

REVIEW OF THE SITING PROCESS FOR A GEOLOGICAL DISPOSAL FACILITY

RESPONSE TO THE CONSULTATION PREPARED BY FRIENDS OF THE EARTH'S NUCLEAR NETWORK

Introduction

Our main issue with the whole review process is that the consultation only seeks to codify process rather than the desirability/practicality of a GDF or, indeed, new build nuclear power

We do not believe the Government has set out a robust case for the need for new nuclear capacity.

The Government's failure to find a long-term solution to Britain's nuclear waste problem remains an important reason not to create more waste by building more nuclear reactors.

The Environment Agency has warned that "there appears to be insufficient justification for assuming that waste packages will last for a target period of 500 years". See CoRWM paper 1676 Longevity of waste packages and reworking of waste packages. Therefore we believe that there is a tacit acceptance of the ultimate strategy of geological disposal being one of dilution and dispersal.

As a consequence of the above, Friends of the Earth remains opposed to deep geological disposal.

We consider that a robust programme of interim storage must play an integral part in the long-term management strategy and has been overlooked. Indeed, the uncertainties surrounding the implementation of geological disposal, including social and ethical concerns, lead CoRWM to recommend a continued commitment to the safe and secure management of wastes that is robust against the (highly likely) risk of delay or failure in the repository programme.

Q.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.

Yes but with the following caveats:

We agree with the statement by the NGO Nuclear Forum that:

“Unless a community is fully informed and involved in the process, and unless the process is seen to be open to challenge and argument, voluntarism cannot be understood as working. We believe tests of support should be taken at various points throughout the process using a variety of methods to ensure comprehensiveness, fairness and credibility. These may include polling, deliberative engagements, citizens’ juries and so on and should be both extensive and intensive”

Alongside the NGO Nuclear Forum, we also applaud the government’s intention to launch the process with a programme of raising national public awareness before seeking volunteers and that a Right of Withdrawal should continue to be held by the Decision Making Body (see below)

However, Friends of the Earth believes that the whole concept of volunteerism risks effectively putting the cart before the horse by effectively making the results of any scientific/geological investigations of a particular area 'fit' any perceived community support. This could be a particular risk in areas where people are more likely to volunteer, such as those with large proportions of nuclear industry employees these being, possibly, the only areas likely to accept a GDF. This is witnessed by the continuing ‘pushing’ of Cumbria as a possible location for a GDF in the face of adverse results from geological investigations.

Q.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?

No.

Friends of the Earth considers that the proposed decision making process throws into questions the government’s professed support for voluntarism and partnership removing, as it does, effective participation in the decision making process by those outside of the bodies who stand to gain from the construction of a GDF.

The proposed a Steering Group, does nothing to dispel these fears proposing a process that is led by government, RWMD and the local authority, with communities and others marginalised into a consultative role only.

This intrusive government involvement could lead to undue pressure being placed on other members of the group, especially when the determination of the government to continue with the development of ‘new’ nuclear power is considered. Along with the NGO Nuclear Forum, we would advocate a truly separate and independent group to undertake oversight of the process.

However, our main reason for our 'no' is the new and, as far as we know, unique leading role afforded to district or borough councils as decision-making bodies, following the removal of the upper (county) tier of local government from the decision making process. To us, this represents jerrymandering of the worst sort. The fact that a County Council was only removed as the Decision Making Authority after voting 'No' to the continuation of the GDF siting process only adds to climate of mistrust. Furthermore, this action effectively clears the way for two Borough Councils in Cumbria, whose cabinets voted to proceed to the next stage of the process, to become volunteers under the new approach in the face of overwhelming evidence that they enjoy little public support for these decisions. This does little to convince us of the basic honesty and integrity of both the process and DECC's involvement.

Q.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.

DECC should grasp what voluntarism actually means in practice and provide for improved governance and scrutiny. The cloak of secrecy has, for too long, led to sub-optimal decisions within the nuclear industry often based on perceived political necessity rather than scientific fact or social need, fostering low levels of trust and endemic suspicion from the public and NGOs. The Cold War is over and the decisions to be made on the disposal of nuclear waste need to include the entirety of an informed public not just a closed political circle that assumes it knows what's best.

Given the prominence of low levels of trust – as outlined by the MRWS Partnership Final Report (West Cumbria Partnership, 2012), we would propose an entirely new and independent oversight body with a remit to peer review and verify technical and scientific data and arguments without political interference.

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

No

Friends of the Earth Nuclear Network has no trust in the impartiality of the British Geological Survey and believes that this process could only maintain credibility if it were to be conducted by another country's geological survey organisation. To support this perhaps extreme allegation, we would point to the continuing consideration of the area of Cumbria approximately adjacent to Sellafield in spite of its unsuitable geology.

Q.5 Do you agree with this approach to planning for the geological disposal facility? If not, what alternative approach would you propose and why?

No

Friends of the Earth Nuclear Network notes the inherent contradiction in paragraph 3.36 of the Consultation document which simultaneously states:

“The UK Government’s preliminary view is that it would not be appropriate for planning decisions for a Nationally significant Infrastructure Project such as a GDF to be made locally”

And

“Any planning application will need to take account of community views where they are relevant – but there is no requirement for community support inherent in the planning process itself.”

These two paragraphs suggest that it is not possible to have a Nationally Significant Infrastructure Planning Regime and volunteerism, the two concepts are mutually exclusive. As a result we reject the proposed approach.

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

No

The failure to mention where waste arising from new build nuclear reactors will be disposed of gives us little confidence in the veracity or openness of this proposal. Especially considering that the Government has stated (section 3.8.1 of nuclear NPS) that before new nuclear plants can be consented, effective arrangements exist or will exist to manage and dispose of the waste they will produce.

This lack of confidence, is amplified by the omission of any mention of the management of waste from other countries sent here for reprocessing a large proportion of which has little or no chance of ever being returned to its country of origin (Japan in particular in the wake of Fukushima).

Furthermore what can only be described as dithering regarding the classification of spent fuel, plutonium and uranium and the consequent indecision on whether these materials will be disposed of in the GDF or not (see paragraph 3.49) hardly engenders confidence in how the proposed clarification of the inventory will be communicated to the host community.

A further suspicion is that it is the Government’s intention to continue take in other countries nuclear waste for reprocessing – for example South Korea, a country with a characteristically intractable nuclear waste problem and vocal public opposition to nuclear waste disposal on its own territory has recently expressed an interest in investing in the UK’s nuclear power industry.

Finally, no mention is made of the disposal of ‘hotter’ waste produced by the higher fuel burn up of new nuclear build

Q 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

It is hard to escape from the feeling that any proposed community benefits amount to a bribe paid, at least in part, by the taxpayer as part of a hidden (illegal) subsidy to the nuclear industry. If community benefits are felt to be justified on the grounds of compensation for potential risk and a perceived decrease in the desirability of an

area, why is such compensation only being considered in the case of a GDF. Given that it is unlikely that such benefits will not and have not accrued to any other large infrastructure project, the inescapable conclusion is that the 'benefits' are little more than the aforementioned bribe.

Q 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?

No

The intractable nature of nuclear waste makes any attempt to address potential socio-economic and environmental effects of hosting a GDF totally meaningless in view of the time scales involved. As such, it would be more honest if it was stated that any attempt to address these issues would potentially have a relatively limited lifespan.