

CoRWM RESPONSE TO WELSH GOVERNMENT CONSULTATION DOCUMENT: GEOLOGICAL DISPOSAL OF HIGHER ACTIVITY RADIOACTIVE WASTE: COMMUNITY ENGAGEMENT AND IMPLEMENTATION PROCESSES

1. CoRWM welcomes the opportunity to comment on Welsh Government's proposals for the processes involved in siting a geological disposal facility (GDF) in Wales and, in particular, for engaging with potential host communities.
2. CoRWM welcomes the fact that the Welsh Policy is set in a UK framework and that Welsh Government is part of the Managing Radioactive Waste Safely Programme. Given that Wales is therefore involved in a programme in which communities in any of England, Wales or Northern Ireland could volunteer to host a GDF on behalf of the country as whole, CoRWM agrees that there must be consistency across the different administrations to the extent that host communities are neither disadvantaged nor favoured simply because of their location within the UK.
3. The publication of the Policy means that Wales, and its communities, are now in the same position as England and Northern Ireland. It is CoRWM's view that arrangements for implementation and community engagement should be predicated on the basis that a Welsh community is as likely to volunteer as an English one.

Question 1 Do you agree that the Welsh Government should adopt processes and arrangements for engaging with potential volunteer host communities that are compatible with those adopted for England and Northern Ireland providing they are consistent with the needs of Welsh communities?

If you consider that the Welsh Government should adopt a different approach please indicate what alternative arrangements you consider would be appropriate and what advantages you consider they would offer.

4. CoRWM thinks that, ideally, processes and arrangements for engaging with potential volunteer host communities in Wales should be compatible with those adopted for England and Northern Ireland providing they meet the needs of the Welsh people. CoRWM has concerns, however, over the practicality of this approach because of the differences between the Welsh and English environments. It intends to follow up these concerns with Welsh Government.

Question 2 Do you agree that geological disposal should only be taken forward with volunteer communities willing to engage, without prior commitment, in discussions about potentially hosting a GDF?

5. Yes. The CoRWM remains committed to the volunteer approach to siting.

Question 3 Do you agree that communities should have a right of withdrawal from discussions which can be exercised at any point prior to a public test of community support?

6. Yes. The right of withdrawal is an essential part of the volunteer approach. CoRWM believes that the same principle should apply in Wales and England.

Question 4 Do you agree that there should be a public test of community support after discussions and the provision of information to a potential host community and before construction of a GDF starts?

7. Yes. CoRWM believes that the same principle should apply in Wales and England, albeit that the public test may be different to suit the nature of Welsh society.

Question 5 The Welsh Government would welcome constructive proposals for how the public test of community support should be structured in Wales.

8. CoRWM believes it will be better able to give advice in this area when the changes in Welsh governance have taken effect and the current process for England has been completed.

Question 6 Do you consider that potential host communities should be given access to information such as the national geological screening and information about the science and engineering of geological disposal in advance of engaging in discussions about potentially hosting a GDF?

9. Yes. Welsh communities should have the same rights of access as communities in England and Northern Ireland.

Question 7 Do you consider that communities in discussion about potentially hosting a GDF should have independent access to expert advice during those discussions when they consider it necessary?

10. Yes. CoRWM notes that paras 2.30 and 2.31 of the Consultation Document refer to members of learned societies. It is CoRWM's understanding that learned societies have been asked to identify experts that might be willing and able to provide advice but have not been asked to restrict their nominations to members of the learned society. CoRWM thinks it is important to cast the net widely with the objective of ensuring that communities can get a balanced view of understanding of the issues which avoids sensationalism as far as possible. This will require the use of experts who can frame their advice within the context of geological disposal and the requirements of the safety case.

Question 8 Do you agree that the inventory for disposal should be specified in advance of discussions and that any changes should be subject to community agreement before any commitment to hosting a GDF?

11. Yes. This information is integral to the provision of full information to communities. The allowable inventory in a GDF will be defined by the safety case which will explain the relationship between the inventory and the size of the GDF.

Question 9 Do you agree that the inventory for disposal should include waste from new nuclear power stations?

12. CoRWM has already stated that there is no technical reason for not including new waste (CoRWM Doc 2749). If circumstances dictate that more than one GDF is required, CoRWM can see no reason to discriminate between legacy and new waste. It reiterates the point that the final inventory must be determined according to the safety case.

Question 10 If you do not agree that waste from new nuclear power stations should be included in the inventory for disposal what disposal option would you prefer for waste from new nuclear power stations?

13. CoRWM confirmed its support for geological disposal in 2013 (CoRWM doc 3122). It does not consider there is an alternative to geological disposal. It follows that if a GDF was restricted to legacy waste, there would need to be another one for the disposal of waste from new build.

Question 11 Do you agree that Government should provide funding to communities to meet the cost of engaging in discussions about potentially hosting a GDF?

14. Yes; CoRWM is clear that communities should be resourced to meet the cost of engaging in discussions.

Question 12 Do you agree that Government should provide additional investment for communities engaging in discussions about potentially hosting a GDF and further community investment if a community commits to hosting a GDF?

15. Yes; CoRWM confirms its belief that communities should benefit in this way. The principles set out in the DECC White Paper leading to quantification of community benefits should apply equally to Wales and England. The way these benefits are used, however, could be different.