KIMO UK Chair: Norman MacDonald KIMO UK Coordinator: Mr Tom Piper



c/o Aberdeenshire Council Alford Area Office School Road Alford AB33 8TY

KIMO UK

Scotland's Higher Activity Radioactive Waste Consultation The Scottish Government Waste and Pollution Reduction Division 1-J Dockside Victoria Quay Edinburgh EH6 6QQ Tel: (44) (01595) 744800 Fax: (44) (01595) 744804

E-Mail: tom.piper@kimo.shetland.org Home Page: www.fishingforlitter.org

If calling please ask for Tom Piper

Date: 07/04/2010

Direct Dial: +44(0)1975 564807 Mobile: +44(0)7789 790775

Our Ref: Your Ref:

Dear Sir/Madam,

SCOTLAND'S HIGHER ACTIVITY RADIOACTIVE WASTE CONSULTATION

KIMO UK is disappointed that one of the disposal options listed in the consultation is the construction of a facility under the seabed, but accessed from land, i.e. entered from the land but with wastes disposed of in a facility mined under the seabed. Similar proposals have been made in the past by the UK Government and, while not explicitly illegal under international laws and marine pollution conventions, are strongly opposed by many countries. Such facilities are suggested because any pollution or leakage of radioactivity would go into the sea where it is much harder to measure its environmental and health impact.

KIMO would also question the notion of disposal as described in the consultation document, as acknowledged some waste will remain dangerously radioactive for tens of thousands of years but disposal sites are to only be designed for a lifetime of hundreds of years. As such we feel that the consultation should only talk about the storage and management of radioactive waste and not its disposal. The original government policy of rejecting disposal in favour of long-term storage with the option of retrieval should be reinstated, or at the very least be the preferred option to disposal except when not technically feasible. It is evident that we are to leave future generations a dangerous legacy in the hope that they are better equipped to deal with our poor decision making.

Yours sincerely,

Tom Piper KIMO UK