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Llywodraeth Cymru
Welsh Government

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Consultation – summary of responses

Call for Evidence

Review of Current Policy on the Disposal of Higher
Activity Radioactive Waste

October 2014

Introduction

1. The Welsh Government policy for the disposal of higher activity radioactive waste (HAW) since 2008 has been to neither support, nor appose the United Kingdom Government policy of geological disposal while continuing to play a full part in the Managing Radioactive Waste Safely Programme. It did however state that should a community within Wales wish to make an expression of interest to potentially host a geological disposal facility (GDF), it would at that point consider its position.
2. In 2014 the Welsh Government took the decision to launch a call for evidence¹ seeking views on whether the policy on the disposal of HAW should be reviewed, and if so what options should be considered. The call for evidence gave a commitment that any such review, were it to be undertaken would be carried out in an inclusive and transparent way.
3. The call for evidence was launched on 29 April and closed on 24 June 2014.
4. There were a total of 25 individual responses received from *inter alia* non governmental organisations, local authorities, regulators, nuclear industry and members of the public.
5. This summary of responses highlights the main themes emerging from the responses received. The full responses will also be published on the Welsh Government website (unless the respondent requested us not to do so) for transparency. An analysis matrix which provides a brief synopsis of the main points made in the responses can also be viewed.

¹ www.wales.gov.uk/consultations/environmentandcountryside/disposing-of-higher-activity-radioactive-waste/?lang=en

Background

6. The call for evidence was issued to seek the views of the people of Wales on whether the Welsh Government should conduct a full review of its current policy, as set out in the 2008 White Paper², and if so what disposal option it should consider. The full list of questions can be found in Annex 1.
7. The Welsh Government considered that it may now be appropriate, for a number of reasons discussed in detail in the call for evidence, to review our policy, including: the need for compliance with the Spent Fuel and Radioactive Waste Directive; the Welsh Government's position on new nuclear power stations on existing sites having altered since the policy was adopted; and the UK Government restarting its siting process for a GDF in England. For these reasons and the further ones outlined in the call for evidence, the Welsh Government took the view that a review of our policy may be necessary to ensure that it remains relevant and appropriate to the needs of Wales.
8. The former Minister for Natural Resources and Food launched the call for evidence on 29 April 2014 and the document was published on the Welsh Government consultation pages. Members of the public were asked to respond by submitting the response form, either by email or by post.

² <https://www.gov.uk/government/publications/managing-radioactive-waste-safely>

Summary

9. The responses received to the call for evidence have been published on the Welsh Government website³. A summary of the responses received to each question can be found in this section.
10. This document summarises the responses received and highlights the main themes which have come out of the call for evidence. The Welsh Government consideration of these responses can be found within Chapter 2 of the Consultation on the Review of the Welsh Government Policy on the Management and Disposal of Higher Activity Radioactive Waste.

How have we analysed the responses?

11. In some cases responders did not answer the questions in the call for evidence, but commented on other related issues. In these cases we have included consideration of those points as part of the responses to Question 4: “Do you have any other comments on the Welsh Government policy for the disposal of higher activity radioactive waste?” In this way all the views that have been received have been considered. In assessing responses to individual questions we have therefore identified both the percentage and numbers of responses that answered the question and the proportion of those responses adopting a particular position.

Question 1: Should the Welsh Government review its current policy on HAW disposal?

94% of respondents who addressed the question and 64% of total respondents agreed that the policy on HAW disposal should be reviewed.

12. 17 of the 25 responses received addressed this question. 16 of these agreed that the Welsh Government should review its policy.
13. The most common reason given for supporting a review (6 of the 16) was that it would be logical given the proposals for Wylfa Newydd and the increased

³ www.wales.gov.uk/consultations/environmentandcountryside/disposing-of-higher-activity-radioactive-waste/?lang=en

amounts of HAW that will result from this development. The point was also strongly made that it is irresponsible for the Welsh Government to support a policy of new build nuclear power stations on existing sites in Wales, without considering the disposal of the resulting waste.

14. Some cited the various reasons as outlined in the call for evidence were appropriate and sufficient reasons for undertaking a review of the policy.
15. Other reasons given included that maintaining a reserved position leads to uncertainty and demonstrates a lack of leadership, there is an obligation for the Welsh Government to ensure the effective management of HAW and that in the time since the current policy was adopted progress has been made in terms of developing a framework [by UK Government] for implementing geological disposal and Scotland have adopted a policy on on-going near surface storage- both of which will need to be considered in relation to Wales' policy.

