



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

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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

<b>Name</b>	REDACTED REDACTED REDACTED
<b>Organisation / Company</b>	Cumbria Chamber of Commerce
<b>Organisation Size (no. of employees)</b>	REDACTED
<b>Organisation Type</b>	REDACTED REDACTED
<b>Job Title</b>	REDACTED REDACTED
<b>Department</b>	n/a
<b>Address</b>	REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED
<b>Email</b>	REDACTED REDACTED REDACTED REDACTED
<b>Telephone</b>	REDACTED REDACTED
<b>Fax</b>	REDACTED REDACTED

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

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?

Thank you for the opportunity to contribute to DECC's review of the Managing Radioactive Waste Safely (MRWS) policy that covers higher activity waste in the UK. The policy is important *nationally* to secure a long-term management solution for these hazardous materials, as well as *locally* given that the majority of the relevant wastes<sup>4</sup> are already stored in Cumbria and are unlikely to leave in the short to medium term.

## Context

Cumbria Chamber of Commerce represents 1,500 business members and engages actively with around 14,000 business contacts throughout the county.

The Chamber of Commerce was a pivotal member of the recent West Cumbria Managing Radioactive Waste Partnership. Our role was a neutral one – we were neither for nor against the development of a Geological Disposal Facility (GDF) – but rather, via our participation on the Partnership we ensured the needs of businesses across Cumbria were met regardless of the way forward.

Our decision as a Chamber was to take this neutral role, enabling us to engage in the discussion and because we represent members across the whole spectrum of Cumbrian businesses including those directly within the nuclear supply chain and those with very different priorities.

We believe that any decision is a citizen representative one through local authorities. We therefore seek to influence to make sure that any decisions are taken in full cognisance of the implications.

Specifically, the Chamber of Commerce raised the issue of potential impacts on the food and drink, tourism and land-based industries as critical to address before it

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<sup>4</sup> The majority of higher activity wastes are already in Cumbria at the Sellafield site. This is regardless of how it is calculated: by volume or by radioactivity.

was too late. Together with Cumbria Tourism, and with funding support from DECC, we led a joint research study to baseline the economic position of Cumbria as well as a study on the potential impacts on the brand of the Lake District and Cumbria. It was important to establish both of these as a 'baseline' before any decisions were taken about entering Stage 4 of the GDF site selection process, where potential site areas would start to be narrowed down to relatively focussed locations. We were grateful to other Partnership members for agreeing that this was an issue, and also to DECC for supporting the work and starting to address our concerns.

DECC's call for evidence asks three questions. Rather than address them each individually, below we outline some over-arching points. The points we make are relevant to any location in the UK (unless otherwise stated), not just Cumbria.

### **Mitigation of impacts**

Many of the impacts of a GDF are obvious: dust, noise, traffic, worker accident risk, and potential public health and environmental implications during. There are some positive impacts such as the jobs arising from the facility, as well as other plants that may logically be co-located near the head-works of the repository. The presence of the facility is also likely to stimulate inward investment through the supply chain.

However, there are some negative impacts that may not be immediately obvious. The siting process will take around 15 years, during which there is a serious risk of the brand of the area being undermined by negative media coverage. This may occur innocently and as part of the general 'rough and tumble' of any large development, or be purposefully created by some players for whom it is convenient. Either way, the potential impact on the food and drink, tourism and land-based industries in Cumbria must not be underestimated. Particularly so for any business that relies on brand equity to leverage value for its products or services. This was seen around the Food-and-Mouth episode where companies took years to recover, or frankly never did.

As instigated by the Chamber and other partners in the Partnership, we believe any repository siting process should acknowledge this risk and manage it up front. Specifically, the following points should be put in place:

- A baseline study of economic indicators, providing a baseline against which future performance can be profiled
- A baseline study of peoples' perceptions of the brand, again providing a baseline
- Regular re-runs of these studies to assess whether there has been an impact, where that impact is being felt, and how large it is
- A proactive mitigation campaign that supports the three industries mentioned *before* any damage might be done

- Funding made available to support this work, as well as regular reviews of funding levels so support can increase (if impacts are larger than expected) or decrease (if impacts are lower)

The Chamber recognizes the importance of an evidence-based approach here. However, we also see the limitations to it if implemented in a very traditional way, as it will be impossible to establish with any certainty whether an impact is solely due to the conversation around the repository – in reality the picture of cause and effect will be more complex and hard to pin down. Clearly though impacts resulting from the conversation are as much a result of the process as any other impact. We would therefore invite DECC to be more flexible in how they approach 'evidencing' these impacts. We suspect that any political support that exists (in any area of the country) will wane if traditional models are pursued too rigidly.

