



Department
of Energy &
Climate Change

Call for Evidence

Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility

Response form

13 May 2013

Call for Evidence

Please use this form to answer questions on the 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
55 Whitehall
London
SW1A 2EY

In order to help us analyse responses, please provide details of your organisation.

When the call for evidence ends, we may publish or make public the evidence submitted. Also, members of the public may ask for a copy of responses under freedom of information legislation.

If you do not want your response - including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the call for evidence. Please note, if your computer automatically includes a confidentiality disclaimer, that will not count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

The responses to this Call for Evidence will inform a public consultation that will follow in the autumn.

We would like to keep stakeholders who are interested in the MRWS process up to date on developments. If you would like to be kept up to date please sign up at the end of the form.

Introduction

1. The UK Government's policy for the long-term management of higher-activity radioactive waste is geological disposal¹. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper² was published which outlined a framework for implementing geological disposal based on the principles of voluntarism and partnership.
2. Three local authorities formally expressed an interest in the MRWS programme: Copeland and Allerdale Borough Councils, and Cumbria County Council. In January 2013, the three local authorities voted on whether to proceed to stage 4 of the process. The two boroughs voted in favour, but the county voted against. The Government had in 2011 given a specific undertaking that the existing site-selection process would only continue in west Cumbria if there was agreement at both borough and county level. The county's decision therefore ended the existing site selection process in west Cumbria.
3. Shepway District Council in Kent had also taken soundings from local residents, but subsequently decided against making a formal expression of interest in the current MRWS process.
4. The Government remains firmly committed to geological disposal as the right policy for the long-term safe and secure management of higher-activity radioactive waste. The Government also continues to hold the view that the best means of selecting a site for a geological disposal facility (GDF) is an approach based on voluntarism and partnership.
5. Evidence from abroad shows that this approach can work, with similar waste disposal programmes based on these key principles making good progress in countries like Canada, Finland, France and Sweden.
6. The fact that two local authorities in west Cumbria voted in favour of continuing the search for a potential site for a GDF demonstrates that communities recognise the substantial benefits that are associated with hosting such a facility – both in terms of job creation and the wider benefits associated with its development.

Purpose of the call for evidence

7. In line with the Secretary of State's written Ministerial statement of 31 January 2013³, Government has been considering what lessons can be learned from the experiences of the MRWS programme in west Cumbria and elsewhere. We are now inviting views on the

¹ Radioactive waste disposal is a devolved matter. The Scottish Government has a separate policy and supports long-term interim storage and an on-going programme of research and development. The Welsh Government has reserved its position on geological disposal of radioactive waste while continuing to play an active part in the MRWS process. The Department of the Environment in Northern Ireland supports the MRWS programme.

² Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal
<https://www.gov.uk/government/publications/managing-radioactive-waste-safely-a-framework-for-implementing-geological-disposal>

³ See <https://www.gov.uk/government/speeches/written-ministerial-statement-by-edward-davey-on-the-management-of-radioactive-waste>

site selection aspects of the ongoing MRWS programme in this call for evidence, particularly from those who have been engaged in (or have been interested observers of) the MRWS process to date. The responses to this call for evidence will inform a consultation that will follow later in the year.

Background

8. Higher-activity radioactive wastes are produced as a result of the generation of electricity in nuclear power stations, from the associated production and processing of the nuclear fuel, from the use of radioactive materials in industry, medicine and research, and from military nuclear programmes.
9. As one of the pioneers of nuclear technology, the UK has accumulated a substantial legacy of higher activity radioactive materials. Some of it has already been processed and placed in safe and secure interim storage on nuclear sites. However, most will only become waste over the next century or so as existing facilities reach the end of their lifetime and are decommissioned and cleaned up safely and securely.
10. These higher-activity wastes can remain radioactive, and thus potentially harmful, for hundreds of thousands of years. Modern, safe and secure interim storage can contain all this material – but this method of storage requires on-going human intervention to monitor the material and to ensure that it does not pose any risk to human or environmental health. While the Government believes that safe and secure interim storage is an effective method of managing waste in the short to medium term, the Government is committed to delivering a permanent disposal solution.
11. In October 2006, following recommendations made by the independent Committee on Radioactive Waste Management, the Government announced its policy of geological disposal, preceded by safe and secure interim storage. The Government subsequently announced that it would pursue a policy of geological disposal with site selection on voluntarism and partnership. This remains Government policy.

Geological disposal

12. Geological disposal involves isolating radioactive waste in an engineered facility deep inside a suitable rock formation to ensure that no harmful quantities of radioactivity ever reach the surface environment. It is a multi-barrier approach, based on placing packaged wastes in engineered tunnels at a depth of between 200 and 1000m underground, protected from disruption by man-made or natural events.
13. Geological disposal is internationally recognised as the preferred approach for the long-term management of higher-activity radioactive waste. It provides a long-term, safe solution to radioactive waste management that does not depend on on-going human intervention.

