



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

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 disposal¹. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper² 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 2013³, 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

¹ 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.

² 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>

³ 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?

What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?

The Government's stated policy on the long-term strategic solution for nuclear waste is for a geological disposal facility (GDF), and any future MRWS strategy should be clear from the outset that this is the only option under consideration and that a suitable site must be found.

The previous MRWS process was based on voluntarism, under which communities (local authorities) were encouraged to volunteer to participate in the site identification process. However, the decision to hand ownership of the initial stages of the process to a partnership of three differently-tiered local authorities (Cumbria county council and Allerdale and Copeland borough councils) also reduced the ability of the Government, the Nuclear Decommissioning Authority (NDA) and CoRWM to lead the process or to make the arguments in favour of geological disposal effectively; those bodies became seen as technical advisors rather than as advocates or promoters. The local authority partnership approach also required approval from all three councils to move to the next stage of the site selection process, effectively placing control over the whole issue into the hands of a small number of county councillors. The fact that both Copeland and Allerdale councils supported moving to the next stage, as did two-thirds of people in Copeland questioned in an Ipsos/Mori opinion survey, could not outweigh a decision taken remotely by a small number of county councillors (mainly from outside the Copeland area) only weeks before the county council elections.

The success of a future MRWS process will require the active involvement of potential host communities in developing the proposals, and the principles of participation and engagement will be critical. However, allowing local authorities to determine the outcome of a process which is designed to deliver a national Government policy may not be the most appropriate route. The Planning Act 2008 introduced a new planning process for Nationally Significant Infrastructure Projects (NSIPs) which requires the promoter/developer to carry out thorough pre-application and consultation and research, which is then considered by the Planning Inspectorate when determining whether to grant consent for the project. Local authorities, communities and environmental bodies, among others, are consultees rather than decision-makers, and Planning Performance Agreements (PPAs) can be put in place which require developers to support local authorities in considering the wider and longer-term implications of the proposed development. Copper Consultancy has many years of first-hand experience in this area and we believe that this process could be used to develop proposals for a geological disposal facility, with the NDA the obvious promoter/developer. The Government's National Policy Statement

(NPS) for Nuclear Power Generation (EN-6) identifies geological disposal as the solution for radioactive waste, but a further NPS specific to geological disposal may be required in order for a GDF to be classified as an NSIP for the purposes of planning legislation.

The issue of whether local geology was suitable for deep burial of nuclear waste in West Cumbria was a key issue during the previous process. Campaigners against the GDF cited reports by independent geologists who claimed it was not suitable, but the nature of the MRWS process (as stated above) meant it was impossible for NDA or DECC to provide a counter-argument; the NDA's detailed geological investigation could not take place until the next stage, but opponents claimed that moving to the next stage meant the creation of a GDF in West Cumbria was a "done deal", even though this was not the case. Again, treating the GDF project as an NSIP would allow the NDA to carry out geological investigation at varying levels of detail at different stages in the development of the proposals. Extensive consultation during and after each stage would allow detailed examination, challenge and review of the findings at each point in the process.

What do you think could be done to attract communities into the MRWS site selection process?

A community's willingness to participate in the site selection process will include a number of considerations, such as safety, health, inward investment, community benefit, employment, disturbance during planning, construction and operation, visual impact and others. The government should clearly define and communicate the economic and social benefits that would be enjoyed by the host community. However it is also vitally important to recognise that communities already living with the nuclear industry and above-ground storage of nuclear waste will have an informed view about its future; areas like West Cumbria and Kent, and others with existing nuclear facilities, for example, have many thousands of people employed in the nuclear industry and a much higher level of knowledge than most other parts of the United Kingdom. West Cumbria is also living day-to-day with the above-ground storage of nuclear waste already.

Communication will be key to getting people involved in any future MRWS strategy. Planning and construction of a GDF will take decades rather than years, so it will be important to engage with young people as a specific audience in potential host communities, as they will be the ones who will live and work with the future results. The extremely long-term nature of the project means there should also be a commitment to work with potential host communities on the development of long-term local/neighbourhood plans. A comprehensive package of economic, social and community benefits should be developed with each potential host community as part of the site selection process, with clear and unequivocal benefits and steps for the eventual host.

In making the case for the GDF, and to attract communities to participate, there should be a communications campaign which explains not only the benefits of a GDF but also the future implications of not having one, led by the Government, NDA and industry. It should be recognised that this would also lead to an opposing campaign, but this should be welcomed as part of a national debate on the issues and the future of UK energy and waste policy.

One of the keys to the success of a future MRWS process will be to engage with the "silent majority" and to ensure that the widest possible public opinion has been canvassed in the potential host community.

