



Department  
of Energy &  
Climate Change

## **Call for Evidence**

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

## **Response form**

13 May 2013

# Call for Evidence

Please use this form to answer questions on the Call for Evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility.

The closing date for the submission of responses is **10 June 2013**.

Responses can be returned by email (preferable) or post.

Email address: [radioactivewaste@decc.gsi.gov.uk](mailto:radioactivewaste@decc.gsi.gov.uk)

Or by post to: The Managing Radioactive Waste Safely team  
Department of Energy and Climate Change  
55 Whitehall  
London  
SW1A 2EY

In order to help us analyse responses, please provide details of your organisation.

When the call for evidence ends, we may publish or make public the evidence submitted. Also, members of the public may ask for a copy of responses under freedom of information legislation.

If you do not want your response - including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the call for evidence. Please note, if your computer automatically includes a confidentiality disclaimer, that will not count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

The responses to this Call for Evidence will inform a public consultation that will follow in the autumn.

We would like to keep stakeholders who are interested in the MRWS process up to date on developments. If you would like to be kept up to date please sign up at the end of the form.

# Introduction

1. The UK Government's policy for the long-term management of higher-activity radioactive waste is geological disposal<sup>1</sup>. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper<sup>2</sup> was published which outlined a framework for implementing geological disposal based on the principles of voluntarism and partnership.
2. Three local authorities formally expressed an interest in the MRWS programme: Copeland and Allerdale Borough Councils, and Cumbria County Council. In January 2013, the three local authorities voted on whether to proceed to stage 4 of the process. The two boroughs voted in favour, but the county voted against. The Government had in 2011 given a specific undertaking that the existing site-selection process would only continue in west Cumbria if there was agreement at both borough and county level. The county's decision therefore ended the existing site selection process in west Cumbria.
3. Shepway District Council in Kent had also taken soundings from local residents, but subsequently decided against making a formal expression of interest in the current MRWS process.
4. The Government remains firmly committed to geological disposal as the right policy for the long-term safe and secure management of higher-activity radioactive waste. The Government also continues to hold the view that the best means of selecting a site for a geological disposal facility (GDF) is an approach based on voluntarism and partnership.
5. Evidence from abroad shows that this approach can work, with similar waste disposal programmes based on these key principles making good progress in countries like Canada, Finland, France and Sweden.
6. The fact that two local authorities in west Cumbria voted in favour of continuing the search for a potential site for a GDF demonstrates that communities recognise the substantial benefits that are associated with hosting such a facility – both in terms of job creation and the wider benefits associated with its development.

## Purpose of the call for evidence

7. In line with the Secretary of State's written Ministerial statement of 31 January 2013<sup>3</sup>, Government has been considering what lessons can be learned from the experiences of the MRWS programme in west Cumbria and elsewhere. We are now inviting views on the

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<sup>1</sup> Radioactive waste disposal is a devolved matter. The Scottish Government has a separate policy and supports long-term interim storage and an on-going programme of research and development. The Welsh Government has reserved its position on geological disposal of radioactive waste while continuing to play an active part in the MRWS process. The Department of the Environment in Northern Ireland supports the MRWS programme.

<sup>2</sup> Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal  
<https://www.gov.uk/government/publications/managing-radioactive-waste-safely-a-framework-for-implementing-geological-disposal>

<sup>3</sup> See <https://www.gov.uk/government/speeches/written-ministerial-statement-by-edward-davey-on-the-management-of-radioactive-waste>

site selection aspects of the ongoing MRWS programme in this call for evidence, particularly from those who have been engaged in (or have been interested observers of) the MRWS process to date. The responses to this call for evidence will inform a consultation that will follow later in the year.

## Background

8. Higher-activity radioactive wastes are produced as a result of the generation of electricity in nuclear power stations, from the associated production and processing of the nuclear fuel, from the use of radioactive materials in industry, medicine and research, and from military nuclear programmes.
9. As one of the pioneers of nuclear technology, the UK has accumulated a substantial legacy of higher activity radioactive materials. Some of it has already been processed and placed in safe and secure interim storage on nuclear sites. However, most will only become waste over the next century or so as existing facilities reach the end of their lifetime and are decommissioned and cleaned up safely and securely.
10. These higher-activity wastes can remain radioactive, and thus potentially harmful, for hundreds of thousands of years. Modern, safe and secure interim storage can contain all this material – but this method of storage requires on-going human intervention to monitor the material and to ensure that it does not pose any risk to human or environmental health. While the Government believes that safe and secure interim storage is an effective method of managing waste in the short to medium term, the Government is committed to delivering a permanent disposal solution.
11. In October 2006, following recommendations made by the independent Committee on Radioactive Waste Management, the Government announced its policy of geological disposal, preceded by safe and secure interim storage. The Government subsequently announced that it would pursue a policy of geological disposal with site selection on voluntarism and partnership. This remains Government policy.

