

Thursday December 18, 2013

## **RESPONSE TO THE DECC CONSULTATION ON THE GDF SITE SELECTION PROCESS**

While the Group has not had the opportunity to consider the consultation document and discuss the proposals in detail, there are some comments it is in a position to make in response to the consultation questions.

In addition, the Group supports the principle of volunteerism.

**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.**

The Group did not discuss this question in detail; however it supports a democratic process which includes a test of public support, with multiple opportunities to withdraw.

Members felt that input should be sought from local government at all levels, including communities on waste transport routes, not only the host community.

**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.**

The group welcomes the public awareness and engagement programme ahead of the “learning phase” but feels that the decision-making process should be based on a democratic process supported by a broad-based partnership as indicated in the response to question one.

**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?**

The Group welcomes the UK Government’s role in the public awareness and engagement programme but wishes to ensure that the information provided during this phase is broad-based, inclusive and covers, among other issues, the current raft of scientific and technical uncertainties attending disposal. That information should also describe how the Radioactive Waste

Management Directorate of the NDA will make the process of resolving these issues transparent and visible.

As per paragraph 2.74 of the consultation document, the group considers that the UK Government should not dictate at which level of local government the right to withdraw may be exercised.

**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?**

The Group considers that the process should be geologically led.

**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?**

As above, the process should be democratic with views from all levels sought and demonstrably taken into account.

**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?**

It is important that all communities involved (host and on waste transport routes) are fully aware of waste inventories. The Group reminds government that the original Committee on Radioactive Waste Management report upon which this programme is based looked only at legacy waste and that it recommended that new build waste should be subject to a separate process, due to the different technical problems associated.

**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?**

The Group's only comment is that it agrees with the sentiment of paragraph 4.11 of the consultation document in that community benefit should be on top of developers' commitments under Section 106 of the Planning Act.

**Question 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?**

Not specifically discussed.