

# **nuclear-waste-watch**

NGO coalition for transparency and participation in nuclear waste management

## **NGO Principles for a nuclear waste directive**

# Introduction

**Nuclear-waste-watch** is a NGO coalition for transparency and participation in nuclear waste management. The coalition begun with the cooperation of the Czech FOE-Group Hnutí Duha, the Hungarian Energy Club, Za Matku Zem (For Mother Earth) from Slovakia and the Austrian Institute for Applied Ecology (AIAE) in a four country project.

In the last two years the several organizations from European countries joined our coalition, which has now 18 members:

- Za Matku Zem (For Mother Earth) - Slovakia
- Mama Terra (For Mother Earth) - Romania
- Hnutí Duha (Friends of the Earth)- Czech Republic
- Green Circle Pécs - Hungary
- Energia Klub (Energy Club) Hungary
- Drustvo za promocijo in vzgojo za zdravje - Slovenije
- Austrian Institute for Applied Ecology - Austria
- The Planet of Hopes, - Russia
- Step Towards, (Snezhinsk) - Russia
- Chelyabinsk Public Foundation "Ecology" - Russia
- Movement for Nuclear Safety "Fatiha", (Chelyabinsk), Russia
- Nuclear Victims Organisation "AICUL" (Chelyabinsk), Russia
- ECO Counselling Center Galati - Romania
- Nuclear Information and Resource Service - USA
- Mama-86 - Ukraine
- Environmental and Cultural Centre "Bakhmat" - Ukraine
- Eco Defense - Russia

Nuclear waste is such a difficult problem that it has not been solved in the past fifty years of operating nuclear power plants. We believe that we have to find a viable solution for the waste and not leave this burden to the next generations.

We would welcome a EU - wide procedure in the form of e. g. waste directive or another type of EU wide harmonized legislation. We carefully analyzed all proposals (nuclear package) which were produced by the Commission and the Council. However, we do not consider these proposals apt to solve the problem and therefore we present the principles for a useful legislation, the 'NGO Nuclear Waste Directive'.

In many EU member states nuclear issues are not discussed in the public, the nuclear industry there has many secrets (military, business and some connected to the threat of terrorism). The nuclear industry in general is so influential, that they are not forced to take responsibility and solve the nuclear waste question or make realistic plans for finding and financing a solution.

Nuclear-waste-watch wants to point out, that huge burdens as nuclear waste and spent fuel cannot be managed without the consent of the people and that it is not enough to “inform” people, but that is necessary to really involve them. This is not guaranteed in a process where e. g. a nuclear waste state agency presents an elaborated concept and the representatives of the civil society, the interested public and regional politicians can only comment on it.

People must be convinced that the amount of dangerous waste is being kept as low as possible and that the treatment & packing technology are the very best and the selected sites are the best available. People must have the opportunity to influence the national strategy as well as the siting process.

We demand an open process: the participants define the problem with the support of experts, who were nominated by representatives of all stakeholders, and discuss and evaluate different options. We think that in such controversial issues as nuclear waste management the results of such an open process have to be taken seriously by governments.

# **NGO Principles for a nuclear waste directive**

## **Transparency and participation in the development of the nuclear waste management strategy**

Each & every country produces nuclear waste. In countries without nuclear energy programs, nuclear waste is being generated in medicine & research. Therefore all countries must develop a nuclear waste management strategy. In order to find public acceptance a public and open discussion is required:

- according to the EU directive on public access to environmental information [CD 2003/4/EC] and the directive on the assessment of the effects of certain plans and programs on the environment we demand a transparent strategic environmental impact assessment (SEA) for the nuclear waste management plan.
- the SEA process has to guarantee public information
- the SEA has to develop the management strategy, the control and monitoring system, criteria for safety and security (protection against war or terror attacks) of waste treatment facilities, storages and repositories, packaging and transports.
- the SEA has to define the criteria for the selection of potential sites and a selection process, which guarantees the involvement of NGOs and the interested public on regional and local level.

## **Participation of the region in the siting process for nuclear waste management facilities**

All stakeholders on the local, regional and political levels have to be involved when it comes to defining the criteria for finding a site for a waste treatment facility.

