



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.

Response form

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Department of Energy and Climate Change
Room M07
55 Whitehall
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SW1A 2EY

Name	REDACTEDREDACTEDREDACTED
Organisation / Company	Oxford Institute for Sustainable Development (OISD), Oxford Brookes University
Organisation Size (no. of employees)	
Organisation Type	REDACTEDREDACTED
Job Title	REDACTEDREDACTED
Department	REDACTED
Address	REDACTEDREDACTEDREDACTEDREDACTEDREDACTED
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	No

confidential? If yes please give a reason

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?

1. Context

- 1.1 I write as a member, for almost three years, of the REDACTEDREDACTEDREDACTED REDACTEDREDACTED. I am one of two academic advisers on the REDACTEDREDACTED REDACTEDREDACTEDREDACTED which is being developed, by REDACTED and its consultants, to apply at both strategic and project levels whenever there is a REDACTEDREDACTEDREDACTED The work undertaken by the REDACTED REDACTED is of a very high standard and at the cutting edge of environmental assessment practice.
- 1.2 I have not been directly involved in the particular case of West Cumbria, although REDACTED has been given regular updates of the progress of the work of the West Cumbria MRWS Partnership. The partnership produced a very important report on the process, options and advice to local councils in 2012.

2. Cumbria CC issues

- 2.1 Cumbria CC has highlighted several issues which were of particular concern to them in coming to their decision not to participate in Stage 4 of the process. I make a few comments on these below.
- 2.2 Uncertainty over legal position about right to withdraw from the process. This is surprising in that the decision to withdraw right through to the end of Stage 5 of the process is clearly specified in all the MRWS procedures.
- 2.3 Uncertainty over suitability of the geology. Such a concern would be a key issue for testing in Stage 4 of the process.
- 2.4 Lack of clarity on the potential Community Benefits Package associated with the proposed geological disposal facility and to be available to the successful volunteer authority (authorities). This does seem to be an area where the government could have been much clearer much earlier. In the event, the local authorities knew much more about the potential costs than the potential benefits. Only when Cumbria voted against did the Minister talk of a Community Benefits Package-- *'worth hundreds of millions of pounds, to*

support the social and economic wellbeing of the host community, which will have a lasting impact for generations'.

2.5 Concern about the potential impact of the proposed development on the tourism industry in the Lake District. This is surprising given that tourism in the Lake District appears to have prospered for decades whilst there have been many types of nuclear development along the adjacent and so-called *Nuclear Coast* of West Cumbria. Indeed for some time the Sellafield Exhibition Centre was an important wet weather tourism attraction for many tourists. Such wet weather is probably a much more important factor in the attraction or otherwise of Cumbria and the Lakes area for visitors.

3. Some potential underlying issues

3.1 The issues in 2 above may point to other underlying issues. One of these relates to the nature of the communication lines between bodies such as the Cumbria Partnership, the NDA and indeed the Central Government, and the three key local authorities—especially their vital decision making committees. I am not privy to the full nature of such lines of communication and the intensity of their use, but from the issues raised, it would seem that there may have been some gaps in the communication of relevant information.

3.2 Another underlying issue relates to that of trust between the various parties, and perceptions of the strength and reliability of various undertakings, especially the legal basis in relation to the right to withdraw.

