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Greenpeace welcomes the opportunity to comment on CoRWM's *Draft Recommendations and Rationales* on managing nuclear waste.¹ It makes the following summary points on the recommendations and discusses some in more detail later in the paper.

Ordering and timing

- CoRWM must make clear – from the outset of its final report – the exact order in which things must happen in terms of managing radioactive wastes. The present ordering of the recommendations, along with encouraging a sense of urgency over pursuing direct (deep) geological disposal (DGD) gives the impression that this should be pursued above all other options. Greenpeace's view is that placing existing waste in adequate packaging and storage facilities is urgent. In the meantime research on several waste management options should continue.
- CoRWM must give a clear timeline of how long it expects the implementation of its recommendations to take effect – this must include pessimistic and well as optimistic dates for key stages of implementation. CoRWM's documents on the speed with which direct (deep) geological disposal (DGD) can take place (e.g. the timeline in CoRWM's document 1561, Annex 1) of 100 years from start to finish for DGD appears unrealistically optimistic. A parallel timescale on storage is needed for the design and construction for stores with a lifetime appropriate for every foreseeable eventuality.

Deep disposal

- Given the uncertainties over DGD it is vital the order in which things will happen is understood – in particular as there is no proven method of deep disposal and no operating disposal facility for high level wastes anywhere in the world. CoRWM must stress the urgent need for the construction of suitable stores whilst further investigations are carried out on DGD – as well as other methods of waste management.
- CoRWM has to make clear what its choice is - 'direct' geological disposal (DGD) or 'phased' geological disposal (PGD). This is important because CoRWM has said that the majority want to see flexibility and retrievability built into whatever option, or combination of options, CoRWM recommends. However, the Committee has chosen instead to recommend that this issue be decided at local (i.e. host) community level.
- CoRWM cannot leave this issue to be decided only at a local community. It is important that the country as a whole knows and understands CoRWM's views on this matter as it is as people need to understand the stage(s) at which flexibility and retrievability can be exercised within the processes recommended by CoRWM. According to CoRWM's draft recommendations flexibility and retrievability would come in the interim storage stage – with direct disposal being just that – disposal with relatively quick backfilling.
- If CoRWM leaves this matter (DGD or PGD) to be decided on *after* its recommendations it will create even more confusion in an already complicated situation. The public is looking to CoRWM for a firmer line on these issues.

¹ For draft recommendations and rationale from CoRWM – here's the web site.

<http://www.corwm.org.uk/PDF/1725%20-%20Draft%20Recommendations%20and%20Rationales.pdf>

Storage

- Because of the above, CoRWM should recommend that interim stores – proposed as an inevitable step toward disposal *and* also as the main contingency in the event of delay or failure to implement disposal – be built to last 150 years. This way the public, industry and Government will more fully understand the costs and measures needed to ensure there is a workable contingency.

Affected communities

- CoRWM must clearly explain that there will be processes that involve not just the 'host' community(ies) which might accept waste for disposal, but that there must also be also processes for negotiation (and possibly compensation) for all affected communities e.g. those holding the waste until disposal, those along transport routes and those which might be affected by blight by neighbouring a host community – for either stores or a disposal facility.
- It must recommend that whatever process of negotiation takes place enables negotiation and discussion between communities.
- CoRWM must also make a statement on the issue of intragenerational equity i.e. the impact on the community(ies) which might volunteer to take a burden – locally – which results from the national benefit (sic) of nuclear power and nuclear weapons.
- CoRWM might also wish to recommend how the conflicting agendas of different sections of the industry can be reconciled.

New wastes

- It is on the issue of continued/new waste creation that CoRWM is at its weakest. In the rationale document it has not offered anything beyond a shortened section of an earlier (and also brief) statement on new build.
- Its recommendation on the reuse of existing nuclear materials, but its failure to express concern over new wastes, contradict each other e.g. if the reuse of existing wastes will create problems in terms of determining an exact inventory for disposal, then new wastes will add significantly to that problem – and create many difficulties more over timing of disposal and repository closure.
- Given the problems the Committee has expressed over the current stockpile of wastes it must, logically, recommend against any new waste creation – in particular from military and large scale civil activities.
- It is unrealistic in the extreme to ask Government to act on the current waste problem with a matter of 'urgency', to recommend communities start discussion on an unproven disposal method, and to ask for everyone to engage on this matter without -recommending against new waste creation.
- Failing recommendations against new waste creation the Committee must spell out exactly what the impact of new waste creation will have in terms of complicating and probably delaying the whole process it is recommending for disposing of existing wastes.
- CoWRM has to explain the problems which arise in terms of the ethics of trying to address intergenerational equity issues now (i.e. not leaving a burden of waste for future generations) with the intergenerational inequity of making a decision now (e.g. new build of reactors) which will leave wastes for future generations.
- In the same vein, CoRWM must recommend against the reuse of plutonium and uranium as this would only exacerbate the waste problem. It must recommend against reprocessing spent fuel because of waste creation.

