



**Submission to the:
Transboundary Environmental Public Consultation – Hinkley Point C**

By

The Secretariat of County Wicklow Public Participation Network

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Introducing County Wicklow Public Participation Network

County Wicklow Public Participation Network (PPN) was established in July 2014 under the directive of the Department of the Environment, Community & Local Government and in accordance with legislation in the Local Government Reform Act 2014 (Section 46). Public Participation Networks were established to be an independent structure that would become the main link through which local authorities connect with the community, voluntary and environmental sectors in a process to facilitate communities to articulate a diverse range of views and interests within the local government system.

Co Wicklow PPN has 200 diverse member groups, some of these groups are networks in their own right. PPN representatives serve as a voice for the community on structures including: the Local Community Development Committee; Housing & Corporate Estate Strategic Policy Committee; Planning & Development Strategic Policy Committee; Transport, Water & Environment Strategic Policy Committee; Community, Cultural & Social Development Strategic Policy Committee; Economic Development & Enterprise Strategic Policy Committee; Wicklow County Childcare Committee; Co Wicklow Children & Young People's Services Committee; Co Wicklow Local Sports Partnership; Wicklow County Tourism Board; Co Wicklow Volunteer Centre and Co Wicklow Joint Policing Committee. PPN Representatives strive to ensure that the needs of the community sector are prioritised within local policy processes.

Context

Co Wicklow PPN was contacted by the Irish Environmental Network with information relating to the Transboundary Environmental Public Consultation – Hinkley Point C. Following this Co Wicklow PPN in collaboration with the IEN ran a public information meeting in Wicklow Town on Tuesday 10th April 2018. This submission is made on the information and research made available at this meeting and highlights the concerns of the Secretariat of Co Wicklow PPN.

Specifics

- The UK is proposing to build 8 new Nuclear Power Plants. Four of these proposed sites are on the west coast of Britain namely Sellafield, Heysham, Wylfa, Oldbury and Hinkley Point C.
- The extension of the operating life of older plants is also being considered.
- The expansion for the programmes advanced without any solutions to nuclear waste.
- Proposals are now being considered for Geological Disposal Facilities both underground and sea. Consultation with communities “willing to participate in the siting process for disposal facilities” specifically includes Northern Ireland

Consultations

- Under the Aarhus Convention – Ireland has the right of “Access to information, Public Participation in decision making and Access to Justice in Environmental Matters”
- Under the Espoo Convention – Ireland has the right to be consulted in relation to any “Environmental Impact Assessment in a Transboundary context”
- The basis for transboundary consultation is as follows: the state of origin determines there is a risk of impacts OR another state requires to be consulted regardless of the state of origins assessment of the risk

- Following court challenges by individuals and organisations including An Taisce and Friends of the Irish Environment, UN committees found the UK non-compliant in relation to transboundary consultations
- While Germany, the Netherlands and Denmark have been proactive in facilitating public consultation, only following an Espoo letter dated 22nd December 2017 confirming the right of the Irish Public to be consulted was a consultation opened on 20 February 2018. The consultation closes this Tuesday 17th April 2018.
- Other consultations are currently underway and have not been formally notified to the Irish public including: Consultations on Geological Disposal (open in Wales and Northern Ireland up to 19th and 20th April respectively); Consultation on the national policy statement regarding Geological Storage. A consultation for siting new plants for deployment post 2025 has closed and is a missed opportunity.

