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Dear Sir or Madam,

NATIONAL GEOLOGICAL SCREENING GUIDANCE CONSULTATION RESPONSE

The national screening exercise could and should be of great importance, if carried out properly and the results used constructively. However there is a risk that, due to the fundamental flaw in the whole approach taken by the White Paper, it could end up being a wasted opportunity to achieve a rational process for dealing with the country's stocks of radioactive waste. Whatever the findings of the screening exercise (more about that later) the locations selected for further in depth study will be based on areas containing "interested" communities (and that term clearly requires clarification, as it is open to interpretation and therefore abuse!) rather than upon the results of the screening exercise however well that exercise is carried out.

In respect of the screening exercise itself I have several concerns, some of which should be reduced by there being active involvement by members of the Independent Review Panel (IRP) – that is assuming that they will be given the power and authority not only to influence RWM/NDA decisions but also to challenge them where necessary. The past history of attempts to foist a GDF upon Cumbria have made me and many others very wary of the integrity of various Government ministers and departments, including DECC and NDA, as well as the British Geological Survey and that is why genuinely independent overseers are required to help engender trust. A truly Herculean task!

Concerns re the Screening Exercise:

1) The thirteen regions that the country has been divided up into appear too large to take on board the complexities of the geology within those regions. Added to this it seems, from the workshop organised by RWM in Carlisle, that the depth of information for each region will be limited – in some parts of the country there is apparently no available information at all. How it is envisaged that such incomplete (and maybe superficial) information will be sufficient to encourage potential host "communities" (that word again!) from specific areas within those regions to make rational decisions whether or not to express an interest is highly debatable. Whilst RWM recognises that there is more detailed information available for particular areas, it is only intending to consider it where appropriate later in the siting process (Section 3.10) – in short only after expressions of interest have been received. Will the presentation of that further more detailed information be open to scrutiny by members of the IRP to ensure its completeness, accuracy and lack of bias? For example, in the case of West Cumbria, will members of the panel be made aware of the extensive studies that have

been carried out by two eminent geologists Professors David Smythe and Stuart Haszeldine? Will they also be aware that Dr Jeremy Dearlove, the MRWS partnership's geologist, admitted that no commercial business would even consider searching for a GDF site in West Cumbria, as the prospect of finding one was so low.

2) Decisions to volunteer are more likely to be taken on the basis of social need (deprivation) rather than geology. History has told us that West Cumbria remains the location of choice despite the fact that it has the most studied geology within the country. Its geology and hydrogeology have already been proved at huge expense to be unsuitable (or at best highly unlikely to be suitable) and nothing has changed. It also still contains areas of social deprivation despite the existence of Sellafield for over 60 years. Whilst it is known that 30% of the country contains geology that looks potentially suitable for the construction of a GDF, it makes no sense to focus once again upon West Cumbria.

3) Whilst the geological information for the screening is being put together by the BGS, it would appear that the narrative for this information is to be provided by RWM. This is a major concern as the narrative is the part that will be used by the general public to grasp the relevance of the findings. The narratives used will need to be varied to enable it to be understood by a whole range of audiences. In all cases it needs to be clear and unbiased. This needs to be overseen closely by the IRP.

Relevance of the Screening Exercise:

We have been told repeatedly at meetings organised by RWM that no areas will be excluded from consideration as potential hosts to a GDF. If that were the case, it seems that RWM is quite prepared at the siting stage to irrationally ignore the findings of its own screening exercise. My understanding is that some areas will be ruled out at the screening stage (see section 1.3) contrary to what was said at these meetings. It would be ridiculous for the screening exercise not to be able to rule certain areas out as being highly unlikely to be suitable. Conversely it should be able to recognise some areas as being particularly promising. Naturally there will be large areas remaining where the outcome is much less certain. If the results are going to be ignored, when accepting expressions of interest, the whole exercise can only be described as being a complete waste of time and maybe just a sop to those, who requested a national screening exercise to be carried out. It would be interesting to know how much effort RWM intends to take to identify and encourage possible host communities, in more affluent areas with seemingly favourable geology, to volunteer. It is likely that only areas that already have connections with the nuclear industry will be even aware that the screening exercise is taking place and its purpose. That being the case no expressions of interest can be expected from other areas irrespective of their geological suitability.

Whilst it is being stressed that no areas have been already earmarked as possible GDF sites, this has to be treated with a large degree of scepticism. On 10 December 2013 The Rt Hon Michael Fallon MP, then Minister for Energy, made it very clear, when giving evidence to the House of Lords' Science and Technology Sub-Committee, that the current process would be engineered so ensure that Cumbria County Council would not again be in a position to disrupt the Government's plans to search for a possible site in West Cumbria. The "Review

of the Siting Process for a GDF" Consultation document issued in September 2013 clearly showed intent to side-line County Councils from the decision making process and after protests this was amended in the final version of the White Paper. Having said that in section 7-9 it now states "UK Government is currently of the view that no one tier of local government should be able to prevent the participation of other members of that community". This effectively achieves the ex-Minister of Energy's goal.

It was stressed, at the workshop organised by RWM in Carlisle, that communities that express an interest will still be able to withdraw late on in the siting process – this still leaves the very contentious point of defining what is meant in this case by the terms "community" or "communities". However, now that exploratory drilling for and construction of GDFs are classified as being Nationally Significant Infrastructure Projects, any decision whether to continue could be taken out of their hands and be taken instead by the Secretary of State.

Conclusion:

I welcome the fact that a National Geological Screening Exercise is being carried out but have serious reservations, if RWM is allowed to retain control over the conduct of the exercise and the production of the supporting narrative. Independent scrutiny of the process is essential.

I am also perturbed by the fact that, in the subsequent Siting Stage, locations to be studied further will be dependent upon potential hosts expressing an interest rather than upon the results of the screening exercise. This is the major flaw in the frame-work outlined in the Implementing Geological Disposal White Paper. It certainly calls into question the level of importance that NDA and RWM are giving to the screening exercise.

Even where much greater information is already available for particular areas, under these guidelines, it is proposed to only consider it where appropriate later in the siting process.

This risks making a mockery of the screening exercise by making the initial results unnecessarily superficial. They should be detailed enough to help inform prospective volunteer communities and these are only likely to come from areas already with nuclear industry connections unless a concerted effort is made by RWM to encourage others, preferably from the more promising regions, to come forward.

I am still convinced that certain locations have already been earmarked for further study and West Cumbria remains at the top of that list despite the fact that just conducting the additional surveying work, let alone the construction and operational work for a GDF, would be very damaging to the county's non-nuclear economy. The Government has a strong preference (section 3.18) to have one GDF site which would require an underground area of up to 20 sq km (with new-build this could well increase). There are alternative areas within the UK where it is probable that a location could be found to accommodate such a large disposal facility.

Yours faithfully,

Rod Donington-Smith

