
From:
Sent: 19 May 2013 16:39
To: radioactivewaste (DECC)
Subject: MRWS Consultation

To whom this may concern

Please find my views and feedback below:

The Request

Government policy for the long-term management of the UK's higher-activity radioactive waste is geological disposal. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper was published which outlined the framework for implementing geological disposal. The MRWS White Paper set out Government's preferred approach to site selection on the principles of voluntarism and partnership.

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. 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.

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, and 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.

In line with Secretary of State Edward Davey's written Ministerial statement of 31 January 2013, 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 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.

My response

FROM

1. Firstly, I whole-heartedly endorse the cross party decision taken by Cumbria County Council and the reasoning for it given by the then Leader (Eddie Martin – Con) and Deputy Leader (Stewart Young – Lab).
2. Secondly, it is absolutely imperative that it is acknowledged by all concerned that our radioactive waste is a NATIONAL issue and that safety, and not convenience of any sort, has to be paramount.
3. Thirdly, if it is perceived that a GDF is the best solution and to be the National Interest, and if it is to be assumed that it has to be safe (ie in one of the best geological locations), then surely it is in the interests of all that a truly objective and independent assessment of the national geology is undertaken without delay. This could be undertaken cheaply and quickly.

That said, it should be noted that such a course of action was begun in the 80s by the British Geological Survey and Nirex see for instance

<http://www.davidsmythe.org/nuclear/chapman%20etal%201986%20geol%20environments%20deep%20disposal%20ILW%20UK.pdf>

Of course, this identified that significant areas of the country (mainly in Eastern England) were potentially suitable for a GDF due to simple and stable geology, low hydraulic gradients and permeabilities

4. Without such a prior objective and independent assessment evidencing that geology in x, y, z areas is potentially suitable/safe then it is patently obvious that no areas in the UK will ever, ever, ever volunteer for a GDF.

And that is irrespective as to what community benefits are offered.

Indeed, even with such an assessment, the chances of any geologically suitable area, in our densely populated and affluent country, actually volunteering are probably remote. However, if any area is to volunteer then the whole process must be beyond any kind of reproach or query and be completely and utterly transparent – namely in short entirely unlike MRWS to date.

Simply, voluntarism will only work if the area volunteering is first known to be potentially geological suitable/safe.

5. This is especially so given that Cumbria (the only area to express an interest) has now said no; notwithstanding that the area has effectively been “groomed” for a GDF for a generation and that most of the UK’s waste is already here.
 6. To proceed further with this process, it is imperative, and in the National Interest, that lessons are learned from both the Nirex debacle and also the recent MRWS process in West Cumbria. Fundamentally this means that geological suitability, and not any other factors, must underpin the future strategy including any ultimately “voluntarism”.
 7. Specifically there needs to be an acknowledgment that the approach over the last 30 years with regard to West Cumbria and a GDF has been irrational, flawed and contrary to the National Interest and our democratic values. Specifically, through concentrating GDF efforts on West Cumbria alone (through Nirex and MRWS) the UK is no nearer finding a solution to radioactive waste than it was 30 thirty years ago. Valuable time has been and continues to be lost as a consequence of insisting on forcing “a square peg in a round hole”.
- Meantime the waste continues to be stored in a far from satisfactory condition posing a threat to humans and the environment – see recent National Audit Office report.
8. It is important to understand that this grooming process effectively began by first of all siting the UK’s nuclear industry in a malleable and remote West Cumbria location, then allowing the UK’s radioactive waste to either be created at or relocated to Sellafield over the last 60 years (all without any form of consultation or democratic mandate); whilst all the time the local economy grew to be increasingly dependent upon the nuclear industry. Thereby making it (geology and other issues aside) an economic and political candidate for a GDF.

The upshot of the “grooming” is that the nuclear industry has had, and has, an unprecedented degree of control over not just the West Cumbrian economy, but also local politics and policy. All of which is entirely inconsistent with a modern, democratic country and any true/sensible voluntarism.

