

## CORE (Cumbrians Opposed to a Radioactive Environment)

Question	Response
<b>Letter</b>	<p>CORE rejects the claim that the West Cumbria MRWS Partnership has provided sufficient information, or delivered a sufficiently balanced assessment of such information as has been provided, for public consultation. Any advice to the Decision Making Bodies to move to the next stage of the Government's MRWS process – the Decision to Participate – would therefore be highly premature and dangerously unsafe.</p> <p>The case for moving to the next stage of the process has not been made, and the Decision Making Bodies should accordingly be advised to exercise their Right of Withdrawal and abandon any further involvement in the process.</p> <p>CORE has chosen not to respond directly to the specific questions posed in the consultation document and comments instead on the basic flaws in the national MRWS process, the Partnership's handling of the process locally and the poorly reasoned conclusions submitted for public consultation.</p> <p><b>Background</b></p> <p>CORE is an independent and local anti-nuclear group which, since its formation in 1980, has focused its campaign work on Sellafield's reprocessing operations and associated detriments which include the production and management of legacy and current nuclear wastes.</p> <p>On nuclear waste disposal issues, CORE has submitted written and oral evidence to Government Select Committees, its (now defunct) Radioactive Waste Management Advisory Committee (RWMAC), and to the Public Inquiry into the application by the Nuclear Industry Radioactive Waste Executive (NIREX) for a Rock Characterisation Facility (RCF) at Longlands Farm near Gosforth.</p> <p>In opposing the policy of the untested 'out of sight, out of mind' dumping of nuclear waste underground, either nationally or internationally, CORE continues to propose a policy of waste disposal at the nuclear sites of origin of the wastes (in conformity with international principles) in custom-built above ground storage facilities where wastes can be properly and safely managed.</p> <p>This policy offers a raft of benefits that are not provided by a sole underground site as envisaged by the current MRWS process in that disposal sites are self-selecting (the licensed nuclear facilities producing the waste) thus obviating the need for volunteerism, the eradication of the need to transport nuclear wastes and spent fuel from one site to another, and the placing of the moral responsibility for waste disposal on the industry that produced the wastes.</p> <p>CORE has advanced the same views in subsequent consultation responses to the Government's Managing Radioactive Wastes Safely (MRWS) programme, and to CoRWM 1 and CoRWM 2.</p> <p>In a number of written responses to CoRWM, and in meetings with CoRWM members, CORE has repeatedly opposed the volunteer system on the grounds that i) it absolves the nuclear industry from its responsibilities towards waste disposal and transfers the burden to the general public and ii) via financial inducements, a volunteer system relegates the selection of the best possible geology as a secondary consideration.</p> <p>On the 14th October 2008, a CORE submission to CCC advised the County Council against expressing an interest in support of Copeland, again</p>

stating opposition to underground dumping and volunteerism. We suggested instead that CCC should adhere to the principles and objections it had raised at the 1995/96 NIREX RCF Public Inquiry and concentrate its efforts on the safe management of Sellafield's existing wastes at Sellafield – with no further imports/exports of wastes into or out of West Cumbria.

CORE has rejected a number of invitations to join or contribute to the West Cumbria MRWS Partnership initiated after Copeland Borough Council's expression of interest was made in 2008. The rejection was made on the basis that CORE would not wish to participate in a Partnership designed to take forward a process that could lead to the underground dumping of nuclear waste in West Cumbria – a policy vehemently opposed by CORE. Further, CORE could see no merit whatsoever in participating in a process in which alternative options for waste disposal (such as above ground storage) were not up for discussion. The outcome – with other NGO's also refusing to participate in the Partnership – has inevitably resulted in a one-sided process that has lacked proper balance.

MRWS & Volunteerism – the National Process.

The policy of volunteerism was inherently flawed in a number of respects:

i) The policy has unjustly transferred the responsibility of nuclear waste disposal to UK communities – thus absolving the nuclear industry from its moral responsibility of dealing with the wastes it has produced over the decades with little or no thought to its eventual disposal. The consequence of 'passing the buck' from the industry to communities has been to provide the industry with carte blanche approval to continue producing waste in the knowledge that its disposal is now a matter for the public and of no further concern to the industry.

ii) CoRWM's 2006 recommendation to Government was that "within the present state of knowledge (CORE emphasis) CoRWM considers geological disposal to be the best available approach for the long-term management of all the material categorised as waste". The qualification on the present state of knowledge was made in relation to the potential for undeveloped or new technologies/techniques/processes mitigating against the committee's recommendation for deep disposal, or overturn it completely. The current MRWS process makes no allowance for such developments.

iii) The policy wrongly elevates the volunteering of communities above the clear and obvious pre-requisite of finding the right geology for nuclear waste disposal. In putting 'the cart before the horse', the MRWS process has been compromised from the start. CORE notes particularly the caveat expressed by Dr Dearlove (Doc 175, page 2) that "the current volunteerism process constrains selection to less than ideal sites".

iv) The Right of Withdrawal from the MRWS process is restricted to the Decision Making Bodies who, under almost all circumstances, can overrule the wishes of other process participants who have chosen to withdraw. This is not only undemocratic and makes a mockery of the much vaunted importance of stakeholder involvement but also leaves the decision on moving to a further stage of the MRWS process at the mercy of the vested interests of the Decision Making Body. This is particularly relevant in the case of the West Cumbrian Decision Making Bodies whose membership is widely considered to be pro-nuclear and to have a pre-disposition to accepting an international underground nuclear dump in West Cumbria.

