

Response form

Please use this form to respond to this call for evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility.

The closing date for the submission of responses is 10 June 2013.

Responses can be returned by email (preferable) or post.

Email address: radioactivewaste@decc.gsi.gov.uk

Or by post to: The Managing Radioactive Waste Safely team
 Department of Energy and Climate Change
 Room M07
 55 Whitehall
 London
 SW1A 2EY

Name	REDACTED REDACTED
Organisation / Company	Gosforth and Ponsonby Parish Councils
Organisation Size (no. of employees)	REDACTED
Organisation Type	REDACTED REDACTED
Job Title	REDACTED REDACTED
Department	
Address	REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED
Email	REDACTED REDACTED REDACTED REDACTED
Telephone	REDACTED REDACTED
Fax	

Would you like to be kept informed of developments with the MRWS programme?	Yes
Would you like your response to be kept	No

confidential? If yes please give a reason

The Government is interested in your views on the geological disposal facility site selection process outlined in the 2008 Managing Radioactive Waste Safely (MRWS) White Paper. To assist us you may wish to consider the following issues in your response:

- What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?
- What do you think could be done to attract communities into the MRWS site selection process?
- What information do you think would help communities engage with the MRWS site selection process?

1. IMPROVEMENTS.

In general terms the issue of trust is the aspect of the site selection process most in need of improvement.

There evolved during the previous process a profound mistrust between some of the participants themselves within the MRWS Partnership (most notably with CALC), and a complete absence of trust between the MRWS Partnership and a large section of the general public, particularly Town and Parish Councils.

This evolution occurred initially because:- there had been no mention in the White Paper of June 2008 of any such body as the MRWS Partnership; the precipitate action of Copeland BC in making an Expression of Interest without any consultation; because its 'lead' participants were the somewhat less than disinterested bodies such as DMB's and the NDA; and later, because of the dubious insistence of the MRWS Partnership that more geological surveys were required to give a greater understanding of the geology of West Cumbria - this despite NDA having at its disposal the results of the extensive work carried out by NIREX in the late 1980's and 1990's, the results of the NIREX Inquiry of 1996, and access to copious studies and investigations by academics and oil, gas, and water interests over a number of years.

More specifically the following factors contributed extensively to an absence of trust:

1. The failure of the MRWS Partnership to comply with both UK and EU legislation in relation to a Strategic Environmental Assessment (SEA).
The insistence of the Partnership that this assessment could be carried out after the beginning of Stage 4 (over halfway through the process)

was remarkably odd and presumably illegal.

2. The failure of HM Government to put the geology and hence fundamental safety, at the top of its requirements.

The principle of Voluntarism is very desirable, but geological considerations and safety were, and are, of paramount importance. Voluntarism should not come into play until a number of potential areas have been identified which are intrinsically safe.

3. The failure of HM Government to ensure that the requirements of the voluntarism process as set out in its own White Paper were adhered to by the MRWS Partnership.

The voluntarism process was hijacked by the DMB's for their own ends and under the noses of DECC representatives. Host Communities (clearly defined in the White Paper) were effectively sidelined and given virtually no recognition in the MRWS Partnership final report.

4. The so-called legal requirement that the decision whether or not to proceed to Stage 4 could only be taken by the respective Cabinets/ Executives of the DMB's and not their full democratically elected membership.

This led to the decision being taken in the two Borough Councils by small cabals representing very restricted geographical areas, all of which had been ruled out as 'unsuitable' by the BGS desktop survey.

5. The importance attached to the IPSOS/Mori poll results.

Analysis of the results showed that some 80% of those interviewed knew little or nothing about the radioactive waste issues, and in the absence of any mention of the proposed locality of a GDF it would have been difficult for respondents to give a meaningful response to the questions posed.

6. The inability of HM Government to ensure that the MRWS Partnership was led by an independent panel, thus ignoring best international practice, and allowing a process to develop which progressively departed from that outlined in the White Paper.

7. The CALC experience, whereby throughout the proceedings it had great difficulty in getting the Partnership to recognise that Parish Councils (representatives of the potential Host Communities) had a crucial role to play in the siting process.

8. The failure of the MRWS Partnership to properly address the geological

concerns regarding the integrity of the host rock of West Cumbria and its suitability for siting a GDF raised by Professors Smythe and Haszeldine. Instead of taking this as an opportunity to engage in a proper debate the Partnership chose to try and belittle the individuals and the information they were presenting.