Response form

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

Name	REDACTEDREDACTED
Organisation / Company	NOEND "No Ennerdale Nuclear Dump"
Organisation Size (no. of employees)	REDACTEDREDACTED
Organisation Type	REDACTEDREDACTED
Job Title	N/A
Department	N/A
Address	
Email	REDACTEDREDACTEDREDACTEDRE
Telephone	REDACTEDREDACTEDREDACTED
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

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?

Q1. What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?

a) Radioactive waste is a National issue and whilst volunteerism is a good thing when safety is not an issue, it is ludicrous to show preference to one site which has questions about the safety case over a site which has a better safety case but has not volunteered. This is not only wasteful in terms of the money spent on investigating a site which may turn out to be unsuitable, but may also create unnecessary economic blight and create the impression that Government is making a "U" turn. There needs to be a National geological survey to first to identify suitable sites and then the white paper developed to provide process to encourage volunteers.

b) It should be unnecessary to state, but sites of natural, historical or heritage importance, especially those that have a high level of legal protection should be excluded at an early stage. This should be clearly stated within the white paper. If the West Cumbrian MRWS had been a commercial project, a Cost/Benefit analysis would have been carried out and the Lake District National Park would have been removed from consideration, long before there was waste of public money. Local political interests ensured that whilst the government was footing the bill, the process would continue regardless of the likelihood of success. The administration was said to have "provided lots of empty suits and desk jockeys with gainful employment whilst it continued" and councillors were heard to say (within closed council meetings) that "who cares about the cost, it doesn't come out of my budget!". In these times of austerity, regardless of my opinion on the pros and cons of the project, as a taxpayer I believe that this was a criminal waste of my hard earned tax contributions.

c) Include within the White Paper, a serious commitment to forming an independent scrutiny panel to oversee any future engagement with the local community. This panel must not include people with any form of self-interest in the outcome. As was seen within the WCMRWS, the corruption of the principles contained within the original White Paper due to local politics was a huge factor in destroying any faith in the fairness of the process.

d) Ensure that, whilst the search for and subsequent construction of a Geological Disposal Facility is carried out, sufficient financial commitment is made for short term secure storage.

e) It is essential that the Government ignores the arrogance of engineers who claim to be able to design systems & structures that will last for thousands of years. The white paper must build public trust in the methodology by ensuring "retrievability" at the fore front. If disposal systems improve or problems occur or even if we find that we are able to make a profitable use of the waste in the future, it would seem ludicrous to find it was inaccessible "by design".

Q2. What do you think could be done to attract communities into the MRWS site selection process?

The Government needs to be crystal clear on the:-

Definition of a "Host community";

Community Control with regard to the "Right of Withdrawal";

Community Benefits Package;

Compensation;

The destruction of trust was a fundamental issue which was why there was no faith in the WCMRWS process. The white paper gave a clear definition of a host community "a small geographically defined area and includes the population of that area and the owners of the land. For example, it could be a town or village." Our Local Council Leader gave us an alternative opinion, which was "the administrative boundary of Copeland or Allerdale". Was it any wonder why people felt that they had no control over their destiny?

It is widely known that there is a long standing social issue whereby "the public" shut off from local political issues until they feel threatened. Knowing this, it was the job of the WCMRWS to engage the public. It significantly failed! I am ashamed to say that I was one of the apathetic masses. I knew that there was a process to find a GDF. I even attended one of the initial presentations, but did not believe that anyone in their right mind would put it in "The Park". Like most people, I assumed it was going to be along the coast, somewhere near Sellafield. That was ok and so I shut off. It was only recently that more information was made available by people who were able to read between the lines and I began to get very scared. By deductive logic, it was clear that the focus of the search could be Ennerdale. Despite pleas for information, there was no denial by the MRWS and this fear was reinforced by the refusal to exclude the National Park. Like the majority of people who feel a threat, I had to become informed very quickly. If this information was more openly available from those considered to be "Anti" and was more obscured by those of the MRWS, is it any wonder I, like many others, became disenfranchised by the MRWS process. Local opposition had less than two months to counter the multi million pound spin machine. Our groups and opposition to the industrialisation of the National Park was made up, not of lunatic fanatics, but of normal, working class people without affiliation to any political movement. A good number of our opposition group have family who work at Sellafield. We all came late to the party, but we all came scared by the corrupted MRWS Process. The white paper may well have been based on good principles but its application in West Cumbria was flawed.

