

Name	REDACTEDREDACTED
Organisation / Company	Greenpeace UK
Organisation Size (no. of employees)	REDACTED
Organisation Type	REDACTED
Job Title	REDACTEDREDACTED
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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?

1. Greenpeace is a campaigning organisation which has as its main object the protection of the natural environment. Greenpeace has worked on the issue of nuclear power since its inception. It has gathered expertise and access to expertise on all issues to do with nuclear power including safety, health, security, economics, transport, waste and proliferation. It is currently applying for a judicial review of the Order granting development consent for Hinkley C and this response is made without prejudice to that claim.
2. The Government policy has been to pursue geological disposal through voluntarism. That policy has failed and there are no candidate authorities and no prospective sites for geological disposal.
3. On the other hand, voluntarism is the only method proposed to succeed in delivering a site for geological disposal. This is clear from evidence abroad and from the substantial work undertaken in advance of the MRWS White Paper.
4. The Government asks what aspect of the site selection process in the MRWS White Paper we think could be improved and how, what could be done to attract communities into the MRWS site selection process and what information we think would help communities engage with the MRWS site selection process.
5. The key, in Greenpeace's view, is that Government should separate the problem of dealing with existing nuclear waste from plans for dealing with future waste from new build. Nuclear waste that already exists has to be dealt with as safely as possible in a way that presents the least danger to present and future generations. It may be possible to gain the consent of a community for disposal of wastes that already exist, but only without asking them to also accept additional wastes (which could be significantly more radioactive), which may be produced in the future through new build.
6. In the 2008 White Paper the Government promised that no consent for nuclear power stations would be given without being satisfied that a disposal route exists or will exist. The evidence is that none will be achieved without voluntarism, and without communities knowing what they are being asked to deal with – i.e. a firm inventory on the radioactive waste. Without this it will prove infinitely more difficult, if not impossible to implement the policy of voluntarism.

The West Cumbria MRWS Partnership clearly had concerns, for a range of reasons, over the inventory it might be asked to accept for disposal in any GDF sited in Cumbria. That they wanted any potential host local community to have a say in this matter, and the relevant decision making body (in this context the relevant local authority) to have a right of veto over the extent of the inventory, was clearly spelt out in the inventory principles that the Partnership produced. That veto was

proposed as an additional 'control', even after the Right to Withdrawal for GDF construction had passed. This is an example of where, if legacy waste disposal had been accepted, new build waste disposal might still have been refused. The lack of clarity over how much waste might be disposed of in a GDF was raised by the then Cumbria County Council leader in the debate on this matter on 30<sup>th</sup> January.

7. The MRWS process was set up following the deliberations of the first Committee on Radioactive Waste Management, which was emphatic that new build wastes should be considered under a separate process to legacy wastes. The Government continues to foist new build onto a process based on recommendations to deal with legacy wastes.
8. It cannot be assumed that there will ever be a willing host community for a legacy waste repository and it can certainly not be assumed there will ever be a willing host community for both legacy and new build waste.