CoRWM draft recommendations and responses (CoRWM parts are in bold).

Introduction:

Since 1997 there has been a vacuum in UK policy on the long-term management of long-lived and more highly active radioactive wastes.

CoRWM has drafted the following integrated package of recommendations. This is the start of a process, leading to CoRWM's final recommendations. Once made, they should be acted upon with urgency.

It is right this matter be given attention and acted on quickly. However, CoRWM's expression of a sense of 'urgency' could be well be taken by the Government as an excuse to push through disposal without the necessary contingency planning (i.e. interim storage) and the consultation that CoRWM also advocates. CoRWM must make it plain from the beginning that its recommendations cannot be cherry-picked to suit Government and industry wants alone and that they cannot be acted on separately. Unfortunately the draft recommendations do not say this clearly enough.

Although the newly elected Government got off to a slow start after 1997, and took until September 2001 before "Managing Radioactive Waste Safely" was published, the five years since then have been usefully used for broad ranging consultations, which are a crucial part of the process. This should be stressed by CoRWM. On the other hand, we also note that according to Nirex, only 8% of existing radioactive is safely packaged and stored. This situation must be dealt with urgently and in any event much more quickly than the "deep disposal option" could possibly be implemented.² The safe immobilisation of wastes into a passively safe state should be included as a crucial step in the process CoRWM is recommending.

Recommendations

1. Within the present state of knowledge, CoRWM considers geological disposal to be the best available approach for the long term management of all the material categorised as waste in the CoRWM inventory when compared with the risks associated with other methods of management

5. CoRWM has not yet decided whether to make recommendations regarding the precise form of geological disposal. This will be an element in the next round of public and stakeholder engagement.

Greenpeace believes that CoRWM should not recommend deep disposal for radioactive wastes given the uncertainties over this method. There is no proven method of deep disposal and no operating disposal facility for high level wastes anywhere in the world.

It is not enough for CoRWM to say it has 'sufficient' confidence in deep disposal whilst at the same time conceding there are technical issues not yet resolved. Certainly, it has presented DGD as part of a package of measures, but has not clearly articulated the extent of the technical problems outstanding on DGD. It must do this so that those who implement its recommendations cannot proceed on the basis that there are little or no outstanding issues – as has been the case in the past. CoRWM should publish a summary of the evidence which has emerged since 1997 which shows which issues have been resolved since the Nirex application for a Rock Characterisation Facility was rejected; which issues remain to be resolved and which

² Times, 19th January 2006

<http://www.timesonline.co.uk/article/0,,2-1995585,00.html>

new issues arise as a result of any new DGD being expected to accept High Level Waste and Spent Nuclear Fuel as well as Intermediate Level Waste (and possibly plutonium as waste).

CoRWM's rationale for choosing DGD depends heavily on the views of a "specialist" group. This group was inevitably heavily dominated by nuclear industry experts. We also believe that CoRWM is placing too much store in the MCDA analysis carried out by specialists and others. This analysis was like comparing apples and pears because of the way it was forced to compare DGD for only 300 years so that it could be compared with the storage options.

As far as storage options are concerned as well as expressing concerns about terrorist attack and war, CoRWM members have also expressed concern about loss of institutional control and severe environmental change – in particular coastal erosion and sea level rise. These concerns have mainly arisen because of CoRWM's decision to define interim storage as lasting up to 300 years. If the timing of interim storage were instead defined as 150 years concerns about loss of institutional control and severe environmental change would be much reduced. However, the possibility of stores being built to last longer than 150 years, or more likely replacement stores, may also have to be considered as there is no guarantee over DGD or indeed the timescales needed by the industry for decommissioning and clean-up.

In addition, it is our understanding that many of the security specialists who advised CoRWM were of the view that the construction of terrorist-proof interim stores is feasible, and indeed will be necessary in the 'short-term' (i.e. several decades) even if the DGD option is achieved.

