

19/12/13

Siting Review Consultation

Engaging with a consultation about a massively complex issue whose outcome is already pre-determined by decision-makers is actually not that easy to do, it is hard to actually prioritise taking precious time out of one's life to engage in a process where those in positions of power have no regard for the thoughts or feelings of those they exercise power over.

I do so however, not because I feel any ability to influence decision-makers but because what I write should be put in the public domain, and in the hope that at some point in the future, decision-makers are held to account for their decisions.

I hope that my submission, along with all the others who give voice to grave concerns, are able to inform part of some future process of accountability. Decision-makers (current or future) must not be allowed to deny that they heard these concerns, or that they were ignorant of the facts.

When the radioactive day of reckoning happens, the things that motivated some humans to produce intractable radioactive wastes will no longer matter. Those that live at this time will not care one jot for the weapons, energy, space-craft and so-called medicines that proponents of this ecocidal industry argue for. They will care about whether they can breathe the air, drink the water and eat the food and give birth to viable off-spring - all the things that this industry and its products threaten.

The hubristic behaviour of those in power regarding nuclear issues can only be because there is some kind of strange victory-disease in operation, where UK Nuclear operators continually crow about their safety record, whilst denying that the worst that could happen could happen here, as has been the case with the Weightman review of the Fukushima catastrophe, which was conducted before the full impact of the catastrophe was known. Some would describe the behaviour of UK decision-makers and those involved with the nuclear industry as good examples of cognitive dissonance in operation. The evidence? wishful thinking!

A quick search engine trawl for the terms nuclear and wishful thinking bring up a good number of examples that illustrate my point:

- <http://www.greenpeace.org/international/en/news/Blogs/makingwaves/nuclear-wishful-thinking/blog/10237/>
- <http://www.worldnuclearreport.org/The-StarPhoenix-US-Wishful.html>
- http://www.alternet.org/story/150369/how_nuclear_power%27s_%22peaceful_atom%22_became_a_serial_killer
- <http://matter2energy.wordpress.com/2013/04/21/fusion-the-power-of-wishful-thinking/>
- <http://www.dawn.com/news/695613/pakistan-and-the-fmct/print>

wishful thinking is self-evident when looking at DECCs consideration, as pointed out by CoRWM, of a 75GW nuclear power programme.

So, I submit my response in the full knowledge that the current raft of decision-makers and politicians will continue to engage in their wishful thinking whilst avoiding the real facts of the situation we are faced with. An unpredictable and quite possibly unmanageable legacy of nuclear waste, an accumulation which poses a severe threat, along with all of the other global accumulations, to life on our planet.

My submission is in bullet-points to aid DECC with their task of identifying themes, a task they clearly struggled with looking at DECC analysis of the Call for evidence submissions, which made notable failures to identify individual themes, sometimes conflating what are essentially separate themes. The bullets should assist in avoiding ambiguity.

- I question the basis for this consultation and am unhappy with its conduct. Engagement with the consultation has been limited for the most part to those 'stakeholders' that DECC could be bothered to invite, which included some notable omissions such as DECC's failure to invite PAWB to take part in the consultation. I question whether the 'extension' offered by DECC has allowed sufficient time for them to engage.
- The organisation and conduct of this consultation has been shambolic with venues for stakeholder events remaining undecided a considerable way into the consultation. I would be surprised if the conduct of this consultation is even legal.
- I have 'no-confidence' in the government's proposed changes in the siting review.
- **New build wastes must have a separate process to that of legacy wastes - a so-called solution to legacy wastes cannot possibly be used as justification of a new build program.**
- government should abandon its ludicrous nuclear new build plans.
- Institutional bias towards a certain outcome means that research may be skewed in favour of findings that support the nuclear establishment's pre-determined idea, i.e. that Geological Disposal can be implemented safely.
- The failure of the Managing Radioactive Waste Safely (MRWS) process in Cumbria is a strong indicator, that any legitimacy that may have been achieved via the CoRWM1 process has been damaged by successive governments' perversion of the MRWS process.
- Focus on a GDF, whilst excluding many of the interdependent recommendations a GDF was predicated on, is a contributory factor to the lack of credibility of the process in the eyes of the public after the experience of engagement in Cumbria.
- All future radioactive waste management should ensure that research and engagement should collect and analyse gendered data and this should form an intrinsic part of any evaluation of processes. The design of any future process should ensure that a representative number of women's voices are included in public engagement and more needs to be done to include women in democratic decision-making bodies.
- Where possible, gender analysis should be retrospectively applied to siting processes to date, particularly on the most recent, failed MRWS process in Cumbria.
- Immobilised, retrievable waste in close to surface/near-surface stores are the appropriate form of management for the foreseeable future.
- The 'accelerated' GDF process exposes the political pressure caused by the planned new build program and violates the principle that **"adequate time must be allowed for the resolution of scientific issues"**.
- The government's subsequent and on-going failure to implement a robust interim storage program is evidence that the new build program is already having a detrimental effect on the management of legacy waste.
- The focus on a GDF, to the exclusion of many of the interdependent recommendations that it was predicated on, is a contributory factor to the massive threat to people and environment that the Sellafield facility poses.

