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Dear Sir/Madam,

## **Consultation on UK policy on managing radioactive substances and nuclear decommissioning**

### **Introduction**

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

Nuleaf's 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 Welsh and UK Government, the Nuclear Decommissioning Authority (NDA) and the 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.

We are active in advising the UK and Welsh Government, the NDA, Magnox and Nuclear Waste Services (NWS) on all aspects of strategy, policy and practice in decommissioning and the management of nuclear waste. We sit on the Radioactive



Substances Policy Group (RSPG) and have been engaged by Government throughout the development of this policy.

Nuleaf's members include all local authorities that host Nuclear Decommissioning Authority (NDA) sites, waste management infrastructure and Geological Disposal Facility (GDF) Community Partnerships.

Our network includes both Elected Members and officers. Councillors serve as the democratic representatives of nuclear communities. Officers, working with Members, are responsible for supporting and enhancing the wider value of the NDA mission through land use and waste planning, education and skills, socio-economic development and sustainability.

This policy review is therefore of great importance to our members and the communities they serve. At the same time, the views of our members are important to the UK and Devolved Governments. Councils are key stakeholders and facilitators of the NDA mission. They can help ensure that this Policy, and the way it is delivered, meets wider economic, social and environmental objectives for the nuclear sector.

## Overview

The nuclear landscape has changed significantly in the last two decades and we agree that a review of the policy landscape is necessary and indeed overdue.

We support, in general terms, many of the changes proposed but believe that the final policy should be amended to ensure that it promotes the best outcomes for nuclear host communities. In particular, we believe that there should be a more explicit and cross-cutting commitment to their socio-economic and environmental needs. Nuleaf's position on this is set out in detail in our **Policy Statements 5** and **7<sup>1</sup>**.

At present, community benefits are paid in relation to certain facilities and certain programmes – for example in relation to the LLWR site or GDF Community Partnerships. There is, however, no consistency of approach.

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<sup>1</sup> [Policy Statements - Nuleaf](#)



The proposed changes in policy outlined in this consultation, particularly the risk informed approach, Near Surface Disposal (NSD) and in-situ disposal, will deliver savings to the Government and industry of many hundreds of millions of pounds. These measures will also impact in new ways on host communities. It is therefore only right that some of these savings are fed back to the communities that will enable the delivery of these new management methods.

The draft policy only commits to community funds in relation to NSD. We believe that this Policy review presents an opportunity to establish a commitment to a framework for Community Benefits that covers all aspects of decommissioning and radioactive waste management. It should recognise the impacts on communities of hosting (a) nuclear decommissioning sites (b) long term nuclear waste stores (c) radioactive waste management and disposal infrastructure such as landfill sites and (d) radioactive waste left in-situ or on-site. A framework would ensure a fair distribution of community benefits across the country and would recognise the service to the nation played by nuclear host communities.

Our view aligns with those of the **National Infrastructure Commission**<sup>2</sup>. The lack of an integrated approach to Community Benefits around nuclear decommissioning contrasts with commitments made in relation to other industries or in other countries. Research commissioned by Nuleaf<sup>3</sup> highlights the community benefits payments for renewable energy projects and the agreement reached in relation to potential fracking sites. It also identifies the examples of:

- Spain, where the radioactive waste management organisation has developed a formula to enable a fair allocation of funds to host communities.
- Bulgaria, where there is a commitment that 2% of the budget of the state radioactive waste body is allocated to community benefits on an annual basis.

Through the Energy Act 2004 there is a legal requirement to socio-economic support. This new Policy represents a golden opportunity to embed that commitment properly in all decommissioning and radioactive waste management activities, tackling all economic and social issues in an integrated way that delivers real change.

Other priority areas for our members include:

- Strong action on sustainable development and net zero within the whole nuclear decommissioning and waste management sector.

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<sup>2</sup> [Stronger coordination of environment and community benefit needed to get planning timescales back on track - NIC](#)

<sup>3</sup> [Appraisal-of-Support-for-Nuclear-Communities-FINAL-2 \(1\).pdf](#)



- A clear commitment to effective stakeholder engagement that reaches out to all within host communities.