4. Future steps?

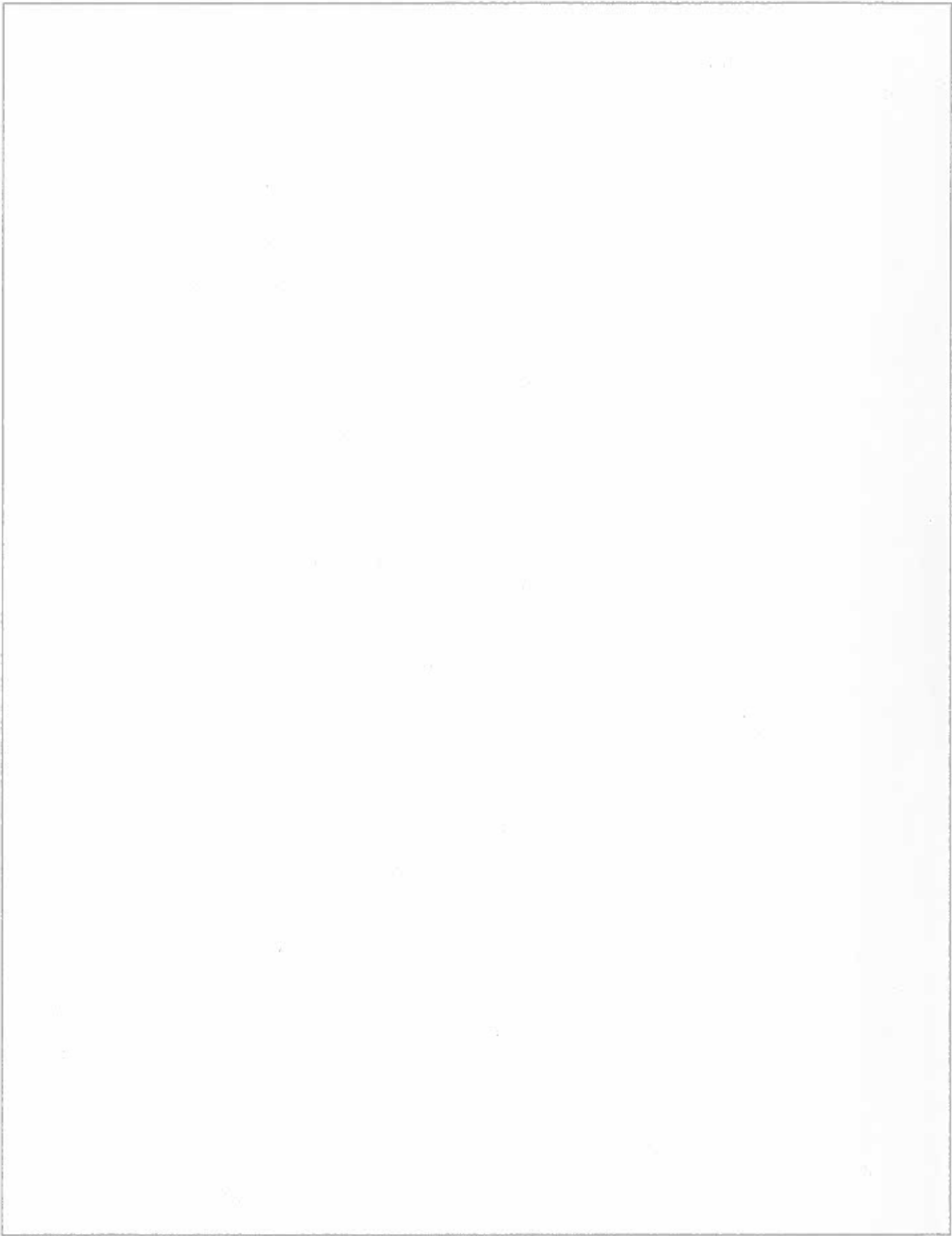
4.1 Some of the steps relate to dealing with the two fundamental points raised in 2 and 3 above. This will necessitate a more intense and open process between key agencies, especially central government, local government, the Cumbria Partnership and the NDA, in explaining the procedures (especially the legal basis of the right to withdraw), and an early scoping of the potential costs and benefits.

4.2 Perhaps there are also lessons to be learnt from countries that appear to have successfully managed the local area volunteer approach to decisions on deep mined disposal facilities. Although it is important to bear in mind that these countries (Sweden, Finland, Canada) are much more sparsely populated than the UK and the facility can be more easily located in their wider and more remote landscapes. The NDA did produce a very useful report on processes and experience in 'Sister Organisations', although more could probably now be gathered from some of the cases, especially for the geological disposal projects at Forsmark (Sweden) and Olkiluoto (Finland).

4.3 Might there also be some merit in considering trying some of the new procedures being used in the evolving work of the Planning Inspectorate's Major Projects Unit (formerly Infrastructure Planning Commission)? These include, for example: Statements of Community Consultation (SoCC), Statements of Common Ground (SoCG) and Planning Performance Agreements (PPA). The latter could provide very useful extra resources for relevant local authorities to help them to participate fully in the various stages of the MRWS process, although also aware of support given to the current Partnership body as an (alternative?) approach.

4.4 Finally, in Appendix B to the Nuclear NPS (DECC, 2011), the Government notes that: *The Government is committed to making the voluntarist and partnership approach work through the MRWS process. However, the Government recognises that it has a responsibility to deal with long-term higher activity waste management, is committed to*

geological disposal as the technical solution, such that it will seek to develop alternative ways to implement that solution if the current framework, as set out in the MRWS White Paper, ultimately proves to be unsuccessful in the UK. As such there may also be some merit in carrying out a nationwide search for sites, based on key criteria, to help to widen the scope of, and encourage more, potential volunteer communities. Indeed this could be seen as good and necessary practice in considering alternatives in the assessment process.



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