



NFLA response to NuLEAF report – ‘Response to changes in the policy landscape’

1. Background

The UK and Ireland Nuclear Free Local Authorities (NFLA) is the oldest nuclear policy group in local government, originating in November 1980. It is headquartered in Manchester with member authorities in England, Scotland, Wales, Ireland and Northern Ireland. Our remit is wide considering most aspects of nuclear policy – nuclear legacy management, radioactive waste management, nuclear safety, nuclear emergency planning, discussions over new nuclear, the impacts of low level radiation on health, the alternatives to nuclear power in tackling the climate emergency and reaching a net zero carbon economy, and encouraging the non-proliferation and abolition of nuclear weapons.

NFLA takes a sceptical approach to nuclear power and nuclear weapons and has consistently done so in its 41 years history. It is vocal on these issues and has a consistent approach backed by a series of environmental principles. The energy debate has ebbed and flowed in that time, and it will continue to do so.

When our host authority, Manchester City Council, was approached by Cumbria County Council and Copeland Borough Council in 2003 to consider joining with them in an approach to the Local Government Association - in order to create a Local Government Association (LGA) Special Interest Group on nuclear legacy management - it came at a time when new nuclear was firmly off the UK Government’s agenda. In a careful consideration of that offer within Manchester City Council and the wider NFLA movement, it was agreed that, whilst we may disagree on new nuclear, we share a common desire to resolve safely issues around radioactive waste and nuclear decommissioning. It was in that spirit we agreed to the request to join in the process that led to the creation of NuLEAF.

Over the 18 years that NuLEAF has worked on nuclear legacy issues, Manchester representatives and NFLA members have been broadly supportive of much of its work. Two of the three NuLEAF Secretaries have been previous NFLA Secretaries. The nuclear legacy policy field remains intensive and there are adequate resources for NuLEAF to fulfil its current mission. The possibility of a new process around a deep radioactive waste repository – where there will be a wider range of views amongst NuLEAF members – will likely add to the Secretariat’s heavy workload, hence why it has received increased resources from the RWM and NDA. Bringing new nuclear into its remit would not only significantly reduce consensus in the group, but it could come to dominate debate within meetings and to its overall workload, to the detriment of working on the nuclear legacy matter.

2. A changing context

It has been UK Government policy since 2008 to develop new nuclear, so NFLA have to ask the question why is this matter really coming to the fore now? It should be noted that in 2008, UK Government policy was for at least 8 large new nuclear reactors to be built. Since then, cost challenges have seen the demise of Sellafield Moorside, Wylfa and Oldbury with little being said about Heysham or Hartlepool. Hinkley Point C is being constructed but considerable doubt remains over whether EDF has the financial resources to complete the development, given its level of indebtedness and the huge costs of decommissioning its own French fleet, as well as the embarrassing delays at Olkiluoto and Flamanville. At Sizewell C, whilst Suffolk County Council has said it is in principle supportive of it, within the planning inquiry it has said it has deep reservations with much of the EDF project. The local council where Bradwell is located has opposed even early developments on the site.

In terms of small modular reactors, whilst there is much political support from the UK Government, there remains major financing and technical questions over the project. Rolls Royce tabled a £4 billion loss in the most recent financial year and financial giants like Aviva, Prudential and the Asian Development Bank have recently noted their scepticism about funding such projects. At best, such developments will only start getting built in the mid-2030s and at huge expense, when we should be dealing with the essential issues of the climate emergency now and over the next 15 years.

At the same time, renewable energy costs have plummeted, and smart energy and energy storage issues remove the issues around baseload power. Councils can also play a huge role in this endeavour, and with over 75% of Local Authorities having passed climate emergency resolutions, decentralised energy could play a major part in moving towards net zero. Instead of seeing new nuclear as a 'transitional' power source, the dramatic improvements in a range of renewables means what limited resources there are should be prioritised solely on them in conjunction with energy efficiency; with energy storage and smart energy back-up.