The pro-nuclear stance of the Decision Making Bodies and their licence to overrule other MRWS participants, such as Parish Councils, will inevitably lead to a deep mistrust of the process and an alienation of those parishes or other organisations and individuals who choose to reject moving to the next stage of the process.

West Cumbria MRWS Partnership.

Whilst they are well understood by discerning stakeholders, the transparent weaknesses of the national process as outlined above appear to have been completely ignored or sidelined by the Partnership. This says little about the Partnership's capacity to view the wider picture and a great deal about its predisposition to push ahead with its inducement-driven desire to take forward an already compromised process.

This weakness is compounded by the Partnership's failure to comprehend the dynamics of the shift from what was designed by Government as a national process to one of a local process whose sole focus is now on West Cumbria. Not one single voice has been raised within the Partnership about the validity of taking forward a clearly unbalanced process, and no queries have been raised about the implications of geological scrutiny being restricted to West Cumbria alone where, in comparison to other known areas of the UK, the geology is suspect and always likely to be second-best.

Additionally, CORE notes a general failure by the Decision Making bodies to properly conform with the Government guidelines on the pre-requisites to arriving at a decision to Express an Interest in joining the national process.

The June 2008 MRWS Document suggests, at Para 6.18, Page 52: the local authority should have canvassed opinion, for example, through existing Local Strategic Partnerships or specifically convened meetings with potential local partners. These partners might include Parish/Town Councils, local Community, Business and Environmental stakeholder groups, and neighbouring local authorities.

An Expression of Interest must be made in writing and Government would expect it to outline the actions taken to gather opinion and arrive at the Expression. (emphasis added).

For Copeland Council, the failure to conform is particularly abject. In a 12th June 2008 press release, the Council officially welcomed the MRWS White Paper Process and in a further press release just two weeks later, announced its decision to Express an Interest on 24th June. The Secretary of State DEFRA was officially informed by letter on 3rd July of Copeland's decision. In an Annex to this letter, Copeland BC confirms that 'key partners' had been consulted.

Such consultation, held in 2007, was however in respect of the Council's draft nuclear policies and NOT on the embryonic MRWS process. Subsequent consultation by Copeland in 2007, on the MRWS Implementation Framework for Geological Disposal, again did not involve canvassing opinions on the making of an Expression of Interest.

In short, such canvassing as has been undertaken by Copeland BC up to June 2008 has been unrelated to canvassing opinion on making an Expression of Interest, and later records show that in the two-week period 12th -25th June, Copeland BC made no further effort to canvas opinions from the wider public or communities. Copeland BC's evidence of prior consultation is therefore at best misleading and at worst disingenuous.

Whilst Copeland BC's failure contrasts somewhat with the request for comments made by Cumbria County Council to a wide group of stakeholders before it officially expressed an interest, the overall efforts by these Decision Making Bodies to accurately gauge West Cumbrian opinion as a whole has fallen far short of the spirit, if not the letter, of the Government's suggested guidelines. This has further undermined the validity of the Partnership's work.

Moreover, the Partnership's work smacks throughout of being 'insular' in that stakeholder engagement has been concentrated on Copeland and Allerdale – at the expense of the rest of Cumbria which, with twice the population of Copeland and Allerdale [330,700: 163,600 - Office of National Statistics, mid-year estimates 2010], has been poorly canvassed and under-represented in the Partnership's process despite the prospect of the County as a whole being significantly impacted by a Decision to Participate.

Common sense should have dictated that the acknowledged complexity of the well researched geology of West Cumbria – a complex geology with higher hydraulic gradients – was unlikely to meet the accepted international criteria for siting an underground dump. Given the highly contradictory geological evidence provided for consultation and the warning of ‘less than ideal sites’, the Partnership’s willingness to ignore the evidence of geological unsuitability and pursue inferior dumping sites provides the clearest indication of its determination to ‘make the geology fit’ irrespective of the long-term safety implications.

It must also be noted that a significant number of scientific and technical issues, raised by a number of NGOs in 2009 and relating to the making of a robust safety case for an underground dump [The Issues Register], remain unresolved today. It is complacent in the extreme for the Partnership to project that these outstanding issues may be satisfactorily resolved at some future point after a Decision to Participate has been made and when any failure to resolve such issues could result in drastic consequences for the safety of an underground dump.