Question 2: CoRWM carried out extensive work before recommending geological disposal in its report in 2006, and confirmed that recommendation in 2013. In the light of this, if the Welsh Government reviews its current policy, should it limit its consideration of disposal options for HAW to geological disposal?

46% of those who addressed the question and 24% of the total respondents felt that a review should be limited to considering geological disposal as the disposal option for HAW.

16. 13 of the responses received either directly answered the question, or the meaning could clearly be gleaned from the response given. Of these 6 stated that a review should limit its considerations to geological disposal as the option for disposal of HAW.
17. Overwhelmingly the respondents who were of the view that the review should be limited to geological disposal felt that CoRWM's recommendations were based on extensive work and sound scientific reasoning. A review of these options would be unnecessary, cover the same ground and may even represent a misuse of public money. Some further stated that there was no reasonably compelling evidence which has emerged since the CoRWM recommendations that there is a viable alternative.

18. A few respondents made the case that alongside geological disposal, some of the HAW inventory may be suitable for alternative disposal methods and these should be explored.

19. Of the respondents who did not support limiting a review to geological disposal (54% of those who addressed the question), there was a clear theme of the lack of faith in the ability of geological disposal to isolate the waste successfully. Some felt that a geological disposal facility would still involve the waste being susceptible to a changing geology, seismic disturbance in contact with the water table. Furthermore there were seven respondents who felt that it would not be possible to ensure the security of a facility over the timeframe required to ensure the waste is isolated until radiation levels reach background levels (250,000 years) for a number of reasons including climate change, changing geology, economic and political stability.

Question 3: If the Welsh Government should consider disposal options other than geological disposal, what should these be?

Of the 13 respondents who addressed the question, 77% were in favour of storage on, or near surface, predominantly stating this should be near site.

23 % were of the view that all possible or all options reviewed by CoRWM should be considered.

20. 48 % of respondents (12) did not address this question. This group include those who did not provide a response from which their view on this question could be deduced, felt that options should be limited to geological disposal and so did not provide a view or stated that the only option is not to produce HAW.

21. Of those who addressed this question directly, 54% (7) suggest they favour a similar policy to that adopted by Scotland (or near site, on or near surface). A further 23 % specified that HAW should be stored on the surface. 23 % of respondents felt that all possible options, or all options originally considered by CoRWM should be reviewed.

Q4 . Do you have any other comments on the Welsh Government policy for the disposal of higher activity radioactive waste?

22. A variety of issues were raised under this question by the respondents, however a few recurring themes emerged. The major theme was a call for the Welsh Government to reverse its support of any new nuclear power stations which will lead to the production of more HAW. Some emphasised that investment should be on renewable forms of energy instead, while others wanted new build policy to be paused until an HAW disposal route is in place. The majority of these respondents did not hold a view of what options should be used to dispose of existing HAW.
23. The issue of siting a geological disposal facility on Anglesey was also raised in the responses received. Some respondents seemed to feel this was the question being raised by the call for evidence.
24. Some responses raised issues which related to CoRWM, including assertions that the UK Government failed to adopt all of CoRWM's recommendations and that a scheduled CoRWM public meeting later this year on Anglesey has been arranged in order to attempt to encourage the community to volunteer for the GDF siting process. The Welsh Government has referred these points to CoRWM for consideration and will publish their response.

Next Steps

25. Following the analysis of responses received on the call for evidence, the Welsh Government considers that it is appropriate to undertake a full review of policy on the disposal of HAW to ensure that it has in place a policy which meets the needs of the people of Wales. This will be undertaken in a comprehensive and transparent way which will enable the people of Wales to have a voice and be fully involved in the process.
26. The first step in this process is a public consultation, which has been issued alongside this summary document, on the principles of a disposal policy. The responses received to this call for evidence have been used to inform the development of this consultation document which also gives the Welsh Government's response to the issues which have been raised.
27. The consultation is published on the Welsh Government consultation pages⁴.
28. If you require further information or a copy of the consultation document, please contact;

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e-mail: RPPmailbox@wales.gsi.gov.uk

⁴ www.wales.gov.uk/consultations/environmentandcountryside/disposing-of-higher-activity-radioactive-waste/?lang=en

Annex 1

Call for Evidence Questions

Q1. Should the Welsh Government review its current policy on HAW disposal?

Q2. CoRWM carried out extensive work before recommending geological disposal in its report in 2006, and confirmed that recommendation in 2013. In the light of this, if the Welsh Government reviews its current policy, should it limit its consideration of disposal options for HAW to geological disposal?

Q3. If the Welsh Government should consider disposal options other than geological disposal, what should these be?

Q4. Do you have any other comments on the Welsh Government policy for the disposal of higher activity radioactive waste?