy for new and existing nuclear power can there be than reducing the industry's costs in this way in order to make nuclear operations a going concern in this country? If the Government is determined to address the failure of private insurers to provide cover for nuclear power operators, I believe that rather than accepting all costs of an incident above a cap, Ministers should consider whether the Government should offer insurance itself, but only contracts which price such cover at the full market rate – as determined by an independent committee.

Finally, despite having worked on nuclear power and nuclear weapons policy for many years, there were parts of this consultation which I found extremely difficult to understand. Indeed, experts I consulted who have worked on nuclear policy for over thirty years consider this to be the most complicated consultation they have ever encountered. At a time when the safety and reliability of nuclear power is of such public interest, I believe that the Government should be making much greater efforts to engage the general public on the proposals that are being put forward in this document. This, in my opinion, is further reason for abandoning the current consultation until we have the best understanding possible of the Fukushima incident and can have a fully informed, open, and public debate about the role nuclear power should play in the UK's energy mix, and the extent to which that should be supported, if at all.

In conclusion, I do not support the thrust of the proposals in the Government's consultation on the implementation of changes to the Paris and Brussels Conventions on nuclear third party liability, and I wish to see this consultation abandoned.

Thank you for considering my response.

Yours sincerely,



Caroline Lucas MP, Brighton Pavilion
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Norwich Green Group City Councillors – 28 April 2011

To whom it may concern

Implementation of changes to the Paris and Brussels Conventions on nuclear third party liability: a public consultation

As 14 elected Green City councillors in a medium sized city, and 7 Norfolk County Councillors we find it incumbent on us to keep a watchful eye on events affecting our local nuclear power stations at Sizewell.

We welcome the increase in liability for nuclear operators, however it remains far too small to be anywhere near covering the lives and properties at risk.

It is far too little, far too soon.

The limits to liability therefore constitute a massive public subsidy, as well as a huge uninsured physical, environmental and economic risk for all in the region.

We endorse the submission from NFLA, attached for your convenience.

We urge that this Consultation be withdrawn until the unfolding events at Fukushima can be properly assessed.

A reasonable time would be after the August 2012 'Convention on Nuclear Safety' meeting organised by the International Atomic Energy Agency (IAEA), to which we and 71 other countries have signed up.

Best wishes

Lesley Grahame
Thorpe Hamlet Ward Councillor
Green Group City Councillors' Office

Nuclear Free Local Authorities – 20 April 2011

Dear DECC section leading on the Paris-Brussels Convention consultation,

I attach the submission of the UK and Ireland Nuclear Free Local Authorities to this consultation. The fundamental point of the NFLA submission is that this consultation should be withdrawn as a result of the Fukushima incident and the learning points of this incident in relation to financial insurance costs. The submission outlines other issues of concern and comments on the wider context of the consultation.

I would appreciate receipt of this email, which is being sent earlier than usual to you due to the holiday period - it is strange to have a consultation period conclude at a time when there are four bank holidays in the week around it.

Yours sincerely,
Sean Morris
NFLA Secretary

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20th April 2011

To whom it may concern,

SUBMISSION OF THE NUCLEAR FREE LOCAL AUTHORITIES TO THE UK GOVERNMENT'S CONSULTATION ON THE IMPLEMENTATION OF CHANGES TO THE PARIS - BRUSSELS CONVENTIONS ON NUCLEAR THIRD PARTY LIABILITY

1. Introduction – withdraw this consultation until the learning points of the Fukushima incident are internationally agreed upon

The Nuclear Free Local Authorities (NFLA) formally submits its response to the UK Government's consultation on the implementation of changes to the Paris – Brussels Conventions on nuclear third party liability.

The NFLA notes that this consultation was launched before the nuclear disaster at the Fukushima Daiichi nuclear plant in Japan. These conventions on liability and nuclear insurance do not come up for review very often. The NFLA believes it is unreasonable that any decisions should be made while events in Japan are still unfolding.

The NFLA also notes that the 'Convention on Nuclear Safety', to which 72 countries have signed up, and organised by the International Atomic Energy Agency (IAEA), will not meet until August 2012 to review the breakdown of safety systems at Fukushima, because the lessons-learned process cannot be completed "until sufficient additional information is known and fully analysed." (1) This reinforces the NFLA's view that this consultation should be withdrawn.

