

## Agenda – Petitions Committee

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Meeting Venue:

Committee Room 1 – Senedd

Meeting date: 5 December 2017

Meeting time: 09.00

For further information contact:

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- 1 Introduction, apologies, substitutions and declarations of interest**  
(Pages 1 – 15)
  
- 2 New petitions**
  - 2.1 P-05-784 Prescription drug dependence and withdrawal – recognition and support  
(Pages 16 – 35)
  - 2.2 P-05-787 Save the Future Generation of Wales  
(Pages 36 – 43)
  - 2.3 P-05-788 Remove the compulsory aspect of Welsh Baccalaureate  
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  - 2.4 P-05-789 Review support for asylum seekers accessing further education  
(Pages 53 – 60)
  - 2.5 P-05-790 Tackle Rough Sleeping  
(Pages 61 – 71)
  
- 3 Evidence Session 1 – P-05-785 Suspend Marine Licence  
12/45/ML to dump radioactive marine sediments from the  
Hinkley Point nuclear site into Wales coastal waters off Cardiff**  
(Pages 72 – 91)

Tim Deere-Jones, Petitioner



**4 Evidence Session 2 – P-05-785 Suspend Marine Licence  
12/45/ML to dump radioactive marine sediments from the  
Hinkley Point nuclear site into Wales coastal waters off Cardiff**

(Pages 92 – 101)

Chris Fayers, Head of Environment, Nuclear New Build, EDF Energy

Pete Bryant, Decommissioning Specialist & Radioactive Waste Adviser, EDF  
Energy

Dr Stephen Roast, Marine Technical Specialist, EDF Energy

**5 Motion under Standing Order 17.42 to resolve to exclude the  
public from the meeting for the following business:**

Item 6.

**6 Discussion of Previous Evidence Sessions**

P-05-785 Suspend Marine Licence 12/45/ML to dump radioactive marine  
sediments from the Hinkley Point nuclear site into Wales coastal waters off  
Cardiff.

Document is Restricted

# Agenda Item 2.1

## **P-05-784 Prescription drug dependence and withdrawal – recognition and support**

This petition was submitted by Stevie Lewis, having collected 213 signatures online.

### **Petition text:**

We call on the National Assembly for Wales to urge the Welsh Government to take action to appropriately recognise and effectively support individuals affected and harmed by prescribed drug dependence and withdrawal.

This petition has been set up to raise awareness of the plight of individuals in Wales who are affected by dependence on and withdrawal from prescribed antidepressants and benzodiazepines – and specifically to ask the Welsh Government to support the BMA's UK-wide call for action to provide timely and appropriate support for individuals affected.

The term "prescription drug dependence" refers specifically to the situation where, having taken their antidepressant or benzodiazepine medication exactly as prescribed by their doctor, patients find they are unable to stop because of the debilitating withdrawal effects. It is important to note here that addiction and dependence are related but different issues. Use of the term addiction implies pleasure seeking behaviour. Reporting of prescription drug dependence in the media continues to allude to "misuse" and "addiction" as if the patient is responsible in some way for their own harm. This is far from the truth. There is no pleasure whatsoever in finding that if you try to reduce or stop your antidepressant, you suffer a wide range of physical and emotional disturbances, that for some people can be life limiting and, tragically, even life ending. Patients need formal acknowledgement, support and guidance to help them through their withdrawal journey and this currently does not exist.

### **Additional information:**

The British Medical Association has recently highlighted the issue of prescribed drug dependence. In May 2017, they wrote: "Prescribing of psychoactive drugs is a major clinical activity and a key therapeutic tool for influencing the health of patients. But often their use can lead to a patient becoming dependent or suffering withdrawal symptoms. In the absence of robust data, we do not know the true scale and extent of the problem across

the UK. However, the evidence and insight presented to us by many charity and support groups shows that it is substantial. It shows us that the 'lived experience' of patients using these medications is too often associated with devastating health and social harms. This represents a significant public health issue, one that is central to doctors' clinical role, and one that the medical profession has a clear responsibility to help address." Because the side effects, tolerance effects and withdrawal effects of these medicines are not medically recognised for what they are, when patients develop these related effects/symptoms they are often prescribed other medicines and then polypharmacy complicates the problems further.

Affected patients are finding themselves with vague diagnoses eg: 'medically unexplained symptoms' or 'functional/somatic system disorders'. These are essentially psychiatric diagnoses attributing various debilitating and disabling physical symptoms to patients' own anxiety, beliefs, etc. This has the effect of discounting, disempowering and demoralising these patients still further. If it cannot be acknowledged that patients can have sustained functional nervous system dysfunction and damage as a consequence of taking medicines 'as prescribed' (sometimes over many years), systemic medical learning and improvement is stifled and patients continue to be further harmed. Meanwhile the initial prescribing risks remain severely underestimated and misleading prescribing guidelines and 'best practice' advice is unchanged.

#### **Assembly Constituency and Region**

- Monmouth
- South Wales East

## Briefing for the Petitions Committee

e-Petition number: [P-05-784](#)

Petition title: **Prescription drug dependence and withdrawal – recognition and support**

Text of petition:

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represents a significant public health issue, one that is central to doctors' clinical role, and one that the medical profession has a clear responsibility to help address." Because the side effects, tolerance effects and withdrawal effects of these medicines are not medically recognised for what they are, when patients develop these related effects/symptoms they are often prescribed other medicines and then polypharmacy complicates the problems further.

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## Background

The use of prescribed psychoactive drugs (such as antidepressant or benzodiazepine medication) can often lead to a patient becoming dependent or suffering withdrawal symptoms. The British Medical Association (BMA) highlights on its [website](#) that due to the absence of robust data, they do not know the true scale and extent of the problem across the UK. However the evidence and insight presented to them by many charity and support groups shows that it is substantial. Data on UK prescribing patterns is provided on their [website](#).

The BMA has undertaken a project working collaboratively with key stakeholders to start to identify what positive action can be taken for the future benefit of patients. This has had a particular focus on the prescribed use of benzodiazepines, z-drugs, opioids and antidepressants.

In March 2014, the BMA board of science sent out a call for evidence to gather the views of stakeholders on ways to improve the prevention and management of prescribed drug dependence. This evidence was set out in an analysis report published in October 2015, entitled '[Prescribed drugs associated with dependence and withdrawal - building a consensus for action](#)'.

Further to their work with a range of professional and governing bodies, charities and support organisations, the BMA is of the view that it is clear that there is an urgent need for

better support systems for patients suffering because of dependence or withdrawal. The BMA also notes that patients often feel there is no support, and no one to talk to, when they encounter problems with these psychoactive drugs.

In October 2016, the BMA published [recommendations](#) based on its [analysis report](#):

- The UK Government, supported by the devolved nations, should introduce a national, 24 hour helpline for prescribed drug dependence.
- Each of the UK governments, relevant health departments and local authorities should establish, adequately resourced specialist support services for prescribed drug dependence.
- Clear guidance on tapering and withdrawal management should be developed collaboratively with input from professional groups and patients.

## Welsh Government action

The response to the petition by the Minister for Social Services and Public Health (dated 18 October 2017) refers to '[Working Together to Reduce Harm](#)', the Welsh Government's 10-year strategy to tackle the associated harms of substance misuse which sets out the approach to tackling the full range of substances that are misused in Wales. This includes prescription only medicines and over the counter medicines, such as preparations containing codeine.

The Welsh Government has also published a [Substance Misuse Delivery Plan](#) for 2016–18 and a [Substance Misuse Annual Report and Forward Look 2017](#). The Minister's response to the petition notes that there are a number of specific actions in the Substance Misuse Delivery Plan 2016–18 relating to tackling dependence on prescription only medicines and over the counter medicines. These actions include targeted prevention and awareness raising campaigns and the development of a specific Substance Misuse Treatment Framework (SMTF) focusing specifically on prescription only medicines and over the counter medicines. The Minister goes on to say that this guidance, expected to be published in March 2018, will assist Area Planning Boards and treatment services in responding to the needs of those with a dependence on these medicines.

The Minister's response highlights that guidance has been published by the National Institute for Health and Care Excellence (NICE), the All Wales Medicines Strategy Group and the Welsh Government which should be followed when prescribing treatment to patients.

The Welsh Government invests almost £50m in the substance misuse agenda annually, with £22.6m provided to the seven Area Planning Boards which are responsible for commissioning all local substance misuse services in order to support those who are



dependent on a range of drugs, including prescription only medicines and over the counter medicines.

## Further information

The Assembly's Health and Social Care Committee carried out an inquiry into [alcohol and substance misuse](#) and published its [report](#) in August 2015.

The Research Service produced a briefing in June 2016 on the [Misuse of prescription and over-the-counter medications](#). This briefing describes the extent of the problem of the misuse of prescription and over-the-counter medicines in Wales and summarises the action being taken to tackle it.



Eich cyf/Your ref P-05-784  
Ein cyf/Our ref RE/00954/17

David John Rowlands AM  
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18 October 2017

Dear David,

Thank you for your letter about the petition that has been received from Stevie Lewis on prescription drug dependence. I am responding as substance misuse falls within my portfolio.

I recognise the misuse of prescription only and over the counter medicines causes serious health problems for some. Misuse can include situations where there may have been poor prescribing practices that may have led to dependency or other problems, as well as use for which the medication was not originally intended.

The Welsh Government has a 10-year strategy in place to tackle the associated harms of substance misuse and this sets out our approach to tackling the full range of substances that are misused in Wales. This includes prescription only medicines and over the counter medicines, such as preparations containing codeine.

We invest almost £50m in the substance misuse agenda annually, with £22.6m provided to the seven Area Planning Boards (APBs) which are responsible for commissioning all local substance misuse services in order to support those who are dependent on a range of drugs, including prescription only medicines and over the counter medicines.

Tackling dependence on prescription only medicines and over the counter medicines is a priority for me, which is why there are a number of specific actions in our Substance Misuse Delivery Plan 2016-18 relating to this. This includes targeted prevention and awareness raising campaigns and the development of a specific Substance Misuse Treatment Framework (SMTF) focusing specifically on prescription only medicines and over the counter medicines. This guidance, expected to be published in March 2018, will assist APBs

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

and treatment services in responding to the needs of those with a dependence on these medicines.


The Welsh Government's independent expert Advisory Panel on Substance Misuse (APoSM) published a report in 2015 entitled '*Reducing the harms associated with prescription-only analgesics: Tramadol*' which made a number of recommendations to address the issue of deaths associated with tramadol and other POM medicines. As a follow up to this report, the Panel is also currently examining the issues associated with analgesics (including opioid analgesics) other than tramadol, in order to make recommendations to improve safe, effective and appropriate use.

There are clear guidelines in place from the National Institute for Health and Care Excellence (NICE) for the prescribing of antidepressant drugs and the treatment of depression. In addition, comprehensive guidance on the prescribing and monitoring of hypnotics and anxiolytics, including benzodiazepines, were published by the All Wales Medicines Strategy Group in 2011 and updated in 2016. In addition, a specific Welsh Health Circular providing advice for prescribers on the risk of the misuse of pregabalin and gabapentin was disseminated throughout Wales in July 2016.

Clinicians are required to follow these guidelines and use their clinical judgement in determining what course of treatment to prescribe to their patients, based on their patients' individual needs and medical history. The options for treatment include psychosocial interventions in addition to or as an alternative to prescribed medication.

I hope this information provides you with background to the work that is currently being undertaken in Wales relating to prescription only medicines and over the counter medicines. The Welsh Government recognises this is an important issue on the substance misuse agenda and my officials will continue to work with stakeholders to ensure that those individuals with a dependence on prescription only medicines and over the counter medicines receive the necessary support and appropriate treatment.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans". The signature is written in a cursive, flowing style.

**Rebecca Evans AC/AM**

Gweinidog Iechyd y Cyhoedd a Gwasanaethau Cymdeithasol  
Minister for Social Services and Public Health

**P-05-784 Prescription drug dependence and withdrawal – recognition and support – Correspondence from the Petitioner to the Committee, 27.11.17**

When talking about prescribed drug dependence (PDD) in this submission I am describing patients who take medication exactly as prescribed by their clinician. There has been no “misuse”. When they chose to stop, they find that they are unable to as they develop, within a very short time frame (generally within a week), symptoms which are worse than those for which they were originally prescribed the medication. These symptoms are withdrawal due to physical dependence. This differs from psychological dependence where the patient will not come off the drug for fear of not being able to cope without it. It also differs from addiction where more of the drug is required for a desired effect.

My name is Stevie Lewis and in 1996, at the age of 41, I was prescribed an SSRI (Selective Serotonin Re-uptake Inhibitor) antidepressant for intermittent insomnia and PMT. In 2002, after several attempts at stopping and failing, I discovered that I had become physically dependent on the drug. For years I kept trying to come off the drug and each time the withdrawal symptoms got worse and worse. In 2009 I developed a movement disorder which has its roots in long term use of an SSRI antidepressant. Eventually I stopped in 2013 and have been through a long and crippling withdrawal.

When I embarked upon this journey of petitioning the Welsh Government, I imagined that the first problem that would face me would be convincing the Committee that PDD exists, and as a result the first page of my submission would be listing statistics and research proving the extent to which people become dependent on antidepressants, benzodiazepines, Z drugs (hypnotics), and opioids. However, it seems clear from the letter from Rebecca Evans AM to the Committee that PDD is a given.

So why is this petition necessary? Because of four fundamental problems. Firstly, no-one wants to admit that antidepressants are as problematic or worse than the other drugs I listed above. If that's the case, what is there left for a doctor to help a patient in emotional distress? Secondly, just as with the recent mesh scandal, doctors do not believe patients when they say they think they are dependent and have withdrawal symptoms, leading them

to diagnose Medically Unexplained Symptoms, many of which are identical to withdrawal symptoms. Thirdly, if withdrawal is recognised, the main option for help for patients in Wales is the Drug Misuse Services, which are totally inappropriate for a patient with PDD. And fourthly, there is no formal consistent drug tapering advice available for anyone to access. Therefore, the aspects of the subject I want to draw your attention to for further investigation and recommendation to the Welsh Government are as follows:

TO APPROPRIATELY RECOGNISE PRESCRIBED DRUG DEPENDENCE BY:

1. Recognising that antidepressants cause dependence to a level equal or greater than the benzodiazepines, anxiolytics, hypnotics and opioids. Following that, their addition by the All Medicines Strategy Group to the list of drugs that are targeted for reduction, as benzodiazepines currently are, together with new prescribing guidelines.
2. Recognising the need for proper identification by Welsh NHS employees of the symptoms of prescription drug withdrawal. Without the clear recognition and acceptance of PDD, GPs and A&E departments erroneously diagnose Medically Unexplained Symptoms and refer patients needlessly to Consultants, Specialists and Psychiatrists.

TO EFFECTIVELY SUPPORT PATIENTS WITH PDD BY:

1. Giving all of Wales access to an NHS funded Prescribed Medication Support Service to match that currently provided across part of North Wales. A service specifically targeted for patients with PDD is required because the promoted alternative is the Substance Misuse Services which treat PDD the same as street drug and alcohol withdrawal. A short withdrawal for patients with PDD is dangerous and potentially life-threatening.
2. Providing approved on-line access to effective tapering plans for each drug.

APPROPRIATELY RECOGNISE PRESCRIBED DRUG DEPENDENCE

## 1. ANTIDEPRESSANTS

The problems with benzodiazepines and sleeping pills (anxiolytics and hypnotics) have been known for 30 years and I am encouraged to see that the All Medicines Strategy Group has a specific outcome to “encourage a reduction in the inappropriate prescribing of hypnotics and anxiolytics” which is monitored annually in the National Prescribing Indicators. Equally encouraging is the documentation in support of this outcome, namely the “Hypnotics and Anxiolytics Practice Guide” and the detailed 69 page “Educational Pack: Material to Support Appropriate Prescribing of Hypnotics and Anxiolytics in Wales”. Rebecca Evans’ submission states: *“In addition, a specific Welsh Health Circular providing advice for prescribers on the risk of the misuse of pregabalin and gabapentin was disseminated throughout Wales in July 2016”* which is also a positive move.