## Geological disposal

12. Geological disposal involves isolating radioactive waste in an engineered facility deep inside a suitable rock formation to ensure that no harmful quantities of radioactivity ever reach the surface environment. It is a multi-barrier approach, based on placing packaged wastes in engineered tunnels at a depth of between 200 and 1000m underground, protected from disruption by man-made or natural events.
13. Geological disposal is internationally recognised as the preferred approach for the long-term management of higher-activity radioactive waste. It provides a long-term, safe solution to radioactive waste management that does not depend on on-going human intervention.

# Response form

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Or by post to: The Managing Radioactive Waste Safely team  
Department of Energy and Climate Change  
Room M07  
55 Whitehall  
London  
SW1A 2EY

Name	REDACTEDREDACTED
Organisation / Company	National Trust
Organisation Size (no. of employees)	REDACTEDREDACTEDREDACTED
Organisation Type	REDACTED
Job Title	REDACTEDREDACTED
Department	REDACTED
Address	REDACTEDREDACTEDREDACTEDREDACTEDREDACTED
Email	REDACTEDREDACTEDREDACTEDREDACTEDREDACTED
Telephone	REDACTEDREDACTED
Fax	

Would you like to be kept informed of developments with the MRWS programme?	Yes
Would you like your response to be kept confidential? If yes please give a reason	No

The Government is interested in your views on the geological disposal facility site selection process outlined in the 2008 Managing Radioactive Waste Safely (MRWS) White Paper. To assist us you may wish to consider the following issues in your response:

- What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?
- What do you think could be done to attract communities into the MRWS site selection process?
- What information do you think would help communities engage with the MRWS site selection process?

As a significant land owner, conservation charity and tourism provider in Cumbria, the National Trust has a key interest in the management of radioactive waste in the county. We were directly involved in the MRWS process in Cumbria in 2012 - 13. The points below reflect our experience of that process as well as feedback from our stakeholders, including NT members, tenants and local communities.

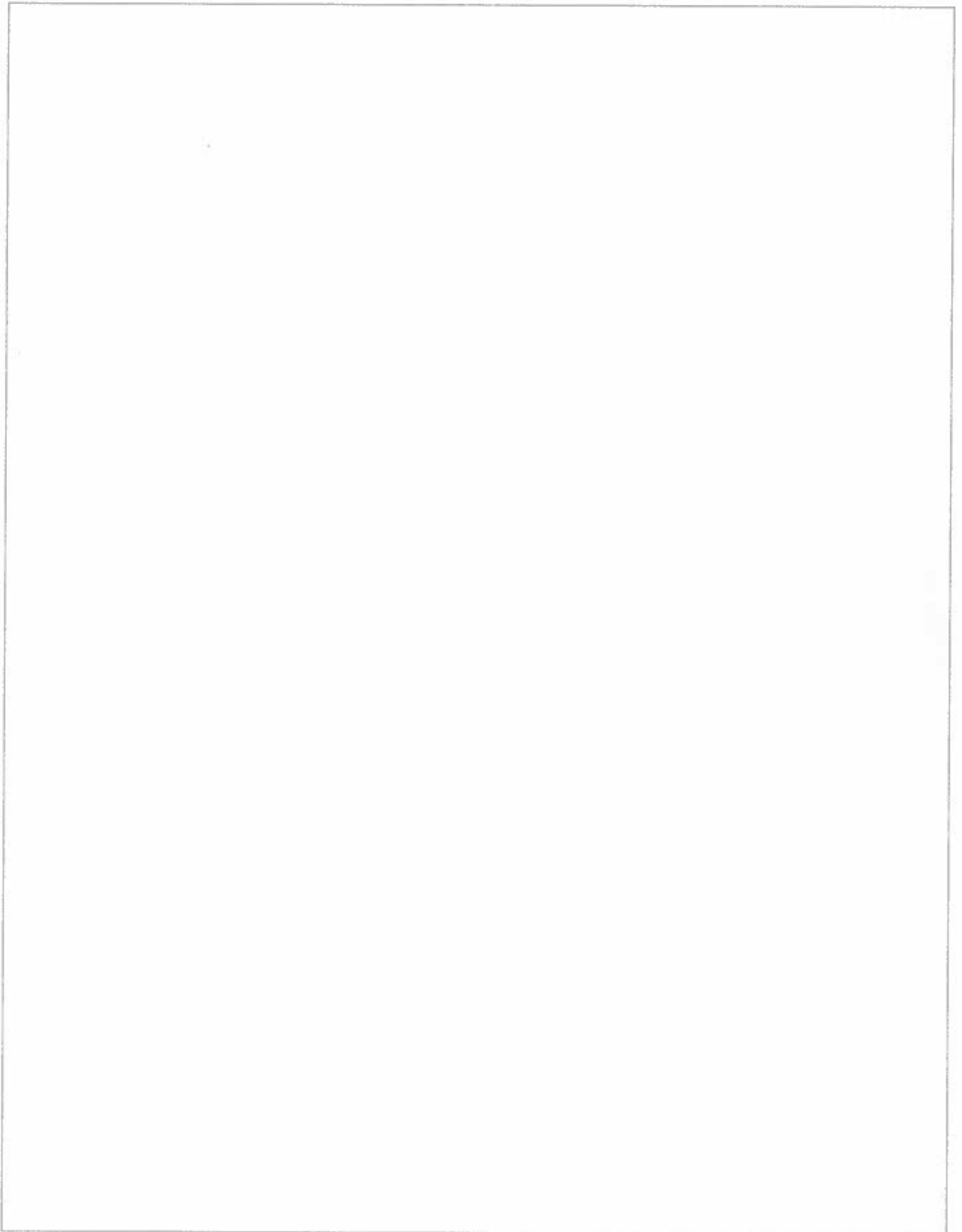
#### **The MRWS site selection process:**