This is relevant to MRWS as this “nuclear dependent” position led to first of all Nirex [irrationally on geological grounds] choosing a West Cumbria location as the centre for its search for a GDF (notwithstanding there was significant and incontrovertible evidence that there were better geological sites elsewhere) and more recently, in my opinion, led to the District Councils in West Cumbria expressing an interest in hosting a GDF – in Copeland’s case within weeks of the 2008 White Paper being published – notwithstanding the previous failure of Nirex in West Cumbria and their then objection to it....

9. The recent MRWS process in West Cumbria was an expensive and entirely undemocratic attempt to unsuccessfully manipulate local opinion. It failed miserably on all levels – not least of all in its attempts to explain issues to the general public in an objective and independent way. Ultimately there was widespread mistrust about the whole process and consultation. Indeed the consultation failures of MRWS were acknowledged by the NDA publically.

10. In my opinion both the NDA and DECC came out of the whole, process extremely badly. There is widespread mistrust of not just the NDA but also DECC – the concerns being centered upon their apparent desire to site a repository in West Cumbria “come what may”. Arms of government should at all times be objective and act in the National Interest.

It may be that both DECC and the NDA have to be removed from any siting process and be replaced with a new statutory based body.

At the very least, the relationship (if any!) between MRWS/the GDF process and the country’s nuclear new build strategy must be clear. In West Cumbria many thought a GDF was inextricably related to local nuclear new build and/or further nuclear investment in West Cumbria ie the latter would only happen if the GDF happened...This misconception does not seem to exist in Somerset or North Wales or Suffolk! It was very wrong indeed to allow waters to be muddied in this way.

11. The MRWS process in West Cumbria ended up with over 75% of the area under consideration being in the Lake District National Park.

The legal protection afforded to National Parks means that, in essence, no GDF could proceed in, under or close to a NP without, at the very least, first exhausting ALL suitable sites elsewhere in the Country. This effectively rendered, and renders, any “voluntarism” of a National Park pointless. Note – no doubt for similar reasons – even the flawed Nirex process had excluded all environmentally sensitive sites (including National Parks) at an early stage.

For MRWS to potentially allow such areas to be volunteered was, and is, madness. Practically, from a legal perspective such sites were never, ever going to be deliverable (even if geologically suitable) and the process would have wasted more time and money before ultimately failing – although in the meantime the process could, and probably would, have blighted the local non nuclear economy which includes a £2bn tourism industry employing over 50,000 people.

There would also have been enormous practical problems in the National Park given that 25% is owned by the National Trust and is inalienable – let alone the national and international outcry which would occur if an Lake District NP GDF ever proceeded.

12. Similarly the area under consideration included major Special Areas of Conservations (SACs), sites of Special Scientific Interest and an Area of Outstanding National Beauty and bordered a RAMSAR site. All of these were ignored by MRWS although again sites such as SACS would effectively render any GDF impossible without first exhausting sites elsewhere in the country – again rendering voluntarism of a SAC etc practically pointless.

13. The issues in 12 and 13 were ultimately acknowledged by the NDA meaning that if the process had continued to Stage 4 in Cumbria, then it could have gone any further without effectively an exhaustion of ALL other sites in the country ie end of voluntarism.

14. If it is not self evident, I re-iterate that to consider any environmentally sensitive sites within the MRWS process is ridiculous, delusionary and negligent. Such sites are simply not legally and practically deliverable – let alone objections on other grounds. So environmentally sensitive areas (including National Parks, AONBs and SACs) should be excluded going forward as should areas of public water supply. If this had happened in West Cumbria then the only area “left” would have been immediate to Sellafield – which of course was founding wanting in Nirex...

15. In my opinion DECC and the NDA should devote all efforts in the short term to procuring better and safer interim storage of nuclear waste at Sellafield . The present state of affairs is simply not acceptable.

16. Meantime a truly independent national geological survey (as aforesaid) should be instigated which could potentially pave the way for any further plans for a GDF.

Best regards,

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