Events in Japan make it all the more important that we stop now and reconsider nuclear insurance after the "lessons learned" process has been completed rather than pushing ahead with these outdated proposals. It is not reasonable to carry on with a normal "business as usual" approach to nuclear power at least until all the lessons have been learnt.

This consultation should, therefore, be withdrawn.

The rest of this submission outlines additional concerns the NFLA has with this consultation in reference to the incident in Fukushima, Japan and in its wider context.

2. Background to the NFLA submission – the financial implications of the Fukushima incident

The NFLA notes that this consultation document and accompanying papers discuss how much insurance cover a nuclear company should have in the event of an accident. The consultation also considers the financial security of companies and raises the question of company insolvency in the event of an accident.

At the time of writing, the NFLA notes that the Japanese Government has ordered Tokyo Electric Company (TEPCO) to make an interim or provisional payment of around £7,300 to roughly 48,000 eligible households – a total of over £350m – more than one third of the maximum liability proposed in this new consultation. This is just an *initial* payment, which many of the evacuees feel is far too small. Tens of thousands of residents are unable to return to their homes near the nuclear plant and are bereft of their livelihoods and possessions. They are unsure when, if ever, they will be able to return home. (2) 150,000 people are still homeless, so the compensation offered amounts to less than £2,500 per person, more than a month after most were evacuated. JP Morgan estimates that TEPCO may face pay-outs amounting to **around £15bn**. (3)

TEPCO is unlikely to survive as a company. There is now speculation that the Japanese Government will break up the company. (4) The Financial Times describes TEPCO as a company with “a shoddy history of cover-ups and sloppy safety standards”. In 2002, it was found to have routinely lied about safety data relating to cracks in its reactors. It has also been reported that TEPCO located back-up generators at Fukushima in the basement, below the level of what turned out to be a wholly inadequate sea defence wall. There are also suggestions – denied by the company – that it delayed cooling the reactors with sea water to avoid scrapping billions of yen worth of assets. (5) Yet the Company is described as “too big to fail”. So like the banks, it is seemingly inevitable that Japanese taxpayers will end up bailing the company out in one form or another.

In the UK the Government has called for a review of nuclear safety because of the situation in Japan, but no review of the financial implications - for the taxpayer, local authorities and emergency services - has been called for. Given the huge financial implications of such an accident, this is, in the NFLA's view, completely illogical. The NFLA believes a revised consultation should be published **after** the detailed picture of the extent of the financial impact of the Fukushima Daiichi accident has emerged.

In the NFLA's view, pushing ahead with these proposed changes to the nuclear liability laws, without first considering the full financial impact of an accident is not acceptable. It will leave the taxpayer to pick up potentially huge but unknown additional costs. It is vital to stop now and reassess the proposals on the level of insurance cover, the legislative arrangements, and the financial security of nuclear companies and whether these can be deemed ‘fit for purpose’ for the coming decades.

As far as the NFLA is aware there have been no stakeholder meetings on this consultation with the emergency services or local authority emergency planning officers. The NFLA believes such meetings need to be organised in a subsequent consultation.

3. Additional comments on the consultation

Under the UK Government's proposals nuclear operators would have to pay the first £1bn towards the cost of any accident in the UK – compared with the current cap on their liabilities of £140m. Whilst raising the level of the cap is to be welcomed, clearly agreeing to cover any costs above £1bn amounts to a public subsidy. This would go against the UK Government's coalition agreement. The consultation document also makes clear that Paris Convention countries are permitted to impose an unlimited liability. (See para 1.4)

The NFLA notes that Barry Jones, Emeritus Professor at Reading University, says any limit on liability for the costs of nuclear accidents eases the burden on nuclear operators. If the government reinsures those costs, in the absence of commercial insurers, then the nuclear operators will be absolved of most, if not all, of the ultimate liability. (6)

The NFLA's view is that there should not be **any** cap on liabilities for the operators of nuclear power plants. There is no cap on liabilities for operators of other kinds of electricity generating plant such as wind farms or solar farms. There should be no special reasons to favour nuclear

power. The UK Government has insisted that there will be no public subsidies for new nuclear reactors. Indeed, UK Energy Secretary Chris Huhne told the *Observer* that he wanted to introduce the new higher £1bn cap to ensure that there would be no public subsidy for nuclear power. (7) However, these proposals clearly represent a subsidy to the nuclear industry.