What is missing and is essential for the Welsh government to put in place is the same national policy and approach towards the prescribing of antidepressants, particularly SSRIs and SNRIs. Prescribers in Wales only have NICE guidelines to read or ignore. 64 million prescriptions for antidepressants were written UK-wide in 2016 and the 2017 figure will be much higher. Research has shown that more than half of people taking SSRI antidepressants will have physical and psychological withdrawal symptoms on reducing and stopping the drug.<sup>1</sup> The Royal College of Psychiatrists in their own survey found that 63% reported withdrawal effects (with some antidepressants as high as 82%).<sup>2</sup>

Please see the attached letter from Dr David Healy, Professor in Psychiatry, Bangor, in support of my assertion that the reduction of antidepressant prescribing should be Welsh Government policy. Dr Healy has been the expert medical witness in a number of trials in the US about the harms done to individuals by antidepressant medication, particularly the SSRIs. He has always been on the winning side. He states: *“There is a pressing need to understand antidepressant dependence – how to avoid it and how best to manage it. This is a more serious problem than benzodiazepine dependence”*.

## 2. IDENTIFICATION OF PDD AND WITHDRAWAL

Anecdotally amongst the community of sufferers of PDD, is the problem of not being believed by your doctor. It follows then that you are less likely to be believed and supported by family and friends. There is a feeling and evidence, from the lived experience of patients, that rather than educate NHS employees about the serious effects that occur when starting, changing or stopping drugs which cause dependence, particularly antidepressants, NHS staff are being educated to look for and diagnose Medically Unexplained Symptoms (MUS) or Bodily Distress Syndrome (BDS). This is despite the fact that the patient in question is taking a drug that causes dependence. This fact is ignored or overlooked.

The Welsh NHS website covers MUS here.<sup>3</sup> The Royal College of Psychiatry describes MUS here <sup>4</sup>. As you can see, MUS is considered to be more prevalent amongst women and people who have anxiety or depression. Dr Healy's letter indicates that antidepressants have been targeted at women. A woman taking an SSRI presenting with withdrawal symptoms is very likely to be diagnosed with MUS.

A quote from BMC Medical Practice, February 2017 provides the most comprehensive list of my withdrawal symptoms that I have seen in one place: *"Recent studies on BDS [Bodily Distress Syndrome] suggest that central sensitisation not only results in multiple symptoms; it may also prompt several specific symptom patterns described by arousal and/or exhaustion symptoms. These symptoms cluster in four groups:*

*1) cardiopulmonary/autonomic arousal symptoms (palpitations/heart pounding, precordial discomfort, breathlessness without exertion, hyperventilation, hot or cold sweats, dry mouth),*

*2) gastrointestinal arousal symptoms (abdominal pains, frequent loose bowel movements, feeling bloated/full of gas/distended, regurgitations, diarrhoea, nausea, burning sensation in chest or epigastrium),*

*3) musculoskeletal tension symptoms (pains in arms or legs, muscular aches or pains, pains in the joints, feelings of paresis or localized weakness,*

*backache, pain moving from one place to another, unpleasant numbness or tingling sensations), and*

*4) general symptoms (concentration difficulties, impairment of memory, excessive fatigue, headache, dizziness).”<sup>5</sup>*

Here is a link to Signs and Symptoms of withdrawal from antidepressants – Fava et al March 2015. <sup>6</sup>

The patient/doctor relationship is hugely damaged by the refusal to believe a patient’s own assessment of the effects of their medication. It is upsetting and inhuman, and potentially leads to further drug interventions, generally of a psychiatric nature.

## EFFECTIVELY SUPPORT PATIENTS WITH PDD

### 1. PRESCRIBED MEDICATION COUNSELLING AND SUPPORT SERVICE

Ms Evan’s submission refers at length to how the Welsh Government supports those with dependency on prescription medicines. *“We invest almost £50m in the substance misuse agenda annually, with £22.6m provided to the seven Area Planning Boards (APBs) which are responsible for commissioning all local substance misuse services in order to support those who are dependent on a range of drugs, including prescription only medicines and over the counter medicines.”*

One of the many distressing situations for someone who discovers they are dependent on prescription drugs is being pointed towards a Substance Misuse Service. It shows a callous lack of understanding of the issues experienced by those physically dependent on antidepressants. Having read the Guidance booklet “Working Together To Reduce Harm: Revised Guidance for Substance Misuse Area Planning Boards 2017”, which is littered with the words “drug misuse” and “alcohol misuse”, I can confirm that there is nothing written in these 34 pages that anyone with prescribed drug dependence would recognise as being of any relevance, help or support to them. For them, there has been no “misuse”.

The Substance Misuse Services have a programme which involves withdrawing people over a 3 to 4 week period. For people who are



dependent on antidepressants or benzodiazepines, this approach is extremely dangerous. It is essential that the tapering process is a long, slow, supported one, as it takes months, or even years for those who have taken the drugs for more than a decade, for the serotonin or GABA receptors in the brain to recover and reset. A patient who is withdrawn quickly from her antidepressant is likely to be desperately ill, with a central nervous system that is in crisis, and her life could be in danger. I quote from the correspondence of Barry Haslam, ex Chair of Oldham Trenchard, a specialist PDD facility in the north of England, to Andy Burnham, Mayor of Greater Manchester in his email dated 22 November 2017: *"I really hope that Greater Manchester can show the rest of the country in how to tackle this very much major hidden public health problem, in order to provide dedicated withdrawal centres and after care facilities that these patients so richly deserve. Substance Misuse and Alcohol Units are NOT the place to withdraw iatrogenic dependent patients who have only taken their drugs as directed by their doctors. It is not just about the stigma but, in providing safe, adequate dedicated withdrawal clinics for those patients brave enough to enter a withdrawal that can take months and even years. SMU Units do not have the necessary expertise."*

There are two noteworthy omissions from Ms Evans' submission which I have discovered during my research and which I hope will lead to some progress in Wales in this particular area. Firstly, Wales has a 24/7 mental health helpline, the NHS funded CALL (Community Advice and Listening Line), which as a matter of routine takes calls from people who suspect they have or do have prescription drug dependency<sup>8</sup> I contacted CALL to establish what they advise in these circumstances. I spoke to [a member of] the Management team. If the caller lives in South Wales, the advice is as follows:

1. To go back to their GP to discuss options (please bear in mind some GPs still do not willingly acknowledge that antidepressants cause dependence and do not have access to tapering plans.)
2. To go to the Drug Misuse Service (most people with antidepressant dependence are shocked and stigmatised by this proposal).

3. To go outside Wales for help, to the Bristol Tranquilliser Project, a free charitable organisation.<sup>9</sup>

If the caller lives in North Wales, the CALL responder breathes a sigh of relief – which brings us neatly on to the second omission from Ms Evan’s letter.

The advice given by CALL is to go to the Prescribed Medication Support Service & Primary Care Mental Health Counselling Service, based in Mold.<sup>10</sup>

This service has been in place for 20 years and covers the Betsi Cadwaladr University Health Board. It is NHS funded and appears to have survived despite rather than because of the Welsh Government. Its absence from any correspondence I have had with the Cabinet Secretary for Health, and from the submission to the Committee is telling.

This service was set up predominantly to help people dependent on benzodiazepines, sleeping pills and over-the-counter medicines as it was clear that a different approach was needed to that taken for street drug misuse. Now they also are helping people dependent on antidepressants, and believe that this need is going to grow because of the ever-increasing prescribing of SSRIs. The existence of this service shows that there is a clear demand in North Wales and therefore there must be the same demand throughout the country. The service is managed by June Lovell and she has given me a document which describes the PDD support service that they provide. I am unable to provide this as a hyperlink so I am including it as an extra page in my submission, to which I hope the Committee will request access.

## 2. ACCESS TO EFFECTIVE TAPERING PLANS

There needs to be good well-resourced information about safe tapering approved by the NHS and made available online for patients, doctors and public, so that people can have fully informed discussions with their doctors and informed family and social support. The team who run the Prescribed Medication Support Service already has what is needed, and could contribute to the NHS Direct Website, the CALL Website and any other sources accessed by GPs. The Ashton Manual for the tapering of benzodiazepines is another resource well-known in the benzo community but not within the NHS. Also for consideration is the provision of tapering strips, with incrementally

smaller doses of each drug, which can only be sourced at the moment outside the UK.<sup>11</sup> Not all medications can be supplied in liquid form and so patients have to cut their pills in order to taper which is difficult and inaccurate. Some GPs do not want to prescribe the liquid form as it is more expensive. I used liquid Seroxat but struggled to find syringes that had small enough measurements to effectively and safely reduce.

I trust that this document gives the Petitions Committee a feel for the issue of PDD. The petition has in excess of 200 signatures, and many of those are experts in the field of prescribed drug dependence – Clinical Psychologists, Psychiatrists, BACP registered Counsellors and Therapists – people who regularly coach and mentor those who have inadvertently found themselves to be dependent and have nowhere to turn for help from the NHS. Ms Evans has established in her submission that there is plenty of money in the pot for drug and alcohol misuse. This is exemplary, and I am delighted to read that as a society we put so much effort into helping people who misuse drugs, whether sourced off the street or over the counter. Clearly there is no need for extra funding, but I wish and hope to establish a need for some of that money to be used caring for people who did nothing more than follow the advice of their doctors.

As I final point, I have avoided the elephant in the room – the fact that inadequate provision of alternative therapies leads GPs and Psychiatrists to medicate as a first response to a patient in emotional distress, rather than a last, despite antidepressants being no better than placebo for mild to moderate depression. However, Laura Williams' petition number P-05-736 is in the process of raising that awareness with the Committee and progress in Wales will hopefully be made to provide a Mental Health service that is joined up and fit for purpose.

## REFERENCES

1. [http://www.psy-journal.com/article/S0165-1781\(14\)00083-3/fulltext](http://www.psy-journal.com/article/S0165-1781(14)00083-3/fulltext)
2. <http://www.rcpsych.ac.uk/healthadvice/treatmentwellbeing/antidepressants/comingoffantidepressants.aspx?theme=mobile>
3. <http://www.nhsdirect.wales.nhs.uk/encyclopaedia/m/article/medicallyunexplainedsymptoms/>
4. <http://www.rcpsych.ac.uk/healthadvice/problemsdisorders/medicallyunexplainedsymptoms.aspx>
5. [Medically unexplained symptoms and symptom disorders in primary care: prognosis-based recognition and classification](#)
6. <https://www.karger.com/Article/FullText/370338>
7. <https://www.benzo.org.uk/otbh.htm>
8. <http://www.callhelpline.org.uk/Default.asp>
9. <http://www.btpinfo.org.uk>
10. <http://www.nhsdirect.wales.nhs.uk/localservices/ViewLocalService.aspx?id=2556&s=Health>
11. <http://www.taperingstrip.org/>



GIG  
CYMRU  
NHS  
WALES

Bwrdd Iechyd Prifysgol  
Betsi Cadwaladr  
University Health Board

David John Rowlands AM  
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November 23<sup>rd</sup> 2017

### **Petition Re Prescription Drug Dependence**

Dear Mr Rowlands

Ten per cent of the population of Wales takes an antidepressant on prescription. Of those between 80 and 90% are on treatment for more than a year - many for over a decade. When the latest antidepressants were introduced around 1990 the recommendation was that they would be used for 3-6 months. Apologists for the drugs say treatment for over a year is a good thing. It's not. It's caused by dependence and it continues because so many people attempting to stop feel so bad they continue with treatment.

The marketing of these drugs targeted women of child-bearing years, although companies knew from the start the drugs were likely to lead to dependence and to birth defects, from major organ defects to behaviour abnormalities such as autistic spectrum disorder.

While treatments can be helpful, the evidence for true benefits when used in general practice is missing. The drugs are now the most commonly used medications by women in their teens and early twenties and in these age groups there is no evidence for benefit. Because of the dependence the drugs cause, many young women are trapped into pregnancies in which their unborn babies are exposed to a teratogen because stopping is so difficult. There is no benefit to the woman for the most part or her child in any instance.

For all too many, women in particular, antidepressants turn out to be a gateway drug, into treatment with mood-stabilizers and other drugs or for antidepressant induced alcoholism or antidepressant induced osteoporosis or other conditions.

There is a pressing need to understand antidepressant dependence - how to avoid it and how best to manage it. This is a more serious problem than benzodiazepine dependence.

**David Healy MD FRCPsych**  
**Professor of Psychiatry**



## Prescribed Medication Support Service

**Pwll Glas Resource Centre,  
Pwll Glas Road, Mold, Flintshire, CH7 1RA  
Tel: 01352 706725  
Fax: 01352 706707**

### **Aims and Objectives:**

- To reduce the number of people dependent on prescribed medication, e.g. (hypnotics and anxiolytics)
- To tackle levels of prescribing that are higher than national targets (SaFF)
- To promote good prescribing practices through collaborative working with GP's and other Primary Care professionals/CMHT and Consultant colleagues.
- To give direct clinical support to long term users of prescribed medication who wish to look at reducing or come off and to give advice to patients prior to the issuing of new prescriptions
- To enable clients to understand their dependence and help them make appropriate life changes.

### **Interventions:**

The service is continually developing and we are constantly striving to learn from the people we see and help. Medication can help some to cope in the short term but dependency can quickly develop if not monitored regularly so we aim to tailor a package of care which empowers the individual through education, advice and expertise.

The Service offers different levels of intervention depending on the individual needs of the clients e.g. a

One-off telephone consultation, to a full range of service options which could include:-

- An Holistic Assessment
- SMART goal setting/Care planning
- Education about improving health and wellbeing e.g. sleep hygiene, diet and coping skills
- Bespoke individual reducing programmes
- Counselling, based on the Cycle of change and Motivational work
- Online CBT (Serenity programme) Auricular Acupuncture
- Auricular Acupuncture
- Bibliotherapy/Book prescriptions
- Advice/Sign posting to other services
- Telephone Support
- Follow-up clinics in GP surgeries or CMHT bases



GIG  
CYMRU  
NHS  
WALES

Bwrdd Iechyd Prifysgol  
Betsi Cadwaladr  
University Health Board

- Pill cutters and plan packs
- T.E.N.S. Units
- Preventative work

In conclusion, we have learned over the years that a slow approach will yield the best results and clients are more likely to succeed if they go at their own pace. Counselling and support is crucial to help people to make important life changes.

**Referrals can be made by:**

- SPOA (Single Point of Access, Primary Mental Health)
- GP's, Community Pharmacists, other primary care professionals
- Consultant Psychiatrists/ CMHT'S
- Open referral policy.

We will prioritise pregnant women and older persons but we do aim to assess all referrals within 28 days.

The service covers Betsi Cadwaladr University Health Board with the exception of North Powys.

**The Team:**

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

# Agenda Item 2.2

## **P-05-787 Save the Future Generation of Wales**

This petition was submitted by Ken Ebihara having collected 54 signatures online.

### **Petition text**

We the undersigned call on the National Assembly for Wales to urge the Welsh Government to ensure the financial resources for youth work contributed by the individual local authorities through 'Revenue Support Grant' is at least 50 percent of its notional allocation.

### **Additional information**

The matter of whether or not introducing the hypothecation of 'Revenue Support Grant' (RSG) for youth work has already been identified in one of the reports released by the 'Children, Young and Education Committee' in the last year. It is a fact that there is a gap between the actual financial contributions to youth work provided by the individual local authorities through 'RSG' and that of the notional allocation for youth work. It is crucial to assure and maintain the quality of youth work provided to young people in Wales in order for them to gain the precious opportunities to improve themselves in a supportive environment. This crucial factor should not only depend on the individual local authorities' decisions, which differ from one to another due to their own priority of expenditure. More proactive intervention by the Welsh Government must be required to ensure the minimum level of quality of services provided all across Wales. Introducing partial hypothecation prevents the individual local authorities from reducing further reduction in financial resources spending on youth work, while it also enables them to retain some extent of autonomy to prioritise their needs of expenditure in accordance with their individual priorities. This particular notion could be the most realistic solution for the matter.

