

## RWMAC ACTION PLAN

Ref.	Main Recommendations	Current Position
1.	The LQA programme needs to be made more transparent, with clearer arrangements for recording the progress of schemes and assessing future plans and progress.	<ul style="list-style-type: none"> <li>• Defence Infrastructure Organisation (DIO) manage a single MOD wide prioritised LQA programme. Having one organisation managing the programme has improved transparency, monitoring of progress and planning.</li> <li>• The LQA process is set out in MOD Defence Estates Practitioners Guide PG 01/07 – Contaminated Land Management: Land Quality Assessment (LQA) Management Guide <a href="http://www.mod.uk/NR/rdonlyres/9BB69BE9-6218-4F06-9139-BB605C38B2C7/0/pg0107.pdf">http://www.mod.uk/NR/rdonlyres/9BB69BE9-6218-4F06-9139-BB605C38B2C7/0/pg0107.pdf</a></li> </ul>
2.	The funding arrangements for the LQA programme would benefit from being simplified and given higher priority in the allocation of MOD resources.	<ul style="list-style-type: none"> <li>• Funding responsibility for the MOD LQA programme now sits with DIO.</li> </ul>
3.	Procedural documentation relating to the programme should be subject to regular review.	<ul style="list-style-type: none"> <li>• The LQA Practitioners Guide is currently undergoing a major review with publication scheduled for early 2012.</li> </ul>
4.	The responsibilities of those managing remediation work should be clearly spelt out (successful remediation should not be dependent on the involvement and personal knowledge of a few particular individuals).	<ul style="list-style-type: none"> <li>• Environmental Protection Act 1990 Part 2A was extended to cover radioactive contaminated land in 2006 and sets out the responsibilities for managing remediation work.</li> <li>• The LQA Practitioners Guide sets out the MOD process for assessing land contamination risks and managing any necessary remediation work</li> <li>• The LQA programme is managed by in-house Environmental Specialists ensuring a consistent approach to managing remediation</li> </ul>
5.	This definition of responsibilities must include	<ul style="list-style-type: none"> <li>• See 4</li> </ul>

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	specific provision for involving relevant branches of the environmental regulators, and identifying their responsibilities, and also provide for the LPA to be brought in at the appropriate time	
6	MOD as the original polluter and a responsible Government Department, must itself ensure that whatever form of site disposal is employed, the land is cleaned up to an adequate standard.	<ul style="list-style-type: none"> <li>• Since the Report MOD disposal policy has changed to ensure that arrangements are in place for the remediation of radioactive contamination.</li> <li>• Through the LQA process the land condition is known and the split of responsibility of each party to the transaction with regard to current and future land contamination is agreed on sale.</li> </ul>
7	MOD should not allow arrangements to be made for the sell-off of land without remediation where there is no downstream control over the quality of the remediation work to be carried out.	<ul style="list-style-type: none"> <li>• See 6</li> </ul>
8	This requires that, in all cases, DE is armed with the necessary expertise to ensure the eventual quality of clean-up work. DERA RPS is the obvious source of much of this expertise. If DERA-RPS is not used, DE must ensure that suitable alternative sources of expertise are available for use	<ul style="list-style-type: none"> <li>• DIO has access to appropriate RPA through both DSTL (formerly part of DERA) and Specialist Environmental Consultants.</li> </ul>
9	MOD should be as clear as is reasonably possible about its contaminated land holdings, and should set up a database for this purpose (drawing on LQA findings and on previous site investigation records, including desk studies and other land quality data).	<ul style="list-style-type: none"> <li>• An LQA database has been established. As at Oct 2011 it held 5370 reports.</li> </ul>

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	At the time of finalising this report (May 2000) the Ministry indicated that it was in the process of developing such a database.	
10	Not least this database should be used to compile as accurate an estimate as possible of future radium disposals to Drigg	<ul style="list-style-type: none"> <li>• Information is extracted from LQAs to inform future radium disposals to Drigg</li> </ul>
11	MOD should ensure possibly in conjunction with other Government departments, that existing records of characterisation and remediation of its past and present landholdings are not lost	<ul style="list-style-type: none"> <li>• The LQA database holds copies of reports produced for past and present landholdings.</li> </ul>
12	MOD should give thought to the feasibility of compiling information on disposals of land predating the LQA programme, where radioactive contamination might have been involved.	<ul style="list-style-type: none"> <li>• The introduction of EPA 1990 Part 2A places the responsibility for inspecting land with the local authority to identify land contamination.</li> </ul>
13	The Ministry should commission work to establish with more certainty, the extent to which buried radium is immobile in all soil and ground conditions.	<ul style="list-style-type: none"> <li>• Complete – Commissioned work is published in the Journal of radiological protection vol.25 (2005) pg127-140 Adrian Baker and Catherine Toque - A review of the potential for radium for luminising activities to migrate in the environment.</li> </ul>
14	The Government, more generally, should revisit its conclusion that where a change of use is proposed, the current planning system alone can ensure an adequate standard of clean-up.	<ul style="list-style-type: none"> <li>• No direct action by MOD</li> </ul>
15	RWMAC also believes that MOD should give consideration to the potential for correlation, and, as far as possible, ensuring consistency of treatment, between its procedures for dealing with radioactive and non-radioactive contamination.	<ul style="list-style-type: none"> <li>• The extension of EPA 1990 Part 2A to cover radioactive contamination, addresses this recommendation</li> </ul>