Submission to the Department of Energy & Climate Change Call for Evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility

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Prospect is a union representing 120,000 professionals, managers and specialists across the private and public, sectors – including 12,000 members working in the nuclear industry, approximately 4,500 of whom work for Sellafield Limited.

As the REDACTEDREDACTEDREDACTEDREDACTEDREDACTED REDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDRED ACTED I have significant insight into the issues that were encountered.

One of the key issues that the Partnership faced was that of the uncertainties involved during Stage 3 of the process. Unfortunately, Central Government served to hamper the Partnership in this area, blocking attempts by the Partnership to gather further information on West Cumbrian geology, for example. We were also not able to set out what forms a community benefits package would take, and at what stages the various elements of it would begin.

The issue of geological uncertainty was of particular concern for the community which, when coupled with a generic lack of trust in Central Government commitments, from experience over several decades, not only gave the impression that a GDF might be unwisely placed in unsuitable geology, but also opened the door to quasi-scientists manipulating the geological issues, seemingly for their own ends and self-aggrandisement, with greater success than might have been assumed, despite the logical fallacies in their arguments.

Another bone of contention was the uncertainty of the inventory. The process, as written, is fundamentally at odds with itself on this matter. It is clear that sufficient progress toward a waste solution is regarded as a prerequisite for allowing new nuclear build, yet the MRWS process does not necessarily require the GDF inventory to include new build waste, even though most people would assume that it must, and that therefore creates the impression that Government is lying to them on this, so cannot be trusted on any other part of the process. Similarly, the fact that the White Paper was not in fact primary legislation further undermined public trust.

In my view, the reason that the summer poll showed a majority in favour of proceeding to Stage 4, was partly due to the level of public consultation, but also due to the trust that people place in the trade unions, to look after the interests of the community.

Additionally, the unnecessary number of stages in the process, the dubious authority of a distant County Council, that does not have West Cumbria's interests foremost in its mind, and the overblown level of Parish Council involvement, were always going to throw stumbling blocks in the path of progress.

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Overall, despite the excellent work of the Partnership in public consultation and in its final report, the process was doomed to failure, partly because of an NGO campaign against it, but mostly because the weaknesses of the process stymied those in favour of continuing with it, and allowed the Cumbria County Council to overrule West Cumbria.

In revising the MRWS process, Government must address the following:

1. A simple two-stage process is required, the first stage being to do everything that is required before taking a final decision to build a GDF in a specific location, the second stage being the actual building of that GDF.
2. At the beginning of Stage 1, the community benefits and impact mitigations must be designed and agreed, prior to invasive testing, with emphasis upon early delivery of benefits and mitigations, beginning at the point of invasive testing, and scheduled in detail throughout the process.
3. The desk-based geological study should run in parallel with the community benefit work, and be followed by invasive testing of potentially suitable sites.
4. Inventory must be discussed and agreed during Stage 1, with Government openly stating, that new build waste will be included, subject to recycling, conditioning, and retrievability.
5. The GDF must include long term monitoring and retrievability, to allow for technological advances, asset re-use, and safety assurance of the design & construction.
6. The decision making and planning authorities must be devolved to the direct control of the interested council area, e.g. Copeland or Romney Marsh.
7. Trade Union involvement throughout the process.
8. The process, including all benefits and guarantees, must be enshrined in primary legislation.