

# **NDA Consultation on a Public and Stakeholder Engagement and Communications Framework for Geological Disposal**

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August 2008

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## **Executive Summary**

The UK Government's Managing Radioactive Waste Safely White Paper gives the Nuclear Decommissioning Authority (NDA) responsibility for planning and implementing geological disposal. The White Paper places various commitments on the NDA including: *'Following publication of this White Paper, the NDA will set out its framework for public and stakeholder engagement and communication during development of the geological disposal facility. Stakeholders will be invited to comment on the framework to allow an engagement and communications strategy to be developed.'* The resulting strategy must be agreed by Government.

This consultation document sets out the proposed principles and framework on which the NDA Public and Stakeholder Engagement and Communications Strategy for geological disposal will be developed. It outlines the proposed aims and objectives of the Strategy and how the NDA proposes to engage and communicate with stakeholders about its work programme on geological disposal. The NDA invites stakeholders to comment on the proposals in this document to help it to develop the Strategy. Questions are posed throughout the document to help stakeholders to be able to make comments and an open question is posed at the end of the consultation document to enable people to make any further comments.

The consultation is open until 30 November 2008 and the NDA would welcome comments by then.

## 1 Introduction

The UK Government<sup>1</sup> issued a White Paper in June 2008 outlining its policy for the implementation of geological disposal of higher activity radioactive wastes in the UK [1]. It sets out various requirements on the Nuclear Decommissioning Authority (NDA), which is responsible for planning and implementing geological disposal in the UK. To implement geological disposal the NDA has set up a new NDA Directorate called the Radioactive Waste Management Directorate (RWMD) to develop an effective delivery organisation to implement a safe, sustainable and publicly acceptable geological disposal programme<sup>2</sup>. The White Paper set a requirement on the NDA to develop a Public and Stakeholder Engagement (PSE) and Communications Strategy for implementation of a geological disposal facility. This consultation document sets out the proposed principles and framework on which the Strategy will be developed. The NDA invites stakeholders to comment on the proposals in this consultation document to help it to develop the PSE and Communications Strategy for the geological disposal facility programme. Questions are posed throughout the document to help stakeholders to be able to make comments and an open question is posed at the end of the consultation document to enable people to make any further comments.

In developing this consultation document the NDA has taken into account Government guidance and standards on stakeholder engagement [2, 3, 4], the NDA Stakeholder Charter [5], UK and international experience of engaging stakeholders [6, 7], and a review of NGO engagement with the NDA [8].

## 2 Background

### 2.1 Government policy

The UK Government has decided that implementing a geological disposal facility will proceed using a voluntarism and partnership approach. This has been described in the Managing Radioactive Waste Safely (MRWS) White Paper [1]. By a partnership approach Government means the setting up of formal Community Siting Partnerships such that members of the communities participating in the site selection process will work with the NDA's delivery organisation and with other relevant interested parties to achieve a successful outcome. This could be by ensuring that questions and concerns about the geological disposal facility siting, construction, operation, closure and post-closure are addressed and resolved as far as reasonably practicable and that the project contributes to a community's further development and well-being. The White Paper outlines how Community Siting Partnerships might be developed and operated. The NDA is committed to working in partnership with the communities who participate in the site selection process.

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<sup>1</sup> UK Government in this context means the Department for Environment, Food and Rural Affairs (Defra), the Department for Business, Enterprise and Regulatory Reform (BERR), the Welsh Assembly Government and the Department of Environment Northern Ireland. The Scottish Government supports long term interim storage of higher activity wastes and therefore did not sponsor the MRWS White Paper.

<sup>2</sup> It is envisaged that this directorate will become a wholly owned subsidiary company of the NDA. Ultimately, it will evolve under the NDA into the organisation responsible for the delivery of the geological disposal facility. Ownership of this organisation can then be opened up to competition, in due course, in line with other NDA sites.

The White Paper gives the Nuclear Decommissioning Authority (NDA) responsibility for planning and implementing geological disposal. It states that the NDA will set out for consultation with stakeholders its framework for public and stakeholder engagement and communication during development of the geological disposal facility. The aim is to consult on the framework to enable an engagement and communications strategy to be developed and agreed by Government. The Strategy is likely to include the following three elements:

- Formal consultations required under statutory or regulatory requirements;
- Engagement as part of the NDA's wider community engagement activities, including Site and National Stakeholder Groups
- Meeting the specific requirements of local communities which are participating in the site selection process

It is anticipated that Government and NDA involvement in early local engagement would come at the invitation of local authority decision-makers working in consultation with potential local partners. It is not anticipated that Government or the NDA would organise local community engagement at their own initiative.

