

# **INDEPENDENT INQUIRY ON THE 'JUSTIFICATION' OF NEW NUCLEAR REACTORS IN THE UK**

**NUCLEAR CONSULTATION GROUP (NCG)  
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## **1. Nuclear Consultation Group**

The Nuclear Consultation Group (NCG) comprise many leading UK academic experts in the fields of environmental risk, radiation waste, energy policy, energy economics, political science, environmental justice, environmental philosophy, particle physics, environmental philosophy, and democratic involvement.

## **2. Background**

The nuclear industry plan to build 10 new nuclear reactors in the UK. Government figures state that a substantial new nuclear build will provide 4% of our energy, and so halt 4% of our CO2 emissions. The cost to taxpayers of decommissioning our current reactors and dealing with our present nuclear waste is £73 billion.

## **3. What is Justification?**

The 'Justification' process is a high level assessment concerning whether the benefits of new nuclear build outweigh the potential detriments. Justification is a regulatory requirement under EU law - it must be done before reactors can be approved.

## **4. How important is 'Justification'?**

Once the Justification decision has been taken it will be difficult if not impossible to re-open major nuclear policy issues. The decision on this could be made before the general election. Government has described this as a 'milestone' decision.

## **5. What is happening?**

The Justification of new nuclear reactors will not be subject to Parliamentary scrutiny until *after* a decision has been made. Since Justification is a key regulatory process and part of the international system for attempting to ensure the safety of nuclear power, it should be carried out in a way which is thorough, transparent, neutral and independent.

But information on how radioactive waste and spent fuel from new nuclear build may be managed or the impact of radioactive discharges will not be assessed until more than a year after any decision on Justification. The same is true for the design of the proposed reactors. Justification is going ahead before new-design reactors have been approved by UK regulators.

This hurried and unsynchronised timeline does not permit real discussion on key issues relevant to new nuclear build in a manner which allows for real democratic involvement about decisions based on meaningful and relevant information.

## **5. Real involvement: Trust in government**

All the key information underpinning 'Justification' needs to be made clear in any case that is put forward for new nuclear reactors. The government is about to take a decision on the 'Justification' of more nuclear power when significant 'what if' issues that are tied to health impact - such as reactor design and siting, vulnerability to attack, radiation waste, radiation risk, reactor decommissioning - have not been resolved in practice. Failure to do so has left the government vulnerable to legal challenge and may lead to hostility and mistrust of any future energy policy decision.

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 its environment and that its role in decision-making.

For the public to be able to invest trust in the governance of nuclear technology, science and risk; consultation must be a truly involving

process. For complex issues with uncertain futures, the goal of involvement is to bring people together, and keep them together, in order to ensure that better decisions are made in the future. A truly involving process will produce a better result for everyone by generating consensus and trust in the eventual outcome.

## **6. Independent Inquiry on nuclear 'Justification'**

Given that Justification, once finalised, will foreclose future discussion on issues crucial to nuclear power, it is vital that this process is opened up in order to allow for meaningful and realistic examination of evidence in a public forum.

Because the Justification of new nuclear power in the UK represents a key issue for trust in governance concerning energy policy and the control of nuclear risk, we believe **the Government should hold an Independent Inquiry, as allowed for under the regulations governing Justification: The Justification of Practices Involving Ionising Radiation Regulations 2004 (No. 1769), Regulation 17.**

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