**CONSULTATION ON AMENDING UK POLICY ON MANAGING RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING**

**RESPONSE OF MID COPELAND GDF COMMUNITY PARTNERSHIP**

1. The Mid Copeland GDF Community Partnership has been established under the Government’s process for identifying a suitable location and willing host community in which to site a deep Geological Disposal Facility (GDF) for the disposal of higher activity radioactive waste. We are responsible for engaging with the local community in the Mid Copeland Search Area about all aspects of the GDF siting process as well as for administering the Community Investment Funding associated with the engagement process.
2. Until 1st April 2023, the Mid Copeland GDF Search Area included the site of the UK’s Low Level Waste Repository (LLWR) in the village of Drigg. As a result of changes to the boundary of the Mid Copeland Search Area that arose due to Local Government Reorganisation in Cumbria, the LLWR site now falls within the Search Area of the South Copeland Community Partnership. Nevertheless, the site is very close to the Mid Copeland Search Area and people in Mid Copeland remain strongly conscious of the site and its important role in managing the UK’s radioactive waste. In view of this proximity and established interest in the Mid Copeland Community Partnership, Drigg Parish Council retains a non-voting seat on the Partnership in addition to its full membership of the South Copeland Community Partnership, enabling it to remain involved in discussions about activities within the Mid Copeland Search Area.
3. The GDF siting process remains at an early stage with the developer carrying out initial site evaluation work and the Community Partnership encouraging local people to find out about the proposals and ask questions so we can identify the key issues and concerns people have and try to provide the information people want.
4. We are responding to the Department for Energy Security & Net Zero’s consultation on updating UK policy on the management of solid radioactive waste in view of the implications these proposals have for the GDF siting process in general and for the work of the Mid Copeland Community Partnership in particular.
5. Our primary area of concern relates to **question 4 of the consultation**, about the policy framework that should be put in place for developing Near Surface Disposal (NSD) facilities for certain types of low hazard Intermediate Level Waste (ILW). Our response focuses on this matter. On the other questions posed in the consultation, we would note only that we support the broad aim of the Government’s proposals which should result in better alignment of policies across the UK and bring a number of benefits and efficiencies in the management of solid radioactive waste, including beneficial impacts for the GDF proposals. We set out below our concerns about the proposals as currently set out by the Government and suggest ways the proposals could be amended to address those concerns.
6. The Government’s proposed policy framework for identifying suitable sites for NSD facilities is set out in paragraphs 5.27 – 5.32 of Part 1 of the consultation document. This explains why the Government does not consider it necessary to implement a process similar to the one it has put in place for the GDF siting process. On community engagement the Government’s proposal is that:
   1. “Our proposed siting policy would require a transparent approach for the evaluation of potential sites, in line with the NDA’s existing transparency and openness policy”.
7. This appears to delegate to the NDA the power to determine how relevant local communities and local authorities would be consulted about proposals to site a NSD facility on a particular part of the NDA estate. This contrasts with the GDF siting process, where the Government’s Working with Communities policy specified the framework for community engagement within which the developer must operate. From our direct experience of managing that GDF engagement process, we believe the Government should similarly include in its policy on development of NSD facilities a clear commitment to effective engagement with affected communities and specific requirements on the developer about how relevant communities will be engaged.
8. The consultation document is similarly concise about the issue of community benefits for those communities that may be impacted by development of NSD facilities. On this matter the document states only:
   1. “The NDA should also provide a community benefits package to the people that live in the local area of its chosen site or sites, as it currently does for the community near the LLWR, in recognition of the service that the community is providing for the rest of the UK. It will be for the NDA to determine the monetary value of the package and to work with the community to decide how it is to be administered and distributed in line with its existing socioeconomic policies for supporting communities around NDA sites”.
9. This appears to afford the NDA complete freedom to determine the nature and level of any community benefits package. We believe the Government needs to establish in policy a more robust and specific commitment to ensuring that a community that hosts a NSD facility would receive substantial benefit in recognition of the service it would be providing to the nation.
10. We believe paragraph 8.115 of Part 2 of the consultation document should be deleted along with any other direct references to exploring the possibility of locating a NSD facility for ILW at the NDA’s LLWR site. Such direct references to the potential use of the LLWR site for a NSD facility in a policy document could be perceived by people in the Search area of the Mid Copeland Community Partnership to indicate that decisions about locating such a facility at LLWR have already been all but taken and that UK policy is now simply being designed in a way that will enable the NDA’s Nuclear Waste Services to deliver that outcome.
11. The LLWR has been operating for many years and good engagement between LLWR and the local community has resulted in a high level of understanding and acceptance of operations at the site. However, this acceptance has been based on the site being used for the disposal of low level radioactive waste. The community has not been engaged about the prospect of the LLWR site also being used for the disposal of certain types of ILW. It is likely that such a proposal would be received with considerable caution by local residents who are likely to have concerns about the prospect of more activity at the site resulting in more noise, more traffic and more disturbance to the village of Drigg and about how siting a NSD facility on the LLWR site would further affect the site’s operational lifetime and anticipated end state.
12. Under the Government’s proposals, the local community around Drigg would have no ultimate right to reject proposals to locate a NSD facility at LLWR. However, those same communities do have the right to reject proposals for construction of a GDF.
13. From the recent baseline local public opinion survey, it may be seen that there is at present quite a high level of community willingness in the Mid Copeland GDF Search Area to consider the possibility of hosting a GDF. We are concerned that proposals to locate a NSD facility at LLWR could result in local dissatisfaction with the NDA and Nuclear Waste Services (NWS) which could have a subsequent negative impact on the level of local support for any NWS proposal to site a GDF in the region.
14. Given the importance to the UK of identifying a suitable site and willing community for a GDF, we consider it appropriate to alert the Government to this risk and to encourage it to take the matter into account in reaching decisions about the siting of NSD facilities.

Andy Pratt

Chair, Mid Copeland GDF Community Partnership

This response has been contributed to by members of the Mid Copeland GDF Community Partnership. Nuclear Waste Services (NWS) is one member of that Partnership, but it should be noted that NWS, as an operating company of the Nuclear Decommissioning Authority which reports to the same government department that is overseeing the policy consultation, has not been involved in developing this response. As such, this response represents the views of local community members of the Community Partnership.

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