Operators of nuclear power plants should still be required to **insure fully** against the cost of an accident. If the necessary insurance cannot be obtained from commercial sources then the operator of any nuclear plant should be required to pay an appropriate premium to the Government (as insurer of last resort). The premium should be calculated by two or more independent actuarial experts and agreed by all stakeholders.

Let's not forget that BP had to pay **£20 billion** after the recent Gulf of Mexico oil spill last year, and a comparative nuclear accident would cost much more to clean-up and take a lot longer before the area is 'clean' again. The cost of the Chernobyl accident can only be roughly estimated, but the magnitude of the cost is clear from a variety of government estimates from the 1990s, which put the cost of the accident, over two decades, at hundreds of billions of dollars. Belarus, for instance, has estimated losses over 30 years at **US \$235 billion**. (8) It has been recently suggested in the Japanese media that the financial cost of the Fukushima incident in compensation may be as much as **£80 billion and the cost of the incident response and clean-up is likely to be many tens of billions more** (9).

4. **Proposed amendments to the Paris-Brussels Convention**

One of the amendments to the Paris-Brussels Convention mean that a claimant will be allowed a longer time – 30 years from the date of the nuclear incident – in which to bring a claim against an operator for loss of life or personal injury. As the latency period for radiation induced cancer can be very long, this is to be welcomed.

However, if there is a cap on the amount to be paid out by the nuclear operator of £1bn, and there is no system for prioritising claims with compensation issued on a first-come-first-served basis, it would seem very unlikely that any money would be left over by the end of that period.

Paragraph 4.2 lists six new categories of nuclear damage for which nuclear operators will be liable. The final three categories are:

- (4) The cost of measures for re-instating an impaired environment;
- (5) Loss of income derived from use or enjoyment of the environment;
- (6) The cost of preventative measures.

There appears to be some scepticism in the insurance industry over whether these things can be insured against. (10) The NFLA believes the UK Government needs to provide more details about how it sees nuclear operators insuring against such liabilities. Again if the insurance industry will not insure these categories of risk this adds to the NFLA's argument that the UK Government should act as 'insurer of last resort' at the full market rate.

5. **Conclusion and NFLA recommendations**

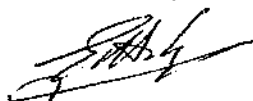
The NFLA makes the following recommendations to the UK Government in reference to this consultation:

1. This consultation should be abandoned until all the lessons of the Fukushima Daiichi nuclear disaster have been learnt; and probably not re-launched until after the Nuclear Safety Convention meeting in August 2012.
2. A future consultation on any amended proposals to the Convention need to include stakeholder meetings involving the emergency services and local authority emergency planning officers.

3. The proposals as they stand at the moment represent a subsidy to the nuclear industry in general and new reactors in particular. There should be no cap on the industry's liability. Setting a £1bn cap at a time when there is an ongoing incident likely to cost many times that figure is illogical.
4. Removing the cap is the only way to ensure that the Government's aspiration to offer compensation for a 30 year period to nuclear accident victims suffering from personal injury can be met.
5. The insurance industry is unlikely to offer insurance against an unlimited liability and has expressed scepticism about three of the new categories of nuclear damage. The Government may need to consider acting as insurer of last resort – but only at the full market rate determined by an independent committee.

If you have any queries with any of the detail with this submission then please contact the NFLA Secretary, Sean Morris, using the details at the top of this letter or s.morris4@manchester.gov.uk.

Yours sincerely,



Bailie George Regan*
Chair of UK and Ireland Nuclear Free Local Authorities

* - Bailie is a Scottish term for a senior councillor, in a similar manner to an Alderman.

