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Dounreay Radioactive Waste Substitution Consultation  
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Our Ref: JM/MR/EL26411  
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Date: 3<sup>rd</sup> March 2011

Dear Sir/Madam,

## **Dounreay Radioactive Waste Substitution Consultation**

It 2004 the Shetland Islands Council adopted a Statement of Principles in relation to radioactive waste management at Dounreay that has guided its decision-making in relation to the decommissioning of the site. The main principles are:

- The Council rejects the idea that radioactive waste can be “disposed” of. Instead, the Council considers the issue to be one of management.
- ▶ The Council opposes any process or activity that involves new or additional radioactive discharges into the environment, as this is potentially harmful to the human and natural environment.
- ▶ The Council rejects the policy of 'dilute and disperse' as a form of radioactive waste management (i.e. discharges into the sea), preferring instead a policy of 'concentrate and contain' (i.e. store safely on-site).
- ▶ The Council supports the principle of waste minimisation.
- ▶ The Council is opposed to the unnecessary transport of radioactive and other hazardous wastes.

▶ The Council believes wastes should ideally be managed on-site where produced (or as near as possible to the site) in a facility that allows monitoring and, if necessary, retrieval of the wastes.

▶ The Council accepts the need for the wastes and contamination at Dounreay to be dealt with responsibly and in accordance with the above principles. It is opposed to 'exporting' wastes so that they become the problem of other communities as much as it is opposed to Dounreay being used for the treatment or management of wastes from any other sites.

Given these principles the Council does not agree with Question 1 in the consultation, believes that waste substitution is not the best option in this case and would suggest that the wastes are retained and managed at Dounreay. This would remove the need for unnecessary transport of intermediate and high level waste by sea to overseas owners. As highlighted in the consultation document the amount of waste is small in relation to the overall inventory and there is space in the existing stores at Dounreay to manage it.

The Council believes that the Government rather than unnecessarily transporting a substituted waste back to the country of origin, due to their lack of suitable storage facilities, should instead seek a financial contribution from the countries involved for managing the waste at Dounreay.

Finally the Council has no objections to this submission being made public.

Yours faithfully,



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John Mouat  
Environmental Liaison Officer  
Shetlands Islands Council