- the involvement of all stakeholders in the planning of the construction of a nuclear waste facility has to be guaranteed by a transparent EIA process where the inhabitants of the region and NGOs have equal opportunities to commission experts - not only in the nearest village but in the whole region.
- the acceptance in the region should be binding EU law and has to be guaranteed by a referendum in a region of a minimal radius of 30 km around the selected site (and more if the social or spatial connection requires this and even across state borders if necessary).
- to guarantee the rights of the directly concerned people it is necessary to guarantee, that the veto of the population in the nearest village overrules the voting result in favor of the nuclear facility in the region.

## **A safe and transparent waste management system in every country**

Every process which uses nuclear material creates nuclear waste with different half live. Every nuclear material turns into nuclear waste which endangers environment and people, therefore no nuclear activity can be excluded from the control; this has to be guaranteed by:

- the complete documentation of all users and all nuclear material used and delivered as nuclear waste in the country regardless of its origin. The documentation must be available to interested individuals.
- a control system and an independent regulatory authority which guarantees that no nuclear material can be removed from the waste management system.
- an agency which is capable of collecting the waste, with enough material and human resources for the storage and treatment of the different waste flows
- the state regulatory authority, which gives licenses to nuclear facilities and controls the use of nuclear material, must have enough power and resources to guarantee the safety of the waste handling inside the management system.
- the activities of the waste management agency and the regulatory authority must be well documented and transparent, their reports must be available to the state administration, NGOs and the interested public. (This can be part of the reports to the Joint convention on nuclear waste, where public access is guaranteed).
- based on the report the public must have the right to ask for further information and the authorities must be obliged to answer.

## Safe and secure containment of nuclear waste

Nuclear waste has to be isolated from the environment until the radioactive decay has reduced the toxicity and activity concentration of the waste to the natural background level. For some of the fission products this will be an unconceivable long time (the twenty-fold half life of  $^{239}\text{Pu}$  would be 500.000 years):

- to fulfill the long-term isolation a multi-barrier protection system of containments and construction of the storage system is required.
- the site of every storage regardless whether the construction is sited on the surface or embedded in the underground must be in a stable geological environment (seismically and hydrologically).
- the long isolation time needs a stable social development which can provide protection of the repository against terror and military attacks and
- cultural development requires the continuous transfer of information regarding the site and content of the repository over many generations
- in case of any accident in the storage system the retrievability of the containers should be guaranteed.

## National responsibility for the nuclear waste

Waste producing states must be responsible for the safe treatment and storage of the nuclear waste. It is irresponsible to export nuclear waste to other countries. The worst case is when a country with low democratic and environmental standards allows to deposit nuclear waste on its territory in order to make money.

- The minimization of nuclear waste. i. e. use of nuclear materials only when there exists no alternative. The biggest amount of nuclear waste comes from electricity production using the nuclear fission process.
- *nuclear waste watch* demands the phasing out of nuclear power as a precondition for the acceptance of waste storages for spent fuel and therefore we also oppose reprocessing of spent fuel and other separation processes.
- *nuclear waste watch* demands a ban on the export of nuclear waste. The solution for nuclear waste management and final storage must be as near as possible to the generator. Any nuclear transport is a risk for environment and people.
- After the phase - out of nuclear power programs neighboring countries could think of establishing a joint waste management program.

## **Polluter pays principle**

It is irresponsible to leave today's nuclear legacy to future generations to deal with. Therefore the money for decommissioning of the plants and the storage of the spent fuel has to be accumulated time ahead by adding a surcharge on the electricity price.

- A safe nuclear waste management including decommissioning of NPPs and the final storage of spent fuel require a large amount of money, this has to be accumulated by the generator of waste. The price of nuclear electricity has to cover all the external costs – that is the way to a fair competition with renewable energies.
- According to a review of decommissioning cost done by NEA these cost estimates vary widely. From today's point of view it would be wise to accumulate a sum of at least 500 million \$ for the decommissioning of a 1000 MW power reactor. This sum ensures that a reactor decommissioning can be financed without state subsidies. Additionally the costs for isolation of the spent fuel from the environment during the next 100.000 years have to be covered.