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Letter of Intent on COWAM 2

The Waste Network (Avfallskedjan) is an NGO that co-ordinates groups of citizens in Sweden at places which have been considered as sites for nuclear waste management. The Waste Network, which is no formal organisation, was created in 1981 as a consequence of test drillings that were planned or executed at a number of sites. The aim of the network is foremost to promote exchange of knowledge and experience between local groups and to co-ordinate common actions as review of reports and dialogues with politicians and government agencies. Together, the Waste Network groups represent a unique and extensive civic experience in Sweden of citizens involved in the nuclear waste issue. On the other hand, most of the groups within the Waste Network have never had any resources except voluntary work. Based on the conditions in Sweden the opinions of the Waste Network can be summarised in the following points:

- The management of the nuclear waste is not solved. As a consequence, in order to minimise the amount of waste, the further operation of nuclear reactors should be restricted to as limited time as possible.
- The choice of method should be made before the choice of site. The deadlock to the KBS method must come to an end. The choice of method must be reconsidered based on clearly expressed functional conditions formulated in advance.
- The siting must be based on considerations on environment and security, not political acceptance. A clear and understandable sieving process at a national scale should be performed to find the best possible site.
- An independent authority must control and supervise the EIA process instead of the nuclear industry. A well performed EIA process is the necessary condition to give the choice of method and site enough legitimacy and acceptance in the eyes of ordinary citizens.
- Environmental organisations being the representatives of the public must be given reasonable conditions and resources to take part in the EIA process to choose method and site. These resources should include the possibility to engage independent experts.

Several representatives of the Waste Network have participated in the concerted action COWAM. In the opinion of these representatives the experiences are very positive. COWAM has created a good basis to go further from the common understanding of the nuclear waste problem to common conclusions on how to deal with the problem in order to reach decisions on the choice of method and site.

The Waste Network intends to participate in a continuation of COWAM in accordance with the preliminary proposal that has been worked out in 2002-2003. The Waste Network has actively participated in this preparative work. The participation in an established project should preferably also be active if the economic conditions can be solved.

In the opinion of the Waste Network COWAM 2 should not take standpoint on specific methods, but this should not exclude that methods are discussed without limitations as a basis for considerations on processes and procedures. Thus, the problem of siting should not only include geological disposal of nuclear wastes.

One overall goal for the Waste Network is to get the possibility to influence the Swedish nuclear waste treatment. In order to manage that the Waste Network has to improve the contacts with the established actors in Sweden within an improved decision making process. However, the local and national co-ordination in a continuation of COWAM could be a problem in Sweden with the presently very evident polarisation between the "establishment" and NGOs. The national co-ordination might at worst act as elimination. There are for the moment no constructive relations between the NGOs and the operator SKB. Thus, the Waste Network can cooperate in a "Swedish group" only on administrative matters.

In the opinion of the Waste Network all proposed Work Packages of COWAM 2 are of interest, except what is only dealing with the administration of the project. The Waste Network's comments on the different Work Packages are based on preliminary descriptions of these WPs:

WP 2/4. Local Democracy and Participatory Technology Assessment

The Waste Network has gathered a lot of experiences of participatory processes and involvement in local democracy in Sweden during more than two decades. These experiences are both positive and negative. We really agree that the participation is resource consuming. Local people are capable to engage on their leisure time, but only to a limited extent. If the process goes on for a long time most people resign and the "establishment" might win due to exhaustion of the local people. The problem is both to engage people at early stages and to encourage the long term engagement.

As described shortly above our opinions on the processes in Sweden might differ considerably from those given by the "establishment". To clear out these differences in opinions it is important that citizen's groups and NGOs can engage their own independent experts to scrutinise what the "establishment" is saying or doing. This might help avoiding controversies based on misunderstandings and put focus on the real differences in valuations. The Waste Network has for a long time asked for an independent body to govern the process. We got some understanding for that position in the "Dialog" project in Sweden in the beginning of the 1990s. The purpose of that project was to investigate how a participatory process might be accomplished in Sweden, however the advices of the project were not realised.

WP 3. Influence of Local Actors on the National Decision-Making Process

The background description for WP3 coincides very well with the way the Swedish NGOs look at the process in Sweden. However, this is not the view of the Swedish "establishment". In their view the Swedish process has gone beyond the stage when local actors should influence the national decision-making. This became obvious already when the National Co-ordinator in 1997 excluded the NGOs from a forum for consultations. The motivation for this was to prevent the NGOs to question the choice of method (the KBS method of encapsulation and storage in granitic rocks). The Swedish NGOs strongly oppose the way of choosing method and site in Sweden and WP3 therefore is of important interest for us.

WP 5. Decision Making Processes

In the opinion of the Waste Network WP 5 is nearly connected to WP 3, both being very interesting from a Swedish NGO standpoint. However the NGO standpoint differs as mentioned from the one of the "establishment" in Sweden of the same reason as explained above in connection with WP 3.

WP 6. Long Term Governance

The issue of long-term governance has not been debated very much within NGOs in Sweden so far, but the discussion has started. Up to the last years most people in the NGOs have shared the earlier official Swedish standpoint that the nuclear wastes should be buried relatively fast and out of reach for humans now and in the future. The reasons for this have been ethical - we should not leave this to future generations - and fear that the wastes could be taken up again and used for producing bombs. As the official standpoint has changed to promote more or less retrievable storage also the standpoints within the NGOs to some extent have changed to a more "wait and see" attitude. Partly this attitude is also based on a growing negative view on geological disposal as such, motivated by the protection of groundwater (in Sweden almost any geological disposal must be located in fissured rocks containing groundwater).

WP 7. Knowledge-Base

This is a very interesting but difficult task. It is important that the knowledge base should not only reflect the views of the "establishment". It might be fruitful to begin from the "bottom" by creating a consensus basis. As pointed out above the NGO opinions in Sweden differs considerably from the opinions of the established stakeholders. The Waste Network agrees strongly on the description of the difficulties expressed in the second paragraph of the background description.

WP 8. Networking Activities

There is a strong interest by the Waste Network for taking part in the networking activities provided that the financial obstacles can be solved.

The Waste Network has no possibility to contribute to the financing of the project. Thus all expenses and time must be paid by the project with the exception of time for single days per year in connection with coordination meetings etc.

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