

**Friends of the Earth England, Wales and Northern Ireland (EWNI)**

Question	Agree	Response
<b>1 – Geology</b>	No	There is evidence that the geology and hydrology is unsuitable for deep disposal, most prominently from leading geologist Professor David Smythe (see for example <a href="http://davidsmythe.org/nuclear/Unsuitability%20of%20Cumbria%2012April2011%20plus%20figs.pdf">http://davidsmythe.org/nuclear/Unsuitability%20of%20Cumbria%2012April2011%20plus%20figs.pdf</a> ). There are risks of geological instability due to the complex geology of West Cumbria and proximity to a fault line in the coastal area. There has been insufficient research and assessment carried out to progress to participation in siting a repository in West Cumbria.
<b>2 – Safety, security, environment and planning</b>	No	There are major environmental, health and security risks posed by a repository for highly radioactive and intermediate levels wastes. Risks include escaping radioactive gas underground and from storing thousands of tonnes of highly radioactive spent fuel in untested facilities above ground. There are localised and significant negative impacts of increased road traffic, air and noise pollution and waste spoil heaps during construction and operation. The loss of biodiversity and landscape value, in itself a huge negative for Cumbrian ecology, may also impinge on the visitor economy. There are concerns that planning reforms to enable ‘fast-tracking’ of infrastructure that is deemed by government to be in the national interest may further disempower local communities in decisions over the siting of a repository.
<b>3 – Impacts</b>	No	<p>The consultation document vastly underplays the environmental, economic and health risks of a repository. Cumbria, and particularly the Lake District, is internationally renowned and treasured for its unique and precious environment. Cumbria’s tourism economy is worth over £2 billion annually with Allerdale and Copeland accounting for over half a billion (<a href="http://www.cumbriaobservatory.org.uk/economy/tourism.asp">http://www.cumbriaobservatory.org.uk/economy/tourism.asp</a> ). The food and farming industry is also vitally important and likely to suffer negative association of proximity to a nuclear waste dump. New businesses may be less likely to locate in West Cumbria due to the negative association, therefore a repository may affect future investment.</p> <p>The consultation document concludes the potential impacts are not sufficient as to warrant an end to the siting process yet no mitigation is put forward to back up the assertion that the process will ‘either sufficiently reduce their effect or compensate for them’. How, for example, has the effect of a repository on Cumbria’s visitor economy been calculated and by what measures is the Partnership confident that this can be compensated? The 550 new jobs in building and operating a repository forecast by the Nuclear Decommissioning Authority is dwarfed by the thousands reliant on the tourism industry.</p>
<b>4 – Community benefits</b>	No	The proposal for a package of ‘community benefits’ completely undermines the principle of a ‘volunteer’ community. It is inappropriate to assume that the unknown and potentially huge risks for communities can be neutralised by improved facilities and new infrastructure. It leaves the whole process open to the idea that communities can be ‘bought off’. There are no direct benefits to the communities from a repository itself apart from the relatively low number of jobs.
<b>5 – Design and engineering</b>	No	It is far too premature to judge the design and engineering because the consultation is seeking approval of ‘a decision to participate’ without having carried out a proper assessment of all regions and suitable geology for a site, and the environmental, health and security risks for West Cumbria.

<b>6 – Inventory</b>	No	<p>There is no international precedent for the mix and amounts of waste that are intended for this repository, taking both high level and intermediate radioactive waste. The consultation does not consider whether new nuclear waste would go into a repository although Government's stated intention is that new nuclear waste would be disposed of at the site (Managing Radioactive Waste Safely White Paper). If the problem of dealing with new nuclear waste is deferred and not taken account of in the consultation, it removes a key consideration of the disposal facility and could enable assessments of new nuclear capacity to be skewed and assessed more favourably.</p>
<b>7 – Siting process</b>	No	<p>The process is premature and is running ahead of the national debate that is needed on the future for nuclear energy and how to deal with legacy wastes and any new nuclear wastes. The communities who would be affected by the repository are not able to participate in the broader decisions regarding our nuclear future, new nuclear build and disposal of new nuclear wastes.</p> <p>The documentation in the consultation presents a positive tone to the option of a repository in West Cumbria. The three councils support new nuclear build in Cumbria and therefore have a compromised position, unable to approach the assessment from a neutral standpoint.</p> <p>Millions have been spent on the process so far and were it to progress to the next stage and further public monies spent on it there would be a significant pressure on the councils involved to continue. The Managing Radioactive Waste Safely White Paper states that parties 'should work positively to seek to avoid' exercising the right to withdrawal, particularly 'when considerable investment will already have been made' (para 6.39).</p> <p>Local opposition groups have raised concerns regarding the stakeholder engagement process and the over-managed nature of public events. For example, the numbers of government, regulatory and Partnership-affiliated professionals at stakeholder events has been large – while the opportunity for opponents to present their views to the public has been side-lined – and local residents and visitors could be overwhelmed by the technical language and bureaucratic nature of the process.</p>
<b>8 – Overall views on participation</b>		<p>Friends of the EWN does not support the proposal of a deep geological radioactive waste disposal facility in West Cumbria and does not support the three councils involved - Allerdale Borough Council, Copeland Borough Council and Cumbria County Council - in participating in any further stages of identification of a repository site in West Cumbria.</p> <p>Friends of the Earth EWN calls upon the Partnership and the three councils to withdraw from the process for the following reasons:</p> <ul style="list-style-type: none"> <li>- the 'volunteer' community approach is inappropriate and the process is flawed</li> <li>- we need a national and fully informed debate on dealing with the nuclear waste legacy and new nuclear waste</li> <li>- there is scientific uncertainty of the impacts of deep geological disposal and suitability of Cumbrian geology</li> <li>- there are potentially grave environmental and economic impacts for Cumbria</li> <li>- the lack of consideration of new nuclear wastes creates a flawed process and may lead to a skewed appraisal of new nuclear build and waste issues</li> <li>- there is very strong local opposition including eight local Cumbrian Parish Councils</li> </ul>
<b>9 – Additional comments</b>		<p>This response is on behalf of Friends of the Earth England, Wales and Northern Ireland (EWNI). We have over 100,000 active members and over 200 local groups. The consultation over a proposed geological disposal facility for nuclear waste to be sited</p>

		in West Cumbria has attracted a significant amount of interest amongst our members, from Cumbria and across the UK, all very strongly against the proposal and the continuation of this process.