

To: radioactivewaste@decc.gsi.gov.uk

Response by the Shut Down Sizewell Campaign to the Review of the Siting Process for a Geological Disposal Facility

Please reply to the Chairman,
Charles Barnett, REDACTED REDACTED REDACTED REDACTED
with a copy to Peter Lanyon, REDACTED REDACTED REDACTED REDACTED

The Shut Down Sizewell Campaign (SDSC) is a NGO numbering about 300 members, funded by private subscription and centred on the Sizewell Coast, with the aim of ridding the area of the nuclear power stations there. It keeps in touch by means of a newsletter and the regular meetings of a core group. This response is made on behalf of the Campaign.

Because the review contains proposals for marginalising NGOs, it is necessary for us to stress that this NGO is a community group that has taken the trouble to organise itself to concentrate its energies on community issues involving nuclear power. We expect therefore that this response will receive attention commensurate with that effort and commitment.

In general, we regret the veiled language in which the proposals in the Consultation Document are couched, the roundabout way in which they are developed and the lack of a concise statement of them. This made deep study necessary before we could begin to discover what was being fed to us between the lines. We remind DECC of its obligations under the Aarhus Convention to both openness and good faith in public consultation.

We set out below what we believe the proposals to be, as concisely as we can, in order to comment on them and suggest alternatives.

Proposal 1: that a test of public support should be taken far earlier than at present, and before the representative authority loses the Right to Withdrawal.

We do not agree that the Right to Withdraw should end any earlier than it was planned to end for Cumbria communities, let alone many years earlier as proposed. If it did, it would be even more threatening to Voluntarism, and we are sad to see threats to this still in the consultation document. Demonstrations of public support seem to us to be essential parts of deliberative engagement, and so ought to occur repeatedly through the process. If it is the case that Government seeks the freedom to act in the absence of public support, then you ought to say so clearly and face the music now.

Proposals 2 and 3: that a district council or unitary authority (not a county council) would be involved in decision-making on hosting a GDF, that a steering group be set up consisting of that authority and two government bodies, that the steering group would itself choose the organisations it wished to form a consultative partnership, and that NGOs would not be part of this but would be involved in a separate process.

To do away with the County council role here, just because Kent and Cumbria have stood in the Government's way so far, smacks of Henry VIII's way of going about things. A GDF would impact on a far larger area than a District, so any reduction in the area of decision-making is contra-indicated. For two parts out of three of a steering group to be government bodies, desperate for a GDF to shore up the unrealistic prospects of new nuclear build, would not be a sound basis for it. The appointment of organisations to a consultative partnership at the whim of the steering group would be vulnerable to exclusion and bias. Isolating the NGOs from the process into a separate category from communities and authorities, when their only distinction from other community groups is their single-mindedness, would be cynical.

The NDA being the developer, it must not be so preponderantly involved in any steering group whose purpose must be decision-making by arbitration between developer and population. Instead, decision-making must involve all levels of elected bodies and of expertise and concern.

Proposal 4: that detailed geological studies take place only after a community has volunteered and after the Right of Withdrawal has ended.

This risks wasting much time and effort in the wrong places. Detailed geological investigations should precede volunteering, to discover where it is suitable to seek volunteers. Safeguards need to be in place to ensure volunteers may withdraw whenever fresh information substantially modifies previous perceptions.

If this appears to be impracticable, because it imposes uncertainties upon such a massive undertaking as a GDF, we would argue that there are alternatives to a GDF altogether. These are to store the material wherever it is created. This would also avoid the dangers of transporting it.

Proposal 5: that the GDF is made a Nationally Significant Infrastructure with a draft generic National Policy Statement (NPS) developed at a very early stage.

Government has forfeited our confidence in NPSs by sealing "principles" into other existing NPSs that have prematurely closed off debates on key local issues. With a GDF this might be about issues that are properly site-specific, not generic – such as long-term spent fuel storage at a GDF's surface, which we know government has not ruled out and that the nuclear industry favours. The timing proposed for a NPS would be well before the completion of the "awareness and engagement" programme, making a mockery of such engagement. Issues with which the public might wish to "engage" could by then have been "spoken for" - sealed in principle in the NPS.

To ensure such matters are fully transparent, a Strategic Environmental Assessment should be made, which would have to be site-specific.

Proposal 6: that the baseline inventory should include all higher activity wastes from new reactors and other sources, as well as the legacy waste presently included. The proposal would also remove the present requirement that any change to the inventory would have to be agreed with any local community which might host a GDF.

We reject this because it is such a major change, that democracy demands would need far wider consideration than is the case here. In addition, the level of information about the additional items proposed is incomplete and subject to change, and may remain so for many years. Again, the space required for the extra cooling of new reactor spent fuel is so great that it would require a far larger facility than that at present envisaged. This then would require the disposal of a far larger volume of spoil. None of these matters is so clear or so well understood – even by experts – as to be capable of acceptance in advance by a volunteering community. These new items must not be included in a baseline inventory.

Instead, all the proposed new items must remain subject to discussion and agreement by all relevant communities and local authorities.

Proposal 7: that, whereas a benefits package would be paid prior to the end of Right of Withdrawal, the rest of any compensation would be kept back until after a full go-ahead is agreed. In addition the benefits would stop a long time before the GDF was closed, and there is no clarity as to whether any benefits would go to neighbouring areas impacted by the GDF, either in construction or in operation.

We reject this proposed change because it implies a form of entrapment.

Instead, all discussions of compensation and benefits must be conducted with sufficient transparency to shame the Government into behaving properly.

Proposal 8: that the addressing various potential socio-economic, environmental and health effects would be brought forward; and that this would be done via a variety of bureaucratic instruments, that would become part of, or associated with the NPS.

We do not understand the social implications of these instruments, and we are sure that communities that may become involved in a GPS do not understand them either. To bring them forward would increase the risk of them ceasing to be appropriate and of omitting issues that had not yet become apparent. We do not trust quasi-principled NPSs. Most of all we mistrust Government when it hides behind smoke-screens of bureaucracies. A GDF would be a massive socio-economic leap in the dark anyway. We must not agree to take that step when we cannot even understand the map, let alone the territory.

Peter Lanyon

On behalf of the Shut Down Sizewell Campaign

December 2013