Whilst the geology of Copeland and Allerdale – other than those areas already ruled out by the British Geological Society – remains the focal point for further study and exploration, there can be little doubt that the official intent will be to focus on a site as close to Sellafield as possible. That the Partnership should believe otherwise – and there is no indication that any consideration has been given to the logistical implications of cross-county nuclear waste transports to a site remote from Sellafield – or to the increased levels of hostility within remote communities - is naïve in the extreme.

The Partnership’s silence on these most basic issues speaks volumes on its ability to objectively advise West Cumbria’s Decision Making Bodies whether or not to move to the Decision to Participate stage.

By maintaining its focus on the Copeland and Allerdale areas as potential underground dump sites, the Partnership has failed to register the significant impacts such a facility would have on the County as a whole or on adjacent regions. Indeed, the Partnership has produced little evidence that it has fully complied with the Government’s further guidelines on ‘Wider Local Interests’ contained in the June 2008 MRWS document which, at Para 6.8 on Page 48, suggests:

Outside the Host Community, there are likely to be other communities that have an interest in the development of a facility in the Host Community, and there needs to be a mechanism that allows them to become involved in the process. Such a community might be the next village, a neighbouring district or a community on the local transport routes to the Host.

On this guideline, there is little evidence that the West Cumbria MRWS Partnership has seriously sought the involvement and views of communities located at the extremities of the County border or of adjoining Counties – particularly in relation to communities located on transport routes whether they be for dump construction traffic or subsequent transports of nuclear waste from across the UK to West Cumbria. This blinkered stance by the Partnership lends further support to the view that it has failed to grasp the wider implications of moving to the Decision to Participate stage.

Coupled with this failure, the Partnership has clearly given no thought to the lack of a ‘Plan B’ in the Government’s MRWS process and the consequences for West Cumbria should the current process be abandoned for any reason. Given the Government’s haste to ‘solve’ the nuclear waste disposal issue – and in the absence of Expressions of Interest being made by any other UK Local Authority – the most likely Plan B to be adopted will be the imposition of an underground dump by Government. The unbridled interest and support for such a facility already shown by the West Cumbrian Local Authorities and the Partnership must inevitably lead to West Cumbria being the front runner for such Government imposition.

The Partnership’s assessment of the detriment that an underground dump would impose, not only on West Cumbria, but on the County as a whole,

has been less than thorough. In assessing the underground dump largely in isolation – rather than in combination with Sellafield’s ongoing operations, the prospect of new reactors at NuGeneration’s Doomrise site and other nuclear facilities that are springing up in West Cumbria.

The overall detriment from these combined facilities will consign the area as a pariah nuclear state in which incentives for diversification and inward investment for non-nuclear enterprises will be stifled. The Partnership’ suggestion that any negative impacts can be mitigated and that the ‘brand and reputation’ of the area can be protected by some future strategy is simply not credible and demonstrates the deficient reasoning at the heart of the Partnership’s work.

CORE notes for example the County Council’s strident and widely supported warning – outside the MRWS process - that the use of West Cumbrian landfill sites for low level nuclear wastes will turn the area into a nuclear ghetto in which neighbourhoods will be blighted and the chance of economic development damaged by the discouragement of non-nuclear investment.[Councillor Tim Knowles, Whitehaven News 19/1/12].

The relevancve of these detriments and the implicit warnings they carry for West Cumbria have clearly had no impact whatsoever on the Partnership’s assessment of the significantly greater and longer lasting damage that will inevitably be inflicted on the area by an international underground waste dump for higher activity wastes and spent reactor fuel. The Partnership’s inability to extrapolate the scale of detriment from low level wastes in landfill sites to higher activity wastes in an international dump highlights the Partnership’s illogical approach to the issue.

The Partnership’s view of the economic sustainability of an underground nuclear dump in West Cumbria has clearly been stimulated by the external and internal input from Energy Coast West Cumbria Limited – a company whose primary objective is to ensure that the nuclear stranglehold on West Cumbria is consolidated. CORE notes, for example, that during the Partnership’s consultation period , Copeland MP Janie Reed – a leading proponent of the Energy Coast plan – is widely reported as calling ‘for no time to be wasted in securing an underground dump for Britain’s nuclear waste in the borough’ and that “the whole of our economic future depends on this.” [North West Evening Mail 8th February 2012]

This claim on economic dependency by Copeland’s MP is without foundation and will have been made intentionally to exert influence on local stakeholders - particularly those in his own constituency - to respond positively to moving to the next stage of the MRWS process. That the Partnership should even consider ‘buying into’ the Energy Coast mantra when the company’s motives are so clearly flagged, provides a further measure of the Partnership’s willingness to submit to the exaggerations of the pro-nuclear lobby and an inability to strike a balanced view on such a vital issue.