

November 17, 2017

Secretary Lesley Griffith
Cabinet for Environmental and Rural Affairs
Welsh Government
5th Floor
Tŷ Hywel
Cardiff Bay
CF99 1NA

Dear Secretary Griffith,

As organizations working to preserve and protect the health of oceans and marine life, we are writing to express serious concerns about the decision to dispose of up to 300,000 tonnes of radioactively contaminated marine sediment, dredged from the seabed at the Hinkley Point nuclear site on the English coast, into the Cardiff Grounds marine dump site close to the South Wales coast.

We are disappointed that the decision to dispose of this radioactive waste off the coast was made without an open and transparent process. Both the public and an independent scientific evaluation should have been part of the process to inform the decision to dump radioactive mud in Cardiff Bay. Instead, this decision appears to have been taken without an Environmental Impact Assessment and the only scientific analysis was tied to the nuclear industry. We urge the Welsh Government to direct Natural Resources Wales to suspend the license it has granted to dump radioactive mud into Cardiff Bay until a fully independent and scientific analysis has been conducted. Additionally, we urge permitting agencies to fully and transparently apply the environmental requirements that must be fulfilled under the relevant EU Directives (such as the Habitats and EIA Directives), as well as areas which are under consideration for additional protections such as the harbour porpoise candidate Special Area of Protection.¹

The time for using world oceans and seas as a dump is over. In the past, communities around the world used the ocean for waste disposal, including the disposal of chemical and industrial wastes, radioactive wastes, trash, munitions, sewage sludge, and contaminated dredged material. Little attention was given to the negative impacts of waste disposal on the marine environment. Wastes were frequently dumped in coastal and ocean waters based on the assumption that marine waters had an unlimited capacity to mix and disperse wastes.

However, we now know that disposal of wastes and other materials into the ocean degrades marine and natural resources and poses human health risks. The Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972 (The London Convention) prohibits ocean dumping of all radioactive wastes and ocean dumping of all other radioactive matter with more than de minimis (exempt) levels of radioactivity, as defined by the International Atomic Energy Agency.

¹ Joint Nature Conservation Committee, Harbour Porpoise Special Areas of Conservation, available at: <http://jncc.defra.gov.uk/default.aspx?page=7059>

We are concerned that it has not been shown that the radioactively contaminated marine sediment is below the levels required for dumping to be allowed. We are also concerned that the likely long-lived and far-reaching health impacts on humans and wildlife have not been properly analyzed regarding the Hinkley radioactive sediment plan. This mud is known to contain long-lived radioactive elements that can bind organically inside living organisms, including human beings.²

In addition, there is documentation that a sampling of chemicals in these sediments found Polycyclic aromatic hydrocarbons (PAHs), Polychlorinated biphenyls (PCBs), Organochlorines, tributyltin (TBT), mercury, and cadmium among others. Some of these samples exceeded "Action Levels" and yet no "action" was taken. The presence of these compounds is known to cause long-term if not permanent harm to sea life that affects the entire food chain.³

For these reasons, we wish to express our strong opposition to the decision to dredge radioactive sediments from the Hinkley shoreline and deposit them in Welsh waters, at risk to the health and longevity of humans and wildlife as well as the ecological wellbeing of the marine environment.

Sincerely,

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Pacific Coast Federation of Fishermen's Associations

² Radiological Assessment of Dredging Application for Hinkley Point C Power Station, Somerset (2013). Cefas Environment Report RL 05/13. K.S. Leonard, P.A. Smedley and S.M. Cogan. April 2013

³ "Hinkley C InOut sample results" (Microsoft Excel spreadsheet) re: re application no MCU 12/45 : applicant EDF Energy: Location: Hinkley C Intakes & Outfalls. CEFAS

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