'Our Energy Challenge'
Response to the UK Department of Trade and Industry Energy Review
from
The All Ireland Nuclear Free Local Authorities Forum

1. This response to the UK Department of Trade and Industry's consultation on the 'Our Energy Challenge' energy review is made by the All Ireland Forum of Nuclear Free Local Authorities.

2. The All Ireland Nuclear Free Local Authorities Forum was formed at an inaugural meeting in Dublin in September 2005 to represent the views of local councils in both the Republic of Ireland and Northern Ireland on nuclear issues. Members of the Forum are Louth County Council, South Dublin County Council, Dublin Regional Authority, Monaghan County Council, Bray Town Council, Down District Council, and Newry and Mourne District Council. The Forum is part of the Nuclear Free Local Authorities network of the UK and Ireland.

3. The Nuclear Free Local Authorities National Steering Committee has made a separate response to the energy review consultation, which we fully endorse and support. However, we wish to make the further additional points from the perspective of Irish local authorities.

Risks to Ireland from a UK nuclear power programme

4. The All Ireland Nuclear Free Local Authorities Forum is concerned that this DTI energy review seems to be principally about the case for building new nuclear power stations in the United Kingdom. We note that just three years ago the UK government's 2003 Energy White Paper 'Our Energy Future' made the case for a low carbon energy future for the United Kingdom. Nuclear power was not seen as having a significant role to play in meeting the UK's future energy needs. The All Ireland Nuclear Free Local Authorities Forum broadly agrees with the conclusions of 'Our Energy Future' and does not accept the case made by Ministers in launching the current review that the outlook has changed significantly since 2003 and that there is now a need to consider nuclear energy as an option for meeting energy needs.

5. The impact of accidents involving nuclear reactors can cross international frontiers and affect the legitimate interests of neighbouring states which do not themselves have nuclear programmes, possibly causing serious long term damage to the environment and threatening the health and safety of their populations.

6. Should the UK government decide to embark on a programme of building new nuclear power stations, this would pose risks to local authorities in the island of Ireland and the citizens they serve. Ireland would face risks in the event of an accident involving a nuclear power station in the UK and has had to face the consequences of radioactive contamination in the Irish Sea resulting from the activities of the UK nuclear industry. These risks would continue – and might increase – as a result of construction of new nuclear power stations in the United Kingdom. However, unlike the citizens of the United Kingdom, who at least would benefit from the generation of electricity by UK nuclear power stations, Irish citizens would receive no benefits at all in compensation for the risks they would be subjected to.

7. Should the UK government decide to proceed to support the construction of one or more new nuclear power stations, the requirements of the International Atomic Energy Agency Convention on Nuclear Safety would apply. We would expect the UK government to comply

with the commitment it has made by reference to the Convention to inform the Directorate General for Energy of the European Commission of any proposals to construct a new nuclear power station so that other EU member states, including the Republic of Ireland, will be alerted, and to permit evidence to be submitted to any subsequent public inquiry by anyone from any country. The All Ireland Nuclear Free Local Authorities Forum would wish to be represented at any such inquiry to give comprehensive evidence as to why no plant should be constructed and hereby requests that:

i) It be alerted as soon as possible should any relevant prior application be made under:
(a) Regulation 9, Justification of Practices Involving Ionising Radiation Regulations 2004;
(b) Section 3, Nuclear Installations Act 1965;
(c) Standard condition 19 of any pre-existing nuclear site licence;
(d) Section 13, Radioactive Substances Act 1993;
(e) Section 36, Electricity Act 1989; or
(f) Article 39, Electricity (Northern Ireland) Order 1992 as amended;.

ii) It be provided with a copy of any strategic or project environmental statement for comment where this relates to any new nuclear plant proposal or which provides the policy in the field of energy, radioactive waste or land use planning against which any relevant application would be considered, and

iii) To this end, this request be forwarded to the relevant agencies to whom such applications would be made or by whom the relevant statements would be advertised for public comment;

iv) It be provided with a specific confirmation that these requests will be met.

UK west coast nuclear sites

8. The shared use of the Irish Sea and the history of discharges into it give the people of Ireland a legitimate interest in any future nuclear developments on the north west coast of the UK. This view was accepted by the UK government's Secretary of State for the Environment following the public inquiry into the application to build a rock characterisation facility as the first stage of a deep disposal facility for radioactive waste adjacent to Sellafield (Appeal Decision Letter, 17th March 1997).

9. Nuclear sites on the west coast of the United Kingdom are of particular concern to Irish local authorities. If press speculation is correct, any new nuclear power stations would almost certainly be built at existing nuclear sites. This suggests that the following west coast locations would be candidates for construction of new nuclear power stations:

- Wylfa.
- Heysham.
- Sellafield.
- Hunterston.

10. Nuclear development at each of these sites would pose risks to the public on the island of Ireland and would be unwelcome and opposed by this Forum. However, of these locations, Wylfa is of particular concern. Wylfa is just 60 miles from Dublin – a European capital city with a population of 1.1 million people which is home to approximately one quarter of the Republic of Ireland's total population. Further nuclear development at the Wylfa site – and

indeed, any attempt to prolong the life of the existing Magnox nuclear station at Wylfa – would be unacceptable and would be strongly resisted by the All Ireland Nuclear Free Local Authorities Forum.