### **Assembly Constituency and Region**

- Cardiff Central
- South Wales Central



## Save the Future Generation of Wales

Y Pwyllgor Deisebau | 5 December 2017

Petitions Committee | 5 December 2017

### Research Briefing:

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Petition number: P-05-787

Petition title: **Save the Future Generation of Wales**

Text of petition: We the undersigned call on the National Assembly for Wales to urge the Welsh Government to ensure the financial resources for youth work contributed by the individual local authorities through 'Revenue Support Grant' is at least 50 percent of its notional allocation.

The matter of whether or not introducing the hypothecation of 'Revenue Support Grant' (RSG) for youth work has already been identified in one of the reports released by the 'Children, Young and Education Committee' in the last year. It is a fact that there is a gap between the actual financial contributions to youth work provided by the individual local authorities through 'RSG' and that of the notional allocation for youth work. It is crucial to assure and maintain the quality of youth work provided to young people in Wales in order for them to gain the precious opportunities to improve themselves in a supportive environment. This crucial factor should not only depend on the individual local authorities' decisions, which differ from one to another due to their own priority of expenditure. More proactive intervention by the Welsh Government must be required to ensure the minimum level of quality of services provided all across Wales. Introducing partial hypothecation prevents the individual local authorities from reducing further reduction in financial resources spending on youth work, while it also enables them to retain some extent of autonomy to prioritise their needs of expenditure in accordance with their individual priorities. This particular notion could be the most realistic solution for the matter.

## What is youth work?

The Youth Work National Occupational Standards (2012) identified that the key purpose of youth work is to:

‘enable young people to develop holistically, working with them to facilitate their personal, social and educational development, to enable them to develop their voice, influence and place in society and to reach their full potential.’

The Youth Service in Wales is a universal entitlement, open to all young people within the specified age range 11 to 25. Youth work is provided through both the voluntary and local authority sectors and through a variety of youth work settings and methods.

According to [the Welsh Government](#), good non-formal educative youth work provides all young people with active interventions with a purpose that produces learning and development environments for young people. It can play an important role in equipping and helping young people to achieve in their formal education. Youth work in Wales offers opportunities for learning that are educative, expressive, participative, inclusive and empowering.

## National Assembly for Wales action

In July 2016, **The Children, Young People and Education (CYPE) Committee** agreed to undertake a “snapshot” inquiry, the aim of which was to review the effectiveness of Welsh Government’s strategy and policies in respect of youth work.

The Committee was particularly interested in exploring:

- Young people’s access to youth work services;
- The effectiveness of Welsh Government strategy and policy on youth work;
- Funding for youth work (Local Authority, Welsh Government, European, Third Sector); and
- Any other issues considered to be relevant to the Inquiry.

This [Research Service blog from February 2017](#) provides an overview of developments preceding the [Senedd debate](#) on the [Children, Young People and Education Committee’s \(CYPE\) inquiry into youth work](#).

In evidence the CYPE Committee heard how funding pressures have had a serious impact on youth work over recent years. According to the Welsh Government’s Statistical Release, the total amount of budgeted expenditure for youth services by local authorities, including funding through the Revenue Support Grant, has reduced by almost 25% over the last 4 years.

As the inquiry progressed the Committee noted the Minister's strong opposition to the hypothecation of funding for youth work within the revenue support grant. The Committee remained concerned, however, that there is a lack of accountability for the use of funds nominally allocated to local authorities via the Revenue Support Grant.

On reflection of stakeholders views and the Minister's response, Recommendation 8 of the [CYPE Committee's report states](#):

The Minister should develop an accountability framework for local authorities' use of funds for youth work via the revenue support grant. The framework should include sanctions if outcomes are not delivered.

This recommendation followed on from evidence which led the Committee to express concerns about increasing pressures on both the statutory and voluntary sector related to short-term funding from multiple funding streams.

## Welsh Government action

The then [Minister for Lifelong Learning and Welsh Language responded positively to the Committee's recommendations](#) during February 2017, accepting the majority of them and acknowledging a close fit with his own thinking. In response to recommendation 8, which is accepted in principle by the Welsh Government, the then Minister states:

The RSG is an un-hypothecated funding stream, and it is therefore a decision of local authorities as to how this funding is utilised to best meet local needs and priorities. It is not possible to identify how much RSG is spent on youth work or to prescribe this amount – the Standard Spending Assessments are notional amounts that are used for calculation purposes only and are not targets for spending. However, historically the Welsh Government has provided direct support to a number of grant schemes intended to support the outcomes of youth work. We have begun the process to undertake a review of all these youth work funding streams to identify the true impact and to support future thinking for supporting youth work in Wales. I want to ensure we have better transparency and value for money.

As part of continued correspondence between the CYPE Committee and the then Minister, the [Committee's Chair Lynne Neagle wrote to Alun Davies in May 2017](#) seeking an update on the Welsh Government's progress for implementing the inquiry's recommendations. On funding, the letter states:

The Committee had significant concerns that youth services would be vulnerable to financial uncertainty if local authorities are not subject to clear guidance and accountability on how the Revenue Support Grant should be spent to support youth services. Could you provide an update on the review of youth work funding streams that you outlined in your response to the Committee?

The [Minister for lifelong learning and Welsh language's response of June 2017](#) reiterated how the Welsh Government provides core funding for statutory youth services through the RSG, but the Minister further updated that:

We are currently in the process of externally reviewing our additional youth work grants, including the National Voluntary Youth Organisation (NVYO) grant, all evaluations are due to be completed

this summer. It will be at this point I will consider our options and then announce my decision, which will include any changes to the NVYO grant. I am fully aware of timescales for current NVYO recipients, including the need to know of any future funding decisions by 31 December.

Furthermore, in its response to this Petition, the Welsh Government acknowledge that this was an issue brought up by the CYPE Committee's Inquiry and outline their efforts to help shape the statutory direction and guidance on youth work to reflect today's legislative, policy and financial landscape, and 'set realistic expectations for what can be achieved.'

The Minister for the Welsh Language and Lifelong Learning, Eluned Morgan, concludes in her letter to the Petitions Committee that she does not intend on making changes to existing funding arrangements whilst these reviews are ongoing.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Eich cyf/Your ref P-05-787  
Ein cyf/Our ref EM/05003/17

David John Rowlands AM  
Chair - Petitions committee.  
National Assembly for Wales  
Cardiff Bay  
Cardiff Bay  
CF99 1NA

government.committee.business@wales.gsi.gov.uk

14 November 2017

Dear John

Thank you for your letter dated 11<sup>th</sup> October concerning Youth Work funding being distributed to local authorities through the Revenue Support Grant.

As acknowledged in your letter, some of the funding currently available for Youth Work goes directly to the local authorities through the Revenue Support Grant (RSG). The purpose of this is to ensure that local authorities are able to use the funding in line with their own locally identified priorities. We are aware that local authorities currently spend differing percentages of their RSG funding on youth work. We are also aware that the Children, Young People and Education Committee Report of the Inquiry into Youth Work "What type of youth service does Wales want?" covers this issue and asks for mechanisms to be put in place to ensure local authorities are held to account for the use of funding for youth work.

As I advised in my response to the Committee's recommendations, I am in the process of reviewing Extending Entitlement. Engagement with the sector to undertake this work is underway. I have asked Margaret Jervis to look at Extending Entitlement, to help shape the statutory direction and guidance needed to reflect today's legislative, policy and financial landscape, and set realistic expectations for what can be achieved. As part of this there will be a consultation in the new year on the way forward.

Additionally I have previously set out the intention to establish a new National Youth Support Services Board. The Board would advise on the future of youth services in Wales, including the implementation of the revised Extending Entitlement and future National Youth Work Strategy, along with the appropriate use of funding to support these key strategies.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

[Gohebiaeth.Eluned.Morgan@llyw.cymru](mailto:Gohebiaeth.Eluned.Morgan@llyw.cymru)  
[Correspondence.Eluned.Morgan@gov.wales](mailto:Correspondence.Eluned.Morgan@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

However, it is important that we allow Margaret sufficient time to complete her review and for the sector to reflect on its findings to ensure that we achieve maximum impact for the benefit of the young people we are seeking to support. I therefore do not intend making changes to existing funding arrangements at this time.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. E. Morgan'.

**Eluned Morgan AC/AM**

Gweinidog y Gymraeg a Dysgu Gydol Oes  
Minister for Welsh Language and Lifelong Learning

**P-05-787 Save the Future Generation of Wales – Correspondence from the Petitioner to the Committee, 24.11.17**

Please let me introduce myself briefly. My name is Ken Ebihara, the principle petitioner for the petition 'Save the Future Generation of Wales'. I genuinely appreciate that a precious opportunity is now offered and the petition is being considered by the Petitions Committee.

There are two points I would like to mention in this regard. Firstly, the vast majority of the people who have signed the petition lived in Wales when they signed and have both British citizenship and rights to vote in the United Kingdom, including for the National Assembly for Wales. Although I am an international student myself, who does not have the right to vote in the UK, the content of the petition is valid and citizens in Wales are truly concerned about it.

Secondly, as indicated, the letter to the committee written by Eluned Morgan AC/AM, the Minister for Welsh Language and Lifelong Learning, the issue had already been identified in one of the reports released by the Children, Young people and Education Committee in 2016, last year. This fact underlines that the members of this committee as well as relevant professionals acknowledge the existence of the issue addressed by my petition.

I fully understand that the Petitions Committee is formed of members from different political parties and might have different views and opinions towards the issue individually. Even so, for the reasons aforementioned, I would like the committee members to conduct a serious and thorough consideration of my petition and take appropriate process regarding the issue for the benefits of those who have supported the petition and for the future generation of Wales.

# Agenda Item 2.3

## **P-05-788 Remove the compulsory aspect of Welsh Bacallaureate**

This petition was submitted by Katharine Drinkwater having collected 60 signatures online.

### **Petition text**

We call on the National Assembly for Wales to urge the Welsh Government to remove the compulsory aspect of the Welsh Bacallaureate and review the structure of the course to ensure it is fit for purpose. Currently it includes a task that encourages underage gambling and fiscal irresponsibility.

Our children deserve the right to excel in a global arena. Around 70% of their studies are already compulsory subjects and the Welsh Bacallaureate takes away opportunities from them as they cannot study all the subjects they want to pursue. This 'qualification' may cater to box ticking exercises but does not help Welsh students achieve their potential (please see excerpt from a WG report that follows). This will have a detrimental effect on the rest of their lives and future career prospects. Give children studying in Welsh schools the same opportunities as those from the other home nations and make Welsh education something to be proud of again.

### **Additional information**

The following is taken from The Welsh Governments own report into the WBQ (The Welsh Bacallaureate Qualification, January 2015) states – The findings of WISERD's report were primarily two-fold. It concluded that the WBQ was enormously valuable in preparing young people for higher education, quite possibly due to the weighting given to it by the UCAS tariff. At the same time, the report supported a previous finding in a 2011 report specifically on Cardiff University that the WBQ Core was not equivalent to an A grade at A-level. Furthermore, it concluded that students with the WBQ were more likely to withdraw from university and less likely to achieve a 'good degree' which is defined as a First Class or Upper Second Class. The report argues that these two findings may be related. It concludes that having the WBQ seems to improve the probability of getting in to university, all other things being equal; but this advantage seems to come at the expense of successful university outcomes.

### **Assembly Constituency and Region**



- Islwyn
- South Wales East

## Briefing for the Petitions Committee

Y Pwyllgor Deisebau | 5 Rhagfyr 2017  
Petitions Committee | 5 December 2017

### Research Briefing: Remove the compulsory aspect of the Welsh Baccalaureate

Petition number: **P-05-788**

Petition title: **Remove the compulsory aspect of Welsh Baccalaureate**

Text of petition:

We call on the National Assembly for Wales to urge the Welsh Government to remove the compulsory aspect of the Welsh Baccalaureate and review the structure of the course to ensure it is fit for purpose. Currently it includes a task that encourages underage gambling and fiscal irresponsibility.

Our children deserve the right to excel in a global arena. Around 70% of their studies are already compulsory subjects and the Welsh Baccalaureate takes away opportunities from them as they cannot study all the subjects they want to pursue. This 'qualification' may cater to box ticking exercises but does not help Welsh students achieve their potential (please see excerpt from a WG report that follows). This will have a detrimental effect on the rest of their lives and future career prospects. Give children studying in Welsh schools the same opportunities as those from the other home nations and make Welsh education something to be proud of again.

The following is taken from The Welsh Governments own report into the WBQ (The Welsh Baccalaureate Qualification, January 2015) states – The findings of WISERD's report were primarily two-fold. It concluded that the WBQ was enormously valuable in preparing young people for higher education, quite possibly due to the weighting given to it by the UCAS tariff. At the same time, the report supported a previous finding in a 2011 report specifically on Cardiff University that the WBQ Core was not equivalent to an A grade at A-level. Furthermore, it concluded that students with the WBQ were more likely to withdraw from university and less likely to achieve a 'good degree' which is defined as a First Class or Upper Second Class.

The report argues that these two findings may be related. It concludes that having the WBQ seems to improve the probability of getting in to university, all other things being equal; but this advantage seems

to come at the expense of successful university outcomes.

## 1. Cabinet Secretary's response

In her letter to the Committee, the Cabinet Secretary for Education states that:

- The research referred to by the Petitioner ([Wales Institute of Social & Economic Research, Data & Methods \(WISERD\)](#)) (2013) was based on a previous iteration of the Welsh Baccalaureate Qualification (WBQ). A revised WBQ has been in place since September 2015;
- The **WBQ is not compulsory**;
- Qualifications Wales are currently undertaking a review of the WBQ (to be published in the Autumn term).

## 2. Overview of the Welsh Baccalaureate

The Welsh Government commissioned the [Independent Review of Qualifications](#) (2012) that recommended that the Welsh Government should establish a revised and more rigorous Welsh Baccalaureate model. The WBQ was redesigned and the new specifications were taught from **September 2015**. The revised WBQ is based on a Skills Challenge Certificate, which is graded, and Supporting Qualifications.

It is awarded at three levels:

- Foundation Welsh Baccalaureate (level 1) for use at Key Stage 4 or post-16;
- National Welsh Baccalaureate (level 2) for use at Key Stage 4 or post-16;
- Advanced Welsh Baccalaureate (level 3) for use at post-16 only.

Alongside the Skills Challenge Certificate, learners take a selection of GCSE, AS, and A level and vocational qualifications appropriate to their needs in order to be awarded the WBQ.

## 3. Compulsory nature of the WBQ

The Cabinet Secretary states that the **WBQ is not compulsory for pupils**. In the [Children, Young People and Education Committee on 18 October 2017](#), Darren Millar, AM said that 'some schools are expressing concerns that they feel strong-armed, almost, into ensuring that the Welsh bac is something that has to be taken post 16'. In response, Kirsty Williams, Cabinet Secretary for Education said:

The decision to allow some students not to participate has to be a decision for the headteachers in those classrooms, but I am clear that there are very real benefits to Welsh students studying the Welsh baccalaureate. We encourage schools and colleges to be able to allow their students to do it, but for each individual student, that has to be a decision for the headteacher within that school; I can't micromanage that process. I'm sure that if a headteacher genuinely thought that somebody's chances of obtaining a place at Oxford or Cambridge or a Russell Group university were severely being disadvantaged because of participating in the Welsh bac, those professional people would

make the right decisions. Because, once again, it's a badge of honour for a school to get pupils into Oxford and Cambridge or Russell Group universities; that's one of the ways in which they demonstrate their success as an institution. So, I think it would be massively inconceivable that a school would go out of its way to force a pupil to do a qualification if they genuinely believed that that was jeopardising their chances of that student going on to fulfil their potential.

