

## **SCOTTISH GOVERNMENT UPDATE TO DOUNREAY SITE STAKEHOLDER GROUP – 19<sup>TH</sup> MARCH 2025**

### **SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM**

#### Review of Scotland's Higher Activity Waste Policy

We conducted our initial round of engagement with stakeholders last year and are currently considering the responses received before moving forward. Thank you to everyone who provided information or took part in discussions. There will be further opportunity to input as we move through the review process and we will provide further updates as this work progresses.

A high level summary of some of the main views received is included below;

- A number of stakeholders asked for clarity around particular areas of the policy including;
  - the interface between the revised UK Radioactive Waste Policy and SG Policy;
  - the interpretation of near-site;
  - what is meant by retrievability;
  - what will happen to challenging wastes that will not be suitable for near surface disposal, including reconsideration of our policy regarding geological disposal;
  - the definition of near surface.
- Include consideration of sustainability, value for money, intergenerational equity and waste management principles considerations;
- Updates in light of technical developments over the last 13 years;
- The idea that radioactive waste can be disposed of be rejected in favour of indefinite storage and development of another solution;
- Any process or activity that involves new or additional radioactive discharges into the environment be opposed;
- The policy of 'dilute and disperse' as a form of radioactive waste management (i.e. discharges into the sea or atmosphere) be rejected in favour of a policy of 'concentrate and contain' (i.e. store safely on-site);
- The principle of waste minimisation be supported;
- The unnecessary transport of radioactive and other hazardous wastes be opposed;
- Wastes should ideally be managed on-site where produced (or as near as possible to the site) in a facility that allows monitoring and retrieval of the wastes;
- the term higher activity waste is confusing due to its similarity with the term high level waste and should be phased out.

### 8<sup>th</sup> Joint Convention Review

We are involved with wider UK work being led by ONR on the 8<sup>th</sup> Joint Convention report for the International Atomic Energy Authority on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management, ensuring that Scottish policies and priorities are presented appropriately. The next review meeting is due to be held from 17<sup>th</sup> of March until 28<sup>th</sup> of March 2025. Dan Couldridge from the team will be part of the UK delegation attending the first week.

### Annual NDA meeting with Cabinet Secretary for Net Zero and Energy

The annual meeting between the Cabinet Secretary for Net Zero and Energy, the NDA Chair and NDA CEO, as set out in the NDA Framework document, is being organised for Spring 2025. The meeting will cover a number of issues including progress across the three NDA sites in Scotland as well as the expanding NDA mission in Scotland with the future transfers of Hunterston B, Torness and the potential transfer of the Vulcan site from the MOD, for decommissioning.

### The Environmental Authorisation (Scotland) Regulations 2018 (EASR 2018) updates

The Environmental Authorisation (Scotland) Regulations 2018 (EASR 2018) are being amended to bring together all the permissioning arrangements for SEPA's four main regulatory regimes (Water, Waste, Radioactive Substances and Pollution Prevention and Control) into an integrated structure and under a single standardised procedure. As per previous updates to this group, these also include some technical updates to the radioactive substances provisions to make improvements from SEPA's experience of operating the regime since 2018.

The new regulations (Environmental Authorisations (Scotland) Amendment Regulations 2025) will now be laid on the 27 February 2025, with the coming into force date scheduled for 1st June 2025.

**Diane Hamilton**  
**Scottish Government**