

Comments by Cumbria County Council Nuclear Issues Working Group on the 'NDA Consultation on a Public and Stakeholder Engagement and Communications Framework for Geological Disposal'

3.1a) *Do you agree with the proposed aim of the PSE and Communications Strategy?*

No, we do not agree with the proposed aim (see comment below 3.1b)

3.1b) *If not, do you have other suggestions?*

The aim needs to ensure real engagement takes place, in order to make better and more informed decisions, so that stakeholders can feel 'ownership' of the Strategy.

Comment

This aim seems ill-defined and leaves the reader with a series of unanswered questions. What exactly does 'influence' mean – by whom; at what stage; how much weight may be put to the local vs national voice? Furthermore, engagement (not just communication) should be consistent across all groups; it must be open and transparent; and it should include hard to reach groups, such as young people, who will be most affected by inter-generational equity.

This section goes on to state that a stakeholder is "...any individual or group who could be affected by or is interested in the NDA geological disposal facility programme", and that those bodies who have a statutory role in the programme will be engaged with by formal mechanisms. This gives a picture of separate talks between the NDA and each group, perhaps not discussing some information with some groups, whereas a more effective engagement format would be for all groups to be engaged together so that different viewpoints and objectives could be taken on board or understood.

3.2a) *Do you agree with the NDA's proposed approach to using preview, joint fact finding and review as part of developing the geological disposal facility work programme?*

There needs to be some clarity on which stakeholders may be involved when and for what, as some topics would be fundamental to some groups but not others. There may also be a need for some engagement just with the very local level stakeholders (with conduct and results set out for everyone to see).

3.2b) *If not, do you have other suggestions?*

Other suggestions on stakeholder engagement could include a few, short questions on the NDA website; a separate geological disposal facility website; a questionnaire sent out with NDA web alerts; placing information on U-Tube or in magazines; or creating computer based interactive tools.

3.3a) *Do you agree with the use of a needs driven approach?*

We would not agree with the use of a needs driven approach, as this appears negative – rather, the focus should be on where the need is greatest. In order to make this section more positive, it should start by explaining the additionality to be gained by meaningful stakeholder engagement – after all, it is only worthwhile engaging if there is an opportunity to influence, otherwise it turns into an information-giving exercise.

The NDA say a needs driven approach to Strategy is based on:

- Statutory requirements;
- The stage of the geological disposal facility and the key issues that need to be addressed at that time;
- Good practice in the UK and internationally;
- Stakeholders' needs and issues.

If there is no intended order to these bullet points, that should be stated; otherwise it looks as though stakeholders are the least important consideration. Furthermore, placing statutory requirements at the top of the list gives the impression that this Strategy is only being considered because the NDA have an obligation. The absence of 'Community Siting Partnership' from the list is a major oversight and needs to be corrected.

Although, in the workshop, the NDA stated that they had not meant this section to be just for their own needs, it does give that impression. During discussion, it was suggested that the NDA and Local Authorities can work in partnership to make the most efficient use of resources

3.3b) *Do you think there are other drivers that should be taken into account?*

No additional comments.

3.4a) *Do you agree that the Strategy will need to be modified over time?*

Strategy needs to be flexible to change and needs regular review to ensure that it still meets objectives, but this is likely to be a process of evolution over time, rather than change for change's sake.

3.5a) *Do you agree with the proposed objectives for the Strategy?*

In general these objectives are aspirational and some need further thought on how they may be carried out. For example, “engage actively with a wide range of stakeholders, especially local stakeholders, to improve the decision-making process”. There needs to be a clear timetable attached to this – who is doing what and when – so that the community is not bombarded by information or tasks. Another example is “obtain necessary public confidence in the process to enable the programme to move forward.” It would be useful to here define the process – is it the PSE, the repository build, the site selection or is there a changing focus over time? The objective to “provide feedback to stakeholders about how their comments have been taken into account and if they have not, why not”, is critical to the process.

4.0a) Do you agree with developing engagement mechanisms tailored to stakeholders?

In general, this amount of consultation could cause overload, as some groups may have an interest in all topics. More specifically, there needs to be more clarity on whom the community can talk to on particular topics – is it the NDA or Government – and on the NDA’s role within each topic. Will some topics be passed on to other organisations, such as British Geological Survey? The site selection process needs more clarity, since much of this topic is outside the NDA’s remit. Also, the design of the facility should not be a national decision, but a local one.

Section 4.1 discusses engagement with local and regional stakeholders. It suggests that the Community Siting Partnership will be set up independently of any existing Site Stakeholder Group (SSG), but that there will be interaction between the two. A Community Siting Partnership should not be evolved from an SSG, as their work focus is different.

