

Response form

Please use this form to respond to this 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

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	Allerdale and Copeland Green Party
Organisation Size (no. of employees)	REDACTEDREDACTED
Organisation Type	REDACTEDREDACTED
Job Title	REDACTEDREDACTED
Department	
Address	REDACTEDREDACTEDREDA REDACTEDREDACTEDREDA REDACTEDREDACTEDREDA REDACTEDREDACTEDREDA
Email	REDACTEDREDACTEDREDA REDACTEDREDACTEDREDA
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?

We welcome the call for evidence and would like to make the following comments in the spirit of helpfulness so that lessons may truly be learnt from the failed process in West Cumbria. The comments are predicated upon Green Party Policy and the Sixth Report of the UK Royal Commission on Environmental Pollution; Nuclear Power and the Environment September 1976, also known as the Flowers Report.

1) Green Party Policy EN600 states: "A deadline for phasing out nuclear power would be set when we come to office and all UK nuclear power plants phased out within this date."

EN604 states: "The long-term management of higher activity radioactive waste should be in surface or near-surface facilities. Facilities should be located as near to the site where the waste is produced as possible. Developers will need to demonstrate how the facilities will be monitored and how waste packages, or waste, could be retrieved. All long-term waste management options will be subject to robust regulatory requirements."

The Flowers report recommended: "There should be no commitment to a large programme of nuclear fission power until it has been demonstrated beyond reasonable doubt that a method exists to ensure the safe containment of long-lived, highly radioactive waste for the indefinite future."

2) We had at least one member at all the MRWS meetings and some of our members followed the meetings and reports very closely. We therefore feel able to whole-heartedly endorse the cross-party decision taken by Cumbria County Council and the reasons given for it.

3) It is essential that it is acknowledged by all concerned that our radioactive waste is a national issue and that safety, and not convenience of any sort, has to be paramount. Given the policy of the Scottish Government & the uncertainty of that of the Welsh Assembly, we feel that, in order to make the search for an answer to this problem truly national, that the remit should be widened to include the possible siting of storage/disposal methods other than GDF.

4) One of the major stumbling blocks of the West Cumbria MRWS was the lack of clarity over definitions and parameters. The host community should be carefully defined and used with consistency throughout policy documents and discussions. The waste to be emplaced should be clearly defined in terms of composition, volume and radioactivity before any process is embarked upon. The host community must know exactly what it is volunteering for at the outset.

5) The MRWS partnership made much of the promise of economic benefit and jobs. For the purposes of adequate comparison to be made, a rigorous assessment should be made of long-term post-construction jobs created by a) GDF b) surface or near surface stores.

6) Before any authority expresses interest they should demonstrate that they have local support in doing so. Shepway decided not to express an interest, due to the lack of public support. That Allerdale and Copeland decided to do so without demonstrating public support, meant that trust was lost from the very beginning. Ultimately there was widespread mistrust about the whole process and consultation. Indeed the consultation failures of MRWS were acknowledged by the NDA publicly. The partnership repeatedly considered the issue of trust and tried to engender trust among the public but they always failed.

7) The fundamental pro-nuclear bias of DECC and the NDA proved to be a major stumbling block to engendering trust and, ultimately, both the NDA and DECC came out of the whole process extremely badly. It may be that both DECC and the NDA have to be removed from any siting process and be replaced with a new statutory body.

8) Geological disposal has not been proven to work, it was merely a pragmatic solution adopted after the banning of marine disposal in 1993. DECC's use of the example of other countries to bolster the case for deep disposal here is treated with suspicion because those countries are not in anyway similar to the UK in size or population density, geology or topography. No country has yet solved the problem of nuclear waste.

9) Any plan for radioactive waste must aim to deal with it in situ and avoid the need for transportation

10) Any process which results in wastes of different composition, or multiplies the amount of waste to be dealt with must be ruled out now, as this only further complicates the problem to be dealt with. Radioactive waste is not homogenous; differing chemical composition, rates of decay etc mean wastes need to be handled in different ways. Any change of definition of waste to "energy asset" should only be considered if it renders the resultant waste harmless.

11) It is important to recognise that the plan to find a site to host a deep underground disposal site may end in failure. After all, detailed plans have failed twice in West Cumbria before. While it may be possible to learn from the process in order to make it more likely that a further consultation will succeed, evidence may arise proving that the site or the concept is not the best or safest possible. A credible consultation should recognise the possibility of failure. During the MRWS process, it was repeated by DECC officials several times in public that Plan B was to make Plan A work. A credible Plan B is needed.

12) In addition to areas of unsuitable geology or topography, areas with landscape designations (National Parks, Areas of Outstanding Natural Beauty) or wildlife designations (Ramsar sites, Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest) should be protected at depth as well as on the surface.

13) If the Government is determined to press ahead with deep disposal, areas with a good chance of proving geologically and topographically suitable should be first identified and expressions of interest sought from those areas. This judgement should be based on a credible geological countryside survey. In this respect the MRWS process was a sham, geology was never considered in any detail and the public felt that the desired result was to come back to West Cumbria.

14) Arrangements for monitoring the waste and retrieving it if found to be leaking, so that it may be repackaged and made safe, must be considered from the outset and designed into any deep disposal project. These arrangements must be able to run for the entire life of waste or until suitable treatment is found to render it harmless.

15) The process of finding a permanent solution will take decades. In fact, it may never be found. The recent Commons Public Accounts Committee report was very critical of the cost overruns and delays in dealing with waste and the decommissioning of facilities, as well as

the ongoing dangerous state of the waste. One committee member, MP Austin Mitchell, described Sellafield as "the biggest nuclear slum in Europe". Therefore DECC and the NDA should make it their highest priority to deal with the waste at Sellafield, and to ensure it is safely stored and monitored on the site.