



BANNG
Blackwater Against New Nuclear Group



DRAFT MAGNOX: SOCIO-ECONOMIC PLAN, 2016 – 18

RESPONSE FROM THE BLACKWATER AGAINST NEW NUCLEAR GROUP (BANNG)

(BANNG Paper No. 29)

PREAMBLE - INFORMATION ABOUT BANNG

The Blackwater Against New Nuclear Group (BANNG) is a Citizens Based Organisation primarily concerned about potential developments of new nuclear reactors and associated radioactive waste storage at the Bradwell site in Essex.

BANNG is also concerned about issues concerning decommissioning at Bradwell: the dissolution of FED and the resulting radioactive discharges into the Blackwater estuary and the atmosphere; and the proposal to transfer ILW from elsewhere for storage at Bradwell. We have responded to consultations on both these issues.

BANNG's support is drawn mainly from communities around the Blackwater estuary but we also have support from people concerned about Bradwell in other parts of Essex and beyond. Since its formation, BANNG has sought to raise public awareness and knowledge about the implications of new reactors at Bradwell through public events and the face-to-face gathering of 10,000 signatures for a Petition that was presented to the Minister for Energy. We have also sought to raise public awareness about the dissolution of FED and the proposed transfer of ILW from elsewhere to Bradwell. We have maintained close contact with local councils, MPs, media and other organisations and have participated in meetings with government officials, regulatory bodies (particularly with the Environment Agency regarding FED) and national groups concerned about nuclear issues. BANNG Core Group members and other supporters attend meetings of the Bradwell Local Communities Liaison Council.

The primary aim of the Group is to seek to protect the people and environment of the River Blackwater estuary and its surrounding area, now and in the future, from the risks and dangers of radioactivity by preventing the further development of nuclear activity in the estuary. BANNG has responded to many government nuclear consultations. A list of BANNG responses and other papers is attached as Appendix A.

COMMENTS ON THE MAGNOX DRAFT SOCIO-ECONOMIC PLAN, 2016- 18

Prioritisation of sites

The methodology for prioritising sites is unclear in the draft Socio-Economic Plan. It is not known what factors have been used, for instance, to make Bradwell a High Priority site. It would seem, however, that the external factor of new nuclear build may contribute to this prioritisation, although it is not possible to understand from the draft why it should.

Prioritisation does not seem to be related to socio-economic funding. For example, Hunterston is a Medium Priority site but is receiving more socio-economic funding than Bradwell.

BANNG believes that Magnox needs to spell out the grounds for prioritisation of sites and how prioritisation relates to financial rewards. This could be done on the pages giving information about the individual sites. It would also be helpful if the layout of these pages were standardised.

BANNG would like to know if the external factor of new nuclear build contributes to the High Priority given to Bradwell and, if so, why it does.

Purpose of socio-economic funding

It is not entirely clear what the purpose of socio-economic funding is. BANNG considers that it should be compensation for communities where decommissioning and clean-up is taking place and which are having to host the storage of nuclear wastes on behalf of the nation – without consultation and without the opportunity to volunteer to do this.

BANNG believes that the concept of compensation should encompass:

- ***the environmental*** – where compensation is in the form of mitigation;
- ***the economic*** – where compensation is achieved through, e.g. job creation, economic development and skills training;
- ***the social and cultural*** – where compensation is achieved through improving culture, amenity and other aspects that increase the well being of the area.

BANNG is primarily concerned with the Bradwell site. In this case, it seems that while vague attempts are being made to provide funding for the economic and social elements, no attempt is being made at compensation to mitigate damage to the environment. On the contrary, radioactive discharges arising from a problematic dissolution process, now being used only at Bradwell, are being poured into the fragile environment of the Blackwater estuary and it is planned that this will continue until at least 2019. Further there will be long-term, on-

site storage of nuclear wastes on a low-lying site that is vulnerable to flooding, storm surges and other coastal processes as a result of climate change.

BANNG believes that proper compensation is required for the continuing damage to the environment of the communities of the Blackwater estuary and for the possible health effects arising from this. We consider that the local Blackwater councils should be demanding proper compensation for this continuing damage.

Distribution of funding

The draft plan gives details of the distribution of funding *among* areas but says nothing of distribution *within* areas.

In the case of Bradwell, both the north and the south of the Blackwater estuary are affected by the activities arising from decommissioning and the storage of nuclear wastes on the site. However, it seems that socio-economic funding is largely being given to Maldon District Council and its associates.

Bradwell socio-economic stakeholders

It is not obvious that Colchester Borough Council (CBC) plays a part on the stakeholder groups consulted on socio-economic funding or that it is a consultee of this draft plan. If CBC is not represented this is a serious issue. There are communities affected by Bradwell on the north side of the Blackwater estuary. For example, Mersea Island lies directly opposite and downwind from the former power station. Both the north and the south sides of the estuary are subject to damage to the marine ecology as a result of decommissioning activities at Bradwell. Both populations are vulnerable to health problems arising from these activities. Both will have to live with the risks associated with long-term storage of nuclear wastes.

Places such as Mersea Island, with the largest population on the estuary, lie within Colchester Borough. The Borough Council, therefore, represents a reasonably populous area.