The Cabinet Secretary's official clarified that the Welsh Government 'actively encourage' the take-up of the WBQ post-16. He said:

The documentation is equally clear with the phraseology, 'where appropriate'. So, there isn't the expectation that every young person in full-time learning in Wales at post 16 will undertake the Welsh bacalaureate. It has many advantages as a qualification—some of them around the employability skills that were referred to earlier in committee—and it does produce, for those who take it, perhaps a more rounded individual than somebody just undertaking an academic period of study, but it is not compulsory and it is down to the institution and the learner to decide whether or not they were going to undertake that qualification.

#### 4. Universities acceptance of the WBQ

In oral evidence to the Children, Young People and Education Committee on 18 October 2017, the Cabinet Secretary said in relation to universities' acceptance of the WBQ:

We are actively working with universities across the United Kingdom for recognition of the Welsh bac, and you'll be aware that the reformed Welsh bac, which now has a grading system similar to that of A-levels, attracts UCAS points [...] there are many, many universities that will use the UCAS point scores from a Welsh bac as part of the offer. For other universities, if they don't do that, they use the process of a Welsh bac as a way of differentiating Welsh students from other students, because our students undertaking this course have got a personal statement and an interview perspective that I believe sets them apart, because they're able to demonstrate that, 'Yes, I can cope with an academic load', which is what our Russell Group universities are looking for—'I can cope with an academic load, but I'm not just about the academic; I've got a whole range and set of skills that I can bring to this university on top of those grades.' So, I think we need to look at it in the round, at what it offers students.

She subsequently [wrote to the Committee on 31 October 2017](#) stating:

In May, I wrote to all university Vice Chancellors to seek assurance that their institutions would accept the reformed Welsh Bacalaureate – Advanced Skills Challenge Certificate (WBQ) as part of their future entry requirements or as part of an alternative offer. My officials are working with universities, including the Russell Group universities, to make sure that Welsh learners taking the WBQ are not disadvantaged when it comes to entry onto HE courses.

Universities, including Oxford and Cambridge, are clear that they value the WBQ and are taking an increasingly flexible approach to recognising it in their offers. The majority of HE institutions broadly recognise the WBQ as an appropriate qualification, although some universities and courses do not count it towards their entry requirements.

## 5. Review of the WBQ

In her [written evidence to the Children, Young People and Education Committee](#) on 18 October 2017, the Cabinet Secretary said

A thematic Review by Estyn is underway to review English, Welsh, Mathematics and Mathematics – Numeracy GCSEs and the Welsh Baccalaureate. Key areas covered will be learners’ well-being, the learning experience (including looking at changes to curriculum organisation to implement the new GCSEs) and leadership and management (including processes for managing change and for tracking and monitoring learner progress).

Estyn’s [remit letter for 2017/18](#) states that the report will focus on curriculum planning and implementation of the new GCSEs in English and Welsh languages and in mathematics and numeracy, and of the new Welsh Baccalaureate. It will include a look at approaches to examination entries.

The Cabinet Secretary also stated that Qualifications Wales has commissioned an independent review of the Skills Challenge Certificate and its place within the Welsh Baccalaureate. The review will evaluate the design and assessment model of the Skills Challenge Certificate at all levels. Estyn is liaising with Qualifications Wales in the publication of their reports to help inform Estyn’s judgements when undertaking their review.

Qualifications Wales will be publishing their review in the autumn term.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Kirsty Williams AC/AM  
Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref  
Ein cyf/Our ref KW/01725/17

David John Rowlands AM  
Chair - Petitions committee.  
National Assembly for Wales  
Cardiff Bay  
Cardiff Bay  
CF99 1NA

government.committee.business@wales.gsi.gov.uk

25 October 2017

Dear David

Thank you for your letter dated 17 October from Katherine Drinkwater about the petition calling on the Welsh Government to remove the compulsory aspect of the Welsh Baccalaureate and review the structure of the qualification.

The Welsh Baccalaureate, like other qualifications, is not compulsory at either Key Stage 4 or post 16. However, I do encourage learners to study the qualification because it provides them with an extra dimension, adding breadth to their learning and providing them with skills needed by both employers and universities.

In her letter Ms Drinkwater makes reference to research into the Welsh Baccalaureate, however the version of the qualification considered by these researchers is not the same as the qualification currently studied at either Key Stage 4 or post 16. A revised Welsh Baccalaureate was introduced in September 2015 in line with recommendations made by the independent Review of Qualifications for 14 to 19 year olds in Wales.

Qualifications Wales are currently undertaking a review of the Welsh Baccalaureate and the findings will be published later this year.

Let me reassure you that the current specifications for the Welsh Baccalaureate at Key Stage 4 and post 16 do not sanction any behaviour or content that is detrimental to learners' wellbeing; including gambling or the encouragement of fiscal irresponsibility.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

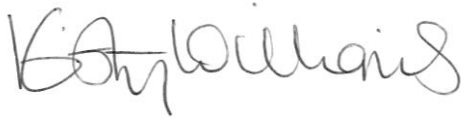
[Gohebiaeth.Kirsty.Williams@llyw.cymru](mailto:Gohebiaeth.Kirsty.Williams@llyw.cymru)  
[Correspondence.Kirsty.Williams@gov.wales](mailto:Correspondence.Kirsty.Williams@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

All challenge briefs for the Welsh Baccalaureate are approved by the WJEC, and learners can choose which approved challenge brief to undertake.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kirsty Williams'.

**Kirsty Williams AC/AM**

Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education

**P-05-788 Remove the compulsory aspect of Welsh Baccalaureate –  
Correspondence from the Petitioner to the Committee, 22.11.17**

Dear Sirs,

I am aware a press release was sent stating Welsh Bac is not compulsory however this statement was very disingenuous as the Wels Bac is one of only two standards that schools will be assessed on from 2018, so schools have to insist the entire cohort study this subject or suffer the consequences of having lower grades.

Either take Welsh Bac out of the assessment criteria or be honest and admit that schools and therefore students have been left no option but to waste time on a subject many do not want to take. Give our children a world class education and not the nationalist limiting subject currently being forcibly pressed onto our children and the staff that teach them.

I would be very happy to discuss this in person.

Kind regards

Katharine Drinkwater



# Agenda Item 2.4

## P-05-789 Review support for asylum seekers accessing further education

This petition was submitted by Gulnar Sohail having collected 78 signatures online.

### **Petition text:**

We call on the National Assembly for Wales to urge the Welsh Government to review the Educational Maintenance Allowance (EMA), the Financial Contingency Fund (FCF) and the Welsh Government Learning Grant (WGLG) to allow for more asylum seekers to be able to participate in further education.

### **Additional information:**

In these difficult times when inflation is on the rise and daily items getting more and more expensive for UK citizens too, it is almost impossible for asylum seekers to progress further in their higher / access education. We (Asylum seekers) are just given just over £5 a day from Home Office and from this amount they have to buy food, clothing, daily transport costs and the list is ongoing. Even if we try somehow (by cutting down on food or any other important things) the transportation cost for the whole course including any other charges like registration, child care are just too much to digest. My point is that there should be no discrimination between an asylum seeker and any other person living in Wales if both are trying to go to college for higher education / access courses. If a Welsh person is getting FCF and WGLG then an asylum seeker should also receive these both or any other related help which will enable them to move forward in their lives. Because of previously mentioned costs I have seen so many asylum seekers turned down their plans to go for higher education. It also means that they will be doing nothing fruitful as work is not permitted and sitting at home will make them more frustrated. I also would like to mention a recent example when a destitute (whose asylum case is refused and his / her cash support and house from Home Office has been withdrawn) has committed suicide. He was living in this situation for some time and he was not able to make use of his life. I believe if he was given an opportunity he might not have gone that far. Enabling more asylum seekers into education will not only give them some purpose for life but it will also enrich the community where they live. After all when we get our residence permit we will be independent and free to

work and this education will help us in many ways to shape our families and communities in much better ways.

**Assembly Constituency and Region**

- Swansea East
- South Wales West

## Briefing for the Petitions Committee

Y Pwyllgor Deisebau | 5 Rhagfyr 2017  
Petitions Committee | 5 December 2017

### Research Briefing: Review support for asylum seekers accessing further education

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Petition number: [P5-05-789](#)

Petition title: **Review support for asylum seekers accessing further education**

Text of petition:

We call on the National Assembly for Wales to urge the Welsh Government to review the Educational Maintenance Allowance (EMA), the Financial Contingency Fund (FCF) and the Welsh Government Learning Grant (WGLG) to allow for more asylum seekers to be able to participate in further education.

In these difficult times when inflation is on the rise and daily items getting more and more expensive for UK citizens too, it is almost impossible for asylum seekers to progress further in their higher / access education. We (Asylum seekers) are just given just over £5 a day from Home Office and from this amount they have to buy food, clothing, daily transport costs and the list is ongoing. Even if we try somehow (by cutting down on food or any other important things) the transportation cost for the whole course including any other charges like registration, child care are just too much to digest. My point is that there should be no discrimination between an asylum seeker and any other person living in Wales if both are trying to go to college for higher education / access courses. If a Welsh person is getting FCF and WGLG then an asylum seeker should also receive these both or any other related help which will enable them to move forward in their lives. Because of previously mentioned costs I have seen so many asylum seekers turned down their plans to go for higher education. It also means that they will be doing nothing fruitful as work is not permitted and sitting at home will make them more frustrated. I also would like to mention a recent example when a destitute (whose asylum case is refused and his / her cash support and house from Home Office has been withdrawn) has committed suicide. He was living in this situation for some time and he was not able to make use of his life. I believe if he was given an opportunity he might not have gone that far. Enabling more asylum seekers into education will not only give them some purpose for life but it will also enrich the community where they live. After all when we got our residence permit we will be independent and free to work and this education will help us in many ways to shape our families and communities in much better ways.

## Overview of statutory student support in further education

Persons seeking asylum in the UK are **currently ineligible**<sup>1</sup> for the statutory financial support offered by the Welsh Government to students in further and higher education.

The petition is calling for asylum seekers to be eligible for the following financial support for further education students.

### Educational Maintenance Allowance

The Welsh Government pays the [Educational Maintenance Allowance \(EMA\)](#) to 16–18 year olds undertaking full-time FE courses of at least 12 guided hours per week, lasting 10 or more weeks. **£30 is paid per week** during term time, with payments made every two weeks. Courses can be either academic or vocational but must lead to a qualification up to and including Level 3. There are eligibility thresholds relating to household income:

- If the student is the only young person in the household, household income must be £20,817 or less.
- If there are any additional young people eligible for child benefit in the household, household income must be £23,077 or less.

The EMA is not available to persons seeking asylum who do not have refugee status or who have not been granted Humanitarian Protection or Discretionary Leave by the UK Government.

### Welsh Government Learning Grant FE

The [Welsh Government Learning Grant in Further Education](#) (WGLG FE) is available to FE students aged 19 or over who are studying courses of at least 275 hours in the academic year at an eligible college. For part-time students whose household income is less than £18,370 per year, between £300 and £750 per year is available. Full-time students (courses of 500+ hours) under the maximum income threshold can get between £450 and **£1,500 per year**.

As with the EMA, the WGLG FE is not available to persons seeking asylum who do not have refugee status or who have not been granted Humanitarian Protection or Discretionary Leave.

### Financial Contingency Funds

The Welsh Government provides **money to FE colleges to administer** Financial Contingency Funds (FCF) which are discretionary funds to be used to provide **financial assistance to those students who need extra help to meet costs** which are not already being met from other sources of funding; to provide emergency payments in respect of unexpected crises; and to

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<sup>1</sup> Refugees are eligible for student support but asylum seekers are not. An explanation of the difference between these two terms is given at the end of this briefing.

assist in cases where a student may be considering leaving their course of study because of financial problems.

Asylum seekers are not eligible to receive FCFs unless they have refugee status or have been granted Humanitarian Protection or Discretionary Leave by the UK Government. See section 3 of [Open University / Welsh Government guidance notes](#).)

## Legal position

As the response to the Committee from the Minister for Welsh Language and Lifelong sets out, the EMA, WGLG FE and FCF schemes are all established by subordinate legislation made under sections 14–16 of the [Education Act 2002](#). Section 14(c) gives the **Welsh Ministers powers to give financial assistance** for the purpose of enabling any person to undertake any course of **education** within the further education sector.

The Welsh Government cannot alter the respective categories of immigration, which are a reserved matter for Westminster. The provision of financial support generally to asylum seekers is also not devolved (the UK Government gives asylum seekers £36.95 per week for all living costs). However, given that the determination of financial support to students is devolved, it would be open for the Welsh Government to consider whether it could make its student financial support schemes more accessible to more asylum seekers. If the Welsh Government were to consider making such changes, it would have to do so in a way that was non-discriminatory way and in compliance with EU law and the European Convention on Human Rights.

## National Assembly for Wales Action

The National Assembly's Equality, Local Government and Communities Committee undertook an **inquiry into the support for refugees and asylum seekers in Wales**. Its report, [‘I used to be someone’](#) (PDF 1 MB) was published in April 2017.

The Committee made **19 recommendations** aimed at improving the support available in Wales, including a speedy and comprehensive consultation revision of the Welsh Government's [Refugee and Asylum Seeker Delivery Plan](#) and adopting the [‘Seven Steps to Sanctuary’](#) as set out by the Welsh Refugee Council.

The Committee considered the barriers facing asylum seekers in accessing education. Two of its recommendations included:

Recommendation 6: The Welsh Government should consider **extending concessionary transport schemes to refugees and asylum seekers**, including children, to enable them to have greater access to education, employment, and volunteering opportunities.

Recommendation 15. The Welsh Government should do more to help refugees and asylum seekers **access education and employment** by:

- promoting the Credit and Qualifications Framework for Wales as widely as possible, both to refugees and asylum seekers and service providers;
- requiring Welsh universities to treat refugees as home students; and
- creating more opportunities for public sector internships and volunteering opportunities designed for refugees and asylum seekers. [Research Service emphasis]

## The Welsh Government's response

The Welsh Government is **revising its Refugee and Asylum Seeker Delivery Plan**. In its [response to the Equality, Local Government and Communities Committee's inquiry report](#) the Welsh Government said it will work with the new Asylum Rights Programme, which is funded by the Welsh Government and led by the Welsh Refugee Council, to ensure the Delivery Plan is developed in collaboration with refugees and asylum seekers. The Welsh Government intends to publish the **new plan in January 2018**.

The petition refers to travel costs. The Welsh Government **rejected Recommendation 6 about concessionary travel**, responding:

Refugees can already access benefits support, including for travel, on the same basis as other Welsh residents. The Welsh Government would not be able to mandate concessionary travel for asylum seekers without legislative change. The Home Office provides asylum seekers with financial support of £36.95 per week, which includes a very small amount for transport costs. **Any concessionary transport funding should be provided by the UK Government.** [Research Service emphasis]

The Welsh Government **accepted in principle Recommendation 15** about doing more to help refugees and asylum seekers **access education**, employment and volunteering, responding:

The Welsh Government recognises the importance of education and employment for effective integration into society. The Credit and Qualifications Framework for Wales ('CQFW') is now managed by a strategic operational partnership comprising the Welsh Government, Higher Education Funding Council for Wales ('HEFCW') and Qualifications Wales. Operational objectives are agreed and set annually by members of the CQFW Advisory Group.

We have proposed, as part of a CQFW Communications Plan, additional key promotional messages targeted at refugees and asylum seekers and service providers.

Under the Education (Student Support) (Wales) Regulations 2017, refugees who meet the residency requirements and who are ordinarily resident in Wales are eligible for student support funding from Student Finance Wales.

HEFCW encourages universities to take account of the Supporting Professionalism in Admissions good practice briefing to Higher Education Institutions on refugees and asylum seekers. The guidance note provides information on the issues and principles of fair admissions for refugees and asylum seekers of all ages, including providing advice to universities on issues such as transition and support arrangements, qualifications, overcoming language barriers, tuition fee status and financial support available.

The Welsh Government's Strategic Equality Plan 2016–2020 includes the aim for the Welsh Government itself to become an exemplar of diversity and inclusion by 2020. One of the key aspects of this is to attract a more diverse field of applicants to the Civil Service in Wales. We will use our Outreach programme, detailing educational, cultural and community groups we will engage with when recruiting to the Welsh Government. This will include refugee and asylum seeker support groups. We hope to use this programme to encourage other public sector bodies to take a similar approach.

