

Meeting of Joint Committee on Communications, Climate Action and Environment - 16th May 2018

Discussion on Hinkley Point C Nuclear Power Plant

Opening Statement of Paul McDonald, Principal, Air Quality, Noise and Environmental Radiation Policy Unit, Department of Communications, Climate Action and Environment.

Cathaoirleach, Members of the Committee I thank you for the opportunity to appear before you today to discuss issues pertaining to the development at the Hinkley Point C Nuclear Power Plant. I am joined by my colleague Mr. Paul Shortt from the Department and by Dr. Micheal Lehane, Director of the Environmental Protection Agency and by Dr. Ciara McMahan, Programme Manager at the EPA and former Director of the Radiological Protection Institute of Ireland prior to its merger with the EPA back in 2014.

The United Kingdom 'New Build' Programme

The Irish Government have been aware since 2009 of the UK's plans to build new nuclear power stations at sites judged as potentially suitable. The UK Government had identified up to eight locations for the construction of new nuclear power plants by 2025. Five of these locations are on the Irish Sea coast, Moorside, Heysham, Wylfa, Oldbury and Hinkley Point. The remaining three locations, Hartlepool, Sizewell and Bradwell are on the United Kingdom's east coast. Ireland has been recognised, for some time, by the UK as a stakeholder in any nuclear development proposal. When the UK initially decided to embark on plans to build a new fleet of nuclear power stations Ireland was one of the stakeholders consulted as part of the National Policy consultation.

Possible Trans-boundary Effects

Following strategic level environmental assessments the UK concluded back in 2009 that there would be no likely significant trans-boundary effects for Ireland arising from the new build programme. Their assessments showed that, while in the event of a significant unintended release of radioactive emissions e.g. as a result of a major accident there would be a possibility of transboundary effects, the probability of such an event was rated as extremely low due to the robustness of the regulatory regime.

This assessment was considered by the Department of Environment at the time, under the technical advice of the RPII, and determined that there was no reason to contradict the conclusion that there were not likely to be significant transboundary effects.

These matters were conveyed to the Government in a Memo of 17th January 2011 and the decision arising was that 'the existing bilateral engagement, supported by on-going contact at Regulator level, was the most effective mechanism through which to raise and seek to have Irish concerns addressed'. This position was conveyed to the UK Government in a letter from the then Minister, Eamon O'Cuiv, to his counterpart on 24th January 2011. The letter went on to say 'Having regard to these considerations, the Government of Ireland is of the view that the appropriate and most productive way forward would be to avail of the aforementioned mechanisms of consultation, rather than to seek a formal trans-boundary consultation'. This proposed way forward was accepted by the UK and remains the adopted position.

It should be noted also that under the EURATOM Treaty, the UK was required to satisfy the European Commission that the development at Hinkley would not result in the radioactive contamination of the water, soil or airspace of another Member State. In that context a Commission opinion, issued in February 2012, considered that in normal operating conditions, discharges of liquid and gaseous radioactive effluents were not likely to result in exposure of the population of another MS.

RPII Report on 'New Build' Programme

The Government asked the Radiological Protection Institute of Ireland (RPII), now merged with Environmental Protection Agency, to prepare a report on the potential radiological implications for Ireland from the proposed new nuclear power plants in the United Kingdom. A principal finding of the report, published in May 2013, is that the routine operation of the proposed nuclear power plants will have no measurable radiological impact on Ireland or the Irish marine environment. This report continues to inform Irish engagement on the UK new nuclear build programme.

Ireland's established position is that, while not a nuclear energy producing country, we acknowledge the right of States to determine their own energy mix. However, we expect that, where a State chooses to develop a nuclear power industry, this will be

done in line with the highest international standards with respect to safety and environmental protection.

Current engagement & recent developments

There are now twice yearly meetings of the UK-Ireland Contact Group on radiological matters. These are attended by representatives from central Departments of both Governments and their respective colleagues from the regulatory and environmental protection agencies. As part of this process, officials from DCCAE and radiological experts from the EPA have visited numerous UK nuclear related sites in recent years including Hinkley Point and Sellafield. The issue of the UK New Build programme is a standing agenda item at these meetings and arising from these discussions a letter was received from the UK Department for Business, Energy and Industrial Strategy in December 2016 concerning the UN Convention on Environmental Impact Assessment in a Trans-boundary Context (the Espoo Convention). In this letter the UK re-iterated their view that the development at Hinkley 'was not likely to cause a significant adverse impact in the environment in another State' and that therefore the UK was not required to undertake trans-boundary consultation under the Espoo Convention. The letter went on to say that, following a recommendation from the Espoo Implementation Committee the UK were seeking our opinion as to whether notification would be useful at the current stage for the development at Hinkley Point C. By letter dated 2nd March DCCAE responded that such notification would be useful and set out the basis for this view and added 'having the opportunity to formally comment on the UK's new build programme is extremely valuable in allaying public concerns in relation to the programme'.

The new build programme and specifically Espoo related matters were discussed at the meeting of the UK-Ireland Group on 27th April following which, on 28th July, a further letter was received from the UK by the Department of Housing, Planning and Local Government- the lead department in relation to Espoo . In this letter the UK stated that while they maintained their position that they did not breach the Espoo Convention they recognised the value of constructive engagement and in that spirit they were providing an opportunity to comment on the current environmental information in relation to potential trans-boundary impacts. The letter went on to say that 'if likely significant adverse trans-boundary effects are identified on the basis of

scientific evidence then we will look at how the regulatory regime might address any identified effects’.

A consultation process was then initiated by the Department of Housing, Planning and Local Government through the local authority network and this process was recently completed.

Emergency preparedness

In the unlikely event that there is an accidental discharge from a nuclear power plant in the UK, the Irish regulatory authorities are well primed to deal with such an eventuality. The UK and Ireland have agreed and developed an early-warning notification system to alert Irish authorities of any problems in nuclear facilities in the UK. This system is regularly tested and discussed through the UK-Ireland Contact Group on Radiological Matters to ensure that it remains robust and fit for purpose.

Ireland has also developed a detailed plan called the National Emergency Plan for Nuclear/Radiological Accidents (NEPNA) to make provision for preparedness and response to nuclear and radiological emergencies taking place both inside and outside the State and includes arrangements to coordinate and manage our first response activities and to ensure the safety of our people, food-chains and environment.

Officials from Irish Departments and Agencies, who will have a role in the event of such an emergency, take part in international exercises to evaluate and improve our response arrangements and capabilities with regard to nuclear and radiological emergencies. In 2017 Ireland participated in a large scale exercise held by the International Atomic Energy Agency to test our operational arrangements of the Convention on Early Notification of a Nuclear Accident and the Convention on Assistance in the Case of a Nuclear Accident or Radiological. The outcomes from this Convex exercise will inform an update to NEPNA which will then be established on a statutory basis to ensure that Ireland’s preparedness and response to nuclear and radiological emergencies remains first rate.