## **2.2 Governance arrangements for the NDA**

Revised governance arrangements for the NDA have been set in place to recognise the existing joint statutory responsibilities of the Secretary of State for Business, Enterprise and Regulatory Reform and the Scottish Ministers, and to acknowledge the radioactive waste management policy interests of Defra, the Welsh Assembly Government (WAG) and the Department of the Environment in Northern Ireland (DoENI).

The Waste Management Steering Group (WMSG) has been established to augment existing governance arrangements. The Group is made up of officials from:

- The Department for Environment, Food and Rural Affairs (Defra);
- The Department for Business, Enterprise and Regulatory Reform (BERR);
- The Welsh Assembly Government (WAG);
- The Department of Environment Northern Ireland (DoENI);
- HM Treasury;
- Scottish Government;
- The NDA.

It monitors all of the NDA's long-term waste management planning and development programmes to ensure a coherent approach to the management of all radioactive wastes, including both higher activity and low level waste.

As part of its work, the WMSG will consider the Committee on Radioactive Waste Management's<sup>3</sup> (CoRWM's) advice to Ministers on the NDA's long-term waste management planning and implementation programmes. The Steering Group may make

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<sup>3</sup> Government is committed to ensuring strong independent scrutiny of the proposals, plans and programmes to deliver geological disposal. Accordingly, the Committee on Radioactive Waste Management (CoRWM) has been reconstituted, with modified terms of reference and expertise. The Committee will provide independent scrutiny and advice to UK Government and devolved administration Ministers on the long-term radioactive waste management programme, including storage and disposal. CoRWM will undertake its work in an open and consultative manner.

proposals to Ministers on how Government, in conjunction with the NDA should respond to such advice. It also provides advice to UK Government and devolved administration Ministers on progress with implementation of geological disposal, and on the decisions that will need to be taken as the staged implementation programme proceeds. The Chair and appropriate members of CoRWM will be invited to attend Steering Group meetings, as necessary.

### **2.3 The NDA Mission**

The NDA Mission Statement [9] is:

To deliver safe, sustainable and publicly acceptable solutions to the challenge of nuclear clean-up and waste management. This means never compromising on safety or security, taking full account of our social and environmental responsibilities, always seeking value for money for the tax payer and actively engaging with stakeholders.

The NDA's strategic priorities include:

- Gain the support and confidence of our stakeholders - Building a reputation for openness and transparency and effective stakeholder engagement; Delivering our socio-economic obligations;
- Create a world class organisation - Developing high performing people and teams and operating to the highest quality standards.

Developing an effective PSE and Communications Strategy for the geological disposal facility is essential for the NDA to successfully fulfil its Mission and strategic priorities. The NDA 2008/11 Business Plan [10] also sets out a commitment to:

*'Review and commence implementation of the public and stakeholder engagement processes that will need to be put in place to deliver a geological disposal facility for higher activity wastes under the MRWS programme.'*

### **2.4 UK and international experience**

UK and international research and experience has shown that building stakeholder confidence is key to making progress with implementing geological disposal [11]. Those countries with inclusive and innovative engagement and communication programmes (e.g. Belgium, Finland and Sweden) have been able to work in partnership with the potential host communities and make significant progress towards implementation. Research [12] shows that active engagement of stakeholders, especially in the early stages of a project, increases the chances of success and can create significant savings in the long term. Early involvement allows stakeholders' issues to be addressed, preventing problems later and avoiding legal challenge.

### **3 Proposed approach to developing a PSE and Communications Strategy**

#### **3.1 Proposed aim of the Strategy**

The proposed aim of the Strategy will be to outline the NDA's approach to enabling a wide range of stakeholders to be involved in and influence the implementation of geological disposal. It will outline the drivers and principles that will underpin the approach.

A stakeholder in this context is any individual or group who could be affected by or is interested in the NDA geological disposal facility programme. The Strategy will not focus on Government, regulatory and permissioning bodies or Consultation Bodies<sup>4</sup> who have a statutory role in the geological disposal programme, as there are formal mechanisms for engaging with them. The NDA work with the Community Siting Partnerships will need to sit within the framework of the PSE and Communications Strategy but will be discussed and agreed with the local communities involved.