Even if we had faith in our local politicians and they were not seen to be bending the facts to suit their needs, local people did not feel that they had control or the opportunity to back out of the process if they had decided to commit to it. I would remind you of what was said by the chairman of the

Committee on Radioactive Waste Management *Professor MacKerron*: "I think it is the essence of an approach that asks for community willingness to participate that up to a certain moment in the process the community has to have a right to withdraw. Beyond that moment, of course, it does not, especially after serious expenditure is incurred. If I can give you an anecdote which I think has very great weight. When we visited Sweden as a committee and we spoke to the mayor of one of the communities that was involved in a competition to be the host site for the Swedish repository, the mayor said to us, "The only way in which we could ever have said yes to this proposal was that until a certain moment we were given an absolute right to say no". In other words, he was saying had there been some sense of imposition on them they would have fought it almost irrespective of the technical merits of the proposal." (Select Committee on Trade and Industry Minutes of Evidence 19th June 2006)

As long ago as 2006 it was pointed out that "Key to finding a long term storage site will be the active engagement of local communities under the principle of 'volunteerism', bearing in mind the need to have clear definitions and processes to allow local communities to decide on the issues.'" (Trade & Industry Committee TISC PN45 0566)

With regard to community benefits and compensation, it is clear that whilst any package would be seen as bribery by many, it is essential that in order to build trust the Government need to be open on the level of commitment to the host community, the degree of control and who will hold the "purse strings". Perhaps more (actual) control should be devolved to Parish Councils rather than local councils who see it as income generation. Decision can be unfairly weighted due to the population size of larger towns in a borough as opposed to small rural economies that actually bear the cost of change. Rural economies have been encouraged to diversify into tourism but that tourism is a fragile and fickle thing and can be damaged by the mere suggestion of change.

As has recently been seen with the High Speed Rail Link, people have a perception that reimbursement for loss of property value or loss of earnings etc. is dealt with unfairly. It is difficult to quantify the cost, the range and the effect brought about by one particular building project. Unless it is clear from the outset how this will be dealt with, a project will not get support from the immediate community.

Q3. What information do you think would help communities engage with the MRWS site selection process?

I am not sure this comment is correctly included under this heading but the Government must ensure that TRUST is a quintessential part of any move to engage with any community to do this it needs to remove "Politics" from the process.

To create and preserve faith in a process, any decisions need to be based on science and trust. I repeat one of the answers to Q1 above. "Include a serious commitment to forming an independent scrutiny panel to oversee any future engagement with the local community within the White Paper. This panel must not include people with any form of self-interest in the outcome. As was seen within the WCMRWS, the corruption of the principles contained within the original White Paper due to local politics was a huge factor in destroying any faith in the fairness of the process."

With regard to trust there was clear public perception that DECC, in the form of Baroness Verma, was attempting to lobby (bully) our County Councillors right up to the morning of January 30th. With regard to trust in our MP, it is obvious to most that he was continually lobbying, manipulating and using the

Sellafield workers as a blunt weapon against any opposition. I understand that it is a recognised tactic to ridicule and deride credible opposition. Using labour groups to crush unorganised smaller groups of local opposition is also considered acceptable by some. However, in a small community it is divisive and will create unnecessary enmity for decades. One only has to watch the cynical use of Twitter and local media to see these tactics in action.

With regard to our Local Politicians it is widely felt that there is an incestuous relationship with nuclear industry and too much weight is given to the "cash coming out of Sellafield" as opposed to representing the actual needs and views of residents of the area. As an example of this the Ipsos MORI is repeatedly used by our Local Council Leader and our MP as an indication of the "West Cumbrian Mandate" for siting of a GDF and justification for their pushing their points of view upon an unconvinced population. There are questions about how the poll was conducted and how, in our view its information was being misrepresented.