We will also work with the Third sector to assess the value of volunteering by refugees and asylum seekers to their organisations and to Welsh society as a whole. The Asylum Rights Programme will offer increased volunteering opportunities for refugees and asylum seekers as part of that service.

The Minister for Welsh Language and Lifelong Learning's letter to this Committee states that **Welsh Government officials will 'continue to explore whether additional support can be given to enable participation in education services'**.

## Definition of Refugee and Asylum Seeker

- **Refugee:** a person who has fled armed conflict or persecution, and who is recognised as needing of international protection because it is too dangerous for them to return home. Refugees are protected under international law by the 1951 UN Refugee Convention, and are entitled to the same social and economic rights as any UK citizen. Refugees have full access to medical treatment, education, benefits, housing and employment, and they are not required to live in any particular area.
- **Asylum seeker:** someone who has lodged an application for protection on the basis of the UN Refugee Convention or Article 3 of the European Convention of Human Rights (ECHR), and is awaiting a decision. They are required to live in specific accommodation in designated dispersal areas in the UK.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Your ref P-05-789  
Our ref EM/05006/17

David John Rowlands AM  
Chair - Petitions committee.  
National Assembly for Wales  
Cardiff Bay  
Cardiff Bay  
CF99 1NA

government.committee.business@gov.wales

14 November 2017

Dear David

Thank you for your letter of 17 October, regarding a petition submitted by Gulnar Sohail to the Petitions Committee. The petition asked for a review of support for asylum seekers accessing further education. The petitioner has specifically named the Education Maintenance Allowance (EMA), Welsh Government Learning Grant (Further Education) (WGLG (FE)) and Financial Contingency Fund (FCF) schemes.

The Welsh Government is working with the Welsh Refugee Coalition's Nation of Sanctuary steering group to develop a new Refugee and Asylum Seeker Delivery Plan, with reference to the Equality, Local Government and Communities Committee report, "I used to be someone". As part of that work, officials will be reviewing what more can be done to support refugees and asylum seekers to integrate into Welsh life and access to education is a key consideration.

All universities and further education institutions (FEIs) have student support centres which provide a range of services, including financial support and counselling, to all students. Information would be made available prior to induction, and on institutions' own websites. The student support centres have expertise, experience and understanding of the barriers to study faced by students and they have links with a range of external organisations supporting priority groups, such as refugee and asylum seeker-related organisations.

FEIs in Wales operate within the post-16 planning and funding framework guidance provided by the Welsh Government. Asylum seekers may be able to access funded programmes of learning provided by FEIs and should contact the student support centre at the FEI to ask about eligible courses/programmes of learning.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Existing eligibility criteria for further and higher education support from Student Finance Wales, and the FCF Scheme administered by the FEIs in Wales, stipulate that only certain categories of students are eligible for student support and home fee status. In general terms these are:

- Persons who have permanent residence status in the UK and have been resident here for three years;
- EEA and Swiss workers and their spouses/civil partners and children in the UK who have been resident in the EEA or Switzerland for three years;
- EU nationals and their spouses/civil partners and children who have been resident in the EEA or Switzerland for three years;
- Refugees (recognised by the UK government) and their spouses/ civil partners and children; or
- Persons who have applied for asylum and have been granted Humanitarian Protection or Discretionary Leave, and their families; or granted Discretionary Leave where no application for asylum has been made; and

A person with refugee status or has been granted Humanitarian Protection or Discretionary Leave do not need to satisfy the three year ordinarily resident in the UK criteria to qualify for support from EMA, WGLG (FE) or FCF schemes, subject to satisfying other criteria. A person must however be ordinarily resident in Wales to qualify for the EMA or WGLG (FE) schemes; or studying at an FEI in Wales to qualify for FCF support.

Asylum seekers, whose status has yet to be resolved, and do not fall into any of the above categories, are not currently eligible for further or higher education student support. However, FEIs and universities in Wales have discretion to charge home fee status and may also provide their own scholarship/bursary schemes or other forms of support in supporting asylum seekers to access education. Similar criteria are applied across the UK.

Officials will continue to explore whether additional support can be given to enable participation in education services.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. E. Morgan'.

**Eluned Morgan AC/AM**

Gweinidog y Gymraeg a Dysgu Gydol Oes  
Minister for Welsh Language and Lifelong Learning

# Agenda Item 2.5

## **P-05-790 Tackle Rough Sleeping**

This petition was submitted by Hanin Abou Salem having collected 71 signatures online.

### **Petition Text**

We're calling on the Welsh Government to tackle rough sleeping in Wales. A devolved government is a "government closer to the people," all the people! I recently moved to Wales and I have fallen in love with everything Welsh. But every day my happiness is mixed with immense sadness because I pass so many people sleeping rough in the streets. Their ongoing misery is an affront to my humanity. As an individual I cannot solve their problem on my own but together as a government and people we can make a difference. The homeless people I pass every day in Wales have indicated that they feel like "forgotten people". They live in a vicious circle which can only be broken if the government sets a clear strategy to get them off the street and into a safe accommodation so they regain their lives. About 2 weeks ago I passed a homeless person and someone commented that individuals sleeping rough want to be homeless. As I was arguing against this logic we passed a homeless man near city road reading a book!

No one chooses to be homeless. People become homeless as a result of certain circumstances and the government has a duty to get people off the street so they can be active citizens who can live with dignity, have access to work opportunities and be able to vote. The Housing Act (Wales) 2014 required all councils in Wales to help anyone at risk of becoming homeless within 56 days does not solve the problem of individuals who are already homeless and sleeping in the streets. We need to address rough sleeping now!

### **Assembly Constituency and Region**

- Cardiff Central
- South Wales Central

## Petitions Briefing

Y Pwyllgor Deisebau | 5 Rhagfyr 2017  
Petitions Committee | 5 December 2017

### Research briefing: Tackle rough sleeping

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Petition number: P-05-790

Petition title: Tackle rough sleeping

Petition topic: We're calling on the Welsh Government to tackle rough sleeping in Wales. A devolved government is a "government closer to the people," all the people!

I recently moved to Wales and I have fallen in love with everything Welsh. But every day my happiness is mixed with immense sadness because I pass so many people sleeping rough in the streets. Their ongoing misery is an affront to my humanity. As an individual I cannot solve their problem on my own but together as a government and people we can make a difference.

The homeless people I pass every day in Wales have indicated that they feel like "forgotten people". They live in a vicious circle which can only be broken if the government sets a clear strategy to get them off the street and into a safe accommodation so they regain their lives. About 2 weeks ago I passed a homeless person and someone commented that individuals sleeping rough want to be homeless. As I was arguing against this logic we passed a homeless man near city road reading a book!

No one chooses to be homeless. People become homeless as a result of certain circumstances and the government has a duty to get people off the street so they can be active citizens who can live with dignity, have access to work opportunities and be able to vote. The Housing Act (Wales) 2014 required all councils in Wales to help anyone at risk of becoming homelessness within 56 days does not solve the problem of individuals who are already homeless and sleeping in the streets. We need to address rough sleeping now!

## Rough sleeping in Wales

The Welsh Government has [defined rough sleepers as](#):

*'People sleeping, about to bed down (sitting in/on or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations or "bashes").'*

Local authorities have carried out a national rough sleeper monitoring exercise in 2015 and 2016 to try to gauge the level of rough sleeping across Wales.

Based on the information gathered by local agencies, health organisations and other community service groups in contact with rough sleepers in the [two weeks from 10–23 October 2016](#), local authorities estimated that **313 persons were sleeping rough** across Wales over this period. Local authorities reported a total of **141 individuals observed sleeping rough** in Wales between 10pm on Thursday, 3 November and 5am on Friday, 4 November 2016. Local authorities also reported that there were **168 emergency bed spaces in Wales of which 40 (24%) were unoccupied** and available on 3 November 2016.

In 2015, based on the information gathered by local agencies, health organisations, and other community service groups in contact with rough sleepers in the [two weeks from 2–15 November 2015](#), local authorities estimated that **240 persons were sleeping rough** across Wales over this period. Local authorities reported a total of **82 individuals observed sleeping rough** in Wales between 11pm on Wednesday, 25 November and 3am on Thursday, 26 November 2015. Local authorities also reported that there were **180 emergency bed spaces across Wales of which 19 bed spaces (11%) were vacant** and available on 25 November.

It should be noted that direct comparisons cannot be made between different rough sleeper exercises due to differences in timing, methodology and coverage. A range of factors can impact on single-night counts of rough sleepers, such as location, timing and weather. As such, the November 2015 and 2016 counts are snapshot estimates, and can only provide a very broad indication of rough sleeping levels on the night of the count.

## Housing (Wales) Act 2014

Under [Section 73 of the \*Housing \(Wales\) Act 2014\*](#) local authorities have a **duty to help to secure accommodation** for all applicants assessed as homeless for a period of **56 days** (or fewer if they feel reasonable steps to help to secure accommodation have been taken). A local authority helping to secure accommodation does not necessarily have to provide or source the accommodation itself. After the 56 day period, the local authority has a continuing [duty under Section 75](#) to **secure accommodation for those in priority need who have not become homeless intentionally**. There is also an [interim duty under Section 68](#) to **secure accommodation if an authority has reason to believe that an applicant is eligible, homeless and in priority need pending a full assessment of their circumstances**.

According to [figures published by Welsh Government](#), during 2016–17, **9,210 households** were assessed as being threatened with homelessness within 56 days. For **5,718 households (62%)** homelessness was successfully prevented for at least 6 months.

During 2016–17, **10,884 households** were assessed as being homeless and owed a duty to help secure accommodation. Of these, **4,500 households (41%)** were successfully relieved of their homelessness and helped to secure accommodation that was likely to last 6 months.

In the same period, **2,076 households** were assessed to be intentionally homeless and in priority need. Of these, **1,674 (81%) households** were positively discharged through acceptance of settled suitable accommodation.

As of 31 March 2017, **2,013 households** were in temporary accommodation across Wales, with **189 households in bed and breakfast accommodation**.

## Views of the sector

A number of organisations who work with homeless people have raised concerns that the *Housing (Wales) Act 2014* does not do enough for those people sleeping rough. The [Wallich charity has stated](#) that the **focus on preventing homelessness ‘hasn't fully taken into account’ rough sleepers**. Going on to note that ‘the focus has been on a preventative agenda which hasn't fully taken into account those that sleep rough and those that live a street-based lifestyle.’ While [Shelter Cymru stated](#) that the Welsh Government’s homeless strategy is ‘proving to be a much better way of dealing with homelessness for our clients’, but, **‘it’s not working so effectively for people who are actually homeless...We’re better at preventing homelessness that we used to be but we’re not so good at helping people once they have fallen into that hole and once they are actually living on the streets’**.

The [Bevan Foundation notes](#) that the *Housing (Wales) Act 2014* does not require local authorities to find accommodation for people who are not ‘in priority need’ or who are classed as ‘not co-operating’ with the support offered. It goes on to explain that ‘this is legal-speak for a single person without children, or someone who is mentally ill, but can get by with medication, or someone who has refused an offer of a home perhaps because it is too far away.’

## Welsh Government action

In response to the petition, the Minister for Housing and Regeneration, Rebecca Evans, stated that:

‘*Prosperity for All*, our national strategy, sets out our view that it is unacceptable that people are forced to sleep on the streets’...

Our national advisory Rough Sleepers Working Group has been considering the recent rise in rough sleeping and how we can best tackle it.’

The minister’s letter goes on to explain some of the new duties created by the *Housing (Wales) Act 2014*, notes that the Welsh Government has, over three years, provided local authorities with **over £10 million of transitional funding** to fulfil these duties, and states that ‘this legislation provides more help to more people than the previous legislation, and does so in a more constructive and timely manner’.

The Minister’s letter also provides details of funding provided by Welsh Government to tackle rough sleeping and homelessness, including:

- The **£5 million homelessness prevention grant** which supports services, including rough sleeper outreach, day services, night shelters, and youth homelessness prevention;
- An **additional £2.6 million of funding** announced over the summer for projects to further improve services to help people off the street, with a particular focus on tackling rough sleeping and youth homelessness;
- The draft budget for 2018/19 includes an **additional £6m in the Revenue Support Grant for 2018/19 and 2019/20** for local authorities to continue homelessness prevention activity previously supported via transitional funding. This money is in **addition to the £6 million already in the settlement for this year (2017/18)** in recognition of changes to the funding of temporary accommodation management fees, and is intended to build on the progress to date in implementing Part 2 of the *Housing (Wales) Act 2014*; and

- There will be an **increase of £4 million a year in the Homelessness Prevention Grant for the next two years** to support the drive to end homelessness, with specific work to tackle the Welsh Government's priorities, including ending the need for anyone to sleep rough.

Every effort is made to ensure that the information in this briefing is correct at the time of its publication. Readers should be aware that these briefing papers are not necessarily updated or otherwise amended to reflect subsequent changes.

Rebecca Evans AC/AM  
Y Gweinidog Tai ac Adfywio  
Minister for Housing and Regeneration



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-05-790  
Ein cyf/Our ref RE/05002/17

David John Rowlands AM  
Chair - Petitions committee.  
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10 November 2017

Dear David,

Thank you for your letter regarding the petition from Hanin Abou Salem calling for the Welsh Government to tackle rough sleeping.

Preventing rough sleeping and other forms of homelessness is both a Government priority and a matter of deep concern to me. *Prosperity for All*, our national strategy, sets out our view that it is unacceptable that people are forced to sleep on the streets. We are committed to tackling the root causes of homelessness, recognising that prevention plays a major part in avoiding the spiral of decline caused by losing a home.

People living on the streets often have complex needs which services need to recognise and respond to. These issues can severely impact on a person's ability to engage with the services whose support they need. By recognising these needs, services can adapt to address the root causes. We are supporting this approach by promoting the training of front line staff to ensure that they are able to recognise the effects of trauma, and best to help people living with these problems to find and keep a home.

Our reform of homelessness legislation has led the UK nations in bringing a preventative approach to the duties placed on local authorities. Since April 2015, new duties under the Housing (Wales) Act 2014 include the obligation to take reasonable steps to prevent homelessness for people who are threatened with losing their home within 56 days.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



The legislation includes duties for people who are defined as homeless - including those sleeping rough - and a requirement for local authorities to take reasonable steps to help a homeless person secure accommodation. This legislation provides more help to more people than the previous legislation, and does so in a more constructive and timely manner.

In order to enable local authorities to perform these duties, the Welsh Government provided three years of transitional funding, totalling over £10 million.

We are pleased as a Government with the progress made up to this point in terms of early intervention and prevention, but recognise there is far more to do to help people who are sleeping rough and may have very complex needs.

The Welsh Government's homelessness prevention grant currently supports a range of services which includes rough sleeper outreach, day services, night shelters, youth homelessness prevention, and help accessing private sector accommodation. This grant of £5 million funds close to 70 different projects across the country including 'Streetlink', a service which enables members of the public to inform local outreach teams of a location where they believe a person is sleeping rough.

Over the summer, the Welsh Government announced an additional £2.6 million for projects to further improve services to help people off the street with a particular focus on tackling rough sleeping and youth homelessness. These projects include several "Housing First" approaches which aim to support people to move straight off the street into secure homes, avoiding the need for hostels where they may have had poor experiences in the past due to their complex needs. Support is provided to help ensure the individual is able to sustain the tenancy and receives the help they need to keep a home.

This additional funding will also be used to improve the quality of, and extend the availability of, emergency provision in Cardiff, Wrexham and Newport where levels of rough sleeping are known to be particularly high.

The draft budget for 2018/19 demonstrates our commitment to tackling homelessness. An additional £6m in the Revenue Support Grant for 2018/19 and 2019/20 will provide long term funding for local authorities to continue homelessness prevention activity previously supported via transitional funding. This money is in addition to the £6 million already in the settlement from this year (17/18) in recognition of changes to the funding of temporary accommodation management fees, and is intended to build on the progress to date in implementing Part 2 of the Housing (Wales) Act 2014.

