

SWAN Response to DECC GDF Consultation

This is a submission by South West Against Nuclear (SWAN) for the DECC consultation Review of the siting Process for a Geological Disposal Facility (GDF), deadline December 5th 2013.

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We will first outline some general issues with the whole process and situation and then deal with the consultation questions.

Is a GDF a good idea?

SWAN do not believe it is. There is no way to know if it will be a long term safe option for future generations. SWAN instead supports storing radioactive waste in near surface above ground facilities. None of the devolved administrations in the UK support GDF as a long term option.

Undemocratic Consultation Process

There have been previous attempts to find a site for a nuclear geological disposal facility (GDF) based on voluntarism that have not succeeded. The 2006 report from the Committee on Radioactive Waste Management (CoRWM) has been ignored by the government who look to be determined to find a solution using centralised control rather than voluntarism.

Cumbria County Council seriously looked at siting the GDF there but after much consideration declined. SWAN views this consultation as an attempt to restart siting the GDF in Cumbria.

SWAN wants this consultation to be abandoned and for the government to adopt all of the interrelated recommendations made by the 2006 CoRWM report.

Interim storage should be the priority

The most urgent priority is the clean up and management of current and legacy wastes. This waste needs to be safely stored before the GDF is considered. the government have got this back to front because of the political pressure to build new nuclear power stations. It is irresponsible to consider building new nuclear power stations when the legacy waste has not be properly dealt with.

As CoRWM points out deep disposal of radioactive waste is not a proven concept so there remains a need for significant independent R&D to further clarify the implications of a GDF. In SWAN's view there is no way to realistically determine the long term radiation levels from a GDF. The idea of creating a safety case for a facility that needs to endure these timescales is meaningless.

Public engagement and openness are essential

The CoRWM report recommended high levels of stakeholder and public engagement and openness but the government has failed to do this. The proposals in the siting review remove accountability and challenge from the process. We reject the amendments that are proposed by the government as we don't consider them to be an improvement on the current siting process.

Geology vs engineering

Rather than finding the best geological option for isolating radioactive waste in the UK the government seems happy to go for one that is "sufficiently good" and then rely on engineering solutions. This is unacceptable and there needs to be a national debate about how to move forward.

Not enough is known about the science of deep geological disposal to make a safety case

Deep geological disposal is claimed to safely contain radioactive waste in multiple, engineered barriers, which are then isolated deep inside a appropriate rock formation so that radioactive materials to not reach the surface.

The Radioactive Waste Management Directorate (RWMD) have listed 900 scientific and technical issues with regard to GDF. 400 are being worked on but that leaves 500 according to the March 2012 RWMD report (1). Those promoting GDF should be clear that the science of if GDF is a safe option has not been determined.

There also remains an issues register with NWAA that the government and the NDA are still unable to answer with over 100 technical and scientific barriers to the final GDF concept. The DECC is failing to show that it understand these complex processes and how they might affect people near to a GDF in the future, in its premature efforts to find a GDF site.

Question 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.

As pointed out above SWAN is opposed to GDF as a waste 'solution' However if the government are determined to pursue this route then we believe that the staged approach outlined by CoRWM is the appropriate way forward, in Cumbria public opinion was tested via built in decision points this is what led to Cumbria's withdraw from the process, we believe that staged decision-making is appropriate. The consultation is proposing a steering committee made up of the 'representative authority', RWMD and the government have decided to go ahead with limited input from the general public. People in the UK are very badly informed about nuclear energy in general and the implications of a GDF. If the government really wants public support then much more effort needs to be made to independently inform them.

In the consultation document it says that the local representative authority 'representing the people most affected by the potential development'. How do you define 'most'. SWAN would argue that it

will affect a large area around the GDF. How will the interests of future communities be represented within the partnership?

It is also the case that depending on the site specific conditions that the most affected community may not turn out to be the so-called host in the long-run, it maybe that communities considered to be 'wider interests' may turn out to be most impacted by leaks in the future.

Additionally communities need to be included in the decision making process and not just consulted (on the Consultative Partnership). The County and Parish Councils are currently not included on the steering committee so it is not in fact a representative authority but a self selected group. There needs to be genuine community involvement. We think it is wholly inappropriate that the government appoints itself to the steering group, in Cumbria the bodies that held observer status did so because it was felt that that it was important that they didn't have undue influence on the process, it looks like government just intends to take over the process using the local authority and host community to create some kind of appearance of legitimacy .

There is an assumption that District Councils/representative authorities are better informed because they have full time staff. Considering how complicated and controversial these issues are, this is not appropriate. There needs to be funding so that independent and impartial scientific advice can be provided so people are not getting their information from those that support the project. Sweden offers an example of this, the nuclear industry funded the Swedish Waste Fund so that NGOs can apply for funds to research GDF options there. Also a coalition of environmental organisation set up the Swedish NGO Office for Nuclear Waste Review (MKG) in 2004 which provides a critical voice in their GDF consultation process.

SWAN strongly advocates for the creation of the nuclear industry fund and a similar NGO review organisation in the UK. Why is the government not making this happen?