Finally, we would make the following general comments on the drafts:

- The foreword for Part I has a focus on new nuclear and net zero. However, this policy is on decommissioning and radioactive waste management, and in particular the decommissioning of legacy and operational nuclear facilities.
- The Policy would benefit from an introductory section that explains the current and likely future nuclear decommissioning landscape in the UK more clearly.
- There is no mention in the policy of the Social Value agenda.
- While the Policy deals with radioactive waste management it would be useful to note the large volumes of hazardous and conventional waste that will be generated during decommissioning. The management of these wastes also presents significant challenges to host communities.
- In Part II (4.5) there is a description of the NDA estate which does not properly reflect the current situation. This should be updated to note that (a) Dounreay has become part of Magnox and (b) that LLWR and RWM, while still legally separate entities, are now part of an integrated Nuclear Waste Services. It may also be worth mentioning the potential for Vulcan and some other Ministry of Defence liabilities to become the responsibility of the NDA.
- In Part II (4.10) the role of the HSE is mentioned. It should also be noted that the HSE will regulate fusion installations in the UK.

We offer a response to all questions posed under Parts I and II of the Consultation. In some instances, we make a similar response under questions posed in Part I and II given the overlap between the policy proposals and the text of the draft policy.

## Response to Part 1 of the consultation

### **1. Do you agree with the proposal to require the application of a risk informed approach as a decision-making framework for the management of all solid radioactive waste? Please provide the reasoning behind your response.**

Yes. As the paper notes, this approach has been applied successfully for a number of years to LLW and has to support the optimisation of management of boundary LLW/ILW wastes. It therefore seems sensible to extend this to all wastes.



That said, we believe the following should be recognised and addressed:

- An approach that is informed by risk, but which also classifies wastes based on rigid boundaries (e.g. ILW) has potential to cause confusion among the public and stakeholders. Careful thought will need to be given as to how this approach is effectively explained during public/stakeholder engagement. This is particularly the case for HAW where wastes previously destined for a GDF may now be deemed safe for disposal near the surface.
- A risk informed approach will, as the paper acknowledges, open up new management and disposal routes. All such changes will benefit some communities but impact more on others. This should be recognised. Nuleaf has consistently argued that the NDA should develop a framework for community benefit payments that covers waste management, storage and disposal as this would help recognise the impact of changes made to existing plans. We would like to see support for a community benefits framework within this policy.
- The paper argues that part of the reason for this change of approach is to deliver more cost-effective solutions. We are supportive of measures that can help reduce costs but only where that is based on management options that deliver the highest standards of protection to people and the environment. While cost savings can be a welcome added benefit of a new approach, they should not be the central driver.

We note that the Scottish Government adopted a risk informed approach in its 2011 HAW policy. One issue that is unclear is what is proposed to happen to HAW waste generated in Scotland that is not suitable for management in a near surface facility. Clarity would be welcome.

We note the reference (4.31) to an integrated solid radioactive waste management strategy. The language of this section should be improved – for example by making an explicit commitment to such as strategy rather than saying it 'could' be prepared; and also making it clear that this new document would replace not just LLW strategies but those on HAW if that is the intention.

**2. Do you agree that the application of the waste hierarchy should be an explicit policy requirement for the management of all solid radioactive waste where practicable? Please provide the reasoning behind your response.**

Yes. The waste hierarchy underpins the principles of sustainable waste management and we support it. While it is more challenging to apply to radioactive waste than to conventional waste, it is right that this should be done. As the paper notes, it is



already required for solid LLW. This has led to better outcomes such as metal recycling.

We would welcome more clarity as to how an 'effective balance of priorities' is to be achieved in considering how the waste hierarchy should be employed. In our view the protection of health, safety and the environment should be paramount. The delivery of better value for money is a welcome additional benefit but should not be the key driver of decisions.

Part 1 (4.36) states that, where disposal is required, it should be done in the optimal way, through the application of Best Available Techniques/Best Practicable Means (BAT/BPM). We agree with this but believe that BAT/BPM should be applied to decisions further up the waste hierarchy, not just to disposal. We would welcome clarification that this is indeed the case.

**3. Do you agree with the proposed amendment to current policies on geological disposal to allow disposal of ILW in near surface facilities? Please provide the reasoning behind your response.**

In principle, we agree with this amendment. If, based on a risk informed approach and in agreement with regulators, some of the current ILW inventory is deemed safe for disposal in near surface facilities, we would not oppose that. Such facilities are operational in other countries, and such a move may enable earlier disposal of part of the HAW inventory.

