

## **P-05-1003 Demand an EIA now on the dumping of radioactively contaminated mud in Welsh waters, Correspondence – Petitioner to Committee, 25.01.21**

### **CR-39 Testing**

NRW do not provide any response to our expert specialist evidence on alpha-testing as opposed to gamma-testing. The latter looks at radiation from bulk samples, whereas alpha testing looks at microsamples. Gamma-testing has picked up nuclear particles of 100micron sizes near Sellafield and on beaches near Dounreay. Gamma-radiation from smaller nuclear particles is not detectable above radiation levels from the bulk material. Alpha-spectroscopy also works on bulk material, so is not adapted to detect the very sparse nuclear microparticles in it.

The nuclear particles in Hinkley mud would be sized 5 microns or less, as that was the filter size on the Magnox cooling ponds. Their gamma signal would be 10 000 times smaller than for the Dounreay 100micron particles. The CEFAS spectrometry was far too insensitive to detect them.

We submit a report from Prof Keith Barnham that analyses the contradiction between the gamma and alpha results for the Hinkley discharges.

NRW report advice their “technical experts”. This advice is unchanged from what CEFAS was telling them earlier. The Hinkley Report ( ‘Hinkley Point C Reference Group’ the Davidson committee) recommended that NRW and the Welsh Government do not use CEFAS in cases where CEFAS are working from EDF, because of conflict of interest. The MMO say they avoided consulting CEFAS on this ground. Could the Petitions Committee ask NRW if they intend to change their practice in view of the recommendation?

### **EDF application to NRW for further dumping at Cardiff Grounds**

EDF applied mid-Feb; NRW say they are still waiting on EDF to supply further (sufficient) information. The parallel application to MMO just sailed through, with no request for further information. We suspect NRW was treating it less leniently. Also, we have a Welsh National Marine Plan that specifies a high degree of protection in the Severn *Marine Protection Area*, specifically that activities in it have “no adverse effect”. MMO have no policy to protect MPAs.

There is joint Wales/England responsibility for the 2018-declared MPA under OSPAR, where conservation is top priority and other activities are limited. However MMO did not follow procedure and consult with the Welsh Government and/or NRW, and paid no regard to the adopted Severn Estuary Management Plan in just issuing its approvals.

The Committee should ask NRW for their view on MMO’s failure to consult with Welsh authorities over their ‘Habitats Regulations Assessment’.

### **EIA defective**

Hinkley mud dumped at Portishead will of course spread round the Estuary. Its chemical and nuclear pollutants will land on beaches and come ashore in south Wales as well as on the English side. EDF’s EIA was no better that they argued in 2018 for Cardiff. They assumed pollutants follow the

Morecambe Bay model, where there are few receptors (= people) and the Irish Sea flushes away pollutants.

The committee informed NRW of issues that should be covered in the EIA, most of which apply likewise at Portishead. NRW were consulted by MMO, but we don't know what they responded and whether they represented Welsh concerns. We can be pretty sure that they relayed to MMO the CEFAS views on nuclear microparticles that they have given the Committee, instead of saying it's up to MMO to make their own assessment of our expert evidence.

We therefore suggest the Committee should ask NRW to disclose whether they represented views from Wales or narrowly their own views in responses to MMO.

### **The Future**

Geiger Bay do not consider the issue decided, having obtained legal advice that we have a good chance of challenging MMO's decisions to allow the Portishead dumping. Please ask NRW why they have not made public MMO's application as is normal practice of public authorities and ask them to place the documents and correspondence in a public file forthwith.