

Plutonium Management Team  
Department of Energy and Climate Change  
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3 Whitehall Place  
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Date 20/08/2012

**RE: Consultation on the proposed justification process for the reuse of plutonium**

Dear Sir / Madam

Thank-you for the email sent on the 28<sup>th</sup> May 2012 regarding the Consultation on the proposed justification process for the reuse of plutonium. Please find below the Natural Heritage, Northern Ireland Environment Agency (Department of the Environment for Northern Ireland) response to the consultation questions.

Do respondents agree with the Government's view that it is sensible to issue generic guidance for the reuse of plutonium? We welcome comments on this proposed approach.

We are content with the proposed approach. We consider that the generic guidance should highlight that although the applicant is expected to provide a range of environmental information for the Justification Process other statutory, regulatory and license clearance processes may require the applicant to provide additional environmental information.

Is the proposed application and decision-making process clear, appropriate and proportionate? If not, how can they be improved?

No Comment.

Is the indicative list of information in Table 3 sufficient and appropriate to assist in the making of justification applications and justification decisions? Does the indicative list omit any relevant information, or include any unnecessary information?

We are content with the indicative list of information in Table 3.

Are there any other ways in which the draft justification process can be improved? If so, how?

We consider that it would be timely to send an advice note to statutory consultees outlining their role and responsibility in relation to the Justification Process. For example it would be worthwhile clarifying whether it is the responsibility of the Department of the Environment for Northern Ireland to pass any application received to whichever Northern Ireland department has lead responsibility for the relevant policy area (as suggested in the 'The Justification of Practices Involving Ionising Radiation Regulations 2004 – Guidance on their application and administration') or will this task

be undertaken by the Secretary of State for Energy and Climate Change? We note that Table 1 – Proposed Justification Process in the current consultation notes that the Department of the Environment for Northern Ireland, Devolved Administrations and relevant Government Departments will be consulted on the draft decision document. Who initiates the consultation with Devolved Administrations and relevant Government Departments?

We consider that it would also be timely to verify and agree the key contact / consultation point for statutory consultees. For example are these type of consultations currently sent to one contact point within the Department of the Environment for Northern Ireland or several contact points. This information would assist us in the administration of appropriate statutory consultee responses.

Yours Sincerely