



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.



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?

#### **Improvements:**

1. International practice for site selection processes are based on two fundamentals:
  - a. *Led by an independent panel* representing a broad range of key stakeholders. For example, in the case of MRWS, the NDA's role was not seen, nor did they act, in a way to engender trust that the process was objective, open and genuinely inclusive in terms of participation. The principle local authorities cabinet/executive structures meant that their legitimacy to represent all the people in the host/affected communities was not achievable. In the context of localism, Town and Parish Councils/meetings should have been directly represented; and
  - b. Geological suitability, overseen by the independent panel, should be investigated *before* seeking voluntary participation by potential host and affected communities.
2. DECC consultation should take place on the stages in the process, the independent panel and clear governance arrangements, and an updated White Paper debated and approved by Parliament. Some legal requirements may be required stemming from the consultation, such as the right of withdrawal by communities, that would need legislation.

#### **Attract communities:**

1. The absence of the above were the key failings in MRWS, however additionally, the community benefits package became a significant material consideration in advance of geological suitability being independently proven. This again undermined trust and generated a perception that the Government's own overriding objectives of safety and environmental protection were being compromised. Any community benefits package should follow geological suitability and not lead site selection. A relevant factor was also the fact that the local authority budgets are struggling to cope with service cuts and, therefore, their own neutrality of decision making was compromised. This again reinforces the need for an independent panel, covered above.

**Information:**

- 1. The consultants commissioned by MRWS did the best they could under the circumstances. What failed in the whole process was *communications*. This partly stemmed from the MRWS Partnership's ambiguous relationship with the DMBs (Decision Making Bodies). Creating an independent panel both reporting to Government and overseeing the process would help simplify communications. Fundamentally, two-way communications, collective learning and understanding and time to build trust was absent. The DMB process deadlines should be flexible around addressing outstanding information uncertainties in the communications process with host and affected communities. Voluntarism needs all relevant parties, overseen by the independent panel, to be in agreement that information requirement or issue x,y,z has been dealt with before moving on to the next stage. Citizen juries should be established to inform decisions of this nature where often complex information can only be conveyed so far within written consultation documentation. A basic tenant of building peoples' trust is *participation* and *ownership* in any decision-making process, and I'm afraid to say that MRWS failed in this regard.**

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