If CoRWM continues to pursue geological disposal it has to make clear what its choice is in terms of e.g. 'direct' geological disposal (DGD) or 'phased' geological disposal (PGD). This is important because CoRWM has said that the majority of those questioned want to see flexibility and retrievability built into whatever option, or combination of options, CoRWM recommends.

However, the Committee has chosen to recommend that this issue be decided at local (i.e. host) community level. If CoRWM leaves this matter to be decided on after its recommendations it will add even more confusion to an already complicated situation. The public and industry is looking to CoRWM for a firmer line on these issues. Leaving the matter to a host community could see it pressured by Government, industry and the 'holding' communities (those which are slated for interim stores) into accepting phased geological disposal – with the result that such a community might receive all the wastes relatively quickly (it becomes a central storage/holding point), but before key issues on the issue of DGD or PGD are resolved. All of the above is important for CoRWM to resolve in order to give clear guidance to the Government, relevant agencies, industry and potentially affected communities over the issue of storage, flexibility and retrievability.

There may be attempts to coerce the potential host community(ies) into accepting a less-than-guaranteed disposal facility through the use of economic measures or political pressure. Discussions on disposal must therefore also involve nationwide consultation as there will be many communities and organisations looking to the outcome on disposal which will want to ensure the process of disposal is undertaken with technical and scientific rigour. It is vital that no one community is left to deal with this alone and, perhaps because of concerns over technical matters then feels it has no other option than to withdraw from the process. By the end of its deliberations CoRWM may still not feel able to make a definitive recommendation over DGD or PGD. If that is the case it should at the very least, present the options in order of preference. The CoRWM report will be referred to for many years to come and if it prevaricates on too many issues, or leaves substantial matters with only vague explanations, for local communities or for the implementation body, this will continue to cause uncertainty over the longer term. It will also leave the recommendations open to misinterpretation (deliberate or otherwise) in the future.

CoWRM must also address how 'outside' bodies such as other national governments or international agencies, are included in these processes e.g. member states of OSPAR.

2. CoRWM recognises that there are social and ethical – AND TECHNICAL -concerns that might mean there is not sufficient agreement to implement geological disposal at the present time. In any event, the process of implementation will take several decades. This period could last for as long as one or two generations if there are technical difficulties in siting or if community concerns – OR POLITICAL DECISIONS/DIFFERENCES make it difficult, or even impossible, to make progress at a suitable site.

CoRWM's recommendations should recognise that it will not only be social and ethical issues which could prevent agreement on disposal, but also that there will be technical concerns and political differences (or decisions) as well as the different agendas within the nuclear industry which could prevent agreement on implementation of geological disposal by themselves, or in combination with other issues.

CoRWM should also make it plain that any host community(ies) are taking on a local burden for what was supposedly a national benefit e.g. civil and military nuclear activities. There are significant questions on intragenerational equity e.g. a small number of communities in this generation taking a disproportionate share of the burden, as well as intergenerational equity. How such communities will be compensated well into the future for a blight that will last for many generations is an issue CoRWM must address.

The following paragraph from the rationale document suggests to us that the whole emphasis of the CoRWM recommendations needs to change: -

“CoRWM takes the view that implementation of a geological disposal facility should only go ahead if there is sufficient agreement, including within the host community, to proceed. This is likely to depend on, among other things, clear demonstration of the suitability of the site. If there is not sufficient agreement, the waste should remain in store”.

We see this as arguing for the primary recommendation from CoRWM to be that waste should be urgently placed in interim terrorist-proof stores (built to last 150 years) whilst work on other waste management options continues, including on storage options, in an effort to demonstrate to potential host communities and the public at large the safety of the best long-term option for nuclear waste management - and that DGD not be pursued with undue haste (relative to the timescale of the radioactive materials concerned).

3. These uncertainties surrounding the implementation of geological disposal lead CoRWM to recommend that a programme of interim storage is required as a contingency and therefore must play an integral part in the long-term management strategy.

If CoRWM decides to recommend DGD, it must give a clear timeline over how long it expects the whole process of implementation of its recommendations to take effect – this must include pessimistic and well as optimistic dates for key stages of implementation.

It is vital that CoRWM clearly spells out that storage is not just a step along the way to disposal, but also *the* contingency plan should disposal fail to eventuate. It must make it plain to the Government and industry – through giving an indicative timeline for how long stores will be expected to last and what kind of store(s) the Committee expects to see built. This information is also essential for the 'holding' communities which will have the waste stores pending any disposal. There is mention of stores possibly lasting 100 years, but this should be extended to 150 years, to give a realistic timetable even if disposal eventuates e.g. the decommissioning timescales put forward by the NDA.

