



Please respond to:

June Love  
DSG Secretariat  
Dounreay.com  
Traill House  
7 Orlig Street  
Thurso, Caithness, KW14 7BJ

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Tel: 01847 890886  
Fax: 01847 893459  
Email: [info@dounreaystakeholdergroup.org](mailto:info@dounreaystakeholdergroup.org)

Geological Disposal Team  
Department of Energy & Climate Change  
Room M06  
55 Whitehall  
London, SW1A 2EY

Dear Sir/Madam

#### **COMMITTEE ON RADIOACTIVE WASTE MANAGEMENT (CoRWM) TRIENNIAL REVIEW 2015**

The Dounreay Stakeholder Group (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, who may not agree entirely with this submission and therefore these organisations have been encouraged to provide their own response.

The DSG welcomes the opportunity to respond to your review of CoRWM and offer the following comments:

#### **Question 1: Do the key functions performed by CoRWM continue to be necessary and appropriate for the successful management of higher activity radioactive wastes?**

##### **Response:**

- The subject of the management of higher activity radioactive waste (HAW) in the UK is complicated and involves many different organisations with different short and long term objectives and interests. The situation of Scotland having a different HAW policy adds to the complexity. There is no body other than CoRWM that takes an overall impartial view of the whole HAW arena in the UK. The key functions continue to be necessary and appropriate.

- A key issue in its remit is the scrutiny of the Government's actions and strategies. This allows CoRWM to offer independent advice to Ministers without being part of the "administration".
- The members of CoRWM are independent and with substantial experience and able to express their views without corporate or Governmental ties.

**Question 2: Do the key functions performed by CoRWM continue to be necessary for the successful implementation of the Geological Disposal Facility Programme in particular? *In respect of questions 1 and 2 you might wish to consider issues such as: is independent scrutiny and advice, over and above that already provided by the independent safety, security and environmental regulators, necessary for the successful long- term management of higher activity radioactive wastes and the delivery of geological disposal? Is stakeholder engagement and transparency of information important?***

**Response:**

- The Geological Disposal Facility Programme (DGF) requires more independent and impartial review and advice to the Government than any other aspect of HAW management.
- The RWM is a new body and basically theoretical with little experience of large project management in difficult political and publically aggressive environments. This was demonstrated in the ill-fated "first attempt" MRWS. CoRWM's remit is not to advise RWM but it can scrutinise its activities and report to Government on RWM's performance and plans. This is essential.
- The regulators remit is to regulate against the current legislation in place. Their role of advice to HAW operators is limited within this statutory remit as they cannot be compromised by their earlier statements when they come eventually to have to decide on a formal application. The interpretation of rules and guidance can be different within limits from different individu?

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**Question 4: What do you see as the benefits and risks of delivering the functions of CoRWM in these alternative ways? In particular, do you view any of these methods of delivery as beneficial, and why?**

**Response:**

*Continued NDPB* – This has the advantage of having an association at arm’s length with the Government and a working relationship with the civil service. As HAW management is a key topic with other countries’ governments and CoRWM must be aware of these programmes the link of being an NDPB facilitates interaction with these other government agencies for the benefit of the UK. The strict Government rules on expenses and fees and CoRWM’s budget ensure money is not wasted.

**Question 5: If you consider that an advisory NDPB is the right delivery mechanism for the functions of CoRWM, what improvements could be made to support the effective and efficient delivery of CoRWM’s remit?**

**Response:**

- CoRWM at present is a source of independent advice and authoritative information to the Government only. CoRWM could be given a role of offering such advice to other third parties. The problem to be considered though is that advice often can be taken by some recipients as being biased because it does not accord with their views. CoRWM could be seen by some as being biased though it would only be giving its considered view after analysis of the facts. This would be particularly difficult in the geology range of issues.
- CoRWM cannot be politically impartial because it supports geological disposal and a GDF whereas the SNP Scottish Government does not support that policy.
- The membership of CoRWM has to change to reflect the changing situation with the second MRWS programme as it develops. At present geological and stakeholder engagement skills are high priorities. Throughout the next decade though skills in project management and foreseeing risk areas and mitigation planning will be essential.

Yours sincerely

*Sent electronically without signature*

**David Flear**  
**DSG Chairman**