11. Coastal erosion issues are likely to be relevant to any decision to build a new nuclear power station at Sellafield. The coastline at Sellafield and the Drigg nuclear waste site has been identified as being vulnerable to erosion and sea level changes looking to 2100 and beyond (Nirex: 'Technical note: Summary note for CoRWM on the impact of rising sea levels on coastal sites with radioactive waste stores'. Report 484385, September 2005). In the longer term coastal erosion issues may also be relevant to the Wylfa, Hunterston, and possibly Heysham sites.

Energy generation and Northern Ireland

12. As yet the UK government has not yet made its intentions clear regarding the possible construction of nuclear power stations in Northern Ireland. In the past the security risks arising from sectarian conflict have generally been regarded as posing an insuperable barrier to the development of nuclear power in Northern Ireland.

13. In March 2002 the Northern Ireland Assembly approved the recommendation that "… Ireland remain a nuclear free zone and call for the closure of those plants in Great Britain that have a great impact on people in Ireland."

14. The All Ireland Nuclear Free Local Authorities Forum would oppose any measures which would compromise the island's current nuclear free status, such as proposals to build a nuclear power station in Northern Ireland. We are therefore asking by this submission that the UK government give an explicit commitment that no new nuclear power stations will be built in Northern Ireland.

15. Northern Ireland's Department of Enterprise, Trade, and Investment is beginning to invest in developing renewable sources of energy through the Energy and Environment Fund / Environment and Renewable Energy funding schemes. We welcome these initiatives, which are a step on the route towards developing sustainable local generation networks and enabling local businesses to benefit from the development and marketing of renewable technologies.

16. However, at the present time investment in renewables remains a relatively small part of current plans to invest in Northern Ireland's energy infrastructure. We feel that the emphasis on current energy infrastructure capital programmes is on the development of centralised gas power and electricity generating networks, and that more could be done to create opportunities for the use of renewables and the local generation of energy. We strongly urge the Northern Ireland Office and the Government of the Republic of Ireland to develop the island's electricity grid infrastructure in the medium term to enable effective local power generation and increase opportunities for generating renewable energy. Grants and planning policies which support microgeneration and energy conservation schemes are required, and the planning process must be simplified to allow businesses and householders to overcome barriers which make it difficult for them to generate a share of their own electricity locally.

17. There is a considerable body of evidence to show that energy conservation programmes are the most cost-effective means of securing energy resources. We believe that a programme of energy efficiency measures combined with pricing policies aimed at reducing energy use would be a preferable to a new nuclear power programme as a means of reducing any UK energy gap.

We would therefore urge the UK government to place a high priority on efforts to maximise energy efficiency at all points in the supply network: during generation, transmission, and at the point of use.

Potential for developing renewable energy arising from electricity market liberalisation

18. Work is underway towards the creation of a single wholesale electricity market on the island of Ireland and it is anticipated that the single market will be in operation in approximately 18 months time. The single market should provide consumers with greater options for purchasing electricity from different suppliers and provide generators with access to increased opportunities for sale of electricity. In particular, it may also provide a more attractive investment environment for the development and sale of renewable energy.

19. The island of Ireland has been blessed with substantial resources for the generation of renewable electricity. The island's situation on the seaboard of the Atlantic ocean provides the opportunity to harness the power of offshore winds, marine currents, and tidal flows, particularly on the north and west coasts. This is also true for large parts of the United Kingdom, particularly Scotland and the north of England. Biomass and geothermal energy resources in Ireland may also prove be viable sources of power.

20. The existing interconnector network between the Republic of Ireland, Northern Ireland, Scotland, and England creates the potential to allow the supply of electricity generated from renewable sources in Ireland to enter UK markets and wider markets. This opportunity has been recognised by the renewable energy company Airtricity, among others, who operate a number of onshore and offshore wind farms (http://www.airtricity.com). Airtricity is a licensed independent electricity supplier recognised by Ireland's Commission for Energy Regulation which supplies electricity to customers in both the Republic of Ireland and Northern Ireland, and also trades into the Dutch and German electricity markets. The UK government should therefore be looking to import electricity generated from renewable sources outside the country to help meet its energy needs in the same way that it imports gas from external sources.

21. Local authorities, as significant purchasers of electricity, have increasing opportunities to use their purchasing power to encourage generators and suppliers to develop renewable energy capacity. Under the European Electricity Directive (2003/54/EC) local authorities, like other customers, are entitled to choose their electricity supplier, and there is no reason why they should not adopt environmental as well as economic and efficiency criteria when selecting a supplier.

22. Given the sustainability agenda that local authorities are now working towards and the opportunities that a single market would provide for purchase of green electricity, it is unlikely that many local authorities in Ireland would wish to purchase imported electricity generated by the UK nuclear industry.

23. Finally, it is worth noting that the first and second largest markets in the world for wind power are Germany and Spain. Both of these markets have developed in the context of decisions not to embark on new nuclear power programmes. Suppliers in Northern Ireland, Scotland, and the Republic of Ireland could help to provide a UK market in renewable energy, but such a market would be considerably less likely to emerge if the UK government decides to embark on a new nuclear power programme.