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

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

#### **3.2 When to engage stakeholders**

The NDA plans to engage stakeholders throughout the development of its work programme on geological disposal. This could involve the following:

- Engaging stakeholders in previewing the work programme that is to be undertaken including the scope and terms of reference for the work where appropriate;
- Undertaking specific joint fact finding projects where stakeholders are involved in identifying contractors and reviewing the work at key stages prior to finalisation;
- Discussing preliminary results and their implications with stakeholders;
- Engaging stakeholders in reviewing the results of work.

The NDA will work with stakeholders to agree which approach will be appropriate for individual topics.

**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?**

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

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<sup>4</sup> Consultation Bodies are organisations that have to be consulted as part of Strategic Environmental Assessments.

### **3.3 A needs driven approach to engagement**

It is recognised that the NDA has finite resources; therefore the PSE and Communications Strategy will be developed to enable an efficient and effective use of resources. The NDA plans to develop a needs driven approach to the Strategy 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.

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

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

### **3.4 Developing a flexible Strategy**

The NDA PSE and Communications Strategy for geological disposal will need to change over time to reflect the changing role of the NDA in the MRWS programme. The subjects that are discussed will also change over time as the programme progresses and different issues are addressed, the stakeholders involved may also change. Therefore, the NDA PSE and Communications Strategy for geological disposal will be reviewed at regular intervals to ensure that it is appropriate to the stage in the MRWS site selection process.

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

**3.4b) If not do you have other suggestions?**

### **3.5 Objectives of the PSE and Communications Strategy**

The PSE and Communications Strategy will be developed to adhere to the NDA commitments as outlined in the NDA stakeholder charter [5] including:

- Establishing open and transparent relationships with stakeholders;
- Proactive communications;
- Welcoming and listening to comments from stakeholders;
- Engaging with stakeholders and consulting widely;
- Ensuring stakeholders are able to engage effectively, by providing relevant briefings, training and information;
- Minimising barriers to engagement, for example by selecting convenient meeting times and reimbursing costs (where appropriate).

The objectives of the PSE and Communications Strategy could include to:

- Understand stakeholders' issues and concerns so that they can be fed into the implementation of the geological disposal facility;
- Engage actively with a wide range of stakeholders, especially local stakeholders, to improve the decision making process;
- Work in partnership with the communities who participate in the site selection process;
- Obtain necessary public confidence in the process to enable the programme to move forward;
- Provide information on all aspects of the programme to implement the geological disposal facility;
- Provide stakeholders with opportunities to actively input into the programme for geological disposal;
- Provide feedback to stakeholders about how their comments have been taken into account and if they have not, why not;
- Fulfil the necessary legislative requirements of Strategic and Environmental Impact Assessment and Sustainability Appraisal.

It is recognised that these objectives may change over time depending on the stage in the site selection process.

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

**3.5b) Do you think there are any additional objectives that should be considered?**

### **3.6 A PSE and Communications Strategy for geological disposal**

The NDA PSE and Communications Strategy for the geological disposal facility will need to be co-ordinated with the various other parts of the NDA. It is envisaged that RWMD will evolve under the NDA into the 'NDA's delivery organisation'. This organisation will be responsible for the delivery of the geological disposal facility and in due course its ownership can be opened up to competition in line with other NDA sites. Therefore the proposal is to develop a stand-alone PSE and Communications Strategy for the implementation of the geological disposal facility.

**3.6a) Do you agree that a separate PSE and Communications Strategy is needed for the geological disposal facility?**

**3.6b) If not do you have other suggestions?**

### **3.7 The basis of the Strategy**

The proposal is to base the Strategy on three elements:

- Consultations required as a consequence of statutory, regulatory or similar requirements, for example, as part of strategic and environmental impact assessment and the permissioning schedule.
- Engagement as part of the NDA's wider community engagement activities, including Site and National Stakeholder Groups. This will include engagement around specific topics that are relevant to the different stages of development of the geological disposal facility.
- Meeting the specific requirements of local communities which are involved in the site selection process. This will include engaging with local decision making

bodies, host communities and wider local interests and the partnerships they establish.

In addition to engagement and communication with a wide range of stakeholders (taken as any individuals or groups that could be affected by or are interested in the development of the geological disposal facility) the NDA will continue to engage with those bodies that have a formal role in regulating, permissioning or overseeing its activities. Arrangements for interfacing with these bodies are being developed in parallel with the preparation of a PSE and Communications Strategy for geological disposal, as part of developing the permissioning schedule for the geological disposal facility.