Overall, this boost to core funding for homelessness will strengthen implementation of the legislation and recognises the increasing pressures on local authorities with rising homelessness, welfare cuts and a difficult housing market. In addition, we are increasing our homelessness budget by £4million a year for the next two years to support the drive to end homelessness, with funding for specific work to tackle our priorities - including ending the need for anyone to sleep rough.

A great deal of work has been done by Welsh Government and the housing sector in Wales to reduce homelessness. However, UK Government austerity measures, including welfare reform, have made the landscape far more challenging than would otherwise be the case. Full roll out of universal credit in Wales is likely to put further pressure on individuals and on services.

Dialogue with local authorities and third sector providers about the challenges ahead is ongoing. Only by working collaboratively can we build on our achievements to date, and continue to make a positive difference to people's lives. Our national advisory Rough Sleepers Working Group has been considering the recent rise in rough sleeping and how we can best tackle it. They will shortly provide me with their recommendations on the priorities for addressing this issue, and I will consider this carefully.

Yours sincerely,



**Rebecca Evans AC/AM**

Y Gweinidog Tai ac Adfywio

Minister for Housing and Regeneration

**P-05-790 Tackle Rough Sleeping – Correspondence from the Petitioner to the Committee, 28.11.17**

To whom it may concern,

I raised my petition with the Welsh National Assembly because I am confident that you care about ending rough sleeping. Despite this commitment [rough sleeper figures for Wales](#) are on the rise. On a daily basis I see people sleeping in the street. The Wallich's outreach teams have [recorded consistent rises](#) in the number of rough sleepers in all the areas they cover and Shelter Cymru has seen 63 per cent of rough sleepers using their service.

So despite [our new homelessness legislation](#), and despite the Welsh Government's [long-term aim](#) to end the need to sleep rough more people sleeping in the street.

What we need:

§ A better monitoring data

§ Interact directly with rough sleepers to find out why they are sleeping rough and how we can help them. They will help us understand how the system has failed them and why they have been unable to break the vicious circle of homeless despite the existence of so many charities that seek to help the homeless.

§ We need to fix the problem by having a 'no rough sleeping policy'. This means no one should be sleeping rough. Long term accommodation needs to be offered to rough sleepers and a proper plan needs to be executed that will make sure that they receive the necessary support that will allow them to get the help they need.

§ Legal reforms and preventive measures that focus on helping people not become homeless has not helped people who are already homeless and sleeping rough in our streets.

§ Factors that need to be addressed: Austerity and benefits cuts, lack of affordable housing.

§ We need more [Housing First](#) accommodation in Wales to help homeless people with long-term mental health and substance misuse problems.

§ Emergency accommodation: conditions need to be improved as some people are too scared to use these accommodations.

§ Some rough sleepers are not offered emergency accommodation because their council says they are not vulnerable enough. Welsh Government guidance recognize that people sleeping rough 'are likely to be vulnerable due to the health and social implications of their situation'. This needs to be clearly communicated to councils so people do not end up sleeping in the street.

§ We also need more services that understand rough sleepers' needs and can help them with employment and skills; money and benefits advice; and help to access and sustain tenancies.

Hanin Abou Salem

# Agenda Item 3

## **P-05-785 Suspend Marine Licence 12/45/ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff**

This petition was submitted by Tim Deere-Jones, having collected 7,033 signatures online and 138 on paper – a total of 7,171 signatures.

### **Petition text:**

We call on the National Assembly for Wales to urge the Welsh Government to direct Natural Resources Wales to suspend the licence it has granted to NNB Genco, which permits up to 300,000 tonnes of radioactively contaminated material, dredged from the seabed at the Hinkley Point Nuclear power station site, to be dumped into Welsh inshore waters.

We further request that the suspension of the licence is used to ensure that a full Environmental Impact Assessment, complete radiological analysis and core sampling are carried out under the auspices of Natural Resources Wales, and that a Public Inquiry, a full hearing of independent evidence and a Public Consultation take place before any dump of the Hinkley sediments is permitted.

### **Additional information:**

Marine Licence 12/45/ML, granted by the Welsh Government, permits the disposal of up to 300,000 tonnes of radioactively contaminated marine sediment, dredged from the seabed at the Hinkley Point nuclear site, into the Cardiff Grounds marine dump site close to the South Wales coast. This will allow work to begin on the 2 new Hinkley C nuclear reactor pipelines.

The sediments to be dredged are adjacent to the waste pipes used for the discharges from Hinkley's 4 existing reactors. Analysis, commissioned by UK Government agencies, shows that the sediment is contaminated by radioactive waste discharged to sea over 50+ years of operations at the Hinkley site. Calculations derived from the official data indicate that the proposed dredge sediments may hold at least 7 billion Bqs of aggregated radioactivity, yet reports state that doses to humans would be very low.

Hinkley's radioactive discharges to sea contain over 50 radio-nuclides, but the analysis has only investigated 3 of them. Thus, the actual aggregated radioactivity content of the sediments will be much higher than indicated by the available analysis. The available evidence also implies that only surface samples (0 to 5cms deep) of the sediment have been analysed, despite the fact that core sample research from elsewhere in the Irish Sea demonstrates that, at depths below 5cms, radioactivity concentrations may be up to 5 times higher.

While sedimentary radioactive material is initially likely to disperse, studies prove that it later re-concentrates in coastal and estuarine mudflats and saltmarshes, and is also available for sea-to-land transfer during onshore winds and coastal flooding. We note the absence of research on the fate of such radioactivity in South Wales inshore waters. In this context we are concerned that the environmental and human health (dose) risks from the proposed disposal have not been adequately researched and that any conclusions based on the current incomplete data, are unreliable.

#### **Assembly Constituency and Region**

- Carmarthen West and South Pembrokeshire
- Mid and West Wales

November 17, 2017

Secretary Lesley Griffith  
Cabinet for Environmental and Rural Affairs  
Welsh Government  
5th Floor  
Tŷ Hywel  
Cardiff Bay  
CF99 1NA

Dear Secretary Griffith,

As organizations working to preserve and protect the health of oceans and marine life, we are writing to express serious concerns about the decision to dispose of up to 300,000 tonnes of radioactively contaminated marine sediment, dredged from the seabed at the Hinkley Point nuclear site on the English coast, into the Cardiff Grounds marine dump site close to the South Wales coast.

We are disappointed that the decision to dispose of this radioactive waste off the coast was made without an open and transparent process. Both the public and an independent scientific evaluation should have been part of the process to inform the decision to dump radioactive mud in Cardiff Bay. Instead, this decision appears to have been taken without an Environmental Impact Assessment and the only scientific analysis was tied to the nuclear industry. We urge the Welsh Government to direct Natural Resources Wales to suspend the license it has granted to dump radioactive mud into Cardiff Bay until a fully independent and scientific analysis has been conducted. Additionally, we urge permitting agencies to fully and transparently apply the environmental requirements that must be fulfilled under the relevant EU Directives (such as the Habitats and EIA Directives), as well as areas which are under consideration for additional protections such as the harbour porpoise candidate Special Area of Protection.<sup>1</sup>

The time for using world oceans and seas as a dump is over. In the past, communities around the world used the ocean for waste disposal, including the disposal of chemical and industrial wastes, radioactive wastes, trash, munitions, sewage sludge, and contaminated dredged material. Little attention was given to the negative impacts of waste disposal on the marine environment. Wastes were frequently dumped in coastal and ocean waters based on the assumption that marine waters had an unlimited capacity to mix and disperse wastes.

However, we now know that disposal of wastes and other materials into the ocean degrades marine and natural resources and poses human health risks. The Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972 (The London Convention) prohibits ocean dumping of all radioactive wastes and ocean dumping of all other radioactive matter with more than de minimis (exempt) levels of radioactivity, as defined by the International Atomic Energy Agency.

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<sup>1</sup> Joint Nature Conservation Committee, Harbour Porpoise Special Areas of Conservation, available at: <http://jncc.defra.gov.uk/default.aspx?page=7059>

We are concerned that it has not been shown that the radioactively contaminated marine sediment is below the levels required for dumping to be allowed. We are also concerned that the likely long-lived and far-reaching health impacts on humans and wildlife have not been properly analyzed regarding the Hinkley radioactive sediment plan. This mud is known to contain long-lived radioactive elements that can bind organically inside living organisms, including human beings.<sup>2</sup>

In addition, there is documentation that a sampling of chemicals in these sediments found Polycyclic aromatic hydrocarbons (PAHs), Polychlorinated biphenyls (PCBs), Organochlorines, tributyltin (TBT), mercury, and cadmium among others. Some of these samples exceeded "Action Levels" and yet no "action" was taken. The presence of these compounds is known to cause long-term if not permanent harm to sea life that affects the entire food chain.<sup>3</sup>

For these reasons, we wish to express our strong opposition to the decision to dredge radioactive sediments from the Hinkley shoreline and deposit them in Welsh waters, at risk to the health and longevity of humans and wildlife as well as the ecological wellbeing of the marine environment.

Sincerely,

Cassie Burdyshaw  
Advocacy & Policy Director  
Turtle Island Restoration Network

Leda Huta  
Executive Director  
Endangered Species Coalition

Mark J. Palmer  
Associate Director, International Marine Mammal Project  
Earth Island Institute

Nancy Blaney  
Director, Government Affairs  
Animal Welfare Institute

Glen H. Spain  
NW Regional Director  
Pacific Coast Federation of Fishermen's Associations

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<sup>2</sup> Radiological Assessment of Dredging Application for Hinkley Point C Power Station, Somerset (2013). Cefas Environment Report RL 05/13. K.S. Leonard, P.A. Smedley and S.M. Cogan. April 2013

<sup>3</sup> "Hinkley C InOut sample results" (Microsoft Excel spreadsheet) re: re application no MCU 12/45 : applicant EDF Energy: Location: Hinkley C Intakes & Outfalls. CEFAS



Brock Cahill  
President  
Kurmalliance

Glen H. Spain  
NW Regional Director  
Institute for Fisheries Resources

Kurt Leiber  
Executive Director  
Ocean Defenders Alliance

Michael Stocker  
Director  
Ocean Conservation Research

Regina Asmutis-Silvia  
Executive Director, NA  
Whale and Dolphin Conservation

Mike Hedges AM,  
Chair of Climate Change, Environment, and Rural Affairs Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

21 November 2017

Dear Mike Hedges AM,

**RE: Disposal of dredged sediment at sea under marine licence 12/45/ML**

Thank you for your letter dated 13 November. Please see below responses to the questions that you raised in your letter.

**Question 1: *Can you explain the process NRW will undertake to ensure that the dredged sediment is “suitable” for deposit in the Cardiff Grounds site?***

We approved the licence holder’s most recent sample plan in January 2017 (as required by licence condition 9.3). We consulted with Cefas<sup>1</sup> as part of this process to secure expert technical advice on the appropriateness of the proposed sample plan.

It is the applicant’s responsibility to arrange for the samples to be collected from the locations identified in the approved sample plan. We understand that the licence holder has also commissioned Cefas to collect and then analyse the samples. Chemical contaminants will be assessed against Cefas Action levels (Cefas’s guideline action levels for the disposal of dredged material are not statutory contaminant concentrations for dredged material but are used as part of a weight of evidence approach to decision-making on the disposal of dredged material to sea). The radiological assessment will follow the conservative generic radiological assessment procedure developed by the International Atomic Energy Agency (IAEA). Cefas will provide us with their advice on the suitability for deposit in the Cardiff Grounds site based on the results of those assessments.

We will then consider the conclusions of this advice in consultation with our internal technical experts (our internal radiological experts will liaise with Environment Agency (EA) nuclear regulatory contacts in providing comments) and Public Health Wales.

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<sup>1</sup> [Centre for Environment, Fisheries and Aquaculture Science](#)

Tŷ Cambria • 29 Heol Casnewydd • Caerdydd • CF24 0TP

Cambria House • 29 Newport Road • Cardiff • CF24 0TP

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg

Correspondence welcomed in Welsh and English

NRW will then determine if it is satisfied that the material is suitable for disposal in the Cardiff Grounds site. The licence holder will require prior written approval from NRW before it commences any disposal activities.

**Question 2: *Can you clarify how you will assess whether the grounds for suspension outlined in Section 72 have been met in relation to the results of the new samples acquired in May and reported to NRW in September 2017? Against what criteria would those grounds be assessed?***

We should clarify that NRW did not receive any sample results in September 2017. We understand that a new suite of samples has been taken and we are awaiting the results and conclusions from the licence holder.

There is no need to consider licence suspension. Licence condition 9.5 prohibits the licence holder from depositing any material after 4<sup>th</sup> March 2016 without our written confirmation that we are satisfied that the material is suitable for deposit in the Cardiff Grounds site. We will not give this approval unless we are satisfied that the material is suitable for disposal.

**Question 3: *EDF Energy has told the Committee that its initial tests investigated over 50 radio-nuclides but only three radio-nuclides were detected. Can you confirm this is the case?***

It would be helpful if the Committee could confirm which specific report is being referred to and we will provide a further response.

However, with respect to the separate independent radiological assessment that NRW contracted Cefas to undertake as part of the Marine licence determination process “*Radiological Assessment of Dredging Application for Hinkley Point C Power Station, Somerset (2013) CEFAS Environment Report RL 05/13*”, a sampling and analysis programme was developed in accordance with IAEA guidelines.

Samples were collected and analysed by gamma-ray spectroscopy to determine the levels of gamma emitting radionuclides (both man-made and naturally occurring) and results were reported for Am-241, Co-60, Cs-137, K-40, Ra-226, Th-232, U-238. In addition to these, the Am-241 data was used to derive estimates for Pu-239,240, Pu-241 and Pb-210. The activities of these alpha-emitting radionuclides were included in the same assessment.

The Cefas report concluded that the total radiation doses to individual members of the public and (dredging) crew, and collective doses, were within de-minimis criteria using assessment methodology developed by the IAEA. The results of which were reviewed by NRW with support from the EA to support our decision to issue a marine licence.

**Question 4: *Would you be prepared to consider commissioning a third party to review the findings of those tests? I trust that you will, in any event, share with this Committee and make public the findings of the most recent tests from May 2017.***

Cefas are an independent third party and are recognised experts in this field of work. We are confident in their competence as a provider of expert technical advice. Our radioactive substances regulation specialist was also consulted on the 2013 radiological assessment. The specialist liaised with the EA’s lead regulator for Hinkley. Both agreed that the Cefas

report was an adequate assessment of the radiological impacts and agreed with its conclusion.

We will follow the same process when we receive the suite of results for the 2017 samples, as well as consulting Public Health Wales.

We will be happy to share the results with the Committee and make them public once we have concluded our assessment.

**Question 5: *What is NRW's view on this issue? Is NRW satisfied that no further analysis of samples from beneath the surface is necessary?***

NRW is satisfied that no further analysis of samples from beneath the surface is necessary, because of the sampling that was undertaken at various depths in 2009.

There is no scientific evidence of higher radioactivity residing at depth in sediments in the Hinkley area. Radiological monitoring of sediments at Hinkley Point is undertaken each year as part of the food, environmental and dose monitoring programme, the results of which are reported in the annually published "Radioactive in Food and the Environment (RIFE)" report. The RIFE report represents collaboration by the environment agencies, Food Standards Agency and Food Standards Scotland across the UK, independent of industry.

Analysis of the monitoring provided by the applicant as well as the ongoing trend analysis of the results of the annual RIFE monitoring programme, shows no indication that deeper sediment layers have higher levels of radioactivity than the surface layers at Hinkley Point.

**Question 6: *Has an Environmental Impact Assessment been undertaken in relation to this specific licence? If not, why? Is NRW satisfied that in looking at this application for a licence to dispose dredged material at sea, that a robust process was followed that gave sufficient consideration to the protection of the marine environment and protection of human health?***

The applications were initially received and processed by Welsh Government (WG) Marine Consents unit. Significant progress had been made on both applications when they were transferred to NRW on vesting day (1 April 2013), when NRW was delegated the Welsh Marine Licencing function on behalf of Welsh Ministers.

