

NFLA WELSH FORUM

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**HINKLEY C's
proposed second mud dump:**

Tim Deere-Jones

Marine Radioactivity Research & Consultancy

Unitary Bristol Channel

- **The Bristol Channel/Severn Estuary system is essentially unitary in nature; it's shorelines and coastal communities**
- share the same surface and bottom water body column
- share the same tidal regime
- experience similar marine and meteorological phenomena

- It has three major sedimentary deposition areas, (Severn Estuary intertidal sediments, Newport Deep and Bridgwater Bay)
- It has three major sediment areas (as above) where pollutants are “sequestered” (locked into the deposits: unless disturbed)

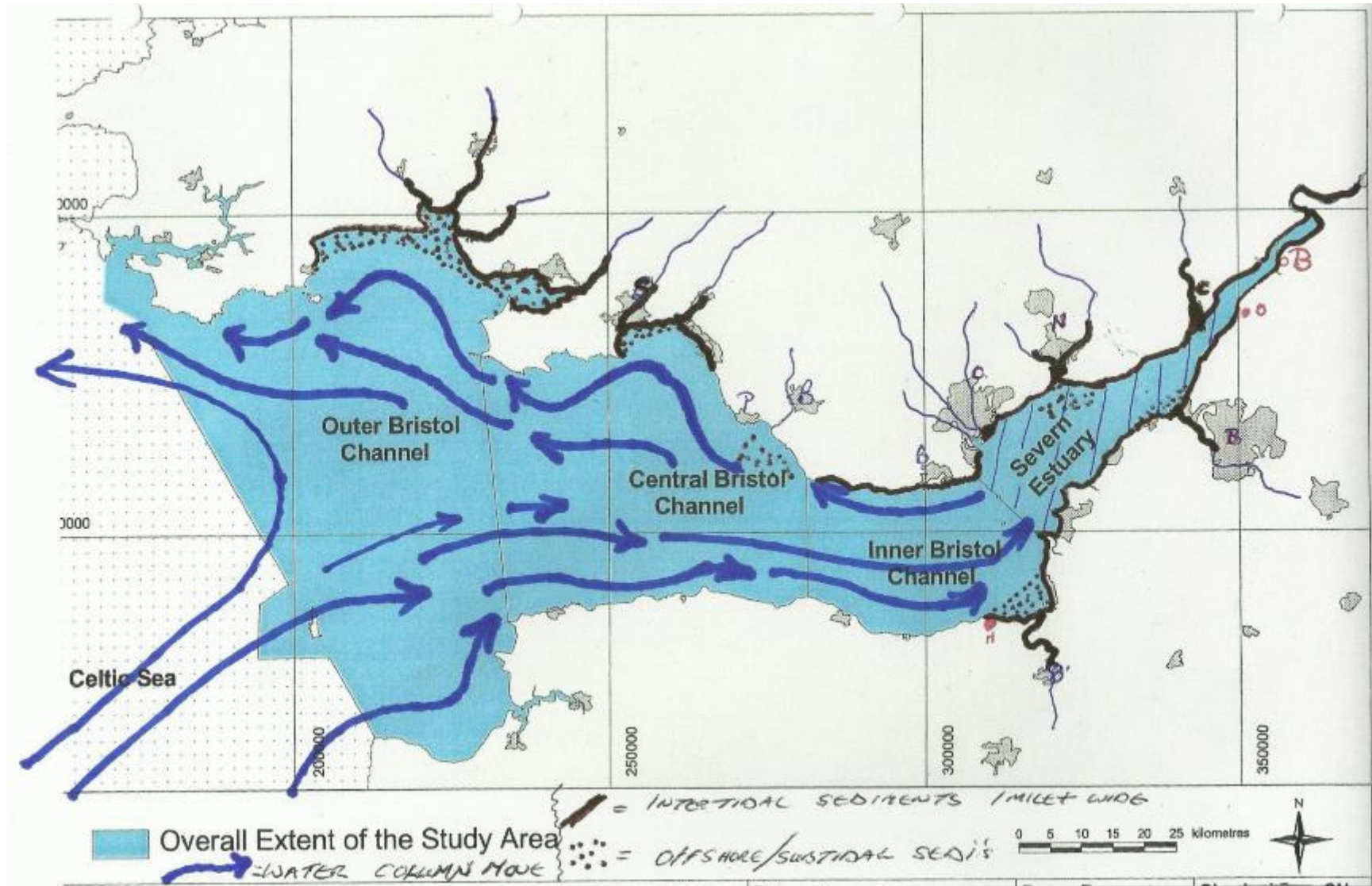
It is notable for

- it's relatively slow flushing time
- It's relatively heavy industrial, agricultural and civil pollution inputs

Including

- Man made radioactivity (Oldbury, Berkeley, Hinkley Point (**8 reactors to date: 2 more in the making**))
- **Chemicals and heavy metals (all found in Bridgwater Bay) but not tested for elsewhere in the system**