**3.7a) Do you agree with the three elements that it is proposed will underpin the Strategy?**

**3.7b) Do you think there are other elements that should be considered?**

## **4 Engaging a range of stakeholders and other bodies**

The NDA recognises that there are a range of stakeholders and other bodies who have an interest in geological disposal. They could be grouped under the following categories

- Local;
- Regional;
- National;
- Government;
- Permissioning and regulatory bodies;
- International.

Under each of these categories there will be different groups of stakeholders with different interests, needs and knowledge of the geological disposal facility programme. The RWMD believes that engagement mechanisms will need to be tailored to the different stakeholders.

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

**4.0b) If not do you have other suggestions?**

### **4.1 Engaging local and regional stakeholders**

The Government White Paper sets out Government's proposal that communities who decide to participate in the site selection process set up a Community Siting Partnership. The NDA is committed to working in partnership with communities who participate in the site selection process. It will be up to the local community to decide the membership and exact remit and structure of the Community Siting Partnership and the topics it will focus on. The NDA will support the community in establishing the partnership and agreeing how the NDA will participate in the partnership's work. The NDA will also support the partnership in undertaking its work, including their interactions with other Community Siting Partnerships in other communities.

The NDA already has Site Stakeholder Groups (SSGs) at its existing sites. If a community near an existing nuclear site expresses an interest it is envisaged that a Community Siting Partnership will be set up independent of the SSG, but will interact with the SSG.

Each local community which participates in the site selection process will be unique and will include a range of stakeholders which will need to be engaged. The NDA plans to develop a local engagement plan in collaboration with the communities themselves. The local elected representatives and the Community Siting Partnerships will lead on engagement with the local community and the NDA will support them in their work. We envisage that the NDA will work with the community to develop approaches for engaging with a range of local stakeholders that could include:

- Local elected representatives;
- The Community Siting Partnership;
- Existing partnerships and bodies in the area;
- Members of the public;
- Minority groups;
- Young people;
- Local NGOs – community organisations and groups (e.g. Trade Unions, Environmental Groups, Women’s Institute, Trade bodies, Church groups etc.);
- Neighbouring communities;
- Regional bodies working in the area;
- Communities on transport routes.

The NDA recognises that local elected representatives and their officers have several different roles in the implementation of the geological disposal facility including:

- Making decisions about the communities’ continued participation in the site selection process;
- Representing the views of their constituencies;
- Making planning decisions;

Therefore it may be important to put in place different mechanisms for engagement with them in these different roles. We will work with local elected representatives and their officers to develop an appropriate approach.

**4.1a) Do you agree with this approach to engaging with local and regional stakeholders about the geological disposal facility?**

**4.1b) Do you think there are other groups of local stakeholders who should be considered?**

## **4.2 Engaging national stakeholders**

As outlined in Section 3.3 the NDA plans to develop a needs driven approach to PSE and communications for the geological disposal facility. A range of mechanisms will be used to engage stakeholders on specific topics; the mechanism chosen will be tailored to each topic and the stakeholders to be involved but could include workshops, meetings, citizens' panels, focus groups, surveys, consultation documents or other mechanisms as appropriate. The NDA plans to talk to stakeholders to agree the most appropriate mechanism to use on particular topics and would involve stakeholders in the development of the agenda for events.

**4.2a) Do you agree with tailoring engagement mechanisms to the topic to be discussed and the stakeholders to be involved?**

**4.2b) If not do you have other suggestions?**

## **4.3 A national forum for geological disposal**

At the national level the NDA has a National Stakeholder Group (NSG) that currently meets twice a year. The National Stakeholder Group (NSG) enables stakeholders to explore issues and submit proposals for consideration by the NDA. Updates on the geological disposal facility project are provided to the NSG and issues discussed with them. However, the NSG does not include all the national stakeholders who are interested in the implementation of a geological disposal facility.

NSG participants are from:

- National and international organisations (including the Government, regulators, Trade Unions, NGOs, members of the nuclear industry);
- Site Stakeholder Groups;
- The NDA.

Other stakeholders who will be interested in the implementation of a geological disposal facility include:

- Local elected representatives and their officers in communities who decide to participate;
- Members of the Community Siting Partnerships;
- Contractors;
- Regional bodies;
- Academics and learned societies.

As outlined above the NDA plans to use a range of engagement mechanisms tailored to the topic to be discussed and stakeholders to be involved.

