

# **DTI consultation: Policy framework for new nuclear build (July 2006)**

## **A response from Friends of the Earth Scotland**

30 October 2006



### **1. Introduction**

Friends of the Earth Scotland (FoES) is an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability. This response represents the views of Friends of the Earth Scotland.

### **2. Summary of main points**

- There is no need for new nuclear build in the UK
- The Government's position on need has not been arrived at properly or impartially
- It is wrong for the Government to propose that arguments around the issue of need, and other key factors, be excluded from the Public Inquiry process
- In doing this, the Government is undermining the Public Inquiry process in the same way that the proposed reforms to the National Planning Framework in Scotland will.

We wish to register our strongest objection to the proposals being made by the Department of Trade and Industry on the policy framework for new nuclear build.

### **3. Specific comments**

#### **3.1. Public Scrutiny**

We believe that it is unacceptable that the Government is proposing no cross-examination or opportunity to present evidence at a Public Inquiry on any of the key issues of need, justification, safety, appropriateness of site, environmental and human health protection or security of nuclear power. We believe that in doing this, the Government would be acting in a way that would allow the nuclear industry to avoid full and independent scrutiny of these vital issues which underpin decisions on new nuclear build. It will also undermine the very important role of the Public Inquiry.

#### **3.2. Nuclear Power**

FoES position on nuclear power is in clear opposition to that of the Government. We believe that there is no case for new nuclear build and that nuclear power is an unsafe, unwanted and an unnecessary way to address climate change. Nuclear power also leaves future generations a legacy of deadly radioactive waste to deal with. Investment in energy conservation and renewables is safer, faster and more effective than nuclear. As a means of solving climate change and improving energy security nuclear power is a 'white elephant'.

**Friends of the Earth Scotland**

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### **3.3. Impartiality**

We believe that the Government's position on new nuclear build has not been arrived at properly or impartially and that the proposals in this consultation perpetuate that. The Scottish Executive proposals to reform the planning system in Scotland also suffer from the same flaw. Under similar proposals currently going through the Scottish Parliament, changes to the National Planning Framework would mean that Scottish Ministers could make decisions on new nuclear build without independent scrutiny and against the will of the majority of the Scottish population, who are still against nuclear power.

### **4. Energy White Paper**

The 2003 Energy White Paper found no case for new nuclear build in the UK, in the main due to the problems of economics and waste. The 2006 Energy Review was widely perceived to have been based on a foregone conclusion by the Government in favour of new nuclear build. It has been suggested, indeed, that the Energy Review was conducted in order for the Government to be able to formally state this revised position in favour of nuclear power. Therefore, Friends of the Earth Scotland believes that this current consultation is based on the selective interpretation of responses made to the Energy Review that the Government have then used to support its already decided position.

We trust that you are able to take these comments into account.

For further information please contact:

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