

Call for Evidence

Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility

Response form

Please use this form to respond to this 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
Room M07
55 Whitehall
London
SW1A 2EY

Name	REDACTED REDACTED
Organisation / Company	REDACTED REDACTED
Organisation Size (no. of employees)	REDACTED
Organisation Type	REDACTED
Job Title	REDACTED REDACTED
Department	REDACTED
Address	REDACTED REDACTED REDACTED REDACTED
Email	REDACTED REDACTED
Telephone	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

I am relying on colleagues REDACTED REDACTED REDACTED REDACTED in West Cumbria to deal with issues of geology and alternatives to GDF.

Here I focus REDACTED REDACTED REDACTED REDACTED REDACTED on political aspects of the MRWS process.

1 What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?

I start from the position that host communities have to give informed consent. The issue is therefore to determine which communities should be asked to consider consenting, and at what stages in the process that consent should be sought and renewed, and ultimately secured.

A further issue relates to the quality and relevance of information as it emerges and which must inform that consent. I note that in the early stages the information will tend to be general and not site specific; as definition is added increased clarity should be an outcome. Consequently, consent in the early stages will be either in principle or 'scoping' in nature but inherently less informed. The process needs to recognise this.

These considerations lead me to the conclusion that the process should begin with the technical assessment of potential candidate sites based on suitability of geology alone and without political considerations in play.

A hierarchy of technically preferred locations should be generated, and this should form the basis of any subsequent public consultation processes.

This approach would also tend to exclude less suitable sites, and certainly exclude unsuitable ones.

Had this approach been followed, West Cumbria would never have been considered as a candidate location for a GDF.

To focus attention, I think the big question you need to honestly address therefore is why West Cumbria was ever seriously considered. Most of us involved in the process whether pro or anti know the answer to this – see below - but it has never been addressed transparently by the proponents. Thus a gulf in trust has been built in from the start.

2 What do you think could be done to attract communities into the MRWS site selection process?

The above in part answers your second question.

However, I note in your para 6 above that you state:

“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.”

This statement exposes a second fundamental flaw in the MRWS process as applied in West Cumbria, as it conflates ‘local authorities’ with ‘communities’.

Had local government not been rendered increasingly impotent over the past five decades or so, your presumption –that local authorities represent local communities- may have had some currency. However, the reality is that as local government has become increasingly dependent on central government – for grants, allocations and even for constraints on how much council tax each is permitted to raise – and on ‘partnerships’ to make up any shortfall, the link between local authorities and the communities they should represent has been increasingly eroded. One only has to look at falling electoral turnouts to evidence this.

Thus a major failure in the MRWS process was that Government was in dialogue with proxies for communities rather than with communities themselves, and poor and compromised proxies at that.

The Stage 3 Consultation Process had brought these ‘interested parties’ into a loose coalition of overlapping vested interests within the MRWS Partnership, which was further reinforced through the parallel Britain’s Energy Coast (BEC) partnership.

It was therefore inevitable that the MRWS partnership would eventually convince itself that its work thus far justified progressing to Stage 4, but based on a rather vague endorsement from the wider public.

This position might have been politically sustainable had not the geological community locked horns in the summer and autumn of 2012, permitting the debate on suitable geology to break free of your exclusionist process. As real potential host geologies began to emerge, ill-informed general support in principle inevitably switched to better informed and vociferous local opposition.

I believe that the disparity between the decisions of the two district councils and the county council can be largely explained by these factors.

Allerdale and Copeland had convinced themselves through the MRWS that the waste already in West Cumbria was not going to go anywhere else, and so the exercise was about finding the most suitable geology in the sub-region regardless of how poorly it might compare with potential candidate geologies elsewhere in England and Wales.

County took a more holistic view, which was also far more ‘porous’ to wider public

opinion in a way that the narrower vested interests with the BEC consortium in West Cumbria were not.

Overall the attraction of local communities into a revised MRWS process must rest on the following recognitions:

- that vested interests cannot speak on behalf of communities
- that Local Government has itself become a vested interest though no fault of its own
- that the geography of a GRF will inevitably be smaller than that of a district or county council, and
- that there is therefore the political potential for the larger population to chase community benefits whilst dumping the disbenefits onto a minority community, and therefore
- that community engagement must be direct and not indirect

A statutory Right of Withdrawal (RoW) to be invoked by the actual potential host communities and not by their proxies would have helped alleviate some of these issues, but Government's apparent determination to talk about it rather than introduce it further undermined trust, and I would guess will have been taken not unreasonably as evidence of both bad faith, as well as that even proponents believed in their guts that deploying 'smoke and mirrors' would be the only way of getting this policy implemented.

In short you had 5 years to legislate for a RoW and failed to do so. So January 30th 2013 was widely understood within the community to be the last opportunity to disembark 'the gravy train', even though this decision was seen in some quarters to have been technically premature.

3 What information do you think would help communities engage with the MRWS site selection process?

Much of this question as framed is answered inter alia above.

However, the question as framed focuses on information content and not on the wider issues of what is understood by 'communities' and how to engage them.

The MRWS process speaks loosely about 'communities' and 'voluntarism', but given the debacle leading to Stage 4 I do wonder to what extent those who thought they were controlling the agenda actually understood the concepts they were trading in?

I have been engaged for much of the last 40 years in community activity and the voluntary sector. You can't do it successfully by bandying slogans. So a question you should ask – perhaps an audit you should undertake? - is to establish how many of the people who framed the terms of reference for MRWS have ever been involved in the voluntary sector and especially in community development. I suspect few if any.

You got community engagement wrong because you tried to run it on your terms, and didn't bother to try to understand how it actually gets delivered on the ground. For example, anyone involved in community development knows you can't substitute focus groups or partnerships or opinion polls for communities. You seemed to think you could. How come?

You tried to progress MRWS in conference rooms and working groups, and to understand it from and through those perspectives, but when the public i.e. 'the community' first truly engaged in debate it was in the village halls, streets, pubs, shops and local media of West Cumbria where you had no presence; no control.

In Summary

- geology first – the entire nation uses electricity, so the entire country should be considered for potential siting
- community engagement follows, and only with those communities where the geology is optimal – in other words where the risks can be convincingly minimised
- keep vested interests at bay throughout – they already have seats at table without masquerading as community representatives as well.

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4th June 2013