



# Shetland Islands Council

---

## **Submission by Shetland Islands Council to the Scottish Government's consultation on the management of Higher Activity Radioactive Wastes**

### **Summary**

## **1. Background**

- 
- 
- 
- 
- 
- 

## **2. Pre-consultation discussions**

The Council recommends that the drafting process and pre-consultation procedure be reviewed to ensure stakeholders, including NGOs and local authorities, are involved fully from the outset.

### **3. Missed opportunities**

*The Council recommends that the Scottish Government begin discussing with stakeholders the drafting of a new radioactive waste policy for Scotland that encompasses all categories of waste.*

*The Council calls on the Scottish Government to state clearly its rejection of the reprocessing of spent nuclear fuel. It should also reject the UK policy on plutonium and call for it to be classified as a waste*

*The Council calls on the Government to announce its intention of developing a comprehensive, co-ordinated and distinctive Scottish radioactive waste management policy that includes all categories of legacy and decommissioning wastes.*

The Council recognises these are difficult issues that raise difficult questions, but the Council recommends the Scottish Government begins discussing with stakeholders the future of these wastes. In particular the Council urges the Scottish Government to consider the future decommissioning wastes at HMS Vulcan.

#### **4. Storage and Disposal**

The Council believes the Government should restore storage as the preferred option for wastes, where technically feasible. All waste facilities should include the provision of retrievability.

While the development of a distinct Scottish policy is welcome, and regulation by a Scottish authority may be preferable, the Council cannot accept this should be a relevant consideration in determining policy

## **5. Near Surface**

The Council totally rejects the interpretation of near surface as being as deep as 100 metres or more and would ask whether this might reasonably be called a deep geological facility - the very policy rejected by the Scottish Government.

While it is obviously impossible to set precise figures to the meaning of 'near surface', the Council calls on the Government to make its intent clear and include a clear statement to the effect that storage or disposal facilities are expected to be either on the surface or as close to the surface as technically and practically feasible

## **6. Proximity Principle**

The Council believes it is impossible to understand how the proximity principle will be applied later in the policy development when there will be discussion on whether there should be local, regional or national facilities. The Council believes the Government should give a clear unequivocal commitment that the proximity principle will be rigorously and strictly applied in the development of the policy

## **7. Seabed Disposal**

The Council believes the under the seabed option for disposal facilities should be deleted from the draft policy

## **8. Stakeholder involvement**

The Council believes that as well as developers, operators and local communities, this section should be amended to include other regional and national stakeholders in these discussions.

## **9. Dounreay**

While the consultation excludes consideration of possible sites for waste facilities the Council wishes to place on record its objection to Dounreay being used for the storage or disposal of any radioactive material except its own legacy and decommissioning wastes