That said, a change in policy does pose potential risks to the current GDF process, and significant challenges in terms of finding an accepting host community for a near surface facility.

As the consultation notes, local communities will need clarity on the inventory for geological disposal before any Test of Public Support takes place. Plans for NSD, and changes to the scale and type of nuclear new build programme, could significantly alter the size and complexity of the GDF inventory. Careful engagement will be required.

The community hosting any proposed NSD facility is also likely to have concerns about such waste being disposed of, near to the surface, in their area. It is therefore vital that any siting process is based on consent and engagement with the host community. We offer more comment on this below.



**4. Do you agree with the proposed policy framework for the development of near surface disposal facilities by the NDA for this disposal of less hazardous ILW? Please provide the reasoning behind your response.**

We agree in general terms. However, there are a number of distinct elements to the policy, and we offer the following comments:

**Scale** – while an NSD would be significantly smaller than a GDF, it could contain up to 21,000m<sup>3</sup> of material. It is therefore still a large facility and one containing a significant amount of radioactive waste.

**Community benefits** – Nuleaf advocates the development of a framework for community benefits that covers all aspects of nuclear decommissioning, storage and disposal. We therefore support the commitment (5.31) to a community benefits package.

Greater clarity is needed on the scale of such a package, how it will be determined and how it will be managed. The Policy notes that the facility would accept waste from other sources in the nuclear and non-nuclear industries on commercial terms. Any community benefits package should reflect the significant sums that an NSD will save the NDA; and the fact that they are deriving income from the import of waste from others.

**Land use planning** – The Consultation document proposed that an NSD be taken forward under the Town and Country Planning Act 1990.

An NSD would be a facility for the permanent disposal of ILW from across the UK and the selected location would be providing a significant service to the nation as a whole. Some would consider that this suggests the new facility should be a Nationally Significant Infrastructure Project (NSIP).

If this process is to be taken forward through local planning, then adequate resources will have to be provided to the Local Planning Authorities (LPAs) involved, for example via a Planning Performance Agreement, to enable them to engage with NDA effectively. Local planning services are under significant pressure, and the planning aspects of a large new facility such as this could not be managed within existing resources.



Whichever planning route is taken, meaningful public engagement and consultation at the pre-application stage will be crucial. This should ensure the community fully understands the nature and implications of the proposals, including the socio-economic, environmental and transport opportunities, implications and impacts. The community should be able to properly influence the nature of the proposals.

**Regulation** – we agree with the proposals for regulation by the Environment Agency/Natural Resource Wales and, potentially, the Office for Nuclear Regulation.

**5. Do you agree that the policy of the UK Government and devolved administrations should promote the use of on-site disposal of radioactively contaminated waste from the decommissioning of nuclear sites, subject to environmental permits? Please provide the reasoning behind your response.**

There are likely to be instances when the case can be made for disposal of LLW or VLLW on site. This should only be where such an approach can be clearly demonstrated to reduce risk and environmental impact.

Host communities are likely to have concerns about the ongoing presence of radioactive material on site, given the commitment made in the Site End States set out in 2006 that material would eventually be removed. Early and meaningful engagement with the community and local authority is therefore required. It will also be important for the NDA Group to work with, and support, the Local Planning Authority where there is a requirement for planning permission.

We question the suggestion that waste disposal on site 'may' require planning consent, as it is understood that waste disposal *should* require planning permission. We regret the omission of reference to this important matter in the framing of Question 5 of the consultation document.

We consider it very important that proposals for disposal of radioactive waste on site are determined through the planning application process. This will support appropriate scrutiny by host Councils and communities and help to ensure that relevant local policy and local concerns are given due consideration in decision making on any proposal for on-site disposal of radioactive waste.



As a move to in-situ disposal/disposal for a purpose is estimated to save many hundreds of millions of pounds, significant community benefits should be payable.