We understand that the Welsh Government, as appropriate authority, took the decision that it was not necessary to determine this application under the Environmental Impact Assessment process. We therefore, in good faith, continued the determination of the marine licence application on that basis.

When NRW issued the marine licence in July 2014 we were satisfied that a robust process had been followed to ensure that the licence fulfilled its requirements of preventing pollution of the environment, harm to human health or impact to legitimate users of the sea.

**Question 7: *Is NRW satisfied it has sufficient data and information on the material, such as sediment samples at depth and testing for radioactivity, to assess in a reliable way the impact of the disposal of the material?***

We are confident that, providing the agreed sampling plan is followed, we will have sufficient data when the reports are submitted. We are satisfied that samples at depth have already been taken and that an appropriate assessment of any potential radiological contamination has been undertaken of all sample results received to date.

We await the submission of the results and conclusions of the samples taken in 2017. We will follow the same procedure, with advice from technical experts, to satisfy ourselves that the sediment does not contain any chemical or radiological contamination which would make it unsuitable for disposal in the Cardiff Grounds site.

**Question 8: *Can you explain the process undertaken by NRW to scrutinise this latest analysis and in doing so, satisfy itself that the conditions of the licence continue to be met?***

As stated above we have yet to receive the sample results and conclusions for the samples taken in 2017.

The approval of a sampling plan under licence condition 9.3 does not mean we have approved the disposal of the sediment. As stated above this requires prior written approval following our assessment of the sample results.

A monitoring plan must also be submitted for our approval under licence condition 9.1 (this plan is aimed at monitoring any build-up of material on the sea bed, rather than chemical or radiological contamination). There have been some discussions between us, the licence holder and our technical experts regarding the scope of such a plan, but we have not received a plan for our approval.

**Question 9: *Can you inform the Committee of any advice NRW received from the Cabinet Secretary or her officials on this issue and the actions you are taking in response?***

We have not received any advice from the Cabinet Secretary or her officials in the context of discharging any of the conditions associated with this Marine licence. However, as NRW is an arms-length sponsored body, which makes decisions independently, we would not expect to receive, or seek, such advice from Welsh Government since we make our evidence-based decisions independently.

We have, however, as is normal practice, met with officials from WG 's Marine and Fisheries Department to agree our communication strategy, and share our current position statement. Such actions were necessary given the level of public interest with this proposed dredge/disposal operation so that Welsh Government were briefed on our previous and current regulatory activities associated with this Marine licence.

**Question 10: *Are you satisfied that the public were consulted sufficiently during the process under Section 69 of the Marine Act?***

We are satisfied that a public consultation was undertaken during the determination of the licence application in accordance with our procedures and legal obligations. The consultation period commenced on 13<sup>th</sup> September 2012 for and lasted for 28 days.

This included the advertisement of public notices in the Western Mail. The notices directed the public to the application documents which were held at Cardiff Central Library.

**Question 11: *Can you confirm that NRW is satisfied that the marine licensing process is robust, fit for purpose and that NRW has sufficient resources to administer it? Are there any aspects of the marine licensing process you believe could be improved, or any matters you would like to draw to this Committee's attention?***

We are proud and confident of the level of experience, knowledge and technical ability we have developed within NRW to support the delivery of the Marine licensing function, following its delegation to us in 2013.

We are satisfied that the Marine licensing process is robust and fit for purpose and that the licences that we issue adequately protect the environment, human health and legitimate users of the sea.

In April 2017, Welsh Government brought in a new fees and charges system and enabled NRW to move to a model of full cost recovery from our licensing activities. This new model allows us to ensure that the level of resources can be adapted to reflect the level of licensing work being received. It also supports the procurement arrangements we have in place for the provision of specialist technical advice and support, through a dedicated budget.

To provide a forum for communication and a joined-up approach to the delivery of marine regulation in Wales, NRW and Welsh Government have created the Wales Marine Licensing Group. This forum creates the opportunity for liaison between WG Policy, WG Enforcement, WG Marine Planning, NRW Regulatory Advisors and NRW Marine Licensing.

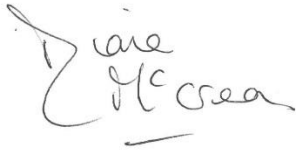
NRW and WG have also established a Marine stakeholder group to help inform the strategic direction of marine regulation in Wales. The stakeholder group also provided valuable input in the recent marine fees and charges review. NRW are active members of industry groups such as Marine Energy Wales, the Welsh Ports Group and the Marine Aggregates sector. These interactions help improve our understanding of our customers, and provide us with vital feedback to further improve our customer experience.

NRW endorses and supports the principle of 'continuous improvement'. Since the Marine licensing regime was brought into the NRW Permitting Service, we have already seen many process efficiencies, such as shared services for administrative tasks and knowledge transfer across the licencing regimes through a Technical Leads Group. We recognise that there are always areas where improvements can be made, such as in the production of guidance and additional website information for customers. We very much see this as an ongoing process that we need to deliver in conjunction with our partners and stakeholders.

It is worth drawing the Committee's attention to the WG's draft Welsh National Marine Plan (WNMP), which is nearing completion. Once implemented, we hope that it will provide better clarity for developers on the appropriate locations for particular marine activities and support NRW with its marine licensing decision making process.

I hope that you find these responses satisfactory. Please let me know if you would like any further clarification or information on the responses in this letter.

Yours sincerely,

A handwritten signature in black ink that reads "Diane McCrea". The signature is written in a cursive style with a large initial 'D'.

**Diane McCrea**

**Cadeirydd, Cyfoeth Naturiol Cymru  
Chair, Natural Resources Wales**

## MARINE AND COASTAL ACCESS ACT 2009: PART 4 – MARINE LICENSING

### Marine Licence: 12/45/ML

The Natural Resources Body for Wales ("NRW") acting on behalf of the Licensing Authority" hereby authorise:

**NNB Genco  
Barnett Way,  
Barnwood,  
Gloucester,  
GL4 3RS  
Company No: 06937084**

(Hereinafter referred to as "the Licence Holder") to deposit in the sea the substances or articles the particulars of which are set out at paragraph 1 of the attached Schedule of Conditions. The Licence is subject to the conditions of use set out, or referred to, in the said Schedule.

This Licence shall be valid from the beginning of the day of **11 July 2014**, (hereinafter referred to as the start date of this Licence) to the end of the day of **04 March 2019**, (hereinafter referred to as the end or expiry date of this Licence).

For the purposes of this Licence and attached schedule and unless indicated otherwise:-

- (i) all times shall be taken to be Greenwich Mean Time (GMT), and,
- (ii) all co-ordinates shall be taken to be latitude and longitude degrees and minutes to two decimal places.

Signed:



For and on behalf of the Licensing Authority

Date of issue: 11 July 2014



## SCHEDULE of CONDITIONS

### 1. Particulars of the Deposit Operation

1.1. Place of production of the substances or articles:

**Hinkley Point C development site, Bridgewater Bay, on the West Somerset Coast**

**Cooling water intake and outfall sites**

**Temporary jetty berthing pocket**

**Within the areas bounded by joining the points given in Annexe 1 of this licence**

1.2. Description of the substances or articles for deposit:

**Arisings from the capital dredge (and secondary dredge during construction) associated with the preparation of the offshore site for the cooling water infrastructure for the proposed new nuclear power station at Hinkley Point. These arisings as described in Marine License Application dated 06 August 2012.**

**Arisings from the capital dredge of the berthing pocket for the Hinkley Point C Project Temporary Jetty. These arisings as described in Marine Licence Application dated 13 September 2012.**

1.3. The Licence Holder or any Agent or Contractor acting on their behalf under this Licence is permitted to deposit a quantity not exceeding 304,885 tonnes of the substances or articles specified at sub-paragraph 1.2 of this Schedule, at the Deposit Area(s) detailed at paragraph 1.4.

1.4 The Deposit Areas authorised under this licence are:

1.4.1 Deposit Area Name and Code: **Cardiff Grounds, LU110**  
at:-

**Within the area bounded by joining the points:**

**51°25.60 N 03° 06.40 W**

**51°25.60 N 03° 06.70 W**

**51°26.50 N 03° 07.10 W**

**51°27.40 N 03° 05.90 W**

1.5. Tank/hopper washings may only be discharged in the area(s) specified at paragraph 1.4

### 2. Agents or Contractors Responsible for the Loading, Transportation, Storage or Deposit of the Substances or Articles

2.1 The Licence Holder must ensure that details of the contractors utilised to undertake the works are submitted to NRW acting on behalf of the Licensing Authority prior to the commencement of works.

- 2.2 The Licence Holder must ensure that the details of the vessels and/or vehicles utilised to undertake the works are submitted to NRW acting on behalf of the Licensing Authority prior to the commencement of the works.
- 2.3 Only those Agent(s) or Contractor(s) and vehicles whose details have been notified to NRW acting on behalf of the Licensing Authority may operate under the terms of this Licence. Any changes must be notified to and be approved by NRW acting on behalf of the Licensing Authority in writing prior to operating under this Licence.
- 2.4 Any person in charge of the loading of a vessel or any intermediate storage of the substances or articles prior to their deposit in the sea shall maintain a written record on the premises relating to individual cargoes or loads (received or dispatched). This written record shall include the following details:
- 2.4.1 date and time each load was received or dispatched and the quantity;
  - 2.4.2 general description of the substances or articles and the name of the producer(s) or holder(s);
  - 2.4.3 registration numbers of vehicles delivering loads;
  - 2.4.4 consignment note numbers (if any);
  - 2.4.5 the reference number of the Licence issued under Part 4 of the Marine and Coastal Access Act 2009, which permits the substances or articles being loaded or stored to be deposited in the sea;
  - 2.4.6 name(s) of vessel or identification code and type of container into which substances or articles are loaded;
  - 2.4.7 signature(s) and status of the person or persons authorising loading of substances or articles to the vessel or container;
  - 2.4.8 the results of any checks carried out on the substances or articles prior to authorisation of loading.
- 2.5 The Licence Holder and any Agent or Contractor responsible for loading, transportation or storage must ensure that only authorised personnel have access to the substances or articles for deposit.
- 2.6 All vessels employed to perform the deposit operation permitted by this Licence shall be so constructed and equipped as to be capable of the proper performance of these operations in compliance with the conditions set out in the Schedule to this Licence. Details of the vessels that may operate under this Licence are as submitted in accordance with sub-paragraph 2.2.
- 2.7 The Master or the Officer of the Watch of each vessel, details as submitted in accordance with in sub-paragraph 2.2 of this Schedule, undertaking the deposit of any substances or articles specified in sub-paragraph 1.2 of this Schedule, shall maintain a written log of operations recording, in the English Language, the following information:
- 2.7.1 the name of the vessel;
  - 2.7.2 the quantity and type of each substance or article loaded for deposit;
  - 2.7.3 the date and time of departure from the port or site at which the substances or

articles are loaded for deposit in the sea and time of arrival (and date if different) at the Deposit Area on each occasion that it proceeds to and from such area;

- 2.7.4 latitude and longitude position (in degrees and minutes and decimal of a minute to at least one decimal place) of the vessel at intervals of not more than 20 minutes throughout the deposit operation which for the purpose of this Licence shall be the commencement of loading (including the dredging) each consignment of material for deposit in the sea through to the completion of the placement or deposit of the material in the Deposit Area;
  - 2.7.5 the time taken to complete the deposit operation and a statement of the reasons for any delays;
  - 2.7.6 courses and speeds together with any alterations throughout each deposit operation (multiple changes may be recorded as "various");
  - 2.7.7 the rate of discharge or deposit, together with any variations, throughout deposit operations;
  - 2.7.8 weather, sea-state, wind and tidal set, and rate throughout deposit operations; and
  - 2.7.9 the signature of the Master at the foot of each log sheet or page of the record.
- 2.8 All deposit vessels are required to carry an Admiralty Chart of appropriate scale to be used in navigation on which the co-ordinates of the licensed Deposit Area(s), as detailed in sub-paragraph 1.4, should be marked.

### **3. Distribution of Copies of this Licence**

- 3.1 The Licence Holder is required to ensure that a copy of this Licence and attached Schedule, any special conditions and any subsequent revisions or amendments thereto is given to:
  - 3.1.1 any Agent or Contractor, details as submitted in accordance with sub-paragraph 2.1 of this Schedule, responsible for the loading, transport storage or deposit of the substances or articles for deposit as described in sub-paragraph 1.2 of this Schedule; and
  - 3.1.2 the Master of any vessel employed in pursuance of this licence.
- 3.2. Copies of this Licence shall also be available at the following locations:
  - 3.2.1 at the address of the Licence Holder;
  - 3.2.2 at any site office, located at or adjacent to the site of the works, used by the Licence Holder, agent(s) or contractors(s) responsible for the loading transportation or deposit of those substances or articles detailed in paragraph 1.2 of this Schedule; and,
  - 3.2.3 at the office of the transport manager with responsibility for any vehicle(s) from which licensed deposits are to be made.
  - 3.2.4 on board each vessel from which deposits are to be made.

#### **4. Inspection of the Operation**

- 4.1 The written record referred to in paragraph 2.3 shall be available for inspection by officers appropriately authorised by NRW acting on behalf of the Licensing Authority and/or authorised Marine Enforcement Officers at all reasonable time at the premises where the substances or articles are stored prior to loading for deposit at sea.
- 4.2 This written log referred to in paragraph 2.6 of the Schedule and all other relevant documents shall be available on board the vessel(s) to which they relate at all reasonable times for inspection by appropriately authorised officers of NRW and/or Marine Enforcement Officers.
- 4.3 The documents referred to in paragraph 3 shall be available for inspection at all reasonable times by appropriately authorised officers of NRW and/or Marine Enforcement Officers at the locations stated in that paragraph.
- 4.4 The Licence Holder must advise NRW acting on behalf of the Licensing Authority and Marine Enforcement Officers **10 days** before the licensed operation, or an individual phase of the operation is expected to commence.
- 4.5 The Licence Holder must allow officers of the Maritime and Coastguard Agency, Welsh Government Marine Enforcement Officer or any other person authorised by the Licensing Authority or NRW acting on behalf of the Licensing Authority to inspect the works at any reasonable time.

#### **5. Returns to be made to NRW acting on behalf of the Licensing Authority**

- 5.1 Certified returns of quantities of substances or articles deposited under this Licence are required to be submitted on the attached disposal return form by 31 January and 31 July each year. The returns must specify the full Licence number and amount deposited each calendar month at each authorised Deposit Area. Where no deposit is made in a given period a NIL return is required.
- 5.2 If this Licence expires during the course of the calendar year and is not renewed or superseded by a further Licence relating to the works specified in paragraph 1, a certified return of quantities of substances or articles deposited under this Licence, shall be submitted not later than 28 working days after the expiry date of this Licence.

#### **6. Force Majeure**

- 6.1 If, by reason of "force majeure" the substances or articles as specified at sub-paragraph 1.2 of this Schedule are deposited otherwise than at the authorised deposit area specified at paragraph 1.4 of this schedule, full details of the circumstances shall be notified within 48 hours to NRW acting on behalf of the Licensing Authority.

"force majeure" may be deemed to apply when, due to stress of weather or any other cause, the master of a vessel determines that it is necessary to deposit the substances or articles because the safety of human life and/or of the vessel is threatened.

## **7. Changes to this Licence**

- 7.1 In the event of the Licence Holder becoming aware that any of the information on which the granting of this Licence was based has changed or is likely to change, he/she shall immediately notify NRW acting on behalf of the Licensing Authority of the details.
- 7.2 Should the Licence Holder wish any of the particulars set down in paragraph 1 of the Schedule to be altered he/she shall immediately inform NRW acting on behalf of the Licensing Authority and receive written consent to the change before taking any further action.

