



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.

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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	REDACTED REDACTED REDACTED
Organisation / Company	St Johns Castlerigg Parish Council
Organisation Size (no. of employees)	REDACTED
Organisation Type	REDACTED REDACTED
Job Title	REDACTED
Department	
Address	REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED
Email	REDACTED REDACTED REDACTED REDACTED
Telephone	REDACTED REDACTED
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?

Introduction

The biggest problem with the MRWS site selection process was not dealing with geological suitability until stage 4 of a 6 stage process (other than the most basic screening in stage 2). The introduction to this current consultation is wrong when it says:

4.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.

This is incorrect. Finland, France and Sweden all considered geological suitability before embarking on voluntarism.

The MRWS approach of seeking local opinion (whose value is questionable without any hard information on the geology being available) is seriously flawed both in principle and because in practice it has restricted the UK's search to one of the least geologically suitable areas – thus wasting millions of pounds and many years.

If this process is to retain any credibility, a national geological survey must take place before seeking expressions of interest from those areas which are amongst the most suitable.

Openness and Transparency

There is no public trust in the MRWS process in Cumbria. The geologists had links to the nuclear industry and the leaked Nirex Report from October 2004 advises tactics that are both underhand and entirely inappropriate when dealing with a matter of national importance with such massive safety implications.

Some of the original NIREX professionals are involved with MRWS today, including the MP for Copeland - a vocal supporter of the plan and former NIREX employee.

If DECC / NDA is to gain the public's trust, it will have to stop acting in this way. In particular the grooming of senior local councillors needs to stop. One way to prevent this grooming or lessen its effect

is to ensure that all council votes on MRWS matters are full council votes, not just executive/cabinet members.

MRWS must also avoid conflicts of interest like: the Allerdale and Copeland leaders also chairing WCMRWS; and a director of the communications company employed by MRWS being the chair of the Keswick Tourism Association (who were bizarrely silent on the subject until a very late stage when they could no longer ignore their members' protests).

Voluntarism

The assumption underlying the MRWS process is that the public are in favour. This is not and was never true. The public were initially ignorant of, then largely against, the process. DECC continues to ignore all other evidence and highlight a MORI poll (Feb/March 2012) as evidence of public support. The only credible information highlighted by the poll was that 80% of those responding knew little or nothing about the proposal. This clearly demonstrates that only a tiny minority of Cumbrians were even aware of the process, highlighting the almost complete failure of the MRWS consultation process. At the public meeting in Keswick (January 2013), the NDA acknowledged that the consultation had failed. The proper response to the discredited MORI poll would have been to halt the process and consider better ways of consulting with the population, not chalk it up as some sort of "pro-vote".

Widespread public opposition gathered momentum in autumn 2012 but was ignored by those who seek to justify this process who favoured the discredited MORI poll. Nevertheless huge numbers of people who contacted Eddie Martin, then Leader of Cumbria County Council, in the weeks before the January 2013 decision, the ratio of opposition to support was around 20 to 1.

If an MRWS process is going to begin in another part of the country, lessons need to be learned from the failed consultation in West Cumbria. Voluntarism should mean that the people can choose to say no and be listened to if they do.

Town and Parish Councils

If the views of town and parish councils are ignored then there is a strong possibility of an urban majority choosing to impose a GDF on a rural minority many miles away from them, against their will. 85% of town and parish councils across Allerdale and Copeland which voted, opposed the move to stage 4, and yet executive members of these councils ignored their opinions.

If this is a voluntary process, town or parish councils covering the actual site being investigated must be given the option to withdraw from the site selection process at any time.

Secure Interim Storage

The National Audit Office has recently reported that Sellafield's nuclear waste storage poses an intolerable risk and that for 50 years the site operators have failed to develop a long-term plan for the waste. Even if a GDF site was found after a proper national search, some of the higher activity wastes including plutonium cannot be buried for well over a hundred years. There is an urgent need for secure interim storage on the Sellafield site. This will also allow research into the principles of geological disposal to continue.

Summary and Recommendations

- 1) The very first step of MRWS should be to conduct an independent and detailed national survey of the geology to highlight the most geologically suitable areas in the whole of the UK for a GDF.
- 2) MRWS should only seek expressions of interest from areas which are both geologically suitable and not environmentally sensitive.
- 3) Any future process should be transparent and fair. All votes must go to full council to help prevent the culture of grooming senior councillors.

- 4) MRWS must allow towns or parishes to exclude themselves from consideration at any time for any reason.
- 5) The Right of Withdrawal must be enshrined in law.
- 6) A benefits package must be specified and sufficient to provide a substantial improvement to the wider area for the full life of the waste. Areas near Sellafield have been failed, and continue to be failed, by their politicians and councillors, many of whom have close links to the nuclear industry. Where are the community benefits for storing this waste for the last 60 years and why should any volunteer community believe it will be different this time?
- 7) There is an urgent need for secure interim storage on the Sellafield site to remove the intolerable risk identified by the NAO.

If all of these recommendations are set out and followed with full transparency, it should enable potential volunteers to have sufficient trust in the process and enable a good chance of success. It can work, and it has worked in other countries – but only if it is done properly and fairly.

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