**6. Are there any further improvements that we might consider in relation to the proposed update of nuclear decommissioning and clean up policy? Please provide the reasoning behind your response.**

From a local government perspective, the critical aspects of the new policy are set out below. For each we offer some comments as to how these expectations could be enhanced:

i. **That land on which publicly owned nuclear facilities are located should be considered first for the location of national infrastructure.**

We note the focus of the proposals on facilitating new nuclear generation in England and Wales. Nuleaf comprises a group of local authorities representing a wide range of views on the desirability or otherwise of new nuclear power generation. As a group we neither support nor oppose new nuclear development. All decisions about future uses of such sites must be informed by dialogue with host local authorities and communities and subject to scrutiny through the relevant planning process.

The NDA Business Plan 2023-26 commits<sup>4</sup> to *'integrate and optimise the Magnox plans with.....any other future missions which Magnox may be asked to support in due course.'* (p.43) We believe that this Policy should be clearer on the expected role of the NDA in proposals for potential new uses/beneficial reuse of their sites, including in relation to new nuclear development. It should also make it clear that any proposals for new uses must not compromise the decommissioning and clean-up of existing nuclear sites.

ii. **Environmental impact and greenhouse gas emissions should be minimised.** We agree that impacts should be minimised and benefits maximised. We suggest that this text is strengthened to state that the decommissioning mission should contribute towards the UK's Net zero carbon targets and should contribute to biodiversity net gain. This is noted under solid waste in Part II.

iii. **That the wider socio-economic and environmental benefits of decommissioning and clean up should be maximised, and negative**

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<sup>4</sup> [NDA Draft Business Plan 2020 to 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)



**impacts be minimised and offset.** We propose that an explicit reference is made here to the payment of appropriate community benefits for those communities that are called on to host nuclear legacy and waste on behalf of the nation.

In addition, we would add a further expectation namely, that where possible and supported by the community, interim uses of sites undergoing decommissioning should be sought.

**7. Do you agree with our proposed updates to the policy statement on the management of spent fuel? Please provide the reasoning behind your response.**

Yes. We supported the end of reprocessing at Sellafield and welcome the statement that new nuclear stations should proceed on the basis that spent fuel will not be reprocessed. At the same time, we recognise that new reprocessing technologies may emerge in future and so also support the commitment that Government should consider their relative merits at that time.

**8. Do you agree with our proposed policy statement on the management of uranium? Please provide the reasoning behind your response.**

Yes. It is important that the UK has a policy on Uranium management. We agree with the key elements of this (7.11).

**Response to Part 2 of the consultation**

**1. Do you think that the draft policy statements on radioactive sources accurately reflects existing practice and regulation? Please provide the reasoning behind your response.**

Yes. It covers all aspects of the management of such sources and deals with the difference of regulation in different parts of the UK.



**2. Do you have any suggestions on how to improve this chapter on radioactive sources? Please provide the reasoning behind your response.**

There is a degree of repetition of certain information. It is not clear that this repetition is always justified.

**3. Do you think that the draft policy statement on radioactive liquid and gaseous discharges reflects existing policy, practice and regulation Please provide the reasoning behind your response.**

Yes. The section is a clear statement of current policy, practice and regulation. Nuleaf supports the preference for the 'concentration and containment' of radioactive substances where possible and agrees with the commitment that every effort should be made to minimise discharges of gaseous and liquid wastes to the environment, through the application of BAT/BPM.

**4. Do you have any suggestions on how to improve this chapter on radioactive liquid and gaseous discharges? Please provide the reasoning behind your response.**

No. The chapter is clear.

**5. The solid radioactive waste policy set out above includes existing policy and policies that would be implemented if the proposals in Part 1 are taken forward. Do you agree that the policy statement captures all relevant policy on managing solid radioactive waste?**

Yes, in general terms.

We support the statement in 8.34 - 8.43 that the principal objective across the nuclear life cycle should be to avoid the generation of waste. If that is not possible then minimisation, reuse and then recycling should be employed if possible. We also support the presumption towards early disposal (8.52).

As the draft Policy notes, waste minimisation along with thermal treatment, smelting, compaction and decay storage have become an increasingly significant part of waste management in the UK. We would therefore suggest that more information is provided on each of these treatments. A map showing the distribution of current storage, treatment and disposal facilities for radioactive waste in the UK would be useful.



Below we propose a number of changes that would improve the policy and align it better with the high-level stated aims set out earlier.