Pro-nuclear commentators may challenge this narrative, but is NuLEAF the body where such a debate will be the dominant theme at meeting after meeting? That is why we have never sought to bring such issues to the forum. All the issues noted by the NuLEAF Secretary in his paper are considerable bodies of work and there are, as the report notes, two distinct and existing local government groups already actively focused on them.

3. Nuleaf's constitutional position

NFLA read the NuLEAF Secretary's reference to the existing constitution as suggesting it potentially provides a way into a much deeper consideration of new nuclear issues. NFLA do not, and never have, seen it in this way. The NuLEAF constitution was drafted to recognise developments in the nuclear sector that could impact on decommissioning and legacy waste management (like, for example, future site uses) so as to ensure 'future proofing' of NuLEAF legacy work, not for providing an opening to promote new nuclear. That is why Manchester City Council representatives, with the support of the NFLA, permitted its inclusion in the constitution.

In the case of proposed new nuclear, there would be extensive new forms of radioactive waste created should they be developed, and our support of NuLEAF is solely focused on dealing with the existing nuclear legacy, not adding to it. Whilst there remains no permanent solution to dealing with the existing legacy, Manchester and the wider NFLA movement do not want to be actively considering such matters in the NuLEAF fora, given that there are alternative bodies those Councils who wish to can already join.

4. Views of members

We raise the question on whether the entire NuLEAF membership has been asked for its views on this matter. Apart from the 15 contributing members, there are around 90 other corresponding members that should be consulted upon. There is likely to be a wide range of views amongst this wider membership and we expect that most would be happy to see NuLEAF stick to its existing remit.

5. Proposed options

Manchester and NFLA members firmly support Option 1. In our view, the other options are divisive and will weaken NuLEAF as a consensual group that has wide support from across local government.

In our view option 2 is not realistic because there is already a huge workload for the NuLEAF secretariat on the current decommissioning and legacy agenda, and without a substantial increase in resources (at least another officer and additional administrative support) the Secretariat could not deal effectively with this increased work programme. In addition, NuLEAF's existing nuclear legacy work would be diluted by the time and effort demanded from new build. Without more funding we think merging legacy and new build will just mean less of both for NNLAG and NuLEAF, as well as potentially antagonising those local authorities who firmly support NFLA policy work. There will be no saving for council's who fund both groups. If they pay less, they will get less.

Option 3 is flawed in exactly the same way.

If Options 2 or 3 are considered and agreed upon, then Manchester City Council and NFLA members would have to reconsider their membership of NuLEAF. The loss of this part of local government would be a loss for NuLEAF as well, and we also believe for the LGA, RWM and NDA.

6. LGA views and the views of the funding agencies RWM and NDA

Following detailed discussion on this matter in Manchester City Council, it has decided to write to the LGA to get its view on these matters. The letter also raises concerns over bringing these issues into NuLEAF's agenda, when the bulk of its funding (if not essentially all of its funding) comes from publicly funded agencies whose remit is to deal with the nuclear legacy, and not to facilitate new nuclear. The LGA is likely to want to see its special interest groups remain consensual in nature.

The bulk of NuLEAF funding comes from RWM and NDA. We would question if it is in either of their remits to legally fund a joint NNLAG and NuLEAF secretariat. We will seek clarity from the two organisations on this matter in order to understand how a public-funded legacy organisation can support a local government group that would support new forms of highly radioactive waste. We expect NDA and RWM do not fund the NNLAG group, and I expect they would not want to see local government's consensus on nuclear legacy breakdown. The nuclear legacy debate is at a critical juncture, and NuLEAF Secretariat staff have enough to get on with in monitoring and influencing this debate. Let NFLA and NNLAG do the monitoring and influencing of the new nuclear debate separately – it has worked well to date, so why change it?

Report developed for Manchester City Council and the NFLA Secretariat
25th May 2021