



5th February 2010
Ref: DSG(2010)C012

Richard Lochhead, MSP
Cabinet Secretary for Rural Affairs and
Environment
The Scottish Government
Victoria Quay
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Please respond to:

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Dear Mr Lochhead

NON-RADIOACTIVE WASTE

The Dounreay Stakeholder Group (DSG) is an independent body whose role is to provide public scrutiny of the Dounreay site and is represented by over 20 community organisations.

At its last meeting in December it was brought to our attention that current regulation dictates that after 3 years the storage of controlled non-radioactive waste for re-use must be moved into landfill and is then subject to landfill tax.

The DSG is supportive of the waste hierarchy, ensuring that materials are recycled, re-used and minimised. However, we are aware that due to the programme of decommissioning the Dounreay site the non-radioactive waste currently stored on site will be required in about 12-15 years and therefore falls outside the 3 year timescale.

Given the fact that the scenario means, as regulation currently stands, that the site would have to transport the material to landfill, pay the landfill tax and then in later years buy and transport new material back to site to allow the decommissioning programme to continue appears to be an unhelpful and unintended consequence. This would mean a considerable expense to the taxpayer and will impact on other nuclear sites where the funding could be better spent.

We are writing to draw this to your attention and to ask that you consider an amendment to this regulation for sites like this that can demonstrate a requirement for the stored material outside the 3 year timescale.

Yours sincerely

Alastair MacDonald
DSG Chairman
On behalf of Dounreay Stakeholder Group

Copies to: Jamie Stone, MSP
 Rob Gibson, MSP
 David Stewart, MSP
 Mary Scanlon, MSP
 Elizabeth Gray, Radwaste department, Scottish Government