

Ref: EIR2024- 040

████████████████████  
27 August 2024

Dear ██████████

Further to our previous correspondence regarding your request for the following information:

1. *When is Project MENSA / construction of the MMF expected to be completed?*
2. *When will the Project MENSA and the MMF facilities be first occupied?*
3. *When will the current Assembly Technology Centre (ATC) facility at the AWE Burghfield site cease operations?*
4. *What impact do the changes referred to in Questions 1, 2 and 3 have on the risk profile of the AWE Burghfield site?*
5. *Have REPPiR Regulation 4 (Hazard Evaluation), REPPiR Regulation 5 (Consequence Assessment) and REPPiR Regulation 7 (Consequences Report) reports been prepared in response to the material change resulting from commissioning of Project MENSA / construction of the MMF? If so, can a copy be provided? If not, when are these reports expected to be made available?*
6. *What impact will the MENSA, MMF and Secretary of State for Defence's investment programme (referred to at Paragraph 1.18 of the SOC) have on AWE's recommendation of "the minimum distances to which urgent protective action may need to be taken" in the event of a radiation emergency of sufficient likelihood to require detailed emergency planning in accordance with the REPPiR risk framework (page 181 of REPPiR ACOP)?*
7. *In their May 2023 proof of evidence Person AW stated that "It has been assessed that the public will be exposed for 2 days (initial release and longer passive release) and not for an hour or two". Can you please tell us (in relation to the assessment which forms the basis of AWE's minimum recommended UPA):*
  - i. *Into what time slices was the 48-hour duration of the off-site dose estimates divided for the purposes of atmospheric dispersion estimation?*
  - ii. *What was assumed about the weather conditions and the wind direction for each time slice?*
  - iii. *What proportion of the total release was assigned to each time slice?*
8. *For the explosive distribution upon which the consequence report is based, what was the estimated effective dose to the most exposed persons outside the premises assuming no protective actions are implemented (an output required by Paragraph 126 of the REPPiR-19 ACOP and of great interest to emergency planners).*

Your request has been handled as a request for information under the Environmental Information Regulations 2004 (EIR/the Regulations). EIR regulation 12(2) stipulates that a public authority must apply a

presumption in favour of disclosure in relation to environmental information and we can confirm that AWE holds some of the information you have requested in questions 1,2,7 and 8., and despite the regulation 12(2) presumption in favour of release, a public authority may refuse to disclose environmental information if (i) an exception to disclose applies, and (ii) in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information.

EIR regulation 12(5)(a) permits a public authority to refuse to disclose information to the extent that its disclosure would adversely affect international relations, defence, national security or public safety.

Regulation 12(5)(a) is a qualified exception and subject to the Public Interest Test (PIT). We will now set out arguments for and against disclosure in terms of the public interest, along with the reasons for our conclusion.

In the Public Interest Test (PIT), two arguments are in favour disclosure. Firstly, there is a presumption in favour of transparency, releasing this information would demonstrate AWE's commitment to openness. However, there are also arguments for withholding the information. These include the public interest in safeguarding national security and defence. Providing details about AWE's infrastructure could be exploited by adversaries or third-party states to plan attacks on the facilities, jeopardising the maintenance of CASD (continuous at sea deterrent) thereby undermining the defence of the nation and our allies. Providing details of future projects at AWE would enable adversaries to identify and directly target these areas. Additionally, releasing this classified information into the public domain would highly likely have critical implications for the UK's global security interests.

The PIT has been conducted and the outcome has fallen in favour of applying the exception 12(5)(a) and as such withholding the information in relation to questions 1,2, 7 and 8 in full.

AWE has carefully reviewed question 7 and found that the 'REPPiR' legislative scheme offers a helpful framework. This has allowed AWE to evaluate and conclude that the methodologies and assumptions used in the Hazard Evaluation and Consequence Report for Burghfield meet the criteria for engaging the regulation 12(5)(a) exception.

Detailed guidance issued by the Information Commissioner's Office (ICO) states, in relation to the national security limb of the exception provided by regulation 12(5)(a), that national security has many different aspects. This exception has been thoroughly considered and we are confident that the exception can be relied upon.

In relation to questions 3, 4, 5 and 6, we have carried out thorough searches to locate the information you have requested and we can confirm that AWE does not hold any of the relevant information in relation to these questions.

Under regulation 9 (Advice and Assistance), we would like to advise you that the when AWE is required to carry out any assessments under REPPiR, AWE will prepare a consequences report as soon as reasonably practicable (unless regulation 6(2)(b) applies) and this report will then be made publicly available in accordance with REPPiR 2019. The risk impact cannot be determined until the projects are up and running, and have been assessed.

Please remember to quote the reference number above in any future communications. If you have any queries regarding the content of this letter, please contact this office in the first instance.

If you are unhappy with the way your request has been handled you have a right to request an internal review within 40 days of receiving this letter, by writing to [information.requests@awe.co.uk](mailto:information.requests@awe.co.uk) or our postal address: Information Requests Team, AWE Aldermaston, Reading, RG7 4PR. If you are still unhappy after an internal review has been completed, under the provisions of Section 50 of the Freedom of Information Act 2000 and Regulation 18 of the EIRs you have the right to take your complaint to the Information Commissioner's Office. Please note the Commissioner will generally not consider a complaint until you have exhausted AWE's internal complaints process.

Yours sincerely,

AWE Information Requests Team