Environmental groups, such as BANNG, are not represented on any of the stakeholder groups. Such environmental groups can play an important part in society. In a representative democracy, such as the UK, elected members seek to represent their constituency and provide legitimation for decisions made by the governing body. However, in an open and plural democracy non-governmental organisations (NGOs), such as BANNG, represent the views, values and proposals of citizens on specific issues or areas of interest in order to raise awareness of issues and enhance the quality of knowledge and debate. This often means scrutinising decisions, questioning policies and contributing alternative perspectives.

Whose money? Who allocates the money?

It should be recognised that the socio-economic funding is provided by the taxpayer and is not in the gift of either the NDA or Magnox. As it is public money, BANNG believes the funding should be completely separated from the activities of Magnox and disbursed by an independent body.

It is unethical that taxpayers' money should be disbursed by Magnox. There is the possibility that this money could be perceived as being used to lessen local criticism of Magnox's activities. Local stakeholder groups may be less keen to hold Magnox/Fluor Cavendish to account if they fear that this could lead to loss of hoped for financial support for their electors.

BANNG believes that it is unethical that taxpayers' money should be disbursed by Magnox and that this should be done by a completely independent body and separated from the activities of Magnox.

Intergenerational issues

BANNG believes that socio-economic funding should continue beyond the entry of sites into Care and Maintenance.

Taking the case of Bradwell, Intermediate-Level Waste (ILW) and the reactor cores will be stored on the site until at least the end of the century. Even if a national repository were to be available in 2060, the ILW from Bradwell will not be the first in the queue for disposal. And a national repository may never be available meaning that the ILW would need to be stored indefinitely on a totally unsuitable site.

This raises intergenerational issues. Nuclear communities, such as those of the Blackwater estuary, are not simply the contemporary population but that of generations to come. It is exceedingly difficult to represent in the present the perspectives of those not yet born. Yet, at Bradwell, the potential negative impacts of discharging radioactivity into the Blackwater estuary and the long-term storage of nuclear wastes lie in the future as well as the present and the needs of the future need to be taken into account.

BANNG believes that this difficult intergenerational issue must be taken into account when it comes to socio-economic funding and that this funding should be continued beyond the entry of sites into Care and Maintenance.

Prepared by Varrie Blowers, Secretary of the Blackwater Against New Nuclear Group (BANNG) with contributions from Professor Andy Blowers, Chair, and Barry Turner, Vice-Chair

24 February, 2016

APPENDIX 1 - LIST OF RESPONSES MADE BY THE BLACKWATER AGAINST NEW NUCLEAR GROUP (BANNG) TO GOVERNMENT AND OTHER CONSULTATIONS ON NUCLEAR ISSUES AND OTHER PAPERS

BANNG (Blackwater Against New Nuclear Group)(2008) Consultation on the Strategic Siting Assessment Process and Siting Criteria for New Nuclear Power Stations in the UK, Response on behalf of BANNG, November
(BANNG Paper No.1)

BANNG (2009a) 'Have Your Say' Government Consultation on Nomination of Sites for New Nuclear Power Stations, Response to the Consultation by BANNG, May
(BANNG Paper No.2)

BANNG (2009b) The Justification of Practices Involving Ionising Radiation Regulations 2004, Consultation on the Nuclear Industry Association's Application to Justify New Nuclear Power Stations, Response to the Consultation from Blackwater Against New Nuclear Group (BANNG), March
(BANNG Paper No.3)

BANNG (2010a) Consultation on Draft National Policy Statements for Energy Infrastructure: Draft Overarching National Policy Statement for Energy (EN-1); Draft National Policy Statement for Nuclear Power Generation (EN-6) and Associated Documents, Response of the Blackwater Against New Nuclear Group (BANNG), February
(BANNG Paper No.4)

BANNG (2010b) House of Commons Energy and Climate Change Committee, Inquiry into Energy National Policy Statements, Evidence on Behalf of the Blackwater Against New Nuclear Group, January
(BANNG Paper No.5)

BANNG (2010c) Environment Agency Generic Design Assessment AP1000 Nuclear Power Plant Design by Westinghouse Electric Company LLC: UK EPR Nuclear Power Plant Design by Areva NP SAS EDF; Consultation Document, Response by Blackwater Against New Nuclear Group (BANNG), October
(BANNG Paper No.6)

BANNG (2010d) The Justification of Practices Involving Ionising Radiation Regulations 2004. Consultation on the Secretary of State's Proposed Decisions as Justifying Authority on the Regulatory Justification of the New Nuclear Power Station Designs Currently Known as the AP1000 and the EPR, response to the Consultation by the Blackwater Against New Nuclear Group, February
(BANNG Paper No.7)

BANNG (2010e) The Energy Act 2008, Consultation on the Financing of Nuclear Decommissioning and Waste Handling Regulations, Consultation on a Methodology to Determine a Fixed Unit Price for Waste Disposal and

Updated Cost Estimates for Nuclear Decommissioning, Waste Management and Waste Disposal, Response of the Blackwater Against New Nuclear Group (BANNG), June (BANNG Paper No.8)