- The government's failure to adopt the interdependent recommendations about GDF from CoRWM1 points to an worrying government preoccupation with justifying a new build program, as was forewarned by independent experts before the new build program was announced.(90)
- The attempt to force through a nuclear new build programme has de-railed what had begun, at the turn of the century, as a legitimate process to find a socially-acceptable strategy for the wastes, as Professor Blowers argues: "a process perverted".
- The government should review its MRWS policy in its entirety as a matter of urgency, as the proposed revisions to the siting process threaten the whole character of the proposals laid out in the White Paper.
- Many of the technical aspects which are a source of uncertainty have a significant impact on selecting a siting criteria.
- This new build-driven process and its attendant consequences do not represent value for money for British taxpayers.
- The Government's attempt to site a GDF is premature.
- Current staged process with clear decision points are the appropriate approach to siting storage and/or disposal facilities.
- Timescales are too tight and should be community-led.
- Testing of support needs to be continuous as is currently the case with the step-wise (staged) process.
- Testing of support is vulnerable to manipulation and therefore needs to be done via a range of methods that potential communities have a say in designing.
- The continued threat to impose radioactive waste on an unwilling community should be removed from the MRWS White Paper.
- A voluntarist approach that only produces one potential volunteer is problematic and can introduce significant risks into the siting process, potentially compromising the long-term safety of a facility.
- Right of Withdrawal needs to be enshrined in legislation that is clear and unambiguous.
- We have concerns about the ability of a community to exercise the right of withdrawal which is exacerbated if only one community 'expresses an interest'.
- The right of withdrawal should continue until as late a stage as possible (as under the current White Paper). It should not be terminated before investigations necessary for a decision to participate begin, as this would dissuade communities from 'expressing an interest'.
- A truly participatory process is essential if any radioactive waste management process is to gain legitimacy and have any chance of success.
- The move to exclude the County Council layer of governance is unacceptable and would be difficult to implement in practice as it runs counter to County Councils' obligations regarding waste management.
- I object in the strongest terms to the proposal that government and the developers 'steer' any siting process. This would create a clear conflict of interests.

- I reject DECC's proposal to relegate 'wider interests' to a consultative body decided on by a steering group.
- I reject DECC's proposal that NGOs are excluded from the siting process completely and the suggestion that the only place for their concerns is on a board whose terms of reference may prevent their participation. We are disappointed that DECC have ignored the recommendations of the independent evaluators in this regard.
- I believe that DECC's proposals represent an ill-disguised shift back to a 'decide announce defend' approach to radioactive waste policy.
- I feel site selection criteria should include a requirement that a facility be remote from human habitations rather than seeking out a 'community'.
- The British Geological Survey (BGS) did considerable work towards this under the previous Nuclear Industry Radioactive Waste Executive (NIREX) process and these findings should be communicated to the public and the strengths and weaknesses debated in the public domain.
- Hydro-geological and geo-chemical selection criteria should be applied to a high-level screening in/out process before communities are invited to participate.
- I strongly object to a GDF being designated under the Nationally Significant Infrastructure Projects (NSIP) process.
- My experience of the NSIP planning process is that legitimate site specific concerns about radioactive waste management were excluded from consideration by the planning authorities.
- The NSIP process also runs counter to any voluntaristic process and is therefore incompatible with the government's claimed commitment to voluntarism.
- The inclusion of inventory in a consultation that is claimed to be restricted to the siting process is inappropriate and denies the public due process in this regard.
- The government's attention to a 75GW programme is unjust and immoral and undermines radioactive waste policy an essential policy domain
- Nuclear power is neither a solution to energy security or climate change and it is clear that these are not the real concerns of those in government presently.