CoRWM must publish a realistic indicative timeline for storage and disposal and one which reflects not the shortest timeline (based on current thinking) but which also includes possible delays. As noted earlier, some of the timelines for disposal presented in CoRWM documents on this issue give a somewhat rosy view of the speed with which DGD can take place. The timeline in CoRWM's document 1561 (annex 1) of 100 years from start to finish for DGD seems unrealistically optimistic – and doesn't even account for all of the NDA's decommissioning to take place. Nor does it account for all military wastes and the agendas of private companies (in this case BE) on their preferred decommissioning and site clearance timelines.

We recognise there is a risk in having an open ended timeline in terms of closure of a repository e.g. industry or Government may drag their heels in addressing the issue – or worse still leave a site open for new build wastes. However, that risk can be significantly mitigated by a realistic timeline for the time over which storage that is needed.

4. Therefore CoRWM recommends a staged process of implementation, incorporating the following elements:

4a) commitment to the safe and secure management of wastes through the development of an interim storage programme that is robust against the risk of delay or failure in the repository programme. Due regard should be paid to:

- **reviewing and ensuring security, particularly against terrorist attacks**
- **ensuring the longevity of the stores themselves**
- **minimising the need for re-packing of the wastes; and**
- **addressing other storage issues identified during CoRWM's public and stakeholder engagement process, such as avoiding unnecessary transport of wastes**

CoRWM is recommending here that storage systems are put in place, that have a lifetime of 'more than 100 years.' Other than deciding we need to get on and research the DGD option (as well as researching better storage options), there is in fact, as has been by at least one member of CoRWM, no need for CoRWM to decide now that waste should be placed in a deep repository. We understand that some CoRWM members expressed concern that if it did not make such a recommendation there would be a temptation on the part of government to cut funding for research into waste management options. It is recognised that government and industry must not cherry pick from CoRWM's recommendations. But as the recommendations currently stand there is just as much danger that government will focus on the DGD recommendation without giving due attention to the more important recommendations about a staged process; the need to (a) demonstrate to everyone's satisfaction the suitability of DGD as a waste management option; and (b) for full consultation, openness and transparency.

Of course, CoRWM might argue that it would be impossible for the Government to avoid interim storage as it is inevitable. However, as we know from past experience there is every chance it might leave it to industry to decide on the length of storage – the risk being it will be much shorter than 100-150 years in order to force the DGD option within a few decades – regardless of whether all technical issues have been resolved by that stage. Given that is exactly what happened prior to the NIREX inquiry in 1997, it could well happen again particularly with an industry keen to get rid of wastes during a new build programme.

Whilst it is recognised that security is vital for waste creation, conditioning, storage, transport and disposal, is it also equally important that security measures are not used as a means to prevent full public disclosure of all relevant information. Protection of the environment must go hand in hand with protection of the democratic process.

CoRWM's final report must contain recommendations on measures that the implementation body take to ensure compliance with an open and transparent policy on information. To do otherwise would create a severely dysfunctional process – and one which would be in breach of the policies and processes CoRWM has espoused.

- b) A commitment to an intensified programme of research and development aimed at reducing uncertainties at a generic and site-specific level in the long term safety of geological disposal, as well as better means for storing wastes in the longer term. Appropriate R&D should be undertaken into alternative management options.**

This recommendation and the rationale fit perfectly with our alternative top-line recommendation that waste should be urgently placed in interim, terrorist-proof stores whilst work on other waste management options continues, including on storage options, in an effort to demonstrate to potential host communities and the public at large the safety of the best long-term option for nuclear waste management.

- c) A commitment to ensuring that flexibility in decision-making within the implementation process leaves open the possibility that other long-term management options (for example, borehole disposal) could emerge as practical alternatives.**

Practicable alternatives may become available up to the point when a decision is made to construct a long-term waste management facility. Conversely – as has been said about DGD in the past: 'the more we know, the more we realise we don't know'. It may, therefore, become clear as work proceeds that some options, which currently appear feasible, must be ruled out.

- d) a continuing public and stakeholder engagement process aimed at building trust and confidence in the proposed long term management approach, including the siting of facilities.**
- e) A set of decision points providing for a review of progress with an opportunity for re-evaluation before proceeding to the next stage, or before foreclosing alternatives.**

An intensified programme of research and development on terrorist-proof storage systems is also required. In the immediate future it is essential to ensure that the new stores - which are urgently required - represent best available technology. Additionally CoRWM recognises elsewhere that it may turn out that it is not possible to implement DGD, in which case interim stores may need to be replaced in 150 years.

