

GDF siting process consultation

Response from:

Ms Cecily Collingridge

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Consultation Questions

1. **Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.**

1. This is a leading question, but, with provisos, yes. The siting of a GDF is a national issue, not a local one. A 'representative authority' needs to be defined and an autonomous decision-making body created. It should be far more representative than any existing body and should be made up equally of men and women.

2. The concept of a GDF does not have UK-wide support. The policy therefore lacks any legitimacy. Consensus with all countries that make up the UK must be reached first.

3. It is not clear whether the search for a site is confined to England or not.

4. Screening criteria for a site should first be agreed. Then those criteria should be applied to identify potential areas. Volunteering should come much later and only from communities within pre-identified areas.

5. An extensive study of public support should be done by an independent body.

6. The process of testing public support should be on-going with clearly defined decision points, not just at the point a Right to Withdraw is lost.

7. It should utilise a range of techniques, such as workshops, panels, in-depth interviews and referenda *across the country*. Polling should be avoided or deemed supplementary as it only measures top-of-mind responses and is easily influenced by propaganda, advertising, etc. As the interests of future generations need to be considered, a wide-ranging, in-depth approach is appropriate. At the local level:

- There should be an approval benchmark set to show a clear, unequivocal, high level of public support, e.g. above 85% approval. 50% is too low and only exceeding this by a smaller margin is an unreliable, probably short-term indicator of support, easily lost.
- A residency screening test should be applied to ensure the interests of any existing community/ies that volunteers are upheld and public opinion is not being skewed by project workers (or those who arrive in anticipation of work), or by others with vested interests connected to the GDF who may move into the area, particularly where there is low population density. This should also rule out those who only moved to the area

within the last x years (to be determined, as appropriate) indirectly attracted to the area as a result of any investment/community funding connected to the project. There is a risk that, due to the long timeframe, momentum may build up in favour of proceeding that is driven by incomers, over-riding any objections the 'original' volunteering community may have.

- Strong support must be given from both men *and* women.
- As a GDF involves large amounts of public funds and the risk of failure could jeopardise UK interests, it is *not* just a local issue. For it to go ahead, 'local' public support should also be endorsed:
 - by adjacent communities/areas
 - by other stakeholders, e.g. communities hosting existing nuclear sites, and those representing wider interests
 - and nationally.

4. Loss of the Right of Withdrawal should take place as late as possible and only after all the data from wide-ranging, intensive studies and the full inventory of legacy waste only (i.e. no wastes from new nuclear facilities) have been acquired, disseminated and evaluated.

2. **Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.**

No

I endorse views expressed by the NGO Forum and Stop Hinkley

3. **Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?**

No

Your proposals smack of introducing bias in favour of pre-determining the outcome you want. It also curtails democracy. The ethical solution to overcome bias is to broaden the scope not reduce it to a single tier in government. Excluding the interests of the County Council that are just as legitimate and other wider interests, including NGOs, is illogical in a project that has such far-reaching implications.

I endorse the views of the NGO Forum.

Women play little part and are under-represented. There is no legitimacy in decision-making.

It is SHAMEFUL that there have been NO women AT ALL on the Geological Disposal Implementation Board except on two occasions when one woman out of 23 attended two of the meetings and she was from DECC, so hardly impartial.

There must be equal gender representation on any Steering Group or decision-making body.

The roles of the regulators are problematic and the public has too little knowledge of them to have developed trust.

They are male-dominated organisations. As studies have shown, men have a greater tolerance of risk than women and men also engage in greater risk-taking behaviours. It is a concern that they alone would determine the acceptability of a safety case.

Furthermore, they are bound by an inadequate radiation protection model, based on ICRP recommendations, that is unsafe for women to rely on.

Little awareness of women's health and the issues surrounding it permeate the nuclear arena. But it is important for you to note that the Lancet, for example, devoted its whole front cover of its issue on 26th Nov 2011 to a quote saying "The Lancet *encourages researchers...to plan to analyse data by sex, not only when known to be scientifically appropriate, but also as a matter of routine.*" and in its Editorial inside: **"Being male or female might be a more important determinant of health, illness, and response to treatment than is known."**

Gender matters!!!

The newsletter also says: "Awareness that gender can influence the prevalence, diagnosis, drug efficacy and tolerance and surgical outcome in a number of diseases is increasing." So chemical toxicity of the waste inventory, etc. could be a serious health risk as well as radiation exposures.