BANNG (2011a) Planning for New Energy Infrastructure, Consultation on Revised Draft National Policy Statements for Energy Infrastructure, Response of the Blackwater Against New Nuclear Group (BANNG), January (BANNG Paper No.9)

BANNG (2011b) The Energy Act 2008, Consultation on Revised Funded Decommissioning Programme Guidance for New Nuclear Power Stations and Consultation on an Updated Waste Transfer Pricing Methodology for the Disposal of Higher Activity Waste from New Nuclear Power Stations, Response from the Blackwater Against New Nuclear Group (BANNG), March (BANNG Paper No.10)

BANNG (2011 c) Management of the UK's Plutonium Stocks, Consultation on the long-term management of the UK-owned Separated Civil Plutonium, Response from the Blackwater Against New Nuclear Group (BANNG), May (BANNG Paper No. 11)

BANNG (2011d) Japanese Earthquake and Tsunami: implications for the UK nuclear industry interim report by HM Inspector of Nuclear Installations May 2011, Comment on Behalf of the Blackwater Against New Nuclear Group (BANNG), August (BANNG Paper No. 12)

BANNG (2011e) Managing Radioactive Waste Safely: desk-based identification and assessment of potential candidate sites for geological disposal, Public Consultation, Response of the Blackwater Against New Nuclear Group (BANNG), September (BANNG Paper No. 13)

BANNG (2012a) Essex County Council's Waste Disposal Document: Preferred Approach, Public Consultation, Response of the Blackwater Against New Nuclear Group (BANNG), January (BANNG Paper No. 14)

BANNG (2012b) Geological Disposal of Radioactive Waste In West Cumbria? Public Consultation, Response of the Blackwater Against New Nuclear Group (BANNG) (BANNG Paper No. 15)

BANNG (2012c) Application for Development Consent by NNB Genco (EDF Energy) for Hinkley Point C Nuclear Generating Station and Associated Development, Written Representation on behalf of the Blackwater Against New Nuclear Group (BANNG), May (BANNG Paper No. 16)

BANNG (2012d) Paper presented to the DECC/NGO Nuclear Forum, 'Radioactive Waste Management and New Build – Problems and Policies', October (BANNG Paper No. 17)

BANNG (2013) Sizewell C Proposed Nuclear Development Stage 1 Pre-Application Consultation, Initial Proposals and Options Consultation Documents, Response of the Blackwater Against New Nuclear Group (BANNG) (BANNG Paper No. 18)

BANNG (2013) Call for Evidence on Managing Radioactive Waste Safely – Review of the Siting Process for a Geological Disposal Facility, Response by the Blackwater Against New Nuclear Group (BANNG), June (BANNG Paper No. 19)

BANNG (2013) Optimising the Number and Location of FED Treatment (Dissolution) Facilities in Magnox Limited – Credible Options. Nuclear Decommissioning Authority, May, 2013. Response of the Blackwater Against New Nuclear Group (BANNG), June (BANNG Paper No. 20)

BANNG (2013) Optimising the Number and Location of Interim Intermediate Level Waste (ILW) Storage Facilities on Magnox Limited and EDF Energy Sites in England and Wales – Credible Options. Nuclear Decommissioning Authority, May, 2013. Response from the Blackwater Against New Nuclear Group (BANNG), June (BANNG Paper No. 21)

(There is no Paper No. 22)

BANNG (2013) Review of the Siting Process for a Geological Disposal Facility. Response from the Blackwater Against New Nuclear Group (BANNG), December (BANNG Paper No. 23)

BANNG (2014) Comment paper on the preferred option of the Nuclear Decommissioning Authority (NDA) for optimising the number and location of:

Interim intermediate level waste (ILW) storage facilities on Magnox Limited and EDF Energy sites; and FED treatment (dissolution) facilities in Magnox Limited, Comments from the Blackwater Against New Nuclear Group (BANNG), January (BANNG Paper No. 24)

BANNG (2015) Manifestoes and Briefing documents on new nuclear build at Bradwell, FED dissolution and transfer of ILW to Bradwell from Dungeness and Sizewell, February (BANNG Paper No. 25)

BANNG (2015) Application by Magnox for an extension to the timescale for the discharging of liquid effluent from the fuel element debris treatment process (FED) into the estuary from 12 months to a further 24 months; Application by Magnox for an option to switch the existing discharges to a new outfall structure when it becomes necessary due to blockages caused by siltation in the existing structure; A radioactive substances application

to allow the switch to the new outfall structure when necessary, Response from the Blackwater Against New Nuclear Group (BANNG), September (BANNG Paper No. 26)

BANNG (2015) Call for Evidence – Implementing Geological Disposal: working with communities. Response from the Blackwater Against New Nuclear Group (BANNG), September (BANNG Paper No. 27)

BANNG (2016) NDA Draft Strategy January 2016. Response from the Blackwater Against New Nuclear Group (BANNG), February (BANNG Paper No. 28)

BANNG (2016) Draft Magnox: Socio-Economic Plan, 2016 – 18. Response from the Blackwater Against New Nuclear Group (BANNG), February (BANNG Paper No. 29)