

## **Consultation on the revised draft National Policy Statements for energy infrastructure: Dept Energy & Climate Change (DECC)**

**Response: Nuclear Consultation Group (NCG)  
24 Jan 2011**

### **Nuclear Consultation Group**

The Nuclear Consultation Group (NCG) comprise 50 leading UK academics and experts in the fields of environmental risk, radiation waste, energy policy, environmental sustainability, energy economics, political science, nuclear weapons proliferation, science and technology studies, sociology of scientific knowledge, environmental justice, environmental philosophy, particle physics, environmental philosophy, energy efficiency, environmental planning, and participatory involvement.

### **Summary**

**DECC Consultation processes have been limited.**

**The following core issues and questions raised by key stakeholders in their responses to previous nuclear consultations run by DECC have not been properly addressed or answered:**

- **Nuclear Emergency Planning**
- **Radioactive Waste**
- **Radiation Risk and Health Effects**
- **Environmental and Economic Impact of Nuclear Accident and Incident**
- **Increased Risk of High Burn-up Fuel for Proposed Generation III Reactors**
- **Climate Change Impact on Nuclear Sites - Flooding and Storm Surge**
- **Threat of Nuclear Terrorism**
- **Nuclear Proliferation**

**For people to be able to trust in the governance and regulation of nuclear risk, it is critically important for the NPS consultation to be more than a 'tick-box' exercise.**

**In the light of the purported commitment to public involvement and engagement that underpins the concept of the 'Big Society' - and given the environmental, economic, and political high-stakes relating to all proposed new nuclear build decisions - DECC must acknowledge,**

**address, and respond in detail to all the issues and questions raised by stakeholders concerning the NPS for energy infrastructure consultation.**

**Failure to do so will leave DECC and the Coalition Government vulnerable to legal challenge and lead to hostility and mistrust of any future energy policy decision.**

### **Nuclear Consultation and the 'Big Society'**

Recent reviews of the impact of climate change suggest that, over the next few decades, the UK will be subject to unprecedented change in human welfare and environmental systems. Key to adapting to this change is the need for secure, clean, safe, affordable energy to heat and power homes and businesses. Creating a low carbon and resource efficient economy involves major structural changes to the way we work and live, including how we source, manage and use our energy.

Public dialogue is core to the building of mutual understanding between government, industry, energy techno-scientists and the public. The fairness of this engagement is especially important in 'energy futures'.

The point of public consultation is to involve and elicit UK public values and attitudes in order to understand the ways in which technologies, infrastructures, everyday practice and policy interventions (do and can) combine to reduce or enhance transition to a low-carbon future. This is done in order to build a shared understanding of sustainable energy futures based on the open exchange of diverse perspectives, and generate a modelled social contract around energy systems through community involvement and critical reflection.

The public mistrust of policy decision-making on issues involving nuclear risk is a defining issue. It is now recognised that the old 'decide-announce-defend' (DAD) approach is dead. As a result dialogue with the public is no longer seen as an 'optional add-on' to science-based energy policy making. Increasingly the focus of environmental risk disputes have centred on government credibility and trustworthiness. This shift has seen successive governments move toward an involvement and engagement model, which focuses on a two-way dialogue between specialists and non-specialists. This approach views dialogue and debate as a means of forging a more lasting consensus by increasing social involvement and participation, thereby fostering a sense of community.

But so far, real safety and security issues and questions raised by key expert and community stakeholders in response to consultations relating to nuclear 'Justification'; 'Strategic Siting Assessment'; 'Fixed Price Unit' for rad-waste; and the draft 'National Policy Statement', have not been satisfactorily addressed or answered by Government Departments and Regulators. These include: Nuclear Emergency Planning; Threat of Nuclear Terrorism; Safety and Security; Radiation Waste; Radiation Risk and Health Effects; Environmental and Economic Impact of Nuclear Accident and Incident;

Increased Risk of High Burn-up Fuel for Proposed Generation III Reactors;  
Climate Change Impact on Nuclear Sites - Flooding and Storm Surge

### Democratic Involvement and Public Consultation

The first pillar of the EU Aarhus Convention on 'Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters' aims to ensure that the public is informed about the environment and their role in decision-making. Here, in order for the public to be able to have trust in the governance of nuclear technology; consultation must be a truly involving process.

Consultation respondents have provided detailed rationales for statements made and questions asked within their submissions. **DECC must clearly address all substantive issues raised by a very broad and experienced set of stakeholders and provide detailed responses to the issues and specific questions raised in the NPS Consultation.**

In other words, in order to overcome the widespread belief that institutions wishing to impose their arbitrary actions upon the public may be partial or secretive - and given the environmental, economic, and political high-stakes relating to all proposed new nuclear build decisions - **all the key issues and questions raised during the consultation must be explicitly, openly and transparently addressed by DECC.** Any failure to do so would leave the Regulators and, hence, Government vulnerable to legal challenge and may lead to hostility and mistrust of any future energy policy decision.

### Public Trust in Government

For people to be able to trust in the governance and regulation of nuclear risk, it is critically important for all new nuclear build consultations to be more than 'tick-box' exercises. Otherwise, the risk is that 'DAD' (decide-announce-defend) will simply metamorphose into UNCLE (unlimited nuclear consultation leading to exhaustion).

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