**6. Do you have any suggestions for how this chapter on managing solid radioactive waste could be improved? Please provide the reasoning behind your response.**

This Chapter is by far the most significant in terms of the changes proposed. We propose the following improvements to the text:

- In Figure 3 it would be helpful, in the name of wider understanding, to use 'alpha', 'beta' and 'gamma' as well as their respective symbols.
- There is reference in 8.64 to 'appropriate' regulatory and stakeholder involvement in the development of waste management plans (WMPs) in the nuclear and non-nuclear sectors. More information should be provided on what 'appropriate' engagement involves, and who the key regulators and stakeholders are, particularly in relation to the non-nuclear sector. We believe that local authorities should be identified as key stakeholders for both the nuclear and non-nuclear sectors. Engagement must include meaningful consultation, enabling communities to influence the nature of proposals.
- Sections 8.65 to 8.67 cover wider engagement with local authorities and communities on WMPs. We are pleased to see in 8.67 that clear guiding principles are noted for consultations. This section should be added to, to note that consultations should be designed to be accessible to as many in the community as possible, including hard to reach groups.
- 8.73 states that the UK and Devolved Governments will encourage waste producers to dispose of waste in an optimal manner. We would propose that this text also recognises the need for engagement and public acceptance.
- In 8.105 there is reference to work being undertaken to evaluate the Scottish HAW inventory and which wastes 'may or may not' be suitable for near surface disposal. It would be helpful to recognise that some Scottish wastes are not suitable for near surface disposal and to explain how such wastes will be managed.
- The commitment of the UK Government to a 24GW new nuclear programme, potentially involving a range of reactor technologies, is likely to lead to a requirement for a GDF to be significantly larger than that which is currently envisaged. This should be acknowledged, and its implications identified.
- CoRWM has recently indicated that it is in dialogue with NWS on the need for a rock characterisation facility to be developed as part of the GDF programme. There is no mention of this as an option within the Policy.
- On NSD, it is helpful that the Policy acknowledges that the NDA may seek dialogue with the local authority and community around the potential for



acceptance of ILW at the LLWR site. This has been anticipated but has not been clear up until now.

- It would be useful if the section on NSD explained how long the waste emplaced within such a facility would be expected to remain hazardous.
- The policy states that an NSD would be constructed on NDA owned land. It is not clear whether this includes NDA land that is not currently designated as a nuclear licensed site. This should be clarified. We believe the Government should avoid generating unnecessary concern by specifying that any NSD must be located on an existing nuclear licensed site.
- Siting an NSD facility on a nuclear licensed site within the NDA estate would represent a very significant change to the nature of the site concerned. It would have an impact both on the proposed end state and the timescale in which land on the site could be released and made available for other purposes. Impacted communities will need to be properly consulted about the anticipated impacts of hosting an NSD facility. Appropriate measures will be required to mitigate and compensate for any negative impacts on the local area.
- Our members take different views on whether an NSD facility should be a Nationally Significant Infrastructure Project (NSIP) or subject to local planning under the Town and Country Planning Act 1990 (8.118). If this process is to be taken forward through local planning, then adequate resources will have to be provided to the local planning authorities involved. Local planning services are under significant pressure, and the planning aspects of a large new facility such as this could not be managed within existing local authority resources.
- We support the commitment in 8.114 to a community benefits package. The Policy states that this package will be determined by the NDA. We note that an NSD facility would accept waste from other sources in the nuclear and non-nuclear industries on commercial terms. The scale of the community benefits package for the community should therefore be significant, reflecting the large sums that an NSD will save the NDA; and the fact that they are deriving income from the import of waste from others. The Policy should recognise that any benefits package should be 'substantial' in nature.
- Regarding disposal of LLW (8.119-8.121), the Policy acknowledges the expectation that commercial operators will continue to provide capacity for disposal. Where this is the case, the Policy should be explicit in requiring that appropriate benefits be paid to the host community. A precedent for this was set by the LLWR site near Drigg.
- In terms of on-site disposal (8.122-8.127), host communities are likely to have concerns about the ongoing presence of radioactive material after assuming previously that all such material would eventually be removed. Effective engagement with the community and local authority is therefore necessary. It will also be important for the NDA Group to work with and



support the Local Planning Authority (LPA) where there is a requirement for planning permission. As a move to in-situ disposal/disposal with a purpose is estimated to save many hundreds of millions of pounds, community benefits should be payable. The Policy should acknowledge this.