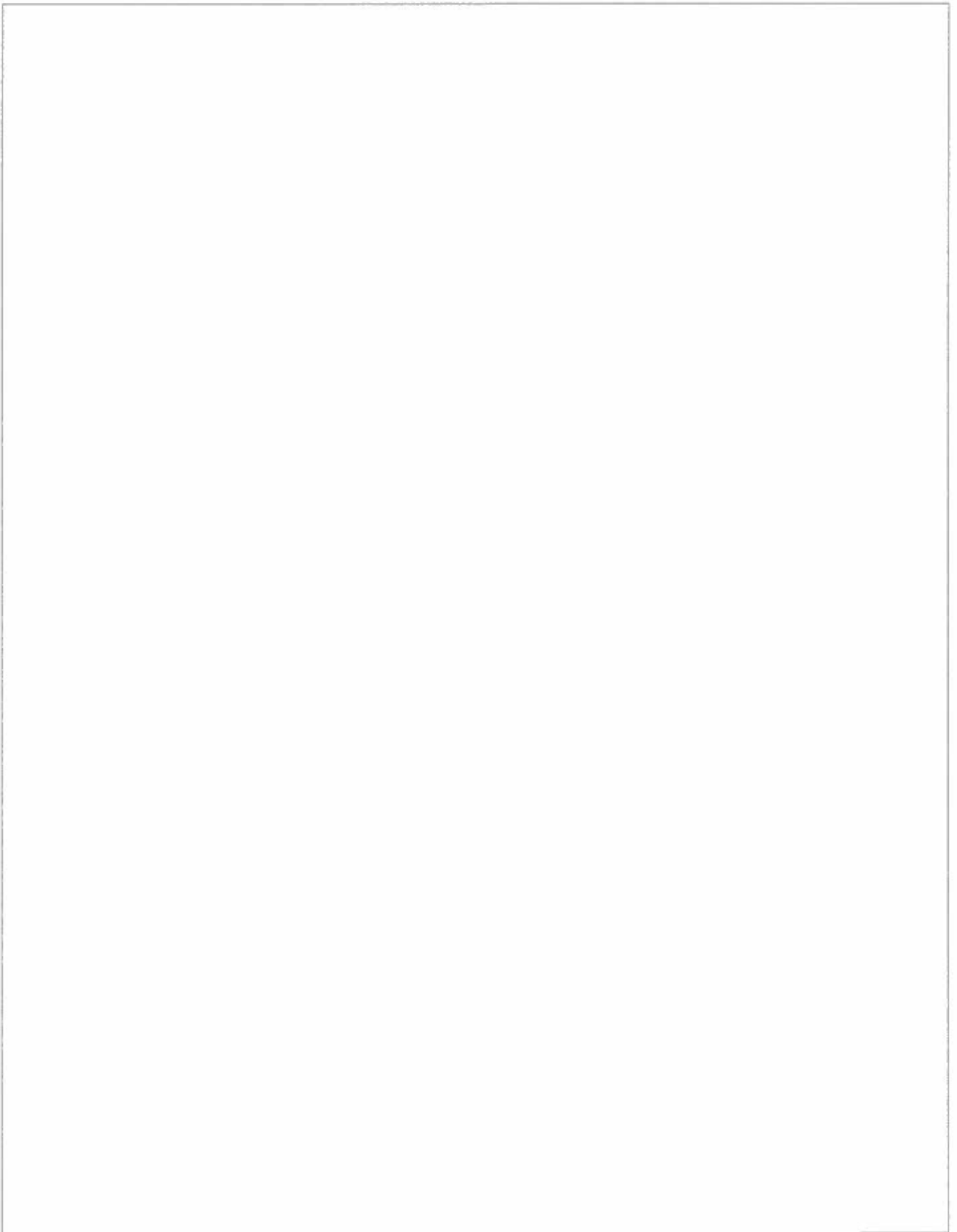
What information do you think would help communities engage with the MRWS site selection process?

To start with, potential host communities need to understand the “need case” for the GDF; where radioactive waste is stored at present, how much of it there is, how much there will be in future, what other options have been considered, and what solutions have been selected by other countries.

Communities will also want clarity on the MRWS process itself, how they will be involved and consulted, and how decisions will be made and implemented. This should include clarity on what would constitute “suitable” geology for a GDF, and exactly how the geology will be assessed to determine whether it is suitable or not.

There should also be clear information on how socio-economic impacts on potential host communities will be assessed, and how those communities will be involved in developing long-term plans for economic, social and community benefits.

It is also not just a question of “what information” would be helpful, but how that information is made available. People are more likely to understand the issues and engage in the debate if the need case and the consequences of not having a GDF are explained in “Plain English”. Technical jargon and bureaucratic language can be intimidating for people who do not have background knowledge, and they are less likely to participate. For instance, engaging well-known “science champions” to explain the issues and de-bunk myths, and using the web and social media channels to communicate with audiences, would encourage a wider discussion and an increased shared understanding, and there are many other examples.



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