



Together Against Sizewell C

Deadline 10 Submission TASC IP no. 20026424

TASC comments on Decommissioning of the desalination plant, comments on the ExA's proposed Requirement 8(3)

In consideration of the wording of Requirement 8(3), TASC are concerned that IPs are required to comment on the suitability of DCO wording for the proposed temporary desalination plant (DP) when not in full possession of the facts, particularly around its full environmental impact where questions remain-unanswered by the Applicant. Although it might be clear that this “DP is only required for the construction phase”, in TASC’s opinion that does not rule out the possibility of another desalination plant, sited in a different Suffolk location, being required for the 60 year operational period and the further decades needed to decommission SZC.

While the proposed wording may be sufficient to ensure that the DP, if ever built, is temporary, and while we accept that a non-compliance clause in the general structure of the DCO agreement may apply, we consider that penalties for non-compliance should be made clear and unequivocal in the proposed wording. TASC believe this cannot be considered in isolation as other aspects of the DP may require additional Requirements such as to limit the amount of environmental damage. Indeed, TASC’s marine ecologist, Peter Henderson, has prepared a report covering various environmental implications about the proposed DP and TASC have attached a copy of the report with this D10 submission.

Due to the lack of a guaranteed potable water supply for the 60 years of operation, it has opened up the prospect of SZC being built and, for no reason other than SZC becomes ‘too big to fail’, an environmentally-damaging, unsustainable source of water has to be found that will then have adverse impacts e.g. a large environmentally-damaging desalination plant somewhere on the Suffolk coast or abstraction from a source which damages wildlife habitats and/or taking supply away from domestic/business users over a period during which all the climate change predictions forecast diminishing drinking water availability. Accordingly, **TASC believe there should be a Requirement that states that construction of SZC should not be allowed to commence until the water company formally confirms that they can guarantee a supply of mains water to meet SZC’s needs for its entire period of operation and decommissioning. This Requirement should be enshrined in the wording of 8(3) and linked directly to the penalty requirement outlined above in the event of any attempt to renege on the agreement not to**

commence construction in advance of formal confirmation from the water company of a guaranteed mains supply and/or any attempt to the employ the desalination plant for any longer than the agreed temporary construction period.

The lack of potable water supply for SZC feeds into wider concerns about the sustainability of the whole project, be it in connection with water, the devastation the cooling water system will have on the marine environment, the consumption of finite uranium sources or the lack of a scientifically proven safe and secure method for the disposal of the radioactive waste. To TASC, the lack of a local potable supply adds to the reasons why the SZC project should be rejected by the ExA as unsustainable.