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Scottish CND Open Letter to Scottish Environmental Protection Agency (SEPA)

Dear Chief Executive,

I'm writing to you in my capacity as chair of the Scottish Campaign for Nuclear Disarmament on behalf of our thousands of members and supporters across Scotland to raise a number of concerns, ask for a written assurance and to seek a meeting with you.

We note SEPA's past failures to publish information about radioactive leaks at Faslane and Coulport and seek written assurance that this secrecy about radioactive leaks will cease.

SEPA is statutorily required to protect Scotland's environment. We understand that SEPA does not have power to curtail MOD activities if they put the public and our environment at risk but surely concealing such incidents and accidents contradicts SEPA's duty to protect the public and the environment. SEPA has no statutory duty to protect the MOD or its facilities from reputational damage.

Why should it not be widely known that pipe work under the responsibility of the MOD and Babcock burst, resulting in radioactive substances being flushed into the sea loch? Why should it not be known that SEPA's recommendations of appropriate rigorous documentation and monitoring of pipe work were not then followed, leading to a repeat of this failure?

We note that it took the journalist Rob Edwards six years to get information held by SEPA about radioactive leaks at Faslane and Coulport which the Scottish Information Commissioner, David Hamilton, states should have been in the public domain. In his ruling, David Hamilton made it quite clear that SEPA had breached Freedom of Information law by wrongly claiming that releasing the information requested by Rob Edwards would endanger defence, national security or public safety.

We would like a written assurance that any future accident or incident involving radioactive substances will be freely reported.

We are also writing to express our concern about SEPA's dismissive comments in the recent newspaper article

(https://www.theguardian.com/environment/2025/aug/09/radioactive-water-bomb-base-scotland-leak-sea-files). This article states 'SEPA published data on radioactive discharges from Coulport and Faslane every year, along with assessments of the environmental impacts. It insisted those discharges were "of no regulatory concern".' These comments are unsatisfactory in several regards.

As far as we have been able to ascertain, the MOD release dated 2 Oct 2019 states the measured concentration of H-3 released was between 65 - 84 Bq per litre, and the maximum amount of water released was 15 cubic metres (equivalent to 15,000 litres).

Therefore the amount of tritium released to the sea was 1.275 megabecquerels (MBq). The report actually cites this as 1 to 2 MBq, i.e. 1 to 2 million becquerels. In our view, this is a large amount of tritium and remains a matter of concern.

Contrary to what the news article states, whilst SEPA publishes data on aerial discharges from Faslane and Coalport in Scotland, it does not publish data on liquid radioactive discharges.

Also contrary to what the news article states, SEPA does not publish assessments of all the "environmental impacts" from Coulport.

Further, SEPA does not define "no regulatory concern". We believe the release of 1.25 million Bq of tritium is clearly a matter of regulatory concern.

We would be grateful if SEPA could arrange a meeting at your offices between responsible SEPA officers and a CND executive member, plus our advisory radiation scientist, Dr. Ian Fairlie, to discuss these matters.

I look forward to hearing from you.

Yours Sincerely,

Lynn Jameson

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