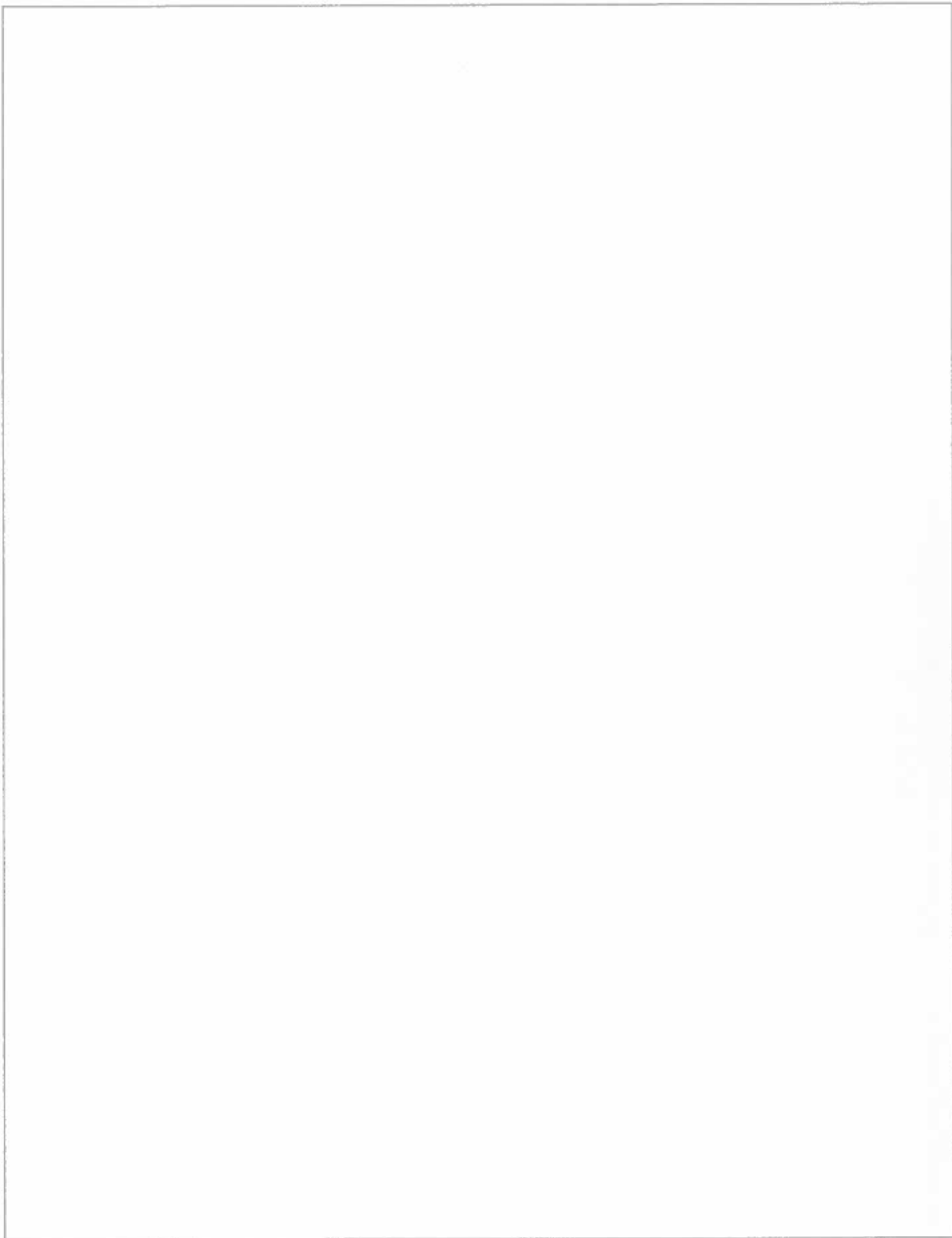
Question 3 of the poll asked "How much do you feel you know about this search in West Cumbria for a potential site for a deep underground disposal facility for higher activity radioactive waste" The answer to this has been presented as showing that over 55% of the residents of West Cumbria know at least a little about the process. Whereas the figures indicated by number of answers to the exact MORI question actually show that 80% knew little or nothing about the search. If that poll were conducted again today, it would clearly produce a very different answer. It is also apparent that the level of opposition increased dramatically when people discovered more information about the search, particularly in those areas identified by the geologist working for MRWS. The parish of Ennerdale and Kinniside recently voted on this and 94% of the electorate wished to withdraw our area from the search.

In addition Q4. asked "From what you know at the moment, do you think that the councils should or should not take part in the search for a suitable site in the respective council areas for a deep underground disposal facility for higher activity radioactive waste" The response to this has been widely advertised as 53% of West Cumbrians being in favour of taking part in a search.

We believe that this was a serious misrepresentation, as this was a response based on little or no knowledge, when taking into account the 80% response from Question 3. We believed that these critical misrepresentations were symptomatic of the manipulative public engagement throughout the West Cumbrian process.

This was not purely something that was driven by solely Copeland Borough Council within West Cumbria. *As an example of the incorrect assertion that Allerdale B.C have a democratic mandate for proceeding, data collated last year on the views of Allerdale's 60 Parish and Town Councils showed that 34 Councils had voted against continuation to Stage 4, while only 3 had voted in favour. Of the remaining 23, six had not considered the issue, four had but could not reach a resolution, and thirteen did not reply to the survey. Councils voting against continuation covered over 53% of the entire Borough's population, while those voting in favour covered less than 3%. The total number of councillors eligible to participate in debates that resulted in a 'No' vote was 334, while those eligible to debate in votes that resulted in a 'Yes' vote was only 28. The feeling within the Parish Councils of Copeland were broadly similar.*

I am happy to discuss any of the above points or provide further detail.



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