

Criminal Justice Act 1988, s.30
Magistrates Courts Act 1980, s.5E
Criminal Procedure Rules (2014), r.33.3(3) & 33.4

EXPERT EVIDENCE REPORT

NOTE: only this side of the paper to be used and a continuation sheet to be used if necessary. All sheets and paragraphs to be consecutively numbered. If Reports are to be typed please use double spacing.

Report of : **John Ainslie** (Coordinator of Scottish CND)
(name of expert)

Contact Address :

c/o Scottish CND
77 Southpark Avenue,
Glasgow G12 8LE
Scotland

Qualifications :

BA International Relations, Keele University, 1977

Relevant experience and accreditation :

I studied nuclear strategy as part of my degree and as an army officer in the 1970s. Since 1991 I have worked as co-ordinator of the Scottish Campaign for Nuclear Disarmament. In this role I have produced detailed reports on British nuclear weapons and nuclear submarines, particularly Trident. These reports have covered safety issues, history, targeting and the effect of nuclear weapons. I have previously given evidence to the House of Common Defence Select Committee on the Trident system and have presented papers to seminars on the history of the British nuclear weapons' programme. I have written the UK section of reports on the modernisation of nuclear weapons published by Reaching Critical Will for the 2012 Preparatory Conference and the 2015 Conference on the nuclear Non Proliferation Treaty. I am Secretary of the Cross Party Group on Nuclear Disarmament in the Scottish Parliament.

Report

1. One of the papers I have produced is entitled “*If Britain fired Trident*” and is sub-titled “*The humanitarian consequences of a nuclear attack by a Trident submarine on Moscow*”
2. This is a study of the humanitarian consequences of a nuclear attack by one Trident submarine on likely primary targets in and around Moscow. It was written as a contribution to the international conference on the Humanitarian Impact of Nuclear Weapons which took place in Oslo in March 2013. It was published online on the Scottish CND website on Tuesday, 26 February 2013 and is available for download at the following link
<http://www.banthebomb.org/images/stories/pdfs/ifbritainfiredtrident.pdf>
3. This study gives an illustration of the catastrophic humanitarian consequences of an attack on targets in and around a large urban area with multiple nuclear weapons. The effects analysis was carried out using two declassified United States government computer programmes, supplemented by information from declassified United States reports and current published research. The targeting scenario is based on archive documents and recent statements from Government ministers and advisers.
4. The study explores the complex interaction between the different effects of the detonation of several nuclear weapons in a modern urban area. Blast damage, firestorms and radioactive fallout would combine to create a very high level of destruction. Those who survived the initial effects would be faced with a chaotic and deadly situation. Around 5 million people would be killed in the short term, including around 790,000 children. There would be additional long term casualties.

5. The response which could be provided by humanitarian and emergency response agencies would be very limited and wholly inadequate. Many hospitals would be damaged or destroyed.
6. The report is based on my best estimate of the most likely primary targets for one Trident submarine today.
7. Matthew McKinzie, Director of the Nuclear Program and Senior Scientist at the Natural Resources Defence Council, is one of the leading international experts on the effects of nuclear weapons. He described "*If Britain fired Trident*" as "an excellent study, so well thought-out from the perspective of a nuclear target planner, careful attention to detail on the physical nuclear weapons effects and a thorough exploration of impacts on infrastructure & the humanitarian dimensions."
8. I attach a copy hereto as an Exhibit under the title "**J.A.1**"
9. A second paper is entitled "Unacceptable Damage" and is sub-titled "*Damage criteria in British nuclear planning*" (February 2013) and in which I seek to explore the 'damage criteria' which underlie British nuclear targeting policy. The paper particularly focuses on the period between 1978 and 1982 when the decision was made to acquire Trident. It is based on an analysis of UK Government documents in the National Archive. This paper is the basis of the targeting scenario adopted in the "*If Britain fired Trident*" report. I attach a copy hereto as an Exhibit under the title "**J.A.2**"
10. I am responsible for the research and compilation of the information which went into preparing both papers and I am very happy to now state that everything therein set out is true and accurate to the very best of my knowledge and belief.

List of any Materials referred to and exhibited hereto.

(1) *“If Britain fired Trident”* Feb 2013 **“J.A.1”**

(2) *“Unacceptable Damage”* Feb 2013 : **“J.A.2”**

Details of any other Literature, Publications and other Material relied upon.

N/A

Statement of facts supplied.

N/A

Statement as to facts within knowledge

All other facts

Statement regarding any examination, measurement, test or experiment done and relied upon.

N/A

Summary of Conclusions

11. The information set out in these two reports indicates that when the UK Trident system was acquired the intention was that it would be aimed at specific facilities in and around Moscow and that this targeting approach is likely to remain in place today.

12. An attack with the warheads on one submarine on these targets would result in a massive amount of devastation and destruction in the second largest city in Europe. The humanitarian impact of such an attack would be catastrophic and emergency services would be unable to make an appropriate response.

John Ainslie

I have read and understand my duties to the Court as an expert witness (as set out at CPR r.33.2), and I have complied with and will continue to comply with those duties.

This Report consisting of **4.** page(s) signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature *WJ Ainslie* Dated the 14th day of September 2015