6. References

- (1) Bloomberg 14th April 2011 <http://www.bloomberg.com/news/2011-04-14/nuclear-regulators-delay-study-of-fukushima-lessons-until-2012.html>
- (2) Independent 16th April 2011 <http://www.independent.co.uk/news/world/asia/nuclear-plant-evacuees-call-for-bigger-payouts-2268640.html>
Telegraph 15th April
<http://www.telegraph.co.uk/news/worldnews/asia/japan/8454029/Japan-nuclear-evacuation-households-to-receive-7500-compensation.html>. This puts the figure at £367m
- (3) New Statesman 15th April 2011 <http://www.newstatesman.com/energy-and-clean-tech/2011/04/power-plant-government-pay>
- (4) Asahi 16th April 2011 <http://www.asahi.com/english/TKY201104150129.html>
- (5) FT 13th April 2011 <http://www.ft.com/cms/s/0/470847a8-6605-11e0-9d40-00144feab49a.html>
- (6) Letter to the FT 3rd February 2011 <http://www.ft.com/cms/s/0/dfb8e1ec-2f28-11e0-88ec-00144feabdc0.html>
- (7) Observer 23rd January 2011 <http://www.guardian.co.uk/business/2011/jan/23/nuclear-power-accident-clean-up-costs>
- (8) Green Facts: <http://www.greenfacts.org/en/chernobyl/l-3/5-social-economic-impacts.htm>
- (9) Guardian, quoting from the Yomiuri Shimbun newspaper:
<http://www.guardian.co.uk/world/2011/apr/13/japan-nuclear-plant-evacuees-compensation>
- (10) Westminster Energy.org: <http://www.westminsterenergy.org/Upload/2006-2008-public-events/20080207/3.3%20Tetley.pdf>

Our Ref: JM/JG/JC/JW/
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Your Ref: -

6 May 2011

Consultation on Paris and Brussels Conventions
on Nuclear Third Party Liability
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By email: parisbrussels@decc.gsi.gov.uk

Dear Sir/Madam

Implementation of Changes to the Paris and Brussels Conventions on Nuclear Third Party Liability

Thank you for providing SEPA with the opportunity to respond to the consultation on implementing changes in the UK to the Paris and Brussels Conventions (the Conventions) on Nuclear Third Party Liability.

SEPA supports the UK Government position to ratify changes to the Conventions by introducing the Nuclear Installations (Liabilities for Damage) Order 2011 (the Liabilities Order) for installations such as nuclear power plants. SEPA notes that the Liabilities Order will increase the scope and amount of compensation payable for certain categories of third party damage caused by nuclear incidents (as defined in the Paris Convention). Importantly for SEPA, one of the new categories of damage covers any costs we may incur when undertaking measures to reinstate the environment.

SEPA notes Government's intention to "decouple" the nuclear site licensing and financial liability regimes in the Nuclear Installations Act 1965 (NIA 65). By doing this, waste disposal facilities that accept low level radioactive waste (LLW) originating from a nuclear site will not be subject to the nuclear licensing regime under NIA 65. SEPA fully supports Government plans to exclude LLW disposal sites from the nuclear licensing regime; the consultation document makes it clear that LLW disposal facilities are already regulated by the environment agencies. SEPA is of the view that our regulatory framework for the accumulation and disposal of radioactive wastes will protect both the environment and human health during the operation and post-closure phases of LLW disposal facilities.

The consultation sets out Government's plans to require disposal facilities that accept LLW originating from a nuclear site to have financial security to cover compensation claims up to a lower financial limit of 70M Euros. However, this insurance requirement will only be interim until such time that Government can obtain a formal opinion from the Nuclear Energy Agency (NEA) that LLW disposal facilities are excluded from the Conventions on the grounds they are low risk. SEPA disagrees with this proposed approach and do not think disposal sites that take LLW from the nuclear industry need to have the insurance provisions now or in the future. Our view is that LLW disposal facilities that take LLW originating from a nuclear site are low radiological risk installations; paragraph 11.15 of the consultation document supports our position and says that "Such LLW disposal facilities do not present the level of hazard (risk) that the Convention was set up to address". Therefore, we would advise against including financial insurance provisions for LLW disposal facilities in the Liabilities Order.

Chairman
David Sigsworth

Chief Executive
Dr Campbell Gemmell

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SEPA is of the view that introducing a new requirement for LLW disposal facilities to insure against liability damage could, potentially, act as a market barrier to entry for those in the supply chain who operate, or plan to operate, LLW disposal facilities. Also, this insurance premium may present a major obstacle to the realisation of the Government's March 2007 Policy for solid LLW to have flexibility in waste management arrangements for the UK.

If the proposal is agreed we would welcome discussions between Government, Office for Nuclear Regulation and EA/SEPA to look at the best means to implement the financial provisions required by the Conventions for the following two types of facility:

1. Commercial facilities that dispose LLW originating from nuclear sites along with other controlled wastes.
2. Commercial facilities and dedicated LLW disposal facilities located off the nuclear licensed site that dispose LLW originating from nuclear sites only.