Section 4.3 looks at the potential for a national forum for geological disposal. This could be just another forum to attend and may not provide any additionality to the engagement work elsewhere, such as at the NDA National Stakeholder Group (NSG) or at the local level. There would need to be clarity on what the forum would do and what stakeholders would gain. It should not be based on an expanded NSG, as again, the work focus of each is different. Basically, it comes back to the issue of capacity or overload, especially for stakeholders giving their own time.

Section 4.4 asks the question “what to engage stakeholders about”. A statement is made about geological disposal being a multi-disciplinary issue and that some stakeholders will be more interested in some aspects than others. This opening statement needs to go deeper, explaining that

stakeholder responses will enable a better process with better decisions made.

A list of topics is given, and stakeholders are asked to indicate which aspects they are most interested in. The list includes:-

- the radioactive waste and materials that may require geological disposal
- the site selection process
- the design facility
- safety assessments
- research and development

In general, this amount of consultation could cause overload, as some groups may have an interest in all topics. More specifically, there needs to be more clarity on whom the community can talk to on particular topics – is it the NDA or Government – and on the NDA's role within each topic. Will some topics be passed on to other organisations, such as British Geological Survey? The site selection process needs more clarity, since much of this topic is outside the NDA's remit. Also, the design of the facility should not be a national decision, but a local one.

7.0a) *Do you think the NDA should set up arrangements to review the effectiveness of its public and stakeholder engagement and communications on geological disposal in addition to the work of CoRWM?*

There needs to be constant review within the NDA itself: can it be seen that feedback from stakeholders to the NDA is making it an organisation willing to learn and change, throughout all tiers? More specifically, feedback to stakeholders from the NDA's RWMD should be provided – what has been received, how has it been used, what has been ignored and why?

Furthermore, it would be useful for stakeholders to know how they can interact with CoRWM in their scrutiny role. The interactions and feedback between the NDA and scrutiny bodies (CoRWM, Regulators, etc.) should be open and transparent, so that stakeholders can be confident of the process.

8.2) *Do you have any comments on the people the NDA should be communicating with about its work on geological disposal?*

'Local stakeholders' should include the nuclear industry's local workforce and supply chain; and 'existing' partnerships' should perhaps have examples, such as the Local Strategic Partnerships. 'Regional stakeholders' gives 'communities on transport routes' as an example –

clarification on how this list may change from the present incumbents, would be useful. 'National stakeholders' should perhaps say 'UK' rather than national, as Scotland and Northern Ireland are unlikely candidates for sites. Missing from the list is the general public.

- 8.3)** *Do you have any views about how the NDA could use these and/or other mechanisms to communicate about geological disposal?*

Section 8.3 concentrates on "how to communicate", and gives a list of potential channels. 'The media' gives examples of journals and newspapers, but this could be much wider, such as local radio and TV or placing a big TV screen at natural congregation sites. 'Face to face meetings' includes conferences, but consideration should be given to existing local fora, such as the Neighbourhood Forum or the LSP. Other suggestions are computer based interactive tools, school curriculum (citizenship?), exhibitions (town halls, supermarkets, libraries), existing local publications or in local universities.

In general, no one communication package fits all – it depends on the topic, the audience, the timing, etc. It should also be remembered that communicating once and sitting back doesn't work.

- 8.4a)** *Do you agree with the proposal to develop tiered information about the geological disposal facility?*

Any website provided needs a good search engine; there need to be links between all levels of documentation, all of which need to be in clear language; and source material should be available to search if stakeholders wish to drill down to that level of detail. The first level should perhaps be an executive summary, which then gives drill down options.

- 8.6a)** *How often do you think the NDA should communicate with stakeholders about geological disposal?*

It is more important to get the structure of the communication correct, than worry about frequency now. Stakeholders need to know what is coming up and when, so that resources are ready – a forward plan, detailing both other NDA consultations and other nuclear-related consultations, would be invaluable.

- 9.0a)** *Do you have any other comments on the proposed framework for developing a PSE and Communications Strategy for the geological disposal facility programme?*

The draft Strategy has an introduction section, but it doesn't really explain the background as to why this new approach has been adopted. Nor does it explain why the NDA consider stakeholder engagement important – it could just be that it's a tick in the box exercise. Setting out the benefits, not just the obligation, would go a long way to increasing stakeholder confidence. Explaining how, or indeed whether, Government will accept NDA recommendations, would also help.

Clarity on the fact that this proposed Strategy is at the national level, and further engagement discussion will be needed further down the line in terms of both time and locality, would be useful to set the Strategy in context. There is a question as to whether it is right to have the PSE and Communications in one strategy – maybe an explanation of the continuum of one to the other, and where information-giving comes in, would be helpful.