Dear Mr Jones,

ENERGY WALES – A LOW CARBON TRANSITION

I am writing to you to express my surprise and disappointment with an important policy change in Welsh Government energy policy, made today, in reference to the potential building of a new nuclear power station at Wylfa in Anglesey.

The Nuclear Free Local Authorities (NFLA) Welsh Forum welcomes your leading role in seeking to develop energy policy in Wales. The NFLA agrees with you that there is great potential in Wales to become a global leader in the development of a wide mix of renewable energy sources, microgeneration and energy efficiency. The published policy document ‘Energy Wales – A Low Carbon Transition’ has much to commend it, following on as it does from the excellent work of the former Welsh Environment Minister Jane Davidson.

Many of the steps raised in the 2012 Policy Document to bring about a low carbon energy revolution are also to be welcomed – the NFLA believes there is a great urgency to take firm and direct leadership over Welsh energy policy and it supports the cross-party desire for energy policy to become a more devolved duty to the Welsh Government from Westminster. The Scottish renewable energy renaissance and its opposition to nuclear power is an example of how ambitious and revolutionary this policy can be.

The 2012 Policy Document makes excellent reading in a number of areas, particularly when discussing tidal and wave power, energy efficiency and smaller renewable energy sources – the NFLA agrees with the Government that these areas of energy policy should be maximised to their potential. The NFLA’s Policy Briefing on the future of Welsh energy and its submission to the Welsh Assembly’s Environment and Sustainability Committee provides detail on our views in this area, which I attach with this letter.

However, I must take issue with a key area of the Policy Document, whilst raising concern over two other areas of the document.

On page 21 of the document there is a detailed support from the Welsh Government of the ‘Anglesey Energy Island’ project and particular mention is given to the proposed construction of a new nuclear power station at Wylfa. The document notes: “There are undoubtedly risks associated with nuclear power but the risks posed by climate change are now so serious that we cannot dispense with a key proven low-carbon technology. The Welsh Government supports
the development of a new nuclear power station on Anglesey.” There is much stress made in the 2012 Policy Document on the economic and jobs benefit to Wales of such a development.

The NFLA strongly disputes this statement and is extremely disappointed that there has been no open discussion of this policy change and of a critical part of future Welsh energy infrastructure. The NFLA would dispute whether nuclear power is a ‘key, proven low-carbon technology’ given the high carbon measures that are required in uranium mining extraction, the extensive construction process behind building new reactors or the measures required around the management and transportation of radioactive waste.

The NFLA also finds the timing of the publication of this Policy Document all the more surprising when the Welsh Assembly is making a very detailed inquiry into Welsh energy – to which the NFLA Welsh Forum has been invited to make an oral submission on the 29th March. Why has the Policy Document been published before the energy inquiry has been completed and fully reported?

Furthermore, the NFLA Welsh Forum Vice-Chair, the NFLA Secretary and a representative from Friends of the Earth Cymru met with the Welsh Environment Minister John Griffiths and officials on the 17th October 2011 and was given absolutely no indication that there would be such an overt change in Welsh Government policy towards nuclear power. Though it was acknowledged that the Welsh Government had no direct power over the siting of nuclear reactors it was noted that Welsh Government policy was still ambivalent to nuclear power as reiterated in the March 2010 Welsh Government Energy Policy Statement ‘A Low Carbon Energy Revolution’.

I think it is important to quote from that 2010 energy statement:
“…nuclear power produces hazardous radioactive wastes from spent fuel and decommissioning for which, even though a final disposal route has been identified, it has yet to be put in place and will create burdens on future generations. Nuclear installations present a variety of safety and environmental risks. Nuclear projects have a history of cost-overruns including projects still under construction, and the long-term nature of nuclear liabilities means total final costs are unknown, but become unavoidable for future generations. An international response to climate change that involves major nuclear developments may increase risks of nuclear weapons proliferation.”

And:
• “We remain of the view that the high level of interest in exploiting the huge potential for renewable energy reduces the need for other, more hazardous, forms of low carbon energy and obviates the need for new nuclear power stations.

• We have a way to go in justifying to the public what must done in dealing with future nuclear waste. We therefore support the call for a public inquiry on dealing with the waste arising from new nuclear build on the grounds of concern over the safety and security of its management. This carries with it the implication that any proposed new nuclear power station must contain credible plans for nuclear waste management.

• Maximise energy savings from energy efficiency and low-carbon energy production from renewables in Wales.”

The NFLA fully supports these comments made in the 2010 Welsh Government Energy Statement and it would like to know how the Government can now justify moving away from this statement given the critical issues on nuclear power it raised two years ago? In addition, the myriad issues that have arisen from the Fukushima disaster, which still have not been fully implemented or understood, suggests to the NFLA that the risks of nuclear power have increased rather than decreased.
A further relevant issue in reference to Wylfa B is that its proposed German owners, RWE Npower and E-on, have not made firm investment decisions on building a new nuclear reactor, are under considerable pressure from their shareholders to withdraw from nuclear power, and are having to engage in such a policy in their home market of Germany due to the German Government's enlightened energy decision to phase-out nuclear power.

The NFLA are further concerned that the 2012 Policy Document makes no real mention of the real pressures being placed on the development of on-shore wind projects, where many major local concerns have been raised across mid and west Wales. The NFLA believes the Welsh Government has to make a pro-active decision to support the development of wind power in a sensitive way with full, open and transparent discussion with local communities and local Councils in Wales – the document has not explained in any detail how this could be achieved.

Finally, the NFLA is concerned with the ‘dash for gas’ element of the Policy Document. The NFLA believes such a policy could divert much needed resources from the renewable sector.

The NFLA was delighted to previously meet John Griffiths to discuss these matters and, at our recent cross-party panel held on the 2nd March in Cardiff County Hall heard representatives from four political parties strongly support our view opposing new nuclear build and a greater promotion of renewable energy, microgeneration and energy efficiency. The NFLA calls for an honest and open debate on these issues, which is why we held the recent cross-party panel. The swiftness of the policy change by the Welsh Government is therefore all the more disappointing. The NFLA would be keen to meet with you, John Griffiths and relevant officials to discuss this policy change further and encourages the Welsh Government to consider the development of a formal dialogue with appropriate environmental and nuclear concerned groups – as the UK Government has done – to discuss these matters in an open and constructive manner.

I hope you can address the matters made in this letter and accept our invitation for you to meet with the NFLA and / or other relevant groups to discuss this further.

Yours sincerely,

Councillor Stephen Churchman
Chair of Nuclear Free Local Authorities Wales Forum
(pp with Councillor Churchman’s approval)

cc: Councillor Ed Bridges and Councillor Ray Davies, Forum Vice-Chairs