**Key message: Acknowledge risks to the brand of a volunteering area and fund work to research and mitigate potential impacts.**

## Community benefits

The Chamber notes the fundamental difference between impact mitigation and community benefits, as defined in Government's White Paper on MRWS. For clarity:

- *Impact Mitigation* = Funding to mitigate impacts where impacts are unavoidable. This could involve for example the costs of a brand protection strategy, or the costs of mitigating construction disruption by increased infrastructure provision. Importantly, impact mitigation aims to bring the situation back to where it was before the repository process started, not building value on top.
- *Community Benefit* = Additional benefits beyond the above two categories, in recognition of a local community fulfilling an essential service to the nation. This could include a variety of investments or funding streams. Importantly, the definition of community benefit must *exclude* the positive impacts that would be expected from the development anyway i.e. jobs, required infrastructure improvements like site access roads. Community benefits are additional.

We invite DECC to not confuse the two when talking to communities, including Cumbria. It is particularly important to the business community and other organisations with an economic generation remit that everyone maintains clarity about community benefits being 'additional'. This is something that the Partnership was usefully clear about, and that perhaps DECC could make clearer with other communities in England and Wales so they understand the potential 'positives' in play.

**Key message: Be clear that community benefits are additional to impact mitigation and additional to the expected positive impacts of the development.**



Timing of community benefits. The current expectation in both the White Paper and also the Partnership's work is that community benefits would only be available once the Right of Withdrawal is lost to community representatives. Whilst we understand the value for money argument here, it is inescapable that it is a 'big ask' for communities to go through 15 years of siting discussions with all the uncertainties associated, on the promise of an unspecified community benefit package at the end of it (after at least 3 changes of Government).

We recognize the Partnership's useful recommendation that DECC work with partners during a Stage 4 to define more clearly what a package might look like regarding governance arrangements, investments, scale and distribution (p178 of the Partnership's final report). Even this though would take about 5 years.

There is therefore an opportunity for DECC to show more leadership on benefits, without being overly-prescriptive. People want to know what is on offer. Firstly, people need to know what ballpark we're in regarding scale – is Government talking millions, or billions? Secondly, what kinds of investments might be possible? Some worked up relevant examples would be useful. Discussions and information on benefits to date have been too slow and too tentative.

We offer one possibility that illustrates our point. There is some international experience of ring-fenced funds. Once the community enters the siting process, Government openly sets aside a significant capital sum into a fund under community control. The community receives the interest on this sum and can spend it how it wishes (local governance arrangements permitting). If the community withdraws from the process, the capital sum is returned. If the facility is approved and construction starts, control of the capital sum is transferred to the community. Importantly, this mechanism is: simple, clear, committing, open, and manages risk to reasonable levels on all sides. It also spreads the timing of benefits over the length of the siting process so that the community sees the proof of Government's commitment to the project. We invite DECC to consider offering this kind of mechanism.

**Key message:** Be more forthcoming with community benefit packages. What scale is intended? What investment options are there? How might it work? Give more information to reset the balance of perceived costs and benefits.

**Key message:** Consider mechanisms that spread the timing of benefits across the whole siting process, such as a ring-fenced fund.

## Integration

To date, the conversations about a repository and the possibility of building new

nuclear reactors have been kept separate. This does not make sense to the Chamber, and we would recommend they are integrated. At a national level the two are connected – new build cannot proceed without satisfactory arrangements for waste – so it is logical for the conversation to be seen as one holistic discussion and even potentially a package of investments and decisions.

**Key message:** Recognise the integration of geological disposal with other nuclear opportunities, and discuss them as one package not as separate entities.

### **Certainty**

To flourish, businesses need certainty and clarity. The MRWS process does not provide this. There is a long period of uncertainty about whether the geology is adequate, whether a community will volunteer, what the impacts will be, what the opportunities are. All of this has the potential to undermine business confidence, and to miss opportunities. The speed of the process needs to be accelerated if at all possible, notwithstanding the need for community representatives to hold a veto on progress (which the Chamber does agree with).

**Key message:** Seek opportunities to accelerate the process, thus giving more certainty to businesses regarding investment.

### **Displacement**

Potential displacement issues around the construction phase should be taken into account. One of the issues highlighted in construction of Thorpe is the displacement effect of the increased level of economic activity related to the construction phase on fledgling local tourism and other activities through issues around traffic congestion and the take up of accommodation by contractors and related over-pricing. This distorted to a degree the underlying economy and although there were positive aspects there were also negative ones. Issues such as transport infrastructure improvements need to be taken into account at an early stage and relevant improvements in place ahead of any other construction activities.

**Key message:** Ensure potential displacement issues around any construction phase are assessed and addressed prior to the start of construction.

