



**Friends of
the Earth
Scotland**

Sue Sadler
CoRWM
4/F8 Ashdown House,
123 Victoria Street,
London
SW1E 6DE.

19th May 2006

Dear Ms Sadler

Response to CoRWM draft recommendations on the long-term management of the UK's radioactive waste.

Friends of the Earth Scotland (FoES) has noted CoRWM's draft recommendations and welcomes the opportunity to comment on them.

FoES strongly believes that geological disposal is not the best available approach for the long term management of nuclear waste and should not be recommended by CoRWM. In our previous submission, we made it clear that we believe that the best available approach is above ground, monitorable, retrievable storage. There are considerable uncertainties and risks associated with deep disposal, and we urge CoRWM to fully take account of the many technical as well as social and ethical issues that cannot be resolved with any level of confidence.

However, should deep disposal be recommended, then detailed information must be provided on the timescales envisaged for interim storage and disposal, taking all possible delays into account. Plans for interim storage must also address the potential eventuality that any initial proposals for deep disposal may well not be feasible. Therefore, all stores should be constructed to last for an absolute minimum of 150 years.

FoES agrees that proposals for the location of radioactive waste facilities should be based on the principle of volunteerism on the part of the community – and without prejudice towards those communities that currently host nuclear facilities. We believe that the principle of volunteerism should also be extended to all other communities affected, for example by the transport of the waste through their locality or those near to stored waste in the interim. There must be absolute transparency with *all* those communities and it is important that CoRWM spells out in some detail how this might be achieved.

On the issue of managing uranium, spent nuclear fuel and plutonium as wastes, FoES believes that CoRWM should recommend against the reuse of uranium and plutonium and against reprocessing spent nuclear fuel as this would create more radioactive waste increasing the overall volume of material that must eventually be dealt with.

Friends of the Earth Scotland

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Given the concerns of CoRWM over current waste stockpiles, FoES believes that CoRWM should recommend against the building of new nuclear reactors. It is important to make the link between the work that CoRWM is currently doing – showing the technical, social and ethical problems of dealing with the UK's legacy of radioactive waste – and how these would be added to and exacerbated by a new generation of untried and untested nuclear power stations.

We also believe that CoRWM should state clearly and on the record that any final recommendation is not verification that the waste issue has been “resolved”, given the many uncertainties and long time frames associated with delivery of either surface storage or a deep repository options. Failure to do so may well lead to the final report being used for political purposes for which it was not intended.

We trust you will take our views into account, in deciding your final recommendations, which we will await with interest

Yours Sincerely

Stuart Hay
Head of Policy & Research
Friends of the Earth Scotland