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Dear Isabelle

RADIOACTIVE SUBSTANCES: HMNB CLYDE FASLANE AND COULPORT

Thank you for your letter of 2 July 2019, setting out the status of an application from MoD to update existing arrangements for disposal of radioactive waste at Faslane and Coulport.

I have no specific comments on the technical aspects of the proposal and believe SEPA, with input from stakeholders, is best placed to assess whether these are appropriate.

You asked a specific question on the application of Article 37 to military activities. The Scottish Government's interpretation is that the Euratom Treaty does **not** apply to military activities. From the papers, there is no suggestion in the letter that the radioactive waste in question comes from other sources than the MoD's military activities at these sites, so on that basis article 37 would not apply.

I note that a future stage of consultation will involve a level of public engagement. I would be grateful for advance notice of when this stage is likely to be reached, to allow me to keep Ministers sighted on developments.

D McGillivray
Deputy Director