- It should also be noted that the conversation with communities on Site End States (SES) happened some years ago. Given the significant changes to SES that may result from this policy, new engagement should be undertaken.
- In relation to any potential replacement to LLWR (8.139) it should be made clear that a full siting process, involving consultation with the potential local authorities and community will be required; as would the commitment to a significant community benefit package.

**7. The nuclear decommissioning policy set out above includes existing policy and policies that would be implemented if the proposals in Part I are taken forward. Do you agree that the policy statement captures all relevant policy on nuclear decommissioning?**

Yes, in general terms. We support the commitment to decommissioning taking place as soon as reasonably practical (9.18) and that it is based on a lifecycle approach (9.21) and the effective management of uncertainty (9.23). A number of improvements and additions are proposed below.

**8. Do you have any suggestions for how this chapter on nuclear decommissioning could be improved? Please provide the reasoning behind your response.**

We propose the following improvements:

- Section 9.7 notes that the policy covers the JET fusion research facility. Given that a number of other fusion facilities are planned or proposed in the UK, we would suggest it may be better to explain that the policy covers the decommissioning of *all* current and future fusion facilities. It is appropriate to refer to the specific case of JET decommissioning, but it should be clear the policy applies more widely in line with the recent consultation that is referred to.
- We welcome the requirement for operators to produce and maintain Decommissioning Strategies and Plans (9.24 onwards), as the lack of lifetime plans and/strategies for individual sites has led to an absence of clarity. An explicit requirement for meaningful, open and transparent engagement and consultation on these Strategies and Plans should be made. This should be accompanied by a requirement to ensure that stakeholders, communities and



the public views will, where appropriate and relevant, influence those strategies and plans. Operators should be expected to respond and explain where this is not feasible or appropriate.

- Section 9.25 section lacks an environmental and net zero dimension and should include consideration of climate change, net zero and the environment including delivering on biodiversity net gain. These issues should also be addressed in the section on Decommissioning Plans (9.27 – 9.32).
- Section 9.29 rightly notes that decommissioning sites represent a potentially valuable resource. We propose that the text is altered to note that '*The future use of a site...**should** therefore be a significant factor*'. We also suggest that this section be amended to note that the potential for interim uses should be explored where these are compatible with the decommissioning strategy.
- We propose that 9.31 be amended to read '*operators will therefore need to discuss potential uses with the relevant **local and planning authorities**...*'. Operators should not just to engage around local plans but with local authorities on wider issues such as economic development, skills and environmental sustainability.
- We agree with 9.32 that decommissioning land may be a key strategic asset and should be considered for national infrastructure. In some areas these sites are earmarked for new nuclear development. Nuleaf neither supports nor opposes new nuclear development. We note however that the NDA's role in terms of facilitating new nuclear development has not been clearly defined. Government must give a clearer steer to NDA as to the extent to which they should be expected to engage in facilitating proposed new nuclear development.
- Section 9.38 should note the role of local planning authorities (LPAs) as regulators.
- We would like to see encouragement in the Policy for mechanisms such as Masterplans and Planning Performance Agreements (PPAs) that help underpin a long term and strategic relationship between operators and local planning authorities. This is of benefit to both parties in the decommissioning of sites.

**9. Do you think that this chapter on the import and export of radioactive substances accurately reflects existing policy, practice and the regulatory framework? Please provide the reasoning behind your response.**

Yes, it is a clear statement of the current policy, practice and regulatory framework.



**10. Do you have any suggestions on how to improve this chapter on the import and export of radioactive substances? Please provide the reasoning behind your response.**

No. Please see our response to the previous question.

**11. Do you agree that the policy covers everything you would expect it to regarding managing spent fuel and uranium? We are not currently seeking views on plutonium management policy.**

Yes.

**12. Do you have any suggestions for how the policy statements on managing spent fuel and uranium could be improved? Please provide the reasoning behind your response.**

The reference in 11.11 to 'current industrial scale reprocessing techniques' including those deployed at THORP and the Magnox Reprocessing Plant is confusing as both those facilities are now permanently closed, something that is acknowledged in the following paragraph of the consultation document.

I hope these comments are helpful.

Yours faithfully,

**Philip Matthews**  
Executive Director