We have a number of concerns with the site selection process as it was experienced in Cumbria.

- The starting point for selecting a site for storage should be geological and environmental suitability, rather than local interest. Rather than start with a call for voluntary expressions of interest, an alternative approach involving a national scan for suitable locations would save time and public money. In the Cumbria case, there had been substantial previous research on the lack of geological feasibility from the NIREX study, yet this did not seem to be a factor in the siting process.
- There is a lack of weight given to the need to exclude certain places from site selection on the basis of grounds other than geology, for example, environmental and heritage significance. Places with national and international designations, e.g. National Parks, AONBs, World Heritage Sites, SSSI, and their settings, should be automatically excluded from consideration as a storage site.
- The National Trust owns and manages land on behalf of the nation. In most cases we hold this land inalienably. Therefore, it is likely that we would strongly object to any adverse impacts to these places or their landscape settings. National Trust land should be automatically excluded from the site selection process and we should be involved at the earliest stages of discussion where new sites are likely to fall into the settings of National Trust land.
- More powers should be given to town and parish councils that represent host communities. For example, the right to withdrawal should include these bodies.
- We would like to know what the implications are of the 'no' vote from Cumbria County Council. We assume the process to find a site continues but has Cumbria been firmly ruled out? We would hope that it has and that the process goes back to basics with a geological search before inviting new communities to express an interest.

## Community engagement

- The principle of voluntarism is critical and the right of communities (via the DMBs and town/parish councils of the host community) to withdraw at any point in the selection process should be confirmed in statute before exploratory work is carried out.
- We believe the consultation process in Cumbria failed for a number of reasons:
  - Communities only realised the specific implications of the selection process very late in the process. This is largely because the likely impact of Stage 5 on Ennerdale as one of the sites for exploration only became public in the last few weeks before the Stage 4 vote rather than being identified and acknowledged much earlier in the process. The local outcry against the threat was intense and received poor handling by the MRWS Partnership which had disbanded by this point creating an information vacuum.
  - Our conversations with local stakeholders indicated a lack of trust in the decision-making process and a lack of transparency about who and how decisions were being made. That decisions were made by Cabinet members rather than full councils could be seen as reducing the voice of local communities.
  - The decision to disband the MRWS Partnership in Autumn 2012 at exactly the point when people and the media were most alive to the process and asking questions was a fundamental mistake. This allowed information to circulate in a confusing, unmanaged and alarming way (e.g about Ennerdale as a possible site under consideration).
  - From a National Trust perspective, we were surprised that representatives from local authorities did not do more to engage us in the process and when we did meet there was a lack of detailed information about the sites under consideration. We did have two meetings with some representatives of the MRWS Partnership but two local authorities failed to meet with us at all. As the Trust is a key landowner in the area with 4 million members, many of whom were writing to us about this issue, we felt this indicated poor stakeholder management.
- An example of an excellent open and proactive engagement related to an infrastructure siting process is the current consultation by National Grid on the route for new grid circuits from Moorside in Cumbria. The contrast between this process, which has informed and consulted with stakeholders and communities over a number of stages and that of the MRWS process is instructive.





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