For both types of facility, the disposal of LLW originating from a nuclear site is not subject to the Environmental Liability (Scotland) Regulations 2009 (ELD); the ELD Regulations do not apply to radioactivity caused by an incident or activity in respect of which liability for compensation falls within the scope of the Paris or Brussels Conventions. Thus, currently, any damage resulting from an incident at both types of facility could only be recovered via the civil compensation scheme under common law.

In the case of commercial facilities that dispose of controlled wastes, the facility will be required to maintain Financial Provision (FP) via its Pollution Prevention and Control (Scotland) Regulations (PPC) permit to cover reinstatement costs. However, this third party liability insurance does not cover incidents that would be solely radiological in nature or fall within the scope of the damage provisions required by the Conventions.

One possible alternative solution would be to amend the ELD regulations such that they would apply the liability insurance provisions required by the Conventions. Alternatively, financial provisions to insure LLW disposal sites against nuclear incidents could be included as new administration arrangements under RSA 93, without the need to amend NIA 65. Recent Guidance issued by the environment agencies requires all operators to have financial resources that prevent harm to the environment during the operation and post-closure phases of a near-surface disposal facility. Thus, SEPA would wish to discuss with Government how best to include financial liability provisions within the scope of our duties and responsibilities under RSA 93.

If UK Government intends to implement the third party liability arrangements in the consultation, SEPA would seek clarification whether we could refuse to grant an authorisation for a LLW waste disposal facility, if the facility operator did not have in place nuclear liability insurance. Also, as discussed above, should SEPA include a new condition in any RSA 93 authorisation for landfill facilities that take waste from nuclear sites to have insurance in place as required by the Conventions? Advice from Government on both matters is needed promptly given that SEPA is currently in the process of determining an application to authorise the disposal of LLW at a facility situated near the Dounreay site.

SEPA considers that the decision to apply retrospectively to NEA to exclude LLW disposal facilities depends on whether Government considers having this exclusion made formal by NEA will provide reassurance to its stakeholders that the risks from LLW disposal facilities are low. Should Government apply to NEA, SEPA recommends that a legal definition of LLW is agreed that goes beyond the definition in the LLW Policy and takes account of the fissile properties of LLW. This will

take account of those facilities that take LLW of nuclear origin but are located off the nuclear licensed site where criticality matters will not be directly regulated under NIA 65 because the facility does not require to be licensed.


SEPA notes that NORM waste is not explicitly mentioned in the consultation document. Thus, SEPA would ask DECC to confirm that NORM disposal facilities are excluded from the liability regime in the Paris Convention.

SEPA notes that the consultation extends the right to claim compensation to those public bodies who incur expense in relation to undertaking "reasonable measures" to reinstate the environment following a nuclear incident. Public bodies include the environment agencies. SEPA notes the Government does not wish to prescribe what matters need to be taken into account when determining what environmental reinstatement measures are reasonable. However, SEPA would welcome further clarification on what matters Government would consider when deciding what are, and what are not, reasonable measures. Also, it would be beneficial to have clarity from Government on issues such as our duties, cost recovery, powers of entry and such like.

As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record.

If you require further clarification on any comments raised in this response, please contact Jim Cochrane, Principal Policy Officer, Radioactive Substances Policy Unit, at the address shown above.

Yours faithfully



Janice Milne
Head of National Operations

Stroud District Council – 15 April 2011

The consultation needs to be halted. It is not possible to continue with a 'business as usual' approach for the nuclear industry in the UK since the events at Fukushima. The Government is reviewing nuclear safety in the UK because of the situation in Japan, but there is no proper review of the financial implications - for the taxpayer, local authorities and emergency services. This is surely a mistake?

A revised consultation re insurance and areas of claim is needed once a detailed picture of the extent of the financial impact of Fukushima is known. Already there is talk in Japan of the government having to take over Tepco. We should stop now and reassess the proposals on insurance cover etc to see if they are fit for the coming decades. Haste now would be a mistake.

It also seems the consultation is going ahead without any stakeholder events or engagement with communities. In addition there is also a potential problem regarding the time given for organisations to respond. Have, for example, all emergency services and other relevant organisations with legal responsibility to respond to an accident been able to consider the current consultation?

In view of all this I strongly recommend that this consultation be halted.

Cllr Philip Booth, Stroud District councillor for Randwick, Whiteshill and Ruscombe ward,

