

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.qsi.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	REDACTEDREDACTEDREDACTED
Organisation / Company	Labour Members, Copeland Local Committee, Cumbria County Council
Organisation Size (no. of employees)	n/a
Organisation Type	
Job Title	REDACTED
Department	REDACTEDREDACTEDREDACTED
Address	REDACTEDREDACTEDREDACTEDRED ACTEDREDACTEDREDACTEDREDACT EDREDACTEDREDACTEDREDACTRED ACTEDREDACTEDREDACTEDREDACT
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Fax	

Would you like to be kept informed of developments with the MRWS programme?	Yes
Would you like your response to be kept confidential? If yes please give a reason	No

Date 9th June 2013

Dear Sirs,

Call for Evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Facility

This letter represents the views of the undersigned Cumbria County Councillors who represent the Copeland area of the County.

Question 1 - What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?

Voluntarism and Partnership should remain the basis of any MRWS policy, but in areas with two tier Local Authorities (the decision making bodies) consideration should be given to the development of a formally agreed partnership between such Authorities, including an agreed mechanism as to how their communities would be engaged and consulted prior to any formal Expression of Interest. In addition to the agreement between Local Authorities, the arrangements for the involvement of all other members of any Partnership should be explicit.

The Localism Act has introduced a clear requirement for cooperation between Local Authorities and other organisations and this should provide a solid basis for producing better mechanisms.

Recent experience has shown the need for greater clarity over the "right of withdrawal" is necessary as misrepresentations of the Government's assurances had a greater impact on public opinion than its true position.

It is also clear that an approach which prioritises Voluntarism over any meaningful assessment of regional geological suitability will lack credibility with the public unless real effort is made to explain and justify it.

Within the limitations of the previous process it is considered that the West Cumbria Managing Radioactive Waste Safely Partnership worked well and provided an unprecedented level of public and stakeholder engagement, but limited advocacy for the process was outweighed by opponents who were able to focus on (largely spurious) safety issues and other fears.

Question 2 - What do you think could be done to attract communities into the MRWS site selection process?

The case for deep geological disposal needs to be made much more clear and convincing; in particular the advantages of that solution in contrast to shallow or above ground alternatives need to be spelled out. The WCMRWS Partnership was unable to fully address another genuine concern, that of the extent of retrievability of wastes during and after the completion of emplacement.

Uncertainties about any guaranteed delivery of quantifiable additional benefits, above and beyond those associated with investigation and construction work need to be fully addressed and resolved. This is a matter for Government as a whole, not just for DECC who are clearly not fully empowered to provide the scale of assurances and certainty required. The lack of clarity in this area created distrust which was exploited by those opposed to any successful continuation of the process.

Despite efforts by Ministers to reassure Local Authorities that they would retain a right of withdrawal until the entire approval process had been completed and construction had started, these proved insufficient to convince those opposed to continuation.

It is suggested that the risk related research proposed by the WCMRWS Partnership should be continued as it will assist in resolving some issues in this area.

Clearly one of the key problems with the process so far is the lack of advocacy for it, a lack of confidence in regulation and a perception that community concerns will be overridden in the 'national interest'. This was overcome in Sweden and more effort needs to be applied to understanding why confidence established there could not be replicated in this country.

It may be that in addressing some of the expectations raised by the Localism Act, the offer of a referendum to, say, a Borough/District area would be appropriate. It should be remembered that in Copeland, over 67% of those responding to the Ipsos/Mori poll were in favour of continuing with the investigations and opposition only grew as irrelevant fears were raised by opportunistic opponents.

Question 3 - What information do you think would help communities engage with the MRWS site selection process?

The current storage solutions are unacceptable in the long term, but the explanation of why there is a national interest in ensuring a deep geological disposal site is developed has not been satisfactorily made.

Uncertainties as to the size of any facility both above and below the surface, coupled with a lack of clarity regarding the precise nature of the material to be deposited in it, need to be resolved in a way which is understandable to the public.

The question of what is acceptable geology and how this compares to the potential acceptability of an area is key. This is inextricably linked to the need for confidence in regulators and certainty about the quality of the overall safety case.

The particular economic and environmental characteristics of any area engaging with this process need to be recognised and respected. The desire of local people and communities to protect what they know and value as opposed to engaging in a project with unquantifiable risks and benefits is understandable.

It is crucial that a project of this magnitude and importance is properly explained to the communities engaging with it. This will require a professional capability to

communicate information and address concerns identified by the WCMRWS Partnership, but yet to be deployed by DECC.

Conclusion

We were extremely disappointed that the previous Cumbria County Council administration did not agree to move to phase four of the MRWS process. Despite the issues and concerns raised above we were confident that all matters could and should have been addressed during that phase of the programme. It is clearly in the interests of the people and communities that we represent, that a solution to the issues surrounding nuclear waste management is resolved. We believe that these and the other issues concerning the future of the nuclear industry will only be resolved through genuine and open dialogue.

Yours sincerely,

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