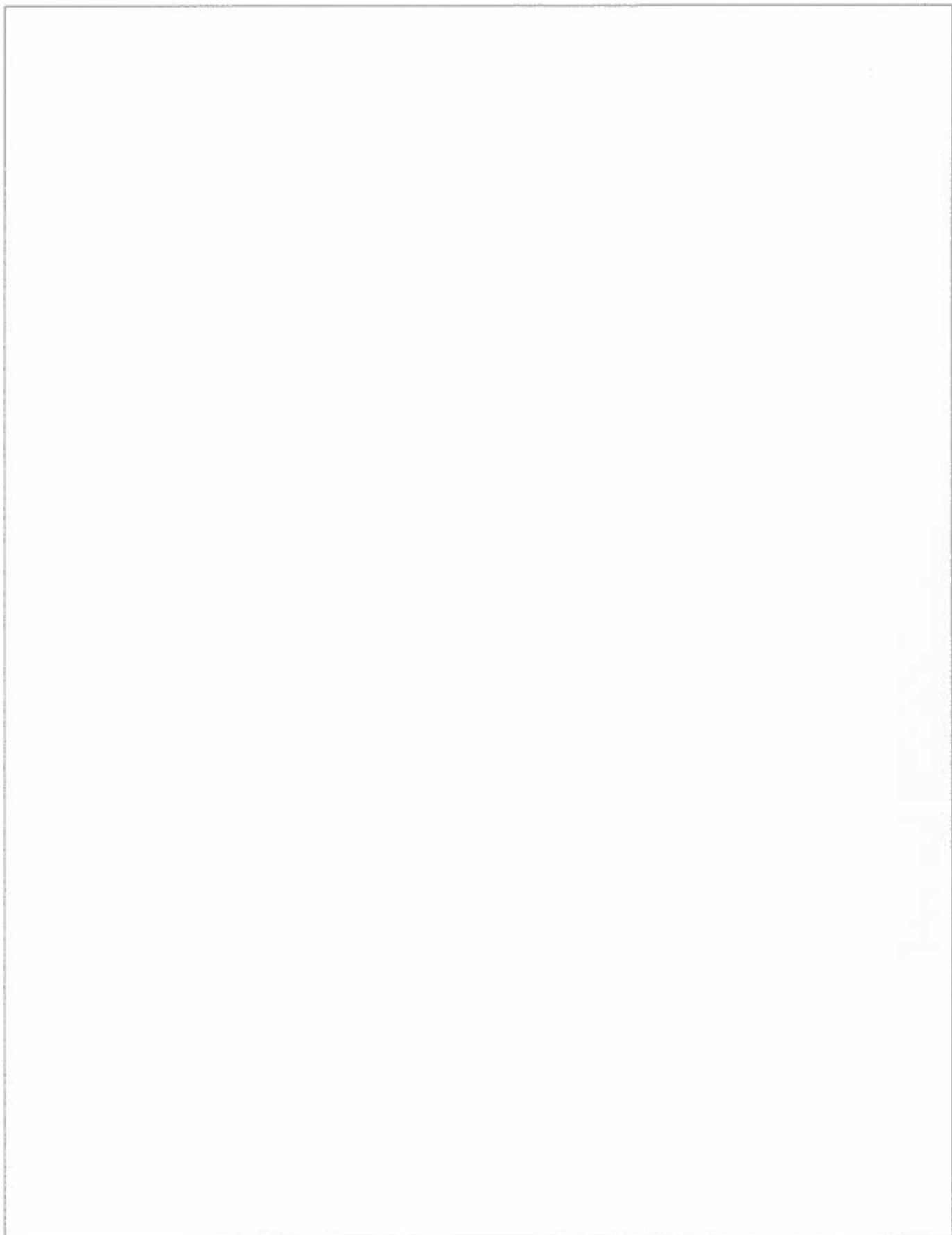
### **Involvement of wide range of stakeholders**

The Chamber has welcomed the close engagement in the West Cumbria MRWS Partnership. Whilst time-consuming, it gave us the valuable opportunity to

strongly represent the interests of Cumbrian businesses, with specific and tangible changes made as a result. We recommend that this opportunity is not lost in any improvements that might be made to DECC's policy. It is essential that, regardless of who the Decision-Making Body/ies are in the country, that DECC hear directly from wider representatives than only the DMBs. In the case of the Chamber, we are in regular touch with 14,000 Cumbrian businesses, which is a vital link to understanding and influencing business leaders in the area in a non-political way. Our analogous bodies around the country will offer similar benefits to any conversation that starts on MRWS in their area.

**Key message: Continue to talk to a wide range of stakeholder organisations, not just the DMBs (wherever this may be in the country).**

I hope these points are helpful. Do not hesitate to come back to me if you would like to discuss them.



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URN 13D/105