CoRWM must recommend that the staged process for implementation involves national and not just 'local' consultation. It must recommend that whatever process of negotiation takes place enables negotiation and discussion between communities. CoRWM might also wish to recommend how the conflicting agendas of different sections of the industry can be reconciled.

It is essential that the implementation process is not continued using the same stakeholder processes as currently used. These are becoming somewhat jaded and many people are becoming increasingly disillusioned in them. It is important that fresh minds and organisations are brought into this process. For this reason it is suggested implementation processes be overseen by a facilitator which has not been involved in this process in the past as current stakeholder processes are not sufficient to cover the complexity of implementation.

CoRWM should also be aware that organisations previously involved in attempts to site nuclear dumps (e.g. NIREX) do not have the confidence of most NGOs or indeed many local authorities. It is highly likely public confidence in this organisation is also low. Even if there was confidence in NIREX, the creation of the NDA has significantly changed the 'landscape' on

decommissioning and clean-up, leaving NIREX as something of an anachronism in the current context. Whilst we recognise the necessary skills of some personnel currently employed by NIREX, we believe that these people should be redeployed within a more relevant organisation with the powers and overall expertise to be part of an implementation programme.

CoRWM must recommend against organisations connected with promoting the nuclear industry being involved in technical oversight and research programmes for implementation. In this regard we register Greenpeace's concerns over the role of companies like AMEC/NNC (AMEC as an organisation involved in decommissioning and which has expressed an interest in new build, and the NNC – National Nuclear Corporation – because of its past involvement in this field) in any implementation work.

CoRWM should also consider whether a Government controlled entity would be suitable for implementation as this too may not have public confidence, particularly because of the conflicting agendas of government on decommissioning, clean-up, waste management and new build. There should be public consultation on the makeup of the implementation body.

5. CoRWM has not yet decided whether to make recommendations regarding the precise form of geological disposal. This will be an element in the next round of public and stakeholder engagement.

We have dealt above with why we think decisions about PGD as opposed to DGD should not be left to the host community alone.

The rationale for this recommendation notes: "a strong public desire to start out on a path that would reduce burdens on future generations, at the same time as allowing an extended period of learning and confidence building, with the potential to pursue a better option if it became available".

Taken together with recommendation 4b and its rationale, and other points made, for example the rationale for recommendation 2, and discussions about the need for flexibility and a staged process, we urge CoRWM to change the emphasis of its recommendations in order to guard against cherry picking by government and industry. As things stand at the moment we suspect that most people in government, as well as most media observers and the public, would simply think that CoRWM has recommended DGD, whereas this is clearly not the case; nor is this what the public wants.

6. If a decision is taken to manage uranium, spent nuclear fuel and plutonium as wastes, they should be added to the inventory and immobilised for secure storage followed by geological disposal. There must be clarity about the inventory that is to be disposed of by the time that communities are invited to express a willingness to participate in the implementation process. Any additions to that inventory should be the subject of an additional stage in the process.

CoRWM should recommend that uranium, spent fuel or plutonium be classed as wastes. It should put together a clear explanation of what the reuse of plutonium and uranium stockpiles would mean a) in terms of further waste creation and b) in terms of the increase in radioactive inventory if these materials are used as reactor fuels. There also needs to be a clear timeline over how long such materials might be used into the future and how that might impact on storage, transport and disposal plans.

Similarly, CoRWM should explain how much waste (and types) would be created if all spent fuel from the current programme – and possible life extension of existing reactors – is reprocessed and if the resulting plutonium and uranium recovered is used for reactor fuel.

7. Community involvement in any proposals for the siting of long term radioactive waste facilities should be based on the principle of volunteerism, that is, an

expressed willingness to participate. Participation should be based on the expectation that the well-being of the community is enhanced.

Volunteerism of a community must involve the acceptance of all possible affected communities, not just the community that might 'host' a disposal facility. Volunteerism of vulnerable communities already heavily dependent on the nuclear industry has to be considered as a key factor in terms of whether such communities are in a position to really resist proposals to site a disposal facility e.g. past activities will leave them open to claims of 'complicity' and also they might feel they need to acquiesce because of fears of job losses due to decommissioning etc. There have to be very clear guidelines on these issues. Assumptions that such communities are fair game have already been made, and it is beholden on CoRWM to ensure they are not disadvantaged during the implementation stage.

