



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	Prospect
Organisation Size (no. of employees)	REDACTEDREDACTEDREDACTED
Organisation Type	REDACTEDREDACTED
Job Title	REDACTEDREDACTEDREDACTED
Department	
Address	
Email	REDACTEDREDACTEDREDACTED
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?

Prospect welcomes the opportunity to respond to the consultation being undertaken in relation to the Siting Process for a Geological Disposal Facility. Prospect represents over twenty thousand members working as scientists, specialists, managers and engineers in the nuclear industry.

The members we represent are proud of the contribution that they make to an industry where safety is of paramount importance. Against that backdrop, policy formulation needs to be empirically based and evidence led. Prospect has been supportive of the view that the most appropriate approach to the management of higher-activity radioactive waste is geological disposal.

Prospect was disappointed and perplexed at the view ultimately taken by Cumbria County Council in the face of the positive votes by Copeland and Allerdale Borough Councils. It is our view that the position reached by Cumbria County Council was not one that was either informed by the most up to date scientific research nor a full appreciation of the proposed next steps. Our observations in terms of process follow in that context.

- Whilst the principles of voluntarism are laudable and few would seek to argue against them- many of our members view the decision taken by Cumbria County Council as perverse in the context of the decisions of Copeland and Allerdale Borough Councils.
- There is a real concern that there was a lack of clarity in relation to the debate which took place as to what was potentially being "signed up" to. In reality this was to move on to the next level of scientific research and a broader impact assessment.
- There was an apparent lack of appreciation in terms of process that a positive endorsement of a move to Stage Four simply committed the parties to further scoping work which included an inventory of waste, negotiations about a package of socio economic benefits and further desktop studies.
- Similarly there was an apparent lack of appreciation that during the period of Stage Four that communities could withdraw from the process at any point.

- Against the backdrop of the above- the debate became confused with some using their opposition to new nuclear generation as a reason to oppose the siting of a GDF and a failure to engage on the issue of long terms legacy waste- much of it military in origin.

It would be naïve to believe that process of this type would be without controversy. Prospect however makes the following recommendations and observations:-

- Whilst Prospect does not question the principle of voluntarism- consideration needs to be given as to how the agreement of local communities is measured and agreed.
- Communications need to be enhanced to ensure that local communities understand what is being asked of them and their representatives.
- Whilst any project would only go ahead if rigorous safety standards were met- it is important that early dialogue take place with regard to the potential socio-economic benefits from a local community perspective.
- In a situation where the debate can become very polarised and heated- consideration needs to be given as how best to provide members of the public with information which can be regarded as authoritative and trustworthy and based on the most up to date science.
- Effective stakeholder consultation is a dynamic and interactive process and particularly in dispersed communities it is important that all avenues are exploited to enhance two way communication.
- Research has consistently shown that those who live closest to nuclear facilities tend to have a clearer understanding of the potential risks and mitigating safety measures in place as well as a more positive view with regard to the potential socio economic benefits. Almost perversely- those who tend to live further away- tend to have a higher perception of risk alongside a reduced familiarity with the potential socio economic benefits.

