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From the Treasurer and Vice-President Sir David Wallace CBE FRS
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The Royal Society continues to follow the development of policy for radioactive waste management with considerable interest, particularly following the publication of the report by the Committee on Radioactive Waste Management (CoRWM) and the subsequent Government response. Like you, the Society regards this as a serious and urgent issue in which it is important to maintain momentum.

In our January 2006 report¹ we emphasised that this next phase of selecting sites for storage, and particularly staged disposal, is likely to be far more sensitive and difficult than the process of agreeing generic disposal options. It is vital that this is a priority for a successor body to CoRWM and that this body has the same independence and capacity to conduct engagement processes as its predecessor (CoRWM), but with enhanced scientific and technical capacity.

We have three concerns about current proposals: the institutional structures through which policy will be developed and implemented, the scientific and technological capacity of a CoRWM successor, and the timescale for determining criteria for disposal site selection.

In relation to the first, it is not clear what the reconstituted CoRWM's role would be in the policy development and implementation process. In the Government's response to CoRWM in October 2006, the Nuclear Decommissioning Authority (NDA) is identified as responsible for planning and implementing geological disposal, with the Government and NDA together developing mechanisms to engage and work with the public and stakeholders. Both national and international experience has underlined the need for bodies charged with managing engagement processes to have a degree of independence from those bodies closer to government with the responsibility for determining and implementing policy. Indeed, a recent report from the Council for Science and Technology, that has been accepted by Government, makes this very point². Particularly on the issue of site selection, which is likely to be much more sensitive than the generic disposal options considered hitherto, it is important that the roles and responsibilities of all the bodies concerned are defined clearly and transparently. The lead on engagement with communities about site selection would best be taken by an arms-length, independent body. Relationships would also need to be clearly

¹ Royal Society (2006) *The long-term management of radioactive waste: the work of CoRWM*. Policy Document 01/06 Royal Society: London

² Council for Science and Technology. 2005. *Policy through dialogue: informing policies based on science and technology*. Available online at: www2.cst.gov.uk/cst/reports/files/policy-through-dialogue/report.pdf

defined between Defra, the reconstituted CoRWM, the body responsible for radioactive waste disposal and the regulator.

In relation to the second point, our January 2006 report recommended that an independent post-CoRWM body be set up to develop a management strategy which would have a much greater scientific and technical capacity, but also have public engagement and education capabilities. We noted in the Government's response, a commitment to establishing an independent advisory committee – a reconstituted CoRWM. The draft terms of reference for the reconstituted CoRWM identify a range of skills and expertise that will be needed. We would like your reassurance that the scientific and technical expertise of the reconstituted CoRWM will be considerably strengthened, whilst maintaining the processes of societal and stakeholder engagement. We would be happy to recommend people for a reconstituted CoRWM panel and also additional experts to provide specific scientific advice during the process.

Our last concern is with the pace at which the site selection process appears to be moving forward. Whilst the identification of exclusion criteria is an inherently good approach, it has taken over four years for the relevant Japanese body (NUMO) to develop scientific exclusion criteria for Japan, and the work is ongoing. If exclusion criteria are also to be socio-economic as well as scientific, the task becomes even more complex. It seems to us most unlikely that such work can be done, carefully, robustly and credibly in a few weeks. It would also seem premature until the post-CoRWM committee has been set up. In the memorandum submitted by Defra³ to the Lords Science and Technology Committee's radioactive waste management inquiry (paragraph 18), reference is made to a phase (apparently rapid) of definition of geological criteria for sites, followed by an apparently longer term process in which the 'credentials' of any site would be established. Whilst the latter seems admirable, we are sceptical that the former should be so restricted, apparently to exclude socio-economic criteria, or that it should be hasty. Moreover, without being embedded in an engagement strategy, we risk repeating the errors of the past which implicitly assumed that the process of decision-making depended only on technical considerations.

In conclusion, I would like to reiterate our continued interest in engagement in policy development for radioactive waste management. I look forward to hearing from you on the above issues.

cc
Gordon MacKerron

³ Defra (2007) Memorandum by Defra. Available online at: www.parliament.uk/documents/upload/stDefra.pdf