

RESPONDENT INFORMATION FORM

Please Note That This Form Must Be Returned With Your Response To Ensure That We Handle Your Response Appropriately

1. Name/Organisation

Organisation Name

Downreay Stakeholder Group.

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

LOVE

Forename

JUNE

2. Postal Address

Downreay Stakeholder Group
 c/o Downreay.com
 Trail house, 7 Olrig Street,
 Thurso, Caithness

Postcode KW14 7BJ. Phone 01847 806082 Email info@downreaystakeholdergroup.org.

3. Permissions

I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

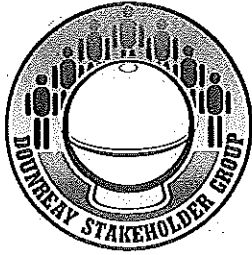
(c) The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your response to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No



8th April 2010
Ref: DSG(2010)C028

Scotland's Higher Activity Radwaste
The Scottish Government
Waste & Pollution Reduction Division
1-J Dockside
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Edinburgh, EH6 6QQ

Please respond to:

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DSG RESPONSE TO SCOTTISH GOVERNMENT'S HIGHER ACTIVITY WASTE CONSULTATION.

The Dounreay Stakeholder Group (DSG) welcomes the opportunity to respond to the Scottish Government's consultation on higher activity wastes.

The DSG is represented by over 20 organisations and therefore this response is one that is generally agreed by most organisations. However, there are some organisations, notably Shetland Islands Council, who have intimated they will submit their own response and therefore other organisations have been encouraged to do the same.

The DSG met prior to its' public meeting held on the 10th March and produced a list of questions relating to the consultation (DSG(2010)C018 refers). This was provided to Elizabeth Gray, Scottish Government, who gave a presentation at the meeting on the 10th which clarified some of the issues raised.

The DSG's response to the consultation is as follows:

- The Scottish Government should be given credit for clear and understandable consultation documents. However, while understanding the complexity of the issue the three documents, which ranged in size of 80+, 100+ and 100+ pages could potentially put a lot of people off responding.
- The Scottish Government proposed policy covers all aspects of the waste issue, except deep geological disposal. Because it appears to cover all options and addresses the waste hierarchy, the developed policy is likely to be flexible enough to cover all eventualities.
- Therefore the DSG has no further comment to make on the consultation for the policy of higher activity wastes and waits with interest to see the final policy.

DSG would like to make the following comments which will inevitably become part of the next stage of consultation:

- Dounreay is a unique site with its own challenges.
- Approximately 97% of the intermediate level waste at Dounreay is long-lived and is therefore unlikely to be suitable for disposal. Therefore it would not appear sensible to build a disposal facility for the remaining waste.
- Given the proximity principle, it is unlikely that wastes from other sites will be sent to Dounreay or vice-versa. Although it should be noted that other producers of higher activity waste in Highland include HMS Vulcan and Raigmore hospital.
- The policy has no significant impact on the current Highland Council policy.

The DSG recognises that once the Policy is finalised issues on proximity, treatment, transport, etc is another stage in the step-wise consultation process and will have more comment to make at that stage.

Yours sincerely

Sent electronically without signature

Bob Earnshaw
DSG Chairman
On behalf of the Dounreay Stakeholder Group