Future generations may suffer the deprivations of war and disease that stunts growth - affecting radiation dose levels too. Radiation sensitivity may increase in future generations. You cannot predict health outcomes to exposures in the future generations using the poor, gender-biased methodology of today.

4. **Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?**

I did not see the point of including a 3D geological map without a key.

The whole subject of initial screening needs to be explored.

Population densities should be added to geological factors.

5. **Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?**

No (endorse Stop Hinkley's response).

1. A separate legal planning regime, specific to this unique facility, needs to be considered.

6. Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?

No

1. The inventory needs to specify the chemical quantities and toxicity as well as the levels of radioactivity. There is a right and need to know everything, not just pre-selected information.

2. Toxicity and radiation effects in women in particular are not well understood and carry greater unknown risks. The level of uncertainty needs to be evaluated for both men and women separately.

7. Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

No

1. There should be no benefits.

2. There needs to be a **social** barrier to protect present and future generations from health and other risks on top of the multi-layered physical barriers, should physical barriers fail. Providing bribes/community benefits/investment is counter-intuitive in that they will serve to promote population growth, putting more people at risk in an uncertain future.

3. The only financial aid that should be considered is to assist those in the region to relocate further away in order to facilitate the creation of a social barrier (this could be a hard or soft-edged exclusion zone, depending on site-specific circumstances).

4. Those who advocate community benefits are motivated by greed and short-term self-interest. Neither do benefits necessarily reach individuals and, instead, tend to be managed (and wasted) by local authorities. Jobs associated with development/ construction overwhelmingly go to men, and only those of working age.

5. Offering benefits without costing a provisional finance programme in advance is reckless and cynical, appealing to baser instincts.

6. Furthermore, offering benefits over an indefinite period, as local communities can take as long as they like to deliberate, is offering a blank cheque and would be vulnerable to abuse.

7. The gender differences in attitudes towards community benefits needs to be measured, reported and fully transparent.

8. If community benefits are implemented, the data needs to be able to show that the greater

radiation risks and societal disadvantages of women are reflected in the benefits they receive.

8. Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

This whole area needs to be explored in greater depth. There is insufficient information or time to answer this question.

9. Do you have any other comments?

1. The call for evidence asked “What do you think could be done to attract communities into the MRWS site selection process?” This subsequent consultation document has made it more difficult – it is poorly written and confusing. Moreover, there appears to be a lot of putting the horse before the cart. It also contains disinformation so trust has been eroded, just by reading it. Your manipulations are evidence of pre-determination.

2. A stark oversight that you could have done to engender confidence, was to state that West Cumbria is now ruled out of further consideration. In one stroke, in your efforts to move the goalposts, you have set any legitimacy in the process or trust in government back decades by omitting this.

- I quote from DECC's letter to councils with the agreement re traffic light system:

The Government accepts that if we reach that point, and where either a Borough Council (in respect of its area) or the County Council in a Cabinet decision, or the Government, after considering the issues, continues to have genuine concerns and no longer wishes to participate, then the principles of partnership to which we have all been committed cannot be met. Accordingly, we would not proceed with the Managing Radioactive Waste Safely process in west Cumbria.

<http://bit.ly/15RxiBQ>

To rescue the situation, you MUST rule West Cumbria out now.

3. Ethics and social sciences such as sociology, anthropology and psychology should play a greater role and those with expertise in these fields should have places on advisory or steering committees, incl. expanding a currently narrow-fielded CoRWM.

- The number of future generations at risk is considerable. If Utilitarians value the welfare of future generations, then even small risks of human extinction or harms should have a high priority.
- The process must be challenged to discriminate between intention and motive, which are two very different things. It is the foresight of consequences that constitutes the moral rightness and should not be sacrificed for financial or other expediency such as to facilitate new nuclear build.
- Whilst geology, hydrology and other such technical considerations are essential

to the MRWS process, they should not dominate to the exclusion of all else.

4. All groupings and decision-making bodies should be gender equal. If they don't exist then they should be created in the interests of future generations that will include women who are going to inherit the burdens.

- Having a closed facility, with potentially little knowledge of what lies within could be a significant psychological burden in itself, without the means to 'manage' the wastes if 'retrievability' is unavailable to them. To suggest a closed GDF removes the burden of management on future generations is a very limited, and dare I say 'male'?, perspective.