

Environment Agency
February 11, 2019

- Government concluded that a waste substitution policy for radioactive waste arising from overseas research reactor fuel reprocessing contracts is an acceptable practice that the NDA can adopt to deal with Dounreay contracts
- We consider that SEPA retain an interest in this matter in so far as the arrangements for substitution continue to meet the policy direction of broad environmental neutrality. On that basis, they have an ongoing interest however this would only involve any direct regulatory role should there be any proposed change in the methodology which would undermine the position we jointly declared in May 2013.
- Government expects broad environmental neutrality to be maintained, primarily on the basis of radiological equivalence. Government will not specify the methodology used to determine radiological equivalence but expects the environmental regulators to be satisfied that the waste substitution arrangements between the NDA and its overseas customers result in environmental neutrality.
- Based on our findings both the Environment Agency and SEPA were content that the Dounreay waste allocation and substitution methodologies and their underpinning calculations will meet the policy direction of broad environmental neutrality.
- The matter of regulating the transfer of radioactive waste from Sellafield to ANSTO is the responsibility of the Environment Agency in accordance with the Transfrontier Shipment of Radioactive Waste and Spent Fuel Regulations. This regulation seeks to ensure that the intended receiving country is capable of managing the waste safely, and seeks the consent of the authorities of the country involved (see <https://www.gov.uk/guidance/radioactive-waste-spent-fuel-or-sources>)
- To-date the Environment Agency has yet to receive an application for the transfer of this waste.
- The response to the consultation, published in 2012, can be found at:
<https://www.gov.scot/publications/dounreay-radioactive-waste-substitution-consultation-response-paper/pages/10/>