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UK Government’s radioactive waste management consultation – NFLA’s final submission raises concerns around centralising nature of the policy

The Nuclear Free Local Authorities (NFLA) publishes today its final response to the UK Government’s consultation on its ‘Managing Radioactive Waste Safely’ (MRWS) policy and siting considerations for developing a deep underground radioactive waste repository (1).

NFLA remain very disappointed and quite alarmed with the centralising tendency proposed within this consultation and the reduction in the role of County Councils as a decision-making body. It advocates that the Government goes back to the drawing board with a policy that fully considers long-term safe interim storage of waste, tackles the hundreds of technical and scientific issues of concern with ‘geological disposal’ and commits itself much more wholeheartedly to openness and transparency to encourage positive community support.

The NFLA final response to the DECC consultation was fully discussed at a meeting of the NFLA Steering Committee in Cardiff on the 4\textsuperscript{th} October. Members unanimously endorsed the response and encouraged its member authorities to submit responses similar in content to it.

The key conclusions of the NFLA model response to the MRWS consultation include:

- The Government’s proposals, set out in the latest consultation document represent a highly counter-productive move back to centralised control, whilst continuing to pay lip service to voluntarism. This consultation document should be withdrawn and the Government should go back to the drawing board.
- The previous process failed partly because of the complexity of the nuclear waste problem, but also because of the Government’s refusal to accept most of the recommendations of its own advisory committee – the first guise of the Committee on Radioactive Waste Management (CoRWM).
- CoRWM 1 recommended a high level of public engagement in any future process. This has largely been ignored.
- The scope of this consultation is focussed solely on finding a site for a geological repository when the priority should clearly be the development of robust interim storage.
- There should be a national debate about whether the priority is to look for the best geology for the job or to use mediocre geology and rely more heavily on engineered barriers.
- There is a need for a more rigorous and in-depth national geological screening of the UK to take place. It would also be very helpful for there to be a full publication of the Nirex list of potentially geologically suitable sites devised in the 1990s.
- RWMD has listed 900 outstanding scientific and technical issues, which need to be resolved. The process of resolving these issues needs to be much more open and transparent.
- Any assessment of community support for a radioactive waste proposal needs to be on the basis of informed consent. The idea that because District Councils have full-time staff they can somehow become better qualified to make a judgement on a highly complicated area of scientific controversy is naive. Funding needs to be provided so that Councils can commission independent advice and so that NGOs can provide a critical voice.
- The Government has blurred the lines between what should be two distinct processes in the current consultation document – the national planning process and the voluntarism of the MRWS GDF siting process. One is a highly centralised system reducing the amount of local decision-making on projects deemed to be in the national interest, while the other should be a more decentralised and consensual voluntarist system. It has the potential as well to create confusion.
over the primary role of County / Unitary Councils as Waste Planning and Minerals Planning Authorities under the national infrastructure planning process, with the decision-making role being given to District Councils for GDF siting under this consultation.

- The Government should drop the idea of using the nationally significant infrastructure planning regime for a GDF.
- Any public awareness campaign needs to be organised by an independent body, not the developer, and should be carried out on the basis that all sides of the debate are represented fairly with equal resources.
- The Government should produce a Baseline inventory which does not include new build reactors and a Maximum Inventory which shows the impact of a 16GW new build programme. It should enshrine in any future process the principle that any community willing to host nuclear waste facilities should get a say in the inventory of waste committed to those facilities. Adding new build waste to a baseline inventory creates a pernicious element to the challenge for any host community and could lead to either a huge GDF footprint or the need for a second or even third GDF at separate locations.
- The Government must re-visit CoRWM’s idea of a separate process which can examine the ethics of producing more waste in the face of the uncertainties involved with nuclear waste management. Communities faced with proposals for nuclear waste facilities in their vicinity should be funded to produce alternative economic strategies so that no-one has to decide to accept such a facility because they feel there is no realistic alternative.
- The Government should ask an independent body to make a full assessment of the experiences of other countries in finding a long-term solution for the management of intermediate and higher level radioactive waste, such as Sweden, Finland and France. This should be published and made freely available to all those considering volunteering for a new repository process.

Councillor Mark Hackett, Chair of the Nuclear Free Local Authorities (NFLA) said: “In putting together this final submission response to the Government’s deeply flawed policy of developing a deep underground radioactive waste repository, the NFLA has consulted with its membership, other local government bodies, local government planning policy officers and local and national NGOs who have engaged in this critical debate.

Our conclusion after three months of detailed consideration remains largely the same – this consultation response is overly centralising in nature, reduces the level of effective democratic engagement and does not provide a sensible way ahead for a policy that needs broad public support and consent. NFLA is aware its views tally with a wide range of other local authorities, even those supportive of new nuclear build, and it hopes the Governments takes serious heed of our views. I believe this consultation is a move backwards and may mean more time is wasted in finding a long-term solution to this complex problem.”

Ends

For more information please contact:
NFLA Secretary, Sean Morris on 00 44 (0)7771 930196 or 00 44 (0)161 234 3244.
NFLA Policy Advisor Pete Roche on 00 44 (0)131 444 1445.

Notes for editors: