

Talking Nonsense – The 2007 Nuclear Consultation

September 2007

Introduction

In 2006 the Government initiated an Energy Review with the aim of producing a new Energy White Paper by the end of that year. The issue of whether or not the UK should build new nuclear power stations was high up the agenda. However, the way in which the Government then proceeded to consult on nuclear power drew heavy criticism from a range of parties (including the Trade and Industry Select Committee, the Environmental Audit Committee, the Environment Agency and the Sustainable Development Commission). It looked as though the Government had already made up its mind on the issue of nuclear power and the consultation was mere window dressing. It was light-weight and full of misleading information. Fundamentally the process was not viewed as being the “fullest public consultation”¹ that the Government had promised to conduct in 2003 before giving the go-ahead on new nuclear power.

On this basis, last summer Greenpeace challenged the legality of the Government’s conclusion - that nuclear power had a “role to play” in the UK’s future energy supply. On 15th February 2007 Mr. Justice Sullivan found in favour of Greenpeace and ruled that the Government’s pro-nuclear decision was “unlawful.” In his Judgment he described the consultation as “seriously flawed” and “manifestly inadequate and unfair”² because insufficient and “misleading” information had been made available by the government for consultees to make an “intelligent response”.

As a result the Government was obliged to re-consult *comprehensively* on nuclear power prior to making decisions to allow or support new build. Consequently, in May 2007 the Government launched this new consultation, “*The Future of Nuclear Power: The role of nuclear power in a low carbon UK economy*,”³ to seek “views on the information and arguments set out on whether the private sector should be allowed to build new nuclear power stations.”

As a matter of law the Government must keep an open mind on new nuclear power until after the “fullest public consultation.” It claims that it “will consider carefully the responses we get and this will enable us to take a decision on nuclear power later in the year.” While the NGOs have always been absolutely committed to taking part in a balanced and open consultation that will actually shape policy, it is has now become clear that the Government has already made up its mind on building new nuclear power stations and that this new consultation is nothing more than an expensive and time consuming sham. It is for this reason that Greenpeace and other leading NGOs have decided to pull out of the consultation process.

Overview

- The consultation is a public relations stitch-up designed to deliver a pre-ordained policy on new nuclear power. Gordon Brown has to take responsibility for the lack of faith in this consultation – as he said in July that the Government has already made up its mind on new nuclear.
- If the Government was serious about running a full and open consultation it should listen to the advice of its own environmental watchdog the Sustainable Development Commission (SDC) which is that nine months should be given to a consultation. In a meeting with the officials from the Department of Business, Enterprise and Regulatory Reform (BERR) on 25th April 2007 several green groups (including Greenpeace, Friends of the Earth, WWF and the Green Alliance) expressed their full support for the SDC’s recommendation that 9 months is the minimum required for full and proper consultation.

- The new consultation is little different from the Government's previous attempt at a nuclear consultation, which the High Court described as "manifestly inadequate and unfair."
- It has been designed to skirt over the many negative aspects of nuclear power such as the full costs of new build (including the risk to taxpayers of subsidies), the many unresolved problems that the radioactive waste from new build will create, and how little nuclear power will do to help cut carbon emissions and guarantee energy security.
- The High Court said a proper consultation must be clear, fair and provide enough information to allow people to make an intelligent response and the Government is obliged to take full account of people's responses *before* deciding policy.
- This consultation is palpably none of these. The process has been unnecessarily rushed, seemingly because of the timeline demanded by the nuclear industry, while the material produced for public consumption contains glaring factual inaccuracies, errors and omissions and is little more than a pro-nuclear polemic.
- Greenpeace and other NGOs were fully committed to being involved in an open and honest consultation so long as the Government's view on nuclear power was preliminary and that all the materials provided to the public were accurate and balanced. Greenpeace, along with many others, have been closely involved with the consultation process, but despite our efforts, it is now clear that this consultation is a sham.

Why are NGOs withdrawing from the consultation?

Greenpeace and other NGOs, along with many individuals, were committed to enter fully into a genuine consultation process on nuclear power and have been closely involved in trying to shape how it would look and operate. We made it very clear to the Government on numerous occasions that we felt there were significant problems with the consultation as it was being developed. We made a genuine attempt to improve the Government's plans for the consultation by suggesting how it could be made longer, fairer and more balanced.

Despite our efforts, it is clear that this is a nuclear consultation in name only and today we have decided to withdraw our support for the process. The following points explain the main reasons why this decision was reached.

1) Gordon Brown has already made up his mind to support new nuclear reactors

The nuclear consultation document says that the Government has "reached the preliminary view that private sector energy companies should have the option in investing in new nuclear power stations."⁴ Whilst it is reasonable for the Government to have an opinion on the supposed benefits of nuclear power, it is now clear that these views are set in stone, with little coverage or discussion in the consultation being given to the disadvantages of nuclear – which have either been downplayed or totally ignored.

Historically, the Government has been very vocal in its pro-nuclear stance. When Prime Minister, Tony Blair said that nuclear power is "back on the agenda with a vengeance"⁵ and, the day after the court's judgement on the original consultation, that the decision "won't affect the policy at all...If we don't replace the existing nuclear power stations then I cannot see how we are going to meet our climate change targets."⁶ Ex-DTI Minister Alistair Darling appeared to pre-empt the outcome of the current consultation when he said in May 2007 that "I believe that nuclear ought to

be part of the mix...we've got to strike a sensible balance and I think including nuclear as an option would do that."⁷

In the middle of the consultation period, Prime Minister Gordon Brown told Parliament "that is why we have made the decision that we will continue with nuclear power, and that is why the security of our energy supply is best safeguarded by building a new generation of nuclear power stations"⁸ The following week, after Greenpeace lawyers reminded the government of its legal obligation to consult, Labour MP Jamie Reed (a former Sellafield press officer) asked a planted question to which Brown gave a prepared answer, saying he'd only decide policy after the consultation. The episode laid bare the reality – that policy was fixed and the consultation a sham. Brown's original statement pre-judged the whole consultation and totally undermined the impression that the Government has an open mind on the future of nuclear in the UK.

The consultation started with the Government stating it has a preliminary view in favour of new nuclear power, arguing that new nuclear is needed but without providing credible evidence to back this up. Many of the responses to the 2006 Energy Review showed however there are several other ways to reduce CO2 emissions from the UK electricity generating sector without the need for new nuclear. The same responses also explained that new nuclear in the UK would crowd out investment for energy efficiency and renewable energy, and that a way to safely dispose of nuclear waste has still not been found yet, a view supported by the SDC.

2) *Timing*

The consultation process is being unnecessarily rushed and the period of time given to discuss the future of nuclear power is completely inadequate. The SDC suggest that "at least nine months should then be set aside for a range of much more substantive consultative and engagement processes"⁹ but the Government has refused to allow this. Officials have conceded that the "rush" is linked to industry concerns getting new reactors built to their own timelines. EdF Energy have said that its "aim would be the first concrete being poured in 2012"¹⁰ and in April EdF's CEO claimed: "2007 is critical. Some element of new legislation will have to be prepared and ready for the new parliament session of 2007-08."¹¹ So, it seems the Government is rushing this consultation through to help potential nuclear operators stick to their schedules.

The NGOs entirely agree with the SDC's conclusions and repeatedly told the Government that the consultation period is far too short – for instance in a letter to Alistair Darling on 22nd March 2007 and in a meeting with the then DTI on 27th April. The nuclear consultation began on 23rd May 2007 and will end at 9pm 10th October 2007, a period of less than five months. Whilst this is slightly longer than the longer than the *minimum* recommended legal limit of three months¹² it is nowhere near sufficient time to properly consult on such a technically complex issue as nuclear power – and an issue which has long lasting ramifications because of the highly radioactive waste reactors produce.

Further, given that much of the consultation has taken take place during the summer holiday period, it is not hard to appreciate the general concern that insufficient time has been allotted to properly consulting with the public. Finally, this consultation is running in parallel with a number of other major consultations, not the least of which is on nuclear waste itself. In informal discussion, officials from the Nuclear Decommissioning Authority (NDA) have said that they believe the amount of consultation could not only lead to 'consultation overload' but also that legal challenges might be possible on the basis that too much is being done at the same time which would mean a proper consultation does not take place on either issue.

3) Public “stimulus” materials

The Government has employed public engagement firm Opinion Leader Research (OLR) to write a stakeholder briefing pack on why the UK needs to look again at nuclear power, which is meant to inform members of the public about the various issues associated with nuclear. This document is fundamentally flawed and cannot form the basis for a full or informed public consultation.

Greenpeace, with other NGOs, trade unions, renewable energy companies and representatives of the nuclear industry met with OLR and the Government on 13th July to discuss this stakeholder briefing pack. This document was full of pro-nuclear opinion masquerading as fact. For instance, it claimed that “the main disadvantages of renewables are...they all have various environmental impacts such as the amount of land they take up,” but added that “the main benefits of nuclear power...it is substantially cheaper than wind generation.”

Attendees to this meeting were then given *two days* to make comments on it, completely insufficient time to be able to respond fully to the huge number of errors and pro-nuclear assertions being made in it. Although asking for comments on complex materials like these during the height of the summer holiday period is one way to guarantee that a full response will not be forthcoming, Greenpeace contacted the Government on 18th July with its initial views on the document, telling them that we were dismayed at how bad it was. Greenpeace was appalled that it contained unqualified statements such as that in the backgrounder that “[an option for dealing with spent nuclear fuel] is to simply store or dispose directly of the material in its entirety,” – a very misleading sentence because no packaged form of spent fuel cleared for disposal, and no facility for spent fuel disposal, exists in the UK. It was exactly these types of inaccurate and incomplete statements in the 2006 Energy Review document that made the process unlawful.

The stakeholder briefing pack fundamentally reproduces the same mistakes. In the section on nuclear waste, where some qualifications could have been made on what might happen to new build spent fuel no effort is made to actually explain that disposal options and plans are just that – options and plans. That no spent fuel has actually been disposed of anywhere in the world is not mentioned, giving the impression that this is an option that could readily be implemented.

On 10th August the Government sent round the second iteration of the stakeholder materials. This was the final opportunity green groups had to comment on them. The documents still contained similar mistakes to the first iteration. One of the “advantages” of nuclear power remained that “it is substantially cheaper than wind generation.” (*Stakeholder materials – Reference Sheet 3: The main benefits and disadvantages of the different electricity sources*). Yet the Government’s own Performance and Innovation Unit found that the cost of wind energy is in fact competitive with nuclear.¹³ But this was never mentioned. The stakeholder materials mention nothing about the billions of pounds that it will cost to decommission new nuclear power stations and deal with all their waste, saying merely that waste has “associated security risks and storage challenges” (*Stakeholder materials – Reference Sheet 3: The main benefits and disadvantages of the different electricity sources*). As the British Wind Energy Association note, wind power is certainly economic when compared to nuclear “even before any environmental costs of nuclear power are taken into account...once the wind farm is in place, there are no fuel or waste related costs.”

On the issue of nuclear waste the new materials said that “on one hand, new nuclear build would increase the legacy of waste for future generations. On the other hand, not allowing new nuclear power stations could lead to higher CO2 emissions which contribute to climate change.” Yet the Nuclear Consultation Document (paragraph 91) clearly says The Committee on Radioactive Waste Management (CoRWM) considered that “should a new build programme be introduced...it would require a quite separate process to test and validate proposals for the management of wastes arising.”

The stakeholder briefing pack remains wildly different from the official nuclear consultation document. For instance it doesn’t even ask the same questions, despite the Government claiming

on the consultation website that “discussion at the events will address the same key questions in the consultation document.” The nuclear consultation document says that its aim is:

- “To provide the government with information which will help it to take the decision on whether or not to allow energy companies to build new nuclear power stations in this country” (page 3)
- “To ask whether it is in the public interest to allow energy companies to invest in new nuclear power stations” (page 3)
- “To ask whether preventing energy companies from investing in new nuclear power stations would increase the risk of not achieving our long-term climate change and energy security goals, or achieving them at a higher cost” (page 11)

Yet the questions asked in the final version of the stakeholder handout we saw are:

- In the context of tackling climate change and ensuring energy security do you agree or disagree that it would be in the public interest to give energy companies the option of investing in new nuclear power stations? (*Stakeholder materials – Participant Handouts 1*)
- Are there any conditions that you believe should be put in place before giving energy companies the option of investing in new nuclear power stations? (*Stakeholder materials – Participant Handouts 1*)

The public has been further deprived of relevant information, as revealed in an interview with Energy Minister Malcolm Wicks when he disclosed that “civil servants were doing preparatory work on alternative strategies should nuclear be rejected.”¹⁴ This second strategy, dubbed Plan B, was not previously flagged in the consultation. Freedom of Information requests have been made for detailed information on the ‘alternative strategies’ civil servants are now working on.

We believe that an open and balanced consultation should give equal air time to all possible alternative ways to reduce the UK’s carbon emissions and guarantee energy security, such as with renewables and without new nuclear, as well as with a status quo energy mix. This has not been the case. The document is a mish mash of unqualified and inaccurate statements.

4) Government delays

Despite entering into the consultation with the best of intentions, and having spent a great deal of time reading and commenting on materials, NGOs and individuals faced unnecessary delays in getting responses back from the Government on critical issues around the consultation. Given the ludicrously tight timeframe in which we have had to operate, these delays added significantly to the impression that the Government was not serious about consulting openly and fairly.

Specific examples of delays include the following:

- On 25th April 2007 NGOs met with the Government and asked then to see a draft of the consultation materials. The DTI agreed to “to take away and consider whether it is possible to share a draft of the consultation” but decided that it was not.
- On 8th June 2007 NGOs received an email from the Government saying that the arranged Nuclear Stakeholder Meeting on 18th June was being “delayed.” It wasn’t rearranged for nearly a month.

- On 30th July 2007 Greenpeace emailed the Government to ask for an update on how the stakeholder materials were being re-drafted. No response was ever forthcoming.
- On 7th August 2007 an email was sent to the Government asking for copies of all the comments made on the stakeholder materials (by NGOs and industry) as tracked changes), as well as information about how the consultation website will look and the terms of reference for the companies the Government employed to run the consultation. A response from the Government was received on 9th August that said they had "have reviewed your request for information but unfortunately will not be able to respond within the timetable you have suggested. We will respond to you as soon as possible." No further response has been forthcoming.
- On 20th August 2007 Greenpeace were promised a copy of the nuclear film (and script) produced by the Government to show members of the deliberative events by 31st August. This has still not arrived.

5) Consultation Website

NGOs asked that the Government post all submissions to the consultation on their website when they are received, rather than at the end of the process (if at all) to facilitate an open, full and transparent consultation. They said no, adding that some people could choose to remain anonymous and that the only way the public might be able to get hold of this information in future is via a Freedom of Information request - and presumably only if that was acceded to. This is plainly unacceptable especially considering how even the deeply flawed debate on GM crops met this basic requirement.

6) Regional Consultation Events

National NGOs also received information from groups which have attended the smaller, regional events that the Government organised. CND Manchester has written to say that the results of a straw poll at the Manchester meeting (which was attended by many (paid) industry representatives and only a small number of NGOs) were used at a later stakeholder meeting in Cambridge by Government officials to give the impression that those attending the Manchester meeting were all in favour of nuclear new build. This despite the fact that CND Manchester had cautioned the Government officials at the meeting that such a 'poll' should not be used to influence the debate in future as it was manifestly inappropriate.

7) Regional Deliberative Events

The Government is hosting a number of regional deliberative events across the UK for members of the public "to input their considered and informed views" on nuclear power. It is claimed these will allow the Government "understand the views of the public after they have heard the key facts and arguments in the consultation."¹⁵

Around 1000 members of the public have been invited to these events, which will take place at around 9 venues on Saturday 8th September 2007. They will last for only 1 day. During this time people are expected to watch a film and then read about, digest and then discuss a hugely complex issue like nuclear power. Recruitment for these events has been "through direct invitation of randomly selected households on selected electoral registers," although no specific explanation of how this was done has ever been given by Government.

These are certainly not the citizens' juries that Gordon Brown has been so keen on recently. In true citizens' juries members of the public are allowed to ask whatever questions they want and to

invite witnesses from wherever they want. The deliberative events in the nuclear consultation are worlds away from this approach. Even though OLR admitted in private that they did have time enough to organise proper citizens' juries, it seems that the Government decided they didn't want them. This is not a good start for Gordon Brown's much vaunted "new" type of politics.

8) Economics of Nuclear Power

The Judicial Review said that "the contrast between the paucity of the information provided to consultees on the issue of economics in the 2006 Consultation Document and the wealth of highly-detailed information on the critical issue of cost-benefit analysis considered by the defendant but not published until after (and in some cases well after) the consultation period had closed, could not be more striking." This still remains the case, with essential information still being withheld by Government. How can the public make a fair assessment of new nuclear power without this information?

In addition, there is nothing in the document on alternatives to nuclear power like renewables, increased efficiency and decentralised energy, even though Malcolm Wicks recently talked about having a "Plan B" for non-nuclear energy scenarios.¹⁶ There is no real evidence of the possibilities of alternatives to nuclear in this consultation. It is all about one thing – more nuclear power.

9) Nuclear waste

In the Judicial Review ruling reference was made to the "thumbnail sketches" of the two critical issues of economics ("cost") and waste ("including decommissioning and long-term waste management"). These were so devoid of content that they could not realistically be said to have told consultees what the Government's proposal were, much less to have told them "enough ... to enable them to make an intelligent response."

The Judicial Review decision noted "when dealing with the issue of waste, the information given in the 2006 Consultation Document was not merely wholly inadequate, it was also seriously misleading as to CoRWM's position on new nuclear waste." We raised this issue – again – with Government officials in email of 18th July 2007. The first draft of the stakeholder document included misleading and inaccurate statements such as, "for longer term waste management, the Government has accepted the recommendations of CoRWM that higher activity waste should be safely stored then disposed of in a geological repository."

This is a corruption of what CoRWM actually said in its lengthy report and recommendations¹⁷ – in which the Committee was quite clear about the difficulties of the ethical, financial and social impact of new build waste and acknowledges new build wastes would have also have an impact on the timing of a waste repository and its closure. Yet, even these simple 'headline' points were not raised in the stakeholder briefing papers. Once again the Government has chosen to simply role the issue of new build waste into the processes' recommended for dealing with existing nuclear wastes. It was exactly this type of brief, unqualified statement, of which so many were included in the January 2006 consultation document, that led to the process been judged to be unlawful.

10) DEFRA Managing Radioactive Waste Safely consultation

On 22nd June 2007 the Government's Managing Radioactive Waste Safely (MWRS) consultation began to seek "views not only on the technical aspects of developing a disposal facility, but how we can engage most effectively with those communities that might have a potential interest in hosting the facility."¹⁸ The MWRS consultation runs until 7th November 2007, almost a full month

after the nuclear consultation finishes. This means that a key area of concern over new nuclear plants (namely what to do with all the waste they create) will be decided once the nuclear consultation has finished. This is entirely unacceptable – how can people make a decision about allowing more nuclear plants, and so more radioactive waste, when the consultation to deal with all the existing nuclear waste hasn't even finished?

This decision is completely baffling. At a meeting NGOs had on 25th April 2007 with Government officials we explained the need for the MRWS consultation to come before the nuclear consultation. This has obviously not happened. The nuclear consultation document says that the consultation is being extended in order to take into account views expressed by those responding to the waste consultation. Yet this means – as with the nuclear power consultation – that only officials will see responses and not the public.

In addition to the problems of the timing of these two consultation exercises, the timing of the MRWS consultation has itself been criticised by the House of Lords Science and Technology Committee, who said it pre-empted the establishment of the new Committee on Radioactive Waste Management¹⁹ and that the rush to finalise the consultation may be seen as being done in order to facilitate new build.

11) What is “full share” of nuclear waste costs?

In response to Freedom of Information requests, the Nuclear Decommissioning Agency has written to say that it cannot offer a definition of ‘full share’ for future nuclear waste costs and that it will be the Government that will decide on the costs of whatever new build operators pay for wastes. The Government has prevaricated on this issue and has said that what constitutes ‘full share’ has not yet been determined - even though it should have been put forward as a clear proposal before the nuclear power and waste consultations took place, so that the public has a firm suggestion to respond to.²⁰ A response from BERR to a Freedom of Information request from Greenpeace on ‘full share’ is equally vague on this important matter. Similarly, how the Government will “ensure” that the nuclear industry provides sufficient funds for new build waste has also been put off for future legislation, with only minimal views on this provided in the nuclear consultation paper.

12) Pre-licensing of new reactors

The first stage of the Generic Design Assessment Process for new reactors, commonly known as pre-licensing, has already started.²¹ Although the Government insists the costs of this process rest with the applicant, allowing it to start before a clear policy decision is made (after a full and open consultation) on new nuclear build has led to increased cynicism amongst the public that the consultation is simply a rubber-stamping exercise. It is a move that has most certainly given comfort to the nuclear industry.

12) Nuclear Industry Lobbying

The consultation with the public over new nuclear power stations may have been “misleading, seriously flawed, manifestly inadequate and procedurally unfair” according to the High Court – but energy companies have had a different experience in getting their views heard at the highest levels of Government. According to recent reports in *Private Eye*, senior executives from the energy company EdF met officials at the Department for Trade and Industry once a month last year to discuss new nuclear power. Attendees at some meetings included EdF's chief executive and the Energy Minister, but the Government has refused to reveal what was discussed, who else was present or release any minutes – even though it admits that “consideration of industry

views on nuclear policy has been key in helping to influence Government thinking on nuclear policy".

When the Energy Review announced the Government's intention to support a new generation of reactors in July 2006, some sections of the media highlighted the multimillion-pound lobbying operation by the nuclear power industry, aimed at persuading the Government to replace Britain's ageing reactors and push through laws making it easier to build new ones. The Prime Minister's younger brother Andrew is head of media at EdF Energy.²² Andrew Brown moved to EdF Energy when it started to build up its presence in this country as an electricity provider from the PR company Weber Shandwick, where he had been director of media strategy. Weber Shandwick has a long history of involvement with the atomic industry. A former UK chief executive of Shandwick International, Philip Dewhurst, has also been an important figure pushing the pro-nuclear message as corporate affairs director for British Nuclear Fuels Ltd. More recently, Mr Dewhurst has been acting as chairman of the Nuclear Industries Association, which clearly states its main objectives as "to influence the climate of public and political opinion in favour of nuclear energy as part of a sustainable balanced energy policy."²³

What do NGOs – and the public – deserve?

All the NGOs involved in this debate, and many individuals, were committed to enter fully into a genuine consultation process on new nuclear power. It is accepted that the Government may express its preliminary view on this issue, but for a consultation to be genuine the view must be preliminary. The consultation must also be open and transparent and those consulted have to be given enough balanced, factual information to allow them to form an intelligent response. In light of the "unlawful" and "wholly inadequate" nature of the Government's previous energy consultation, the NGOs believe that before any change in policy on new nuclear power stations there must be a full public consultation on and participation in the decision.

This consultation is biased and misleading. The Government should go back to the drawing board, read Mr Justice Sullivan's judgment from February 2007 (and in particular his criticism of their approach to the waste question), then start the consultation process again – making sure it lasts at least 9 months and is supported by fair and balanced materials. Further, the Government must prove that its view on new build is preliminary, else why should the public bother engaging in the consultation process?

Any government consultation on the issue of nuclear power must be comprehensive, informed and conducted over a long enough time scale to elicit and consider genuine and informed responses from the broader public as well as traditional stakeholders. The failure to do so would not only leave the Government vulnerable to legal challenge but in all probability lead to widespread hostility and mistrust of any policy decision made on future energy policy. Most importantly the Government's plans deprive the public of their right to a full and proper consultation.

So much for Brown's new kind of politics.

¹ *Energy White Paper: Our Energy Future – creating a low carbon economy*, Department of Trade and Industry, February 2003 <http://www.dti.gov.uk/files/file10719.pdf>

² *The Queen on the application of Greenpeace Limited -v- Secretary of State for Trade and Industry*.

15th February 2007 <http://www.greenpeace.org.uk/MultimediaFiles/Live/FullReport/ERJRSullivanJudgement.pdf>

³ See <http://nuclearpower2007.direct.gov.uk/>

⁴ *The Future of Nuclear Power: The role of nuclear power in a low carbon UK economy*.
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http://www.publicservant.co.uk/news_story.asp?id=3658
- ¹⁷ See <http://www.corwm.org.uk/content-1092>
- ¹⁸ See <http://www.defra.gov.uk/corporate/consult/radwaste-framework/index.htm>
- ¹⁹ <http://www.publications.parliament.uk/pa/ld200607/ldselect/ldsctech/109/109.pdf>. P 32, para 4.2
- ²⁰ *UK industry to foot nuclear waste bill*. Financial Times, 19th August 2007 <http://www.ft.com/cms/s/0/fb8e6cb0-4e86-11dc-85e7-0000779fd2ac.html>
- ²¹ See <http://www.hse.gov.uk/nuclear/reactors/>
- ²² *As nuclear power gets go-ahead, the links with Brown's lobbyist brother: Government accused of caving in to industry*. Evening Standard 11th July 2006
- ²³ *The powerful business of promoting a nuclear future*. The Guardian 11th July 2006
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