



**Isle of Man
Government**

Reiltys Ellan Vannin

Department of Environment, Food and Agriculture

Rheynn Chymmyltaght, Bee as Eiriny's

GDF Siting Process Consultation
Department of Energy and Climate Change
Room M07
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Dear Sir/Madam

Received 9/12/13

A submission by Isle of Man Government's Department of Environment, Food and Agriculture (DEFA) in response to the Consultation on UK Government proposals to improve the siting process for a Geological Disposal Facility (GDF)

The Department of Energy and Climate Change (DECC) requested views on proposals to improve certain aspects of the siting process for a GDF, as set out in the public consultation document.(Ref.1) Having read the consultation document, I am pleased to make this submission on behalf of the Isle of Man Government. The comments offered in this submission are predicated on the assumption that there could be renewed interest amongst 'Councils in West Cumbria' in participating in the siting process for the Geological Disposal Facility. Furthermore the comments are confined to particular issues which are – 'wider stakeholder engagement', 'CoRWM's terms of reference', the 'assessment of geological suitability' and 'the waste inventory for geological disposal', dealt with in Consultation questions 2,3, 4 and 6 respectively.

In making this submission the Isle of Man Government wishes to point out that the Isle of Man is the immediate neighbour to the West/Southwest of the West Cumbrian local authorities, separated only by a fluid medium that readily transports any contamination to the seas around the Isle of Man, those seas being important sources of food for human consumption as well as being of amenity value, as indeed is the larger body of the whole Irish Sea.

In response to Question 2 – decision making within the siting process

Isle of Man Government notes that in the consultative document DECC recognise that there is a need to assess the impact of the GDF development more widely. The consultative document mentions the 'Focusing phase' of the revised siting process and a proposal to constitute a 'Consultative Partnership for the views of the County and others to be fully heard'.

In the event that a volunteer community in West Cumbria is willing to engage in the GDF siting process, and 'a Consultative Partnership of wider local interests' is formed, then the Isle of Man Government would wish to have liaison links with the associated Consultative Partnership, via some appropriate means.

Isle of Man Government also welcomes the acknowledgement by DECC that development plans for any GDF 'would require very extensive consultation, taking into account wider interests.'

In response to Question 3 – Committee on Radioactive Waste Management (CoRWM) terms of reference

The consultative document mentions a proposal to establish a mechanism for independent peer review of technical statements issued by Government and non-Government bodies involved in the GDF siting process. Isle of Man Government regards this proposal as an improvement to the scrutiny procedure for the GDF siting process, and in particular would support the revision of CoRWM's terms of reference to perform such a function.

In response to Question 4 – assessment of geological suitability

The consultative document mentions a proposal to launch a national public awareness raising programme for the GDF project.

Isle of Man Government regards the proposal for the public awareness raising campaign to be a useful initiative, in so far as it would help public understanding of the Geological Disposal project, particularly amongst neighbouring communities which consider themselves affected by the host community decision to participate in the siting process.

Isle of Man Government also welcomes the proposal that the geological aspect should be given greater consideration at an earlier stage in the GDF siting process. In this regard the offer to produce more detailed geological and socio-economic reports specific to a potentially interested region, should improve public confidence in the decision making process.

In response to Question 6 – clarification of the inventory for geological disposal

The consultative document mentions a need to provide more information on the types and amounts of radioactive waste to be placed in the GDF.

In furtherance of the objective of improving the siting process for any GDF, the Isle of Man Government supports the UK Government proposal *to 'clearly define a single Baseline Inventory for geological disposal.'* Furthermore Isle of Man Government would also welcome further information (when available) as to whether the GDF is intended to contain UK defence programme wastes and or foreign nuclear wastes.

In conclusion, the Isle of Man Government recognises that *'the UK Government remains committed to implementing geological disposal in the UK'* and while we can support certain proposals to improve the siting process; **the Isle of Man Government is strongly of the opinion that West Cumbria is unlikely to be a suitable location for geological disposal of nuclear waste.**

Yours sincerely



Richard Lole
Chief Executive D.E.F.A.

Ref.1 Consultation, Review of the Siting Process for a Geological Disposal Facility, Department of Energy and Climate Change, September (2013)