ATTRACT COMMUNITIES.

The short answer to the question of attracting communities is for HM Government to display a far greater degree of transparency, honesty and integrity than hitherto shown. We note already in 'The Call for Evidence' an absence of these qualities.

For example:

1. In Point 5 of the introduction it is stated that an approach based on Voluntarism and Partnership Working can work by quoting examples from Canada, Sweden, France and Finland.

What is not pointed out is the very different approach taken by at least 3 of the 4 countries. Leaving aside the Canada example (huge country, small population and very different from UK) we do know that before the Voluntarism and Partnership Working approach was utilised in Sweden, France and Finland a geological survey of each country (Presumably in compliance with EU regulations relating to an SEA) was carried out, and all but a handful of areas ruled out as unsuitable for deep geological disposal. From those areas not ruled out, volunteer communities were sought.

This was putting geology (and hence safety) first and Voluntarism and Partnership Working second, a complete contrast to the previous process adopted for the UK and which HM Government seem to wish to continue.

It does not auger well for the future that this difference in approach is not highlighted.

2. In Point 6 of the introduction the fact is mentioned that two local authorities in West Cumbria voted in favour of moving to Stage 4, thus demonstrating that those "communities recognise the substantial benefits that are associated with hosting such a facility". Yet what is completely ignored is the fact that Cumbria County Council, the senior local authority, voted against continuing because of doubts surrounding geology and safety.

Also ignored is the fact that the ten member County Council Cabinet had a far greater geographical and population coverage than do the seven member executives of the two Borough Councils which are drawn respectively from wards in Whitehaven and Workington and the immediate surrounding hinterlands, all areas of which were ruled as unsuitable for a GDF by the BGS Survey.

3. It has been reported that following the termination of the site selection process in West Cumbria, meetings have been held between the Leaders of the two Borough Councils, the local MP and HM Government. Quite why these meetings were held and what the substance of them was, is largely unknown.

Such meetings only engender suspicion and are far removed from the transparency required to attract and encourage communities to the site selection process.

INFORMATION

1. First and foremost the length of time for which higher activity wastes remain harmful needs to be made clear.

Statements that such wastes can be "potentially harmful for hundreds of thousands of years" while alarming in the extreme need a greater degree of certainty attached to them. How potentially harmful? How many hundreds of thousands of years?

If there is no certainty to these questions then it should be stated.

2. What also needs clarification is how long an underground man-made disposal facility and the various secondary engineered barrier systems are expected to last.

3. There is serious concern about the ability of West Cumbria's infrastructure to deal with the present situation, let alone handle any additional large engineering project.

A potential GDF, a potential new-build nuclear power plant, major Grid upgrading, and the continuing requirement for the Sellafield site to operate, indicate a definite need for both a modern road and rail infrastructure.

Will this be forthcoming and will it be provided before work starts on any of these large projects?

4. There should be a clear and unequivocal statement that there will be no 'above-ground works' both in, and within the setting of, the National Park.

Specifically, all areas of Eskdale and Ennerdale granite within the National Park must be ruled 'out of bounds' to any activity relating to deep geological disposal.

The highest level of protection possible is afforded by legislation to National Parks and that level of protection should in no way be

compromised.

5. It should be made clear that groundwater flows, hydraulic gradients, as well as rainfall are important considerations in relation to siting a GDF.
6. It would be helpful if a clearer definition of 'community' than appears in the White Paper could be made.

The use of the term 'community' has shown no bounds in elastic interpretation. This was highlighted many times during the previous process as the DMB's sought to imply that they had support for proceeding as they wished, or even misrepresented facts to their own advantage eg. Defining themselves as Host Communities.

Time and time again the 'Community of West Cumbria' was referred to by the MRWS Partnership and repeated by the media – there is no such thing. West Cumbria is a collection of communities, many of them in dispersed rural areas.

7. Point 6 of the introduction to this document illustrates the blurring between local authorities and communities.

The two local authorities (actually the 7 member executives for each council) certainly voted in favour of proceeding to Stage 4; all of the communities which make up each local authority area had that decision thrust upon them. This did not prevent the leader of Copeland Borough Council claiming she had a mandate for the 'community of West Cumbria' – as stated above, there is no such thing.

8. Despite the assurances given in regard to the Right of Withdrawal, in reality because this was not legally binding, any Decision to Participate was in fact a final decision.

The DMB's appeared not to recognise this situation but in any future process it should be clarified at the outset.