Question 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? Please explain your reasoning.

No. The consultation document describes a public awareness programme followed by a 'learning phase'. It looks like the 'representative authority' will be learning from RWMD and the government. Where is the independent information and recommendations considering that RWMD and government both support GDF? This public awareness campaign needs to be organised by an independent group.

Question 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. The consultation states that government will be holding a national public awareness and engagement programme. As said above there needs to be independent information about what is being proposed.

It states that the 'NDA should advocate geological disposal as an essential enabler for its decommissioning and waste management responsibilities.' This implies that GDF is the only option

when it is much more important to consider interim storage. Also legacy waste should be properly dealt with before considering any new nuclear power stations.

It states that 'the UK Government is keen to explore options for more effective engagement with NGOs and other groups, some of whom may be opposed to the implementation of geological disposal.' NGOs and their dissenting voice are essential if the process is going to achieve any legitimacy. DECC needs to ensure that the terms of reference are such that the NGO's can participate rather than excluding them as they did with the MRWS process, the government's suggestion that the NGO's be brought into the Geological implementation board is inappropriate for the same reason

It only states that setting up 'An entirely new independent advisory body could be established' is an option, why? This is exactly what should be done and there is no good reason why not.

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

No. This question is based on the assumption that a GDF is good idea when the science about how safe it is for future generations is unclear.

The consultation document states that 'UK Government's preliminary view that the use of criteria to identify (or 'prescreen') areas that are considered 'suitable' or 'unsuitable' at the outset should not be adopted. SWAN disagrees with this view, it is perfectly possible to screen out areas based on Geology as happened with the MRWS process in Cumbria if an open, transparent and well informed decision making process decides it's a good idea then a list of the most hydro-geologically suitable sites should be identified. Then these options should be explored first.

The word 'complex' is used by the government in the consultation document to describe inappropriate geological sites. These sites are thought of as "sufficiently good", this might be acceptable if we're talking about something unimportant like a cardboard storage box for toys but not when trying to find a underground storage site for highly toxic nuclear waste. To then rely on untested engineering solutions is totally irresponsible.

Prof David Smythe, (Emeritus Professor of Geology at Glasgow University) states that West Cumbria is completely unsuitable by any objective scientific standard. Additionally there are much more suitable sites in eastern England with thick clay or hard crystalline rock below flat sedimentary layers. This would not be first time in the UK where an unsuitable site is pursued for nuclear waste disposal. In 1988, Nirex listed 537 UK sites but then selected Sellafield for investigation in 1991 even though it was not on the original list.

The geology vs engineering solutions needs to be debated in public rather than the government assuming it knows best. In 1997 the Nirex Inquiry Inspector asked the BSG to weigh up the suitability for GDF of West Cumbria vs other UK regions.

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

No. The proposed approach is a undemocratic move to centralised control of GDF planning decisions. County and Parish Councils will only be consulted on GDF plans but not involved in the decision making process. In SWAN's view all those affected by a proposed GDF site should be fully involved in a deliberative decision making process.

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

No. The government is planning on include nuclear waste from new nuclear power stations in the inventory. The purpose of the GDF is to find a long term solution to the UK's legacy nuclear waste problem. The new programme of nuclear reactors will double or triple the amount of nuclear waste so this should not be included in the inventory.

Also if the government lumps all the legacy and new nuclear waste into the inventory then if a GDF site is found, the local community may not have any choice but to accept all the waste. So if a community does decide that a GDF can be sited near them, they need to decide which nuclear waste gets stored there. The government's desire for new build is undermining the essential legacy process.

Question 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 because in SWAN's view if the government has its way, the community (social) benefits are a 'pay off' to the community that ends up with GDF after the undemocratic process proposed in the consultation documents. Such benefits could undermine the choice of the optimal radiological protection as is required by law

Additionally, the consultation document does not seem to have a clear understanding between the different types of community benefits. Community benefits are to help the community engage in the process and 'providing a community benefits package to the community that hosts a GDF, commensurate with developing the social and economic wellbeing of a community that has decided to provide such an essential service to the nation.' Social benefits happen once the decision to move forward with the project is taken and include house price protection, employment, infrastructure project etc.

Question 8 – Do you agree with the proposed approach to addressing potential socioeconomic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

No because as described above the social community benefits are a 'pay off' to the community that has the GDF forced upon it.

There is no way to know what the environmental effects of a GDF on a community will be because the science is so unknown

There is no credible way of ensuring any 'social benefit' for the generations who may exist when the repository begins to leak. The logic behind the GDF is about relinquishing control of the waste because institutional arrangements cannot be ensured over these timescales. It follows then that the government can't ensure institutional arrangements sufficient to ensure that future generations who would be directly affected by the leaking repository could receive those benefits

This proposed process needs to be abandoned and a new process designed so that the decision making process is truly democratic and inclusive to communities that it will affect.

References

1. Geological Disposal: RWMD Approach to Issues Management, RWMD March 2012
<http://www.nuclearwasteadvisory.co.uk/wp-content/uploads/2013/02/Geological-Disposal-RWMD-approach-to-issues-management-March-2012.pdf>