UNITARY BRISTOL CHANNEL



EdF's management of dredge waste "disposal site" choice (1)

- On the basis of a series of FoI requests and documentary scrutiny I have uncovered the following facts:
- Through 2011/2012 During the original consent process for HPC, EdF several times stated (to MMO and Sec of State for Energy & Climate Change etc) it's intention to **dispose of all capital and maintenance dredge arisings within the local transport system**
- But: in Oct 2011 EdF final Application and ES entered a (*low profile*) short clause that this was "**provided that relevant MMO criteria are met, or at Cardiff Grounds if not**".
- Despite this clause: on 7th Feb 2012 the Inquiry Inspector reported to MMO and Sec of State referencing **EdF proposal to retain dredge arisings "within the local transport system"**
- BUT: by Aug 2012 the Env' Agency letter noted that **EdF have declared preference to use Cardiff Grounds**, and makes **counter recommendation that EdF use a new site at HOLM DEEP (ensuring a "more localised and sustainable disposal")**
- Sept 2012 EdF write to National Infrastructure Directorate (the planning authority) rejecting Env' Agency recommendation on grounds that the Env' Agency proposal would require EdF to
 - Undertake "significant data collection"* "seek approval of CEFAS and MMO"* "lead to new area of seabed being effected by disposal"*
- After this exchange the HOLM DEEP proposal is no longer mentioned: despite the fact that it is a deep water site, furthest away from any Severn Estuary coastal environments and communities and is very strongly dispersive

EdF's management of dredge waste "disposal site" choice (2)

- I have been unable to uncover any further documentation explaining which MMO Criteria were avoided by such an action but assume that such relevant criteria covered issues such as
 - alternative uses for the dredge waste (landfill, agricultural, construction),
 - the suitability of the dredged material for disposal to sea including the impacts of contaminants in the material,
 - perceived impacts on any nearby sites of conservation or other value
- ALL of these issues have now been raised in submissions from Campaigners : the last 2 (contaminants and impacts on nearby sites) since the inception of the anti dump campaigns in 2017
- **In the context of the previous above it is clear that UK and Westminster Govt funded regulatory and EPA organisations:**
 - **were unable to over rule the nuclear industry EdF demands and had no power to enforce recommendations**
 - **and that the nuclear industry EdF only had to provide the most flimsy and weak justification for ignoring such recommendations**
- Clearly, at the time of the original HPC application, EdF avoided **fulfilling "the relevant MMO criteria" for dredge waste dumping in English waters by bringing their dredge waste disposal operations to Wales**
- and rapidly, and without **any major** imposition from Welsh Gov', **gained consent from a Minister during the inter regnum between the closure of the previous Welsh EPA and the opening of the new NRW**
- **I conclude that EdF found the Welsh Government and it's relevant Minister to be less demanding than the MMO Criteria**
- **And that the Welsh Gov and it's minister were compliant in the extreme to the possible detriment of Welsh coastal environments and communities**

The Portishead LU070“Disposal” Site

- **LU070 historically used for disposal/dumping of port “maintenance” dredge wastes only**
- Due to long term historical use: a general assumption that such dredge wastes are relatively harmless and: time to observe negative impacts (*this assumption is now beginning to be questioned*)
- In general dredge waste disposal at such sites has not required EIA or pre dump baseline data acquisition

- **BY CONTRAST:** Capital Dredge (new projects) should require EIA and baseline data acquisition (not provided at Cardiff and so far not carried out for Portishead)
- No quantification of local intertidal and subtidal radioactivity or chemicals
- No quantification of current doses to coastal communities or stakeholders
- No examination of end fate of “dispersed” sediments and their pollutants
- Thus at LU070 still attempting to avoid MMO Criteria

- It’s clear that EdF have again been attempting to manipulate the “maintenance” dredge disposal site designation in order to avoid:
 - working to acquire baseline (pre-dump) data and
 - having to prove that the dump of Bridgwater Bay wastes will not increase pollution levels at dump sites and adjacent areas
 - Applying for a special license to dispose of Capital dredge waste at a new Capital dredge waste disposal site such as HOLM DEEP)

NFLA/SH Consultation Submission demands

- **FULL EIA to acquire relevant baseline data for proposed Cardiff Deep and Portishead disposal sites**
- **Additional extended work on radiological contents of sediments to be dredged.. more thorough analysis of alpha and beta emitters (*spatial distribution: more nuclides*)**
- **more work on potential public health impacts of suspended dredged sediment along Bridgwater Band downstream coastlines (Bridgewater Town, R. Parrett tideway, Burnham sea front etc)**
- **Independent (not EdF) scoping of EIA**
- **Referral of issue to relevant Minister and full Public Inquiry to investigate and discuss outcome of EIA and more “political” issues (EdF control of disposal site choice and overriding of Env Agency recommendations etc)**