## **8. Contacts**

- 8.1 Except where otherwise indicated, the primary point of contact with NRW acting on behalf of the Licensing Authority and the address for returns and correspondence shall be:-

**Marine Licensing Team  
Natural Resources Wales  
Cardiff Permitting Centre  
29 Newport Road  
Cambria House  
Cardiff  
CF24 0TP**

Email: [marinelicensing@naturalresourceswales.gov.uk](mailto:marinelicensing@naturalresourceswales.gov.uk)

- 8.2 For the purposes of this Licence any references to Marine Enforcement Officers shall mean the relevant officers located at:-

**Welsh Government  
Fisheries Office  
Suite 3, Cedar Court  
Haven's Head Business Park  
Milford Haven  
Pembrokeshire  
SA73 3LS**

**Tel: 01646 693412**

**Email: [milfordhavenfisheryoffice@wales.gsi.gov.uk](mailto:milfordhavenfisheryoffice@wales.gsi.gov.uk)**

## **9. Project Specific Conditions**

- 9.1. The Licence Holder must submit a proposal for a monitoring programme of the disposal site and immediate environs to Natural Resources Wales acting on behalf of the Licensing Authority for written approval at least **12 weeks** before any disposal operation. The scheme will include details of pre, during and post disposal operation surveys, and any actions to be taken as a consequence of the survey findings. The purpose of the scheme will be to enable the avoidance of significant build up of material and any consequent shallowing.
- 9.2. The Licence holder must ensure the programme, and any consequent actions are be undertaken in line with the agreed programme. Reports of the monitoring must be

submitted to Natural Resources Wales acting on behalf of the Licensing Authority within the timescales agreed within the programme.

- 9.3. The Licence Holder must submit a proposal for a sediment sampling scheme of the source sites and immediate environs to Natural Resources Wales acting on behalf of the Licensing Authority for written approval at least 6 months before any disposal operation to occur after 4<sup>th</sup> March 2016. The scheme will include details of sampling grid, analyses suites (including any appropriate radiological assessment) and proposed format of a report determining the suitability of the material for disposal at site LU110 along with timescales for carrying out these actions.
- 9.4. The Licence holder must ensure the sediment sampling must be undertaken in line with the agreed scheme, as referenced in paragraph 9.3. Sampling scheme reports must be submitted to Natural Resources Wales acting on behalf of the Licensing Authority within the timescales agreed within the scheme.
- 9.5. The Licence Holder must ensure that no material is deposited after 4<sup>th</sup> March 2016 without written confirmation from NRW, acting on behalf of the Licensing Authority, that they are satisfied the material is suitable for deposit at site LU110.
- 9.6. The Licence Holder must ensure a notice to mariners is issued at least **10 days** prior to works commencing to notify local mariner's and fishermen of the presence of the works.
- 9.7. The Licence Holder must notify the UK Hydrographic Office of the timetable and location of the works, to permit the promulgation of Maritime Safety Information and the updating of nautical charts and publications, where necessary.
- 9.8. The Licence Holder must ensure bunding and storage facilities are installed onboard any vessels used to contain and prevent the release of fuel, oils and chemicals associated with the plant, refuelling and equipment into the marine environment.
- 9.9. The Licence Holder must ensure that any oil, fuel or chemical spill is reported to NRW acting on behalf of the Licensing Authority by telephone to 0800 807060 and by email to [marine.licensing@naturalresourceswales.gov.uk](mailto:marine.licensing@naturalresourceswales.gov.uk)
- 9.10. The Licence Holder must ensure that the works do not encroach on any recognised anchorage, either charted or noted in nautical publications within the proposed consent area.
- 9.11. The Licence Holder must ensure that best practice is used to minimise re-suspension of sediment during these works.
- 9.12. The Licence Holder must ensure that material is deposited as evenly as operationally possible over disposal site LU110 (excluding the area south of 51° 25.8N).
- 9.13. The Licence Holder must ensure that no material is deposited south of 51° 25.8N.
- 9.14. The Licence Holder must ensure that no deposit activities are undertaken at the same time as deposit activities undertaken by other licensed users of disposal site LU110.
- 9.15. The Licence Holder must advise the Marine Enforcement Officers within **10 days** of completion of the works.

## **Annexe 1**

Place of production of the substances or articles:  
**Within the areas bounded by joining the points:**

### **Outfalls**

51°13.32N 03°09.60W  
51°13.27N 03°09.60W  
51°13.27N 03°09.56W  
51°13.24N 03°09.56W  
51°13.24N 03°09.48W  
51°13.29N 03°09.48W  
51°13.29N 03°09.52W  
51°13.32N 03°09.52W  
51°13.32N 03°09.60W

### **Hinkley Intake 1**

51°13.99N 03°10.10W  
51°14.01N 03°10.00W  
51°13.96N 03°09.98W  
51°13.95N 03°10.09W  
51°13.99N 03°10.10W

### **Hinkley Intake 2**

51°14.08N 03°10.20W  
51°14.09N 03°10.10W  
51°14.05N 03°10.08W  
51°14.03N 03°10.19W  
51°14.08N 03°10.20W

### **Hinkley Intake 3**

51°13.91N 03°10.49W  
51°13.92N 03°10.39W  
51°13.88N 03°10.37W  
51°13.86N 03°10.48W  
51°13.91N 03°10.49W

### **Hinkley Intake 4**

51°13.99N 03°10.06W  
51°14.01N 03°10.49W  
51°13.96N 03°10.48W  
51°13.95N 03°10.58W  
51°13.99N 03°10.60W

### **Temporary Jetty Berthing Pocket**

51°12.70N 03°09.43W  
51°12.72N 03°09.30W  
51°12.69N 03°09.43W  
51°12.70N 03°09.29W

## EXPLANATORY NOTES

*This page does not form part of this Licence 12/45/ML or its associated schedule but the Licence Holder is recommended to read the following guidance notes.*

1. The granting of this licence does not absolve the Licence Holder from obtaining such other authorisations, consents and approvals which may be required under any other legislation, controls or regulations.
2. Under Section 72 of the Marine and Coastal Access Act 2009, NRW acting on behalf of the Licensing Authority may vary or revoke this Licence if it appears to the Authority that the Licence Holder is in breach of any conditions in it or for any other reason that appears to the Authority to be relevant.
3. A person who contravenes Section 65 (1) of the Marine and Coastal Access Act 2009, or fails to comply with any condition of a Marine Licence, commits an offence under Part 4, Chapter 3, Section 85 of the Marine and Coastal Access Act 2009.
4. It is a defence, Under Part 4, Chapter 3, Section 86 of the Marine and Coastal Access Act 2009, for a person charged with an offence under Section 85 (1) to prove that:
  - a) the activity was carried out for the purpose of securing the safety of a vessel, aircraft or marine structure or for the purpose of securing life, and,
  - b) that he/she took steps within reasonable time following the incident to inform NRW acting on behalf of the Licensing Authority of:
    - (i) the fact that the activity was carried out,
    - (ii) the locality and circumstances in which it was carried out, and
    - (iii) any substance or objects concerned.
5. If the works authorised by this Licence are unlikely to be completed by the expiry date of this licence, the Licence Holder should apply for a replacement licence **at least 4 months** prior to the expiry date of this Licence.



# Agenda Item 4



## Briefing

### Hinkley Point C and dredging in the Bristol Channel

#### WHAT WE ARE DOING AND WHY

##### What we are building at Hinkley Point

EDF Energy is currently building a new nuclear power station at Hinkley Point in Somerset. When completed in 2025, Hinkley Point C will provide enough low carbon electricity to provide reliable, low carbon electricity to homes in Wales and across the UK for over 60 years. In total, it will provide 7% of the UK's electricity demand, or enough power for 6 million homes.

It is a major undertaking, involving a supply chain that includes Welsh companies (including a contract with Express Reinforcements in Neath to supply 230,000 tonnes of steel), with around 150 Welsh residents working on the construction site every day, of a total of 2500 construction workers, and 25,000 employment opportunities throughout the construction period.

##### Why we need to dredge

As part of the construction of Hinkley Point C, we will be dredging sediment from the seabed off the Hinkley Point C site ahead of the drilling of six vertical shafts for the cooling water system. The cooling water system is a significant piece of infrastructure, which involves tunnelling more than 3km out into the Bristol Channel.

In order to do this, it is necessary to dredge the immediate area where we will be installing the vertical shafts. This process will take in the region of 3-6 months, and we will begin to dredge the area in summer 2018.

EDF Energy is one of many companies - over many decades - dredging and depositing sediment in the Bristol Channel for industrial or construction purposes.

The sediment we and others are dredging in the Bristol Channel is typical of the sediment found anywhere in the Bristol Channel, and as such it is no different to the sediment already at the Cardiff Grounds. It is not classed as radioactive under UK law and poses no threat to human health or the environment.

#### WHY CARDIFF GROUNDS

##### Why we are moving the dredged sediment to Cardiff Grounds, why not somewhere else?

While there are other licensed disposal sites in the Channel, the Cardiff Grounds is the only site large enough to handle the amount of the type of sediment we will dredge, and as the sediment was confirmed to pose no environmental or health risks there is no need to relocate it elsewhere.

Cardiff Grounds has been a licensed disposal site since the 1980s, and takes on average 1,500,000m<sup>3</sup> of sediment each year. It is important to emphasise that EDF Energy is not the only company licensed to use the

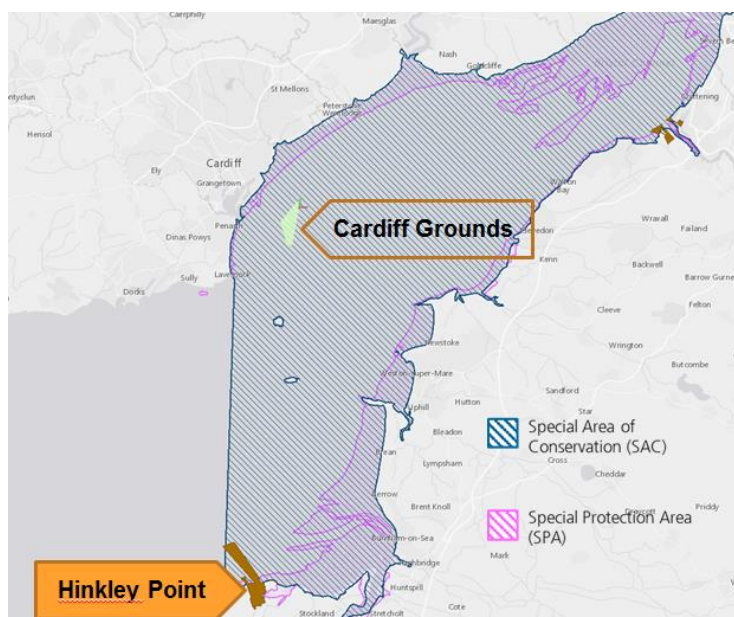
Cardiff Grounds - the site will have received several million cubic meters of dredged sediment from other parts of the Bristol Channel over several decades.

### Why not relocate the sediment further out to sea or elsewhere?

The area we are dredging is within a recognised Special Area of Conservation (SAC)

Any sediment removed from this area, must be put back into this area in order to maintain the natural balance of sediment in the SAC.

Within this SAC, the Cardiff Grounds are the largest and only suitable grounds to deposit sediment from EDF Energy and other companies conducting dredging in the Channel.



## TESTING THE SEDIMENT

### Concerns have been raised that the sediment is radioactive waste/material – is it?

No. The sediment is typical of sediment found elsewhere in the Bristol Channel, and under UK law it is not radioactive.

Radioactivity occurs naturally, including in foods we eat, and can be artificial / produced by human activities. Any sediment in UK coastal waters will contain naturally occurring levels of radiation, and in areas of industrial activity there may be extremely low levels of artificial radiation present.

In the case of the Bristol Channel, the very low levels of radioactivity identified in the sediment are predominantly naturally occurring (over 80%), with a small amount of artificial radioactivity, which will have originated from legacy discharges from hospitals, medical isotope manufacturing facilities (including those formerly based in Cardiff) and nuclear facilities. Whether the radioactivity is naturally occurring or artificial this has no impact on how it interacts with the human environment.

## Of the low levels of radioactivity that CEFAS did find in the sediment, what would be the human or environmental health impacts?

Taking the naturally occurring and artificial radioactivity together, the levels are so low they pose no danger to human health or the environment.

In order to assess the human impact of the extremely low levels of radioactivity identified in the sediment, a highly conservative, internationally recognised (International Atomic Energy Agency) assessment methodology was used.

The methodology conservatively assumes a member of the public spends around four hours per day every day on the shore near the Cardiff Grounds and consumes 50 kg of fish and 15 kg of crustacean and molluscs every year, all sourced from near the Cardiff Grounds. Exposure to the radioactivity in the sediment is also considered from inhaling any sediment that may accumulate on the shore.

Even assuming a person does all of the above, the majority (over 90%) of the radiological dose they would receive would be from naturally occurring radiation, the remainder from artificial radiation sources. Where radiation dose is a measure of health effect.

Taking account of the natural and artificial radioactivity together, the dose received would be equivalent to:

- Eating 20 bananas each year (bananas contain potassium-40, a naturally occurring radionuclide )
- 10,000 times less than an airline pilot's annual dose
- 750 times less than the average dose received by a resident of Pembrokeshire (due to Radon)

This is an infinitesimally small level of exposure to radiation, far below the threshold requiring a more detailed assessment or even close to approaching a radiation dose that could impact human health or the environment.

## What was the process we went through to test the levels of radioactivity in the sediment?

Year	Activity	Result
2009	CEFAS obtained sediment samples at depths up to 4.8m as part of the HPC Planning Application.	Levels of radioactivity in the sediment are found to be so low they equate to 'not radioactive' in law  In addition, no artificial radioactivity was observed below 2 m
2013	Natural Resources Wales commissioned an independent analysis by CEFAS to determine the radioactive characteristics of the sediment to assess the licence application. 17 sediment samples were taken in 2013	Levels of radioactivity in the sediment are found to be so low they equate to 'not radioactive' in law
2017	EDF Energy commissioned CEFAS to undertake a analysis as required, and approved, by NRW to support the Licence. 12 sediment samples were taken in May 2017.	Levels of radioactivity in the sediment are found to be so low they equate to 'not radioactive' in law

## Who carried out the tests?

The tests were carried out by CEFAS, an executive agency of the UK Government. CEFAS has some of the most advanced radiation testing equipment in the world and also provides services to Natural Resources Wales and the Welsh Government, as well as the Marine Management Organisation for the English government. Further details about CEFAS' capabilities in radioanalytical testing is available at:

<https://www.cefas.co.uk/media/52931/radioanalytical-services-181116.pdf>

CEFAS' Schedule of Accreditation is available at: [https://www.ukas.com/wp-content/uploads/schedule\\_uploads/00002/1875Testing%20Single.pdf](https://www.ukas.com/wp-content/uploads/schedule_uploads/00002/1875Testing%20Single.pdf)

## It has been claimed the tests were not thorough - did CEFAS test the sediment for every possible source of radiation?

Yes. Despite claims to the contrary, there is no question about the integrity of the testing carried out by CEFAS, which carries out work to the highest international standards.

The analysis techniques used detect the presence of alpha, beta and gamma emitting radionuclides, rather than just testing for a few select radionuclides. Simply put, if a radionuclide is present it will be detected by the testing equipment.

## It has been claimed that you did not test the sediment at depth – is this correct?

The sediment has been tested at depth. In 2009 CEFAS obtained sediment samples at depths up to 4.8 m to support the HPC Planning Application. No artificial radioactivity was observed below 2 m. This is likely because any sediment at a depth of greater than 2 m depth will have accumulated hundreds if not thousands of years ago, prior to the start of industrial activity in the area. As a consequence repeated testing to greater depth is not required.

As the surface sediment samples contain both the naturally occurring radionuclides and a small portion of artificial radionuclides these therefore provide a conservative estimate of the radioactivity in the sediment for the purpose of assessing its suitability for the disposal at the Cardiff Grounds.

**November 2017**

Document is Restricted