



The Scottish Parliament
Pàrlamaid na h-Alba

Net Zero, Energy and Transport Committee

Nicole Paterson
Chief Executive Officer
SEPA

21 November 2025

Dear Nicole,

Environmental Regulation at HMNB Clyde

I am writing about how SEPA carries out environmental monitoring in relation to His Majesty's Naval Base, Clyde, at Faslane and Coulport. This is further to correspondence the Committee received from Bill Kidd MSP (attached below for information). The Committee considered the letter at our meeting on 4 November and agreed I should write to you in these terms.

The Committee recognises that operations at Faslane and Coulport are a substantially reserved matter, as they relate to defence and national security, and also understands that the Environmental Authorisations (Scotland) Regulations 2018 are disapplied in the case of the Base. However, we note that the Ministry of Defence and SEPA have agreed a [Memorandum of Understanding](#) which, in effect, treats the 2018 Regulations as if they were applicable at the Base. It would also be our understanding that SEPA can use their usual powers to investigate alleged environmental breaches near the Base, whether or not there is reason to believe the Base might be the source of the alleged breach.

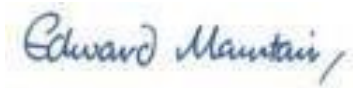
1. It would be helpful if you could first confirm that what I have set out in the prior paragraph is correct, alongside any other information that might help the Committee understand how SEPA exercises a regulatory role in and around HMNB Clyde.
2. It would be helpful also to have your view on whether SEPA consider that the current arrangements enable a robust inspection and regulatory process for the protection of the environment, health and public safety in the vicinity of the Base. The Memorandum states that that SEPA agrees to seek to apply “the same environmental protection principles as would be applied at equivalent civil sites” whilst the Defence Nuclear Safety Regulator agrees to work to “produce outcomes that are, so far as reasonably practicable, at least as good as those which have been required by legislation had there been no exemptions or derogations for MOD”. The Committee would welcome SEPA’s views on whether these aims are being consistently met.

Contact: Net Zero, Energy and Transport Committee, The Scottish Parliament, Edinburgh, EH99 1SP. Email netzero@parliament.scot. We welcome calls through Relay UK and in BSL through Contact Scotland BSL.

3. If you have any comments or information you can share about the events, or reported events mentioned in Mr Kidd's letter, and reflections on how SEPA or others have been able to handle these, I would welcome you sharing these with the Committee.
4. Finally, I would be grateful for SEPA's response to Mr Kidd's comment that SEPA "withheld key documents until compelled to release them, with the justification that disclosure would threaten reputations rather than national security". (Your [publicly stated legal position of 3 September](#) on disclosure of information pertaining to inspections carried out under the Memorandum has been noted.)

I would be grateful for a response by **Thursday, 18 December**.

Yours sincerely,

A handwritten signature in blue ink that reads "Edward Mountain".

Edward Mountain MSP

Convener

Net Zero, Energy and Transport Committee

Convener
Net Zero, Energy and Transport Committee
The Scottish Parliament
Edinburgh EH99 1SP

17th September 2025

Dear Convener,

I am writing to you to request that the Committee consider undertaking an Inquiry into Nuclear Safety Incidents at HMNB Clyde and RNAD Coulport, within the powers of this Parliament.

Recent disclosures, including the release of previously withheld documents following a ruling by the Information Commissioner, have revealed a concerning pattern of safety breaches, infrastructure failures, and radioactive contamination at these facilities.

These include two Category A nuclear safety events within two years—classified by the Ministry of Defence as the most serious type of incident—as well as reports of increased tritium emissions and radioactive leaks into Loch Long.

The Ministry of Defence has confirmed these incidents but has declined to provide detailed information, citing operational security. The Scottish Government has similarly confirmed that it has not received substantive details regarding the nature or environmental impact of these events. This lack of transparency significantly impairs the ability of Scottish institutions to assess and respond to potential risks to public health and the environment.

Furthermore, the Scottish Environment Protection Agency (SEPA) withheld key documents until compelled to release them, with the justification that disclosure would threaten reputations rather than national security.

This raises serious questions about the robustness of regulatory oversight and the prioritisation of public interest.

Given the environmental significance of Loch Long and the proximity of these facilities to communities in Argyll and Bute and the wider west of Scotland, I believe it is essential that the Committee investigate:

The nature and frequency of nuclear safety incidents at HMNB Clyde and RNAD Coulport.

The condition of infrastructure and maintenance practices at these sites.

The adequacy of current oversight mechanisms, including the role of SEPA and UK regulators.

The transparency of reporting and public communication regarding radioactive discharges.

The existence and adequacy of emergency response plans, including whether a national plan exists and is publicly accessible.

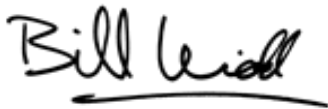
The financial implications for local authorities and whether costs are being appropriately met by the UK Government.

I believe such an inquiry would be in keeping with the Committee's remit and would provide valuable clarity and reassurance to the public.

I would be grateful if the Committee could consider this request at its earliest convenience.

Please do not hesitate to contact me should you require any further information or supporting documentation.

Yours sincerely,

A handwritten signature in black ink that reads "Bill Kidd". The signature is written in a cursive style with a horizontal line underneath the name.

Bill Kidd MSP
Glasgow Anniesland