



Minsmere Levels Stakeholders Group

7 Days to go before PINS Sizewell C Development Consent Order decision!

Over the past three weeks whilst we waited for the Planning Inspectorate to consider EDF's DCO application, critical issues surrounding the Olkiluoto EPR in Finland have contributed to a further delay in fuel loading. A critical pressure safety system on the reactor has been found to leak due to cracked or broken components following pressure testing. This problem will require further examinations at Flamanville 3 and testing of the same systems at Taishan when the two reactors are next off-line.

China's involvement in Hinkley Point, Sizewell and Bradwell hit the news as the Huawei 5G issue has returned front and centre, resulting in the Chinese ambassador threatening to pull China General Nuclear out of the new nuclear build programme in the UK whilst EDF have failed to get any progress on the Regulated Asset Base proposal from government and we all continue to wait for an updated energy whitepaper and new national policy statement for new nuclear facilities to be connected to the grid after 2025 (where existing enabling legislation, EN-6, lapses).

Meanwhile, a climate coalition of 59 NGOs *including* RSPB, National Trust, Greenpeace and World Wildlife Fund have sent a letter to the government with a 7-point plan for "building back better" from the Coronavirus pandemic. They are clear in their request that energy infrastructure, training and investment be in renewable technologies be prioritised and this was preceded by Europe not including nuclear in its European Green Deal.

A study of the potential effects on the Minsmere/Sizewell coastal frontage by Nick Scarr [Sizewell Coastal Morphology and Climate Change](#) calls into question EDF's reliance on the Sizewell stretch of coast being in an area of "micro-stability" due to the protection afforded by the Sizewell/Dunwich bank complex and Thorpeness coralline crag outcrop.

According to the Nuclear Decommissioning Authority (Technical Note 11261814), "high burn" spent fuel from an EPR will need to be cooled on-site for 140 years before being suitable for the "yet to be built" Geological Disposal Facility. **This means that SZC spent fuel will have to be made safe on this coast until 2177 for the first fuels used in the reactor and at least 2237 for the final fuel loads, assuming the reactor is active for only 60 years.** This is a vastly different perspective than that discussed in the EN-6 legislation that has spent fuel and high-level waste being able to go to the GDF as early as 2135.

Such long timescales are simply not predictable from a climate change and sea level rise perspective. It is highly questionable whether EDF and CGN will be operating over these timescales to ensure that any coastal defences put in place are capable of coping or being adapted to manage for over two centuries. Given the serious issues already raised by multiple agencies and organisations regarding EDF's currently incomplete plans for coastal defence and the potential effects both north and south of the Sizewell frontage, it seems remarkable that this DCO proposal has not yet been discarded as simply unrealistic being subject to too many risks and unknowns.

Assuming the DCO is approved for examination next Wednesday (24th June) we will be examining all the relevant sections of the proposal from a coastal and inland hydrology perspective and will be putting forward a Relevant Representation submission to take part in the examination stage. As we progress our case with other organisations with similar concerns, we will make sure we keep you updated on our findings and issues from the DCO so you can make your own representations to the Planning Inspectorate and become an Interested Party.

In order to continue with our efforts in scrutinising the DCO once released we ask that you consider donating to MLSG through the link below or purchase the Minsmere Levels history book by donating at least £7.50 below, including postage, and sending an e-mail to MinsmereLevelsSG@gmail.com requesting a copy and giving your address details.

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