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**GDF Siting Process Consultation
Department of Energy and Climate Change
55 Whitehall London
SW1A 2EY**

19 December 2013

Dear Sir

Consultation on the Review of the Siting Process for a Geological Disposal Facility

Prospect welcomes the opportunity to respond further on the Review of the Siting Process for a Geological Disposal Facility. Prospect represents over 21,000 members working as scientists, engineers, specialists and managers in the energy and nuclear industry.

The members we represent are proud of the contribution they make in an industry where safety is of paramount importance. Against that backdrop, policy formulation needs to be robust, empirically based and evidence led. Prospect has been supportive of the view that the most appropriate approach to the management of higher-activity radioactive waste is geological disposal.

Prospect was disappointed and perplexed by the view ultimately taken by Cumbria County Council in the face of the positive votes by Copeland and Allerdale Borough Councils. It is our view that the position reached by Cumbria County Council was not one that was either informed by the most up-to-date scientific research nor a full appreciation of the proposed next steps.

We welcome the further consultation as this focuses on many of the issues and observations already highlighted in our previous consultation responses. Having considered the questions posed in the consultation, Prospect wishes to make the following points;

- Prospect has consistently argued that the principle of voluntarism should remain. In order to provide confidence in the process we agree that a robust and transparent test of public support in a suitably defined area should be taken before the representative authority loses the Right of Withdrawal. We agree that the representative authority level should be at District County level (or nearest equivalent)
- In terms of decision making, we believe the proposed changes provide a greater degree of clarity in order for communities to make a more informed decision in relation to the siting process. We have consistently argued for the need for more information to be provided at an earlier stage in relation to geological suitability.

- On a similar note, we have consistently argued for the need for earlier clarity in relation to the scale, nature and timing of community benefits and potential socio economic impact.
- We welcome the proposals in relation to peer review as an aid to public confidence and informed debate. In a situation where the debate can be polarised and heated- the public have a right to be provided with information which can be regarded as authoritative and trustworthy and based on the most up to date science.
- As part of this, there needs to be greater clarity in relation to the proposed inventory of waste for disposal in the GDF. We believe any potential inventory must anticipate nuclear new build for the UK.
- We are supportive of the structured approach in relation to "Learning" and "Focus"
- Community engagement is going to be crucial to the success of any process. In order to achieve the qualitative debate desired at community level- consideration needs to be given to the imaginative use of social media. Learning from previous experiences, the consultation needs to be a two way process to ensure that communities not only have access to authoritative information- but they have the ability to raise points and have questions answered.

Yours sincerely

Garry Graham

Deputy General Secretary