Concerns in relation to the siting of Nuclear Power Plants and Waste Disposal

- The UK's position on Hinkley is that licensing and monitoring of conditions are effective, and impact will not be significant (Ref: screening statement transboundary impacts). "Such accidents are so unlikely to occur it would not be reasonable to "scope in" such an issue for environmental impact assessment purposes" (Ref: Secretary of State Decision Letter). This implies that accidents don't happen. 3 Mile Island 1979, Chernobyl 1986, and Fukushima 2011 contradicts this supposition.
- The Planning Inspectorates screening acknowledges Ireland as the nearest state to the Hinkley Point site yet it was excluded in the Article 37 assessment.
- Following the Chernobyl accident radio-active particles were found in Galway, Mayo, Sligo and Waterford. Particles were found in foodstuffs including milk and upland sheep were particularly affected.
- Concerns set out in the submission from Nuclear Free Local Authorities which highlights health concerns in relation to the normal operational emissions from Hinkley Point C
- The failure to adequately consider worst case scenarios for Ireland in the event of an accident
- The validity of model-based approaches used to estimate the transport potential of effluent to Ireland
- The adequacy of calculations of risks associated with climate change particularly in relation to flooding and atmospheric dispersion. N.B. loss of power through flooding was the primary cause of Fukushima
- The Proposed Nuclear Power Plants in the UK Potential Radiological Implications for Ireland RP11 report assumes mitigation by sheltering i.e. staying indoors. How realistic is this? For how long? What about access to food and drink particularly as Ireland's water facilities are uncovered? What about farm animals and agriculture?
- In 2015 licenses for 159 blocks, including areas around Hinkley, were granted for fracking (unconventional gas exploration). Fracking has been confirmed as a factor in provoking earth quakes. Earth quakes could cause a nuclear accident
- In December 2017 The Guardian reported an increase of terrorism arrests (by September) of 54%. What would be the impact in Ireland if terrorist activities were directed at nuclear plants?
- An Irish Times Article reported that the HSE has stated that Ireland has no capacity to deal with a nuclear incident
- A 2016 report by the ERSI suggests that the potential economic impact of a nuclear accident in Ireland could cost the county in excess of 161 billion Euro and wipe out agriculture.

- Professor John Sweeney, NUIM believes the transboundary impact screening to date is flawed
- Ireland's capacity, readiness and response times to deal with an emergency
- As Ireland is not a nuclear nation does it have the ability to independently assess the adequacy of UK proposals?
- The impact of Brexit and the UK withdrawal from the Euratom Treaty which is concerned with matters like nuclear safety, waste and transport of nuclear materials.

Concerns in Relation to Consultation and the Democratic Process

- The Department of Housing's website states that each local authority received a letter on this subject on 28th July 2018. However, it was the Irish Environmental Network which highlighted the consultation process to Co Wicklow PPN and Co Wicklow PPN Representatives report that the issue was not raised at any of the Strategic Policy Committees on which they sit.
- The Secretariat of Co Wicklow PPN is concerned that rights to consultation under the Espoo Convention and the Aarhus Convention were not extended to the Irish public in the ethos in which these conventions were developed.
- Consultations on Geological Storage of Radioactive waste concludes on 19 April 2018. The Republic of Ireland has not been included in this consultation process
- As one of the UKs closest neighbours, the Irish public should be consulted on any developments in the UKs nuclear programme from the initial planning stage.
- The Secretariat of Co Wicklow PPN would like to highlight the key considerations for consultations: early participation "when all options are open", effective consultation – allowing communities time to digest information, research possible impacts/concerns and formulate a response

Expectations

Taking the above information and concerns into consideration the Secretariat of Co Wicklow PPN is requesting that government departments, state agencies, Ministers, TDs and elected representatives proactively facilitate the following:

- Early and effective engagement with any proposals for nuclear programmes that have even the slightest chance of impacting on Ireland
- Proactive policies and action to ensure the Irish public interests are addressed and our right to be consulted is vigorously upheld
- The Irish Government still has a course of action to use in order to gain an extension for the consultation on behalf of the Irish public – please use it.
- Examination of Ireland's capacity to respond to consultations of this type and the rectification of any shortfall
- Examination of Ireland's capacity to react to a nuclear accident.

The Secretariat of Co Wicklow PPN would also like to adopt the concerns set out in:

- The submission made by the ELIG at the IEN team
- The submission made by the Environmental Pillar