

Philip Matthews
Executive Director

c/o Suffolk County Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

0794 920 9126
philip.matthews@nuleaf.org.uk

By email to Contact@onr.gov.uk

14 January 2021

Dear Sir or Madam,

Consultation on ONR's revised interpretation of 'bulk quantities' in the context of licensing nuclear installations for storage and disposal of radioactive matter.

1. Introduction

Nuleaf (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. We are directly supported by over 100 local authorities and national park authorities across England and Wales and speak for the wider LGA.

Our remit encompasses all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including the UK and Welsh Government, the NDA, RWM Ltd. and regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

Nuleaf is actively engaged in all aspects of radioactive waste management and disposal. Our Executive Director sits on the NDA's Integrated Waste Management (IWM) and Site Decommissioning and Remediation (SDR) Theme Overview Groups,



working alongside ONR and the environment agencies. Local Planning Authorities (LPAs) are a regulator of the nuclear industry through the land use and waste planning regime, and our Radioactive Waste Planning Group (RWPG) is an expert forum bringing together senior planning officers.

We are also engaged significantly in the GDF siting process. Our Executive Director was a member of the Community Representation Working Group (CRWG), established by DECC (as was) to consider community engagement and implementation processes for the GDF. We also provided written and oral evidence to Parliament on the National Policy Statement (NPS) on geological disposal. Nuleaf has a close working relationship with RWM, supporting and advising them as they build their capacity to engage with local authorities. This is of great importance, given the central role that councils have in the GDF Siting Process.

Nuleaf's **Policy Statement 3: Geological Disposal** sets out our support for the development of a geological disposal facility (GDF) for the UK's Higher Activity Radioactive Wastes (HAW), with certain qualifications and while recognising that some local authorities take alternative views on HAW management.

Our comments are informed by our policy and by discussion with our member local authorities.

2. General Comments

We believe that it is sensible for ONR to be making this change now even though GDF siting process is currently at an early stage. It is important that there is clarity on the licensing and regulatory regime for a GDF as it is very likely that potential host communities will want to discuss and seek reassurance on these aspects of the process.

We agree with the proposed changes and that (a) the rationale for these changes is explained and (b) ONR has adhered to its principles of good regulation.

We would like to offer some more general comments, intended to aid with clarity and community understanding:

- The Executive Summary should set out clearly what the proposed new policy would be. At present it is not an executive summary but rather an explanation of the reasons for the change.
- It is correct that geological disposal is the policy of the UK Government, and the paper does note that geological disposal applies to England and Wales.



However, the Scottish Government has a separate policy of Near Surface Disposal (NSD) and the NDA is considering this option in England and Wales for part of the HAW inventory. It would be helpful to reference this and explain whether this proposed change has any relevance to near surface disposal facilities.

I hope these comments are helpful.

Yours faithfully,

Philip Matthews
Executive Director