

Annex 15 A note on the Energy Review and Consultation on process



April 2006

**Response to the Department of Trade and Industry's Energy Review
consultation document
'Our Energy Challenge' (January 2006)**

A note on the Energy Review and Consultation on process

Greenpeace is concerned about the nature and purpose of the Energy Review and about process of consultation initiated by the Government in the document "Our Energy Challenge."

The introduction to "Our Energy Challenge" states that the government remains committed to the White Paper "Our Energy Future – Creating a low Carbon Economy" and the Energy Review is limited to "further measures to meet our goals". However, the paper also states that:

"The review will report to the Prime Minister and the Secretary of State for Trade and Industry in the early summer"¹

and

"The aim will be for the government, once it has assessed the conclusions of the Review, to bring forward proposals on energy policy later this year."²

The paper also states that:

"The government is clear that, in making important decisions about energy policy including nuclear power, there should be the fullest possible public consultation. This consultation paper is part of the process. The government is not at this stage bringing forward policy proposals."³

Thus, the paper and the review process conflate and confuse a review of earlier policy with a consultation on a future and different policy or plan; in particular a decision on nuclear power.

In Greenpeace's view, insofar as this consultation is intended to be part of process of public consultation and participation on the future of nuclear power, it is wholly inadequate.

¹ page 14

² page 13

³ Page 6

Before there is any change in policy in relation to new nuclear power stations, the building and operation of which will create such a significant and long term environmental hazard, there should be full public consultation on and participation in the decision.

We agree with the conclusion of the Sustainable Development Commission that

“..for good governance reasons, a comprehensive national debate will be needed to explore all possible sustainable energy options with the public, *before* any decisions are made on a new nuclear power programme by Government.”⁴

We are very concerned that the consultation period is only 12 weeks - the minimum considered acceptable by government for any consultation. This is clearly not enough for full consultation and participation on a weighty policy decision about the future of nuclear power.

The process for the decision making should be clear, transparent and fair and be accompanied by the information necessary for full public consultation and participation. Proper consultation on future of nuclear power would include, for example providing full information to the public on alternatives, costs, safety, the extent and routes of the transport by road, rail or sea, of nuclear materials and nuclear wastes, plans for dealing with nuclear waste, vulnerability to terrorist attack, legal and other measures for nuclear emergencies and the implications for nuclear proliferation. There should be sufficient time for consultees to respond and comment on the information and on other evidence.

This consultation clearly falls short of these requirements. We note, for example, that the consultation period closes before there is any recommendation for how to deal with nuclear waste. In the circumstances, the process cannot possibly serve as part of a genuine consultation process on the future of nuclear power.

Finally, it is widely believed and reported that the government decision to sanction or plan new nuclear power stations has already been made. We note, for example, Mr Blair's reported comments in Australia where he said

"Clean coal technology, carbon sequestration, renewable energy, the new generation of nuclear power, all of these things I think are going to be part of the mix that we use for our future energy requirements."

No meaningful consultation process can be carried out and no good decision can be made if the issue has been pre-judged. On the basis of this hastily conducted and inadequate consultation process the government will not be in a position to form a view that nuclear power is necessary or desirable: to do so would confirm suspicions that the decision has already been made.

⁴ page 14