
From:
Sent: 03 June 2013 16:12
To: radioactivewaste (DECC)
Subject: response to consultation on 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 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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