**CoRWM RESPONSE to Welsh Government’S Consultation dOCUMENT ‘rEVIEW OF wELSH GOVERNMENT POLICY ON THE MANAGEMENT AND DISPOSAL OF HIGHER ACTIVITY RADIOACTIVE WASTE**

**21 January 2015**

**BACKGROUND**

1. CoRWM welcomes the opportunity to respond to the consultation on the Welsh Government’s review of HAW management and disposal[[1]](#footnote-1).
2. CoRWM congratulates Welsh Government on the clarity of the consultation document and the way it sets out the Welsh Government’s decision making process step by step from deciding to undertake a review, to concluding from that review that disposal is the preferred option for management and to proposing geological disposal as the preferred disposal option.
3. CoRWM notes that, should Welsh Government decide, after consideration of the responses to this consultation, to endorse a policy of geological disposal, there will be a need for further consultation on the next steps for taking the process of site selection forward in Wales should a Welsh community come forward. CoRWM believes that this process should be determined as soon as is practicable. Uncertainty over the process is likely to lead to confusion and misunderstandings which should be avoided if possible.

**QUESTION 1**.

*The Welsh Government is reviewing its current policy on the disposal of higher activity radioactive waste and spent fuel declared as waste. In carrying out this review, the Welsh Government has three options:*

* *should it seek to adopt a policy for disposal for HAW and spent fuel should it be declared as waste?*
* *should it retain its existing neutral position of neither supporting nor rejecting a disposal option?*
* *should it adopt a policy opposing a disposal option for HAW and potentially spent fuel?*

*Please give your reasons.*

1. CoRWM’s view on the options for the management of HAW have always been that geological disposal is the best available option for the management of HAW for the reasons referred to in paragraph 1.1 of the Consultation Document.[[2]](#footnote-2) It therefore supports the option for Welsh Government to ‘*seek to adopt a policy for disposal for HAW and spent fuel should it be declared as waste’*.
2. CoRWM believes that the Welsh Government’s ‘*existing neutral position of neither supporting nor rejecting a disposal option*’ has created a policy vacuum and is not likely to instill confidence in local communities about the management of HAW. Welsh Government’s support for new nuclear power at Wylfa Newydd as stated in paragraph 3.5 of the Consultation Document implies that the Welsh Government believes that the waste from new build will be satisfactorily managed; maintaining a neutral position on HAW management is inconsistent with this belief.
3. Adoption of ‘*a policy opposing a disposal option for HAW and potentially spent fuel*’ is based on the belief that disposal is not safe. CoRWM believes that, in the long term, geological disposal is the best option for managing radioactive waste. Interim storage of the waste is a necessary prelude to disposal but storage of the waste is not a viable long term option. It places an unacceptable burden on future generations to deal with the waste, it leads to a greater risk of worker exposure and, in comparison with geological disposal, it carries a much larger risk associated with the potential loss of institutional control at some time in the future.
4. Even if it were decided not to proceed with any new build, CoRWM would still reject this option for managing the legacy waste.

**QUESTION 2**

*Should the Welsh Government adopt a policy for geological disposal for the long term management of higher activity radioactive waste and spent fuel declared as waste?*

*Please give your reasons.*

1. CoRWM believes that ‘*the Welsh Government* [should] *adopt a policy for geological disposal for the long term management of higher activity radioactive waste and spent fuel declared as waste*’. It shares Welsh Government’s views, expressed in paragraph 3.19 of the Consultation Document, that while there are other disposal options that can deal with some of the waste, geological disposal is the only option that could provide a complete solution for the whole inventory.
2. CoRWM’s support for geological disposal does not mean that CoRWM is advocating that no other disposal option is considered under any circumstances. If there are opportunities to dispose of some waste using other disposal options, these should be considered where appropriate. CoRWM believes that Welsh Government should not close its mind to these other disposal options but should maintain a watching brief and keep its policy under review.

**QUESTION 3**

*If the Welsh Government does not adopt a geological disposal policy should it adopt a policy for an alternative disposal route for higher activity radioactive waste and spent fuel declared as waste? If so what policy should it adopt?*

*Please give your reasons.*

1. CoRWM does not think there are currently any alternative disposal routes for HAW that could take the place of geological disposal. As noted in CoRWM’s response to Question 2, CoRWM would not rule out other disposal options, such as borehole disposal or near surface disposal, as additional disposal routes but they cannot be substitutes for geological disposal for the full inventory of HAW. For this reason, CoRWM’s answer to the question ‘if Welsh Government does not adopt a geological disposal policy should it adopt a policy for an alternative disposal route for higher activity radioactive waste and spent fuel declared as waste?’ is an unequivocal no.

**QUESTION 4**

*Do you have any other comments on the Welsh Government policy for the disposal of higher activity radioactive waste and spent fuel declared as waste?*

1. If the outcome of this review is that Welsh Government decides to adopt a policy of geological disposal, CoRWM believes that it will be important to move to the next steps as soon as is practicable in order to explain the implications of the policy for the people of Wales and to consider and, where appropriate, consult on matters including but not limited to an assessment of sustainability, health impact assessment, impact on equality, rural areas, the rights of the child and the Welsh language..

1. http://wales.gov.uk/docs/desh/consultation/141023haw-consultation-en.pdf [↑](#footnote-ref-1)
2. CoRWM’s position is that “geological disposal” (i.e. emplacement underground at a depth of 200-approx. 1000 metres with no intention to retrieve) is currently the best option for the ultimate disposition of HAW. However, other disposal options, for example deep borehole disposal or emplacement at less than 200 metres depth, are possible for some components of the HAW inventory. In this document, CoRWM makes a clear distinction between “geological disposal” (used specifically to denote CoRWM’s preferred option) and “disposal”, a broader term which includes geological disposal, as well as other forms of disposal. [↑](#footnote-ref-2)