



6 April 2010

To: RadioactiveWasteTeam@scotland.gsi.gov.uk

www.nuleaf.org.uk

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Dear Sir/Madam,

Response to the Scottish Government Consultation on Higher Activity Radioactive Waste Policy

I write on behalf of NuLeAF, which is a Special Interest Group of the Local Government Association that seeks to represent the views of its member local authorities in England and Wales on nuclear legacy management issues and developments that may impact upon that management. Further information on NuLeAF may be found at www.nuleaf.org.uk.

Although the proposed policy is for Higher Activity Wastes (HAW) that arise in Scotland, NuLeAF wishes to comment on the proposals to the extent that they may (a) have direct impacts on radioactive waste management in England and Wales or (b) set precedents for strategies for managing wastes in England and Wales.

We therefore consider it appropriate to comment on the following issues:

Position on Geological Disposal

We note that the position of Scottish Ministers is not fully explained. It is notable that no reference is made to the reasons why CoRWM included geological disposal in its recommendations, following its extensive programme of assessment in the period 2003-6¹. There is, however, brief reference to Scottish Ministers being committed to near-surface disposal (rather than geological disposal) "partly" in order to facilitate easier retrievability of wastes over the long-term (p9).

Specifically in relation to the accompanying Strategic Environmental Assessment process (Question ER1), it is not clear whether that assessment can be considered complete and comprehensive when the alternative of geological disposal is excluded largely on the grounds of Ministerial pronouncement without adequate explanation.



Amount of ILW that cannot be disposed of

NuLeAF has recently had an update from NDA on the identification of alternative disposal routes for reactor decommissioning wastes (RDW), including graphite (see [Steering Group 27 Jan item 7](#)). This clearly indicated that further assessment is needed before it is known what proportion of RDW could be disposed of to near surface facilities. As such, the assertion in the Environmental Report (ER) that only around 25% of Scottish ILW cannot be disposed of may need to be subject to review and revision as NDA assessments are completed.

Implementation of the proposed policy is therefore likely to require a more detailed assessment than currently available of the suitability of different forms of HAW for near surface disposal over different timescales.

Development of a Strategic Siting Strategy

The consultation document (CD) explains that the Scottish Government wishes to avoid a prescriptive approach and proposes that NDA develop an appropriate strategy. It also discusses four broad siting options: fully decentralised, partly decentralised, partly centralised and fully centralised. However, the CD and ER are silent about whether any of the concepts from the GDF siting process in England and Wales – voluntarism, partnership and community benefits – should be applied to any of the broad siting options.

There are a number of points that can be made about this:

- The approach to siting ILW treatment, storage or near-surface disposal facilities in Scotland may set a precedent for future approaches in England and Wales.
- It is arguable that concepts of voluntarism, partnership and community benefits should be applied in some circumstances. The case for application of these concepts could be argued to increase from decentralised to centralised options (in terms of provision of a service for a greater number of sites), and from storage to disposal (in terms of the level of public controversy and difficulty of siting).
- The application of such concepts would seem to be a matter of Government policy, not NDA strategy.
- There is a need for public consultation and debate about the potential applicability of such concepts.

So, although NDA may be able to develop some aspects of an implementation strategy (CD question 17), other aspects may require the Scottish Government to take the lead.

It would be helpful in this respect if the Scottish Government could clarify under what circumstances it considers that concepts of voluntarism, partnership and community benefit might apply. It would also be beneficial to subject its preliminary thinking to public discussion.

Omission of Socio-Economic Effects from Environmental Assessment

Despite an acknowledgement that significant effects could arise from perceptions of hazard and risk (para 6.04), the ER does not systematically address the potential socio-economic impacts of siting different types of facility, including blight.

This is in contrast to the NDA's SEA of the proposed UK LLW Strategy (see [LLW SEA](#)). Although concluding that LLW management options are unlikely to cause significant or widespread socio-economic impacts, this acknowledges that effects will be specific to local circumstances.

It is possible to imagine that the socio-economic impacts of siting some facilities (eg centralised ILW near surface disposal) could be particularly significant.

I hope that these comments are of value.

Yours sincerely,

Fred Barker

Fred Barker
Executive Director