8. Willingness to participate should be based on the provision of community packages that are designed both to facilitate participation in the short term and to ensure that a radioactive waste facility is acceptable to the host community in the long term.

This is not just a decision for the 'host' community but one which must also be taken in full consultation with the affected community(ies) e.g. neighbouring districts which may be worried by possible blight or other impacts such as those communities along waste transport routes, particularly where several transport routes meet.

9. Community involvement should be achieved through the development of a partnership approach, based on an open and equal relationship between the potential host community and those responsible for implementation.

As above, this cannot be limited to the host community(ies) – which is taken to mean the community where a repository would be sited - but should involve all affected communities e.g. those which might be asked to have a nuclear waste store for several decades prior to implementation of disposal.

10 At the end of each stage of the decision making process there should be provision for a review and the right of communities to withdraw from the process before proceeding to the next stage, up to a pre-defined point.

Communities which get to a certain stage in the implementation process may be pressured by national government (and industry and even the implementation body) into continuing even if it has concerns. Pressure might also come from 'holding' communities. In this respect the implementation body, and organisations such as the NDA, must ensure they realistically discuss the expectations of the communities around nuclear sites. The NDA's strategy has already raised expectations through giving possible site clearance dates, although it is recognised these will probably have to be changed in the light of CoRWM's work. Communities should not be pressured into becoming regional or national 'holding' centres because of expectations of site clearance by existing nuclear communities (perhaps encouraged by nuclear companies wanting to free up space for new build?).

CoRWM has to give an idea as to how it would like to see the competing agendas and expectations of the affected communities being reconciled (if that is possible). Industry is also going to have different agendas and CoRWM should give some indication over how that might be handled.

11. In order to ensure the legitimacy of the process, the key decisions at each stage should be ratified by the appropriate democratically elected body(ies).

CoRWM should give some indication of its thinking on how far such processes would extend e.g. only to county level? If regional assemblies are initiated for England would they be involved?

How would the Government of the Isle of Man and the Government of the Republic of Ireland and the Northern Ireland Government be involved if there are matters concerning disposal or storage which could impact on their territories? Would second tier (Borough) and Parish Councils be involved and how would they be expected to consult with their respective populations? Will money be made available for local referenda?

12. CoRWM considers that an open and transparent process is an essential pre-condition to successful implementation of these recommendations.

Proposed changes to Nuclear Industries Security Regulations already threaten the openness and transparency of discussions on nuclear matters (see response to first dot point, recommendation 4 a.). Greenpeace has attached its response to the DTI on the proposed changes for CoRWM's consideration.

CoRWM must spell out precisely the type of process it sees - in terms of access to information – as being vital to successful implementation of its recommendations. That way, in the future the public will have some yardstick by which to measure the implementation.

CoRWM takes no position on the desirability or otherwise of nuclear new build. We believe that future decisions on new build should be subject to their own assessment process, including consideration of waste. The public assessment process that should apply to any future new build proposals should build on the CoRWM process, and will need to consider a range of issues including the social, political and ethical issues of a deliberate decision to create new nuclear wastes.

CoRWM is well aware of the problems with new build that Greenpeace and many other organisations have expressed concerns over. It will not repeat them all here.

However, it has to be said that given the concerns expressed by CoRWM over the current stockpile of wastes, particularly its vulnerability to terrorist attack, and its views that the issue must be addressed with urgency, it seems irreconcilable that it has not recommended against new build – whether military or civil.

It is a contradiction for CoRWM to express concern over the environmental and security risks of keeping wastes above ground and yet not recommended against a possible new build programme of untried and untested reactors and their associated spent fuel stores – the transports of spent fuel - which will also pose environmental risks and be potential terrorist targets for well into the end of the next century. CoRWM should acknowledge that even if disposal of spent from new build was accepted (assuming direct disposal and no reprocessing) it will still have to be stored at reactor sites for several decades prior to transportation to a disposal site. Is this acceptable given the problems we know arise with existing wastes? Indeed, CoRWM must recommend against any further reprocessing too as part of any waste management plans.

New build will impact massively on the public confidence in CoRWM's recommendations. It could have a huge impact on both storage and disposal timelines. CoRWM has expressed some of the wider concerns over the impact of use of nuclear materials on the inventory that might go into a repository, yet has refuses to make the connection that the same applies to new build waste.

There is therefore an inherent contradiction to CoRWM's approach on current wastes and the reuse of nuclear materials on the one hand and its approach to new build on the other. The Committee must make it clear what problems it sees – practical, social, political, ethical and technical – for those making decisions to create more wastes.