**4.3a) Do you think stakeholders need a national forum to bring them all together on a regular basis to discuss the disposal facility programme?**

**4.3b) If yes, please explain why and what the aims and objectives of this forum might be?**

#### **4.4 What to engage stakeholders about**

Geological disposal is a multidisciplinary issue, some stakeholders may be particularly interested in certain aspects of the development and some stakeholders may not be interested in all aspects of geological disposal. We would like to understand which aspects of the geological disposal facility programme stakeholders are particularly interested in engaging with.

#### **4.4) Please indicate which aspects of geological disposal facility development you are particularly interested in engaging with the NDA about:**

- The radioactive waste and materials that may require geological disposal;
- The site selection process;
- Research and development;
- The design of the facility;
- Safety assessments (operational, transport and long-term safety);
- Sustainability assessments (social, environmental and economic impacts)
- Public and stakeholder engagement and communications;
- Other, please specify.

#### **4.5 Engaging regulators and permissioning bodies**

As outlined in Section 3.7 the NDA is working with regulators and permissioning bodies to develop a permissioning schedule for the geological disposal facility. This will outline how early and continuous scrutiny of the geological disposal facility will be developed through engagement with the relevant regulatory and permissioning bodies. This will be made publicly available.

The regulatory and permissioning regimes require public consultation to take place as part of the permissioning process. We will work with the regulators and permissioning bodies to bring about a co-ordinated approach to stakeholder engagement.

#### **4.6 International stakeholders**

The Government has formal mechanisms for engaging with other countries. The NDA will use these to engage other countries on its plans and programmes. The NDA also has collaboration agreements with waste management agencies across the world and will continue to participate in international research projects. International experts will also be involved in previewing and reviewing the NDA's work.

## **5 Approach to written consultations**

The Cabinet Office Code of Practice on Consultations [2] encourages Government Departments and Agencies to consult widely throughout their processes. It states that there should be at least one written consultation period lasting a minimum of 12 weeks during the development of policy. The Code outlines how written consultations should be conducted and formatted. The Code applies to all Government Departments and agencies, non-departmental public bodies, such as the NDA, are encouraged to follow the Code for their processes.

The NDA proposes to follow the Code of Practice on Consultations for all written consultations associated with the geological disposal facility. Consultations will be run for a minimum of 12 weeks; this period may be extended if the consultation occurs close to or during a holiday period.

**5.0a) Do you agree that the NDA should follow the Cabinet Office Code of Practice for all written consultations associated with the geological disposal facility?**

**5.0b) Are there other codes of practice you believe the NDA should take into account when developing its engagement plans for geological disposal?**

## **6 Providing feedback**

The NDA believes that the inputs it receives from stakeholders are extremely valuable and useful in developing its work programme and will help to inform our proposed approach to implementing a geological disposal facility. Given that the nature of the inputs the NDA will receive from stakeholders will be diverse it is difficult to be prescriptive about how the NDA will respond to those inputs. However, we believe it is important to provide feedback to stakeholders on how their comments have been considered and, where appropriate, taken into account.

**6.0) Do you have any suggestions how the NDA can demonstrate it has listened to the views and responses it receives?**

## **7 Review of the NDA stakeholder engagement on geological disposal**

Good practice in stakeholder engagement often involves undertaking a review of the engagement process to identify lessons that can be applied in future stakeholder engagement. The Government has reconstituted the Committee on Radioactive Waste Management (CoRWM) to scrutinise the implementation of geological disposal. CoRWM will provide an independent review of the NDA's work on geological disposal including its stakeholder engagement.

**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?**

**7.0b) If not do you have other suggestions?**

## **8 Communication by and within the NDA on geological disposal**

### **8.1 Internal and external communication from and to the NDA**

The way in which issues are addressed and communicated both internally and externally will be key in obtaining and maintaining stakeholder confidence. Within the NDA, this means ensuring commitment to the PSE and Communication Strategy and that issues raised by stakeholders are fed into the appropriate work areas and are properly addressed. In external communications it means ensuring that consistent messages are delivered, feedback on inputs are provided to stakeholders and appropriate behaviours are demonstrated by NDA staff.

### **8.2 Who to communicate with**

The previous sections have outlined a range of stakeholders and other bodies who might be interested in geological disposal and may want to receive information about the NDA's work on geological disposal including:

- Local stakeholders (local elected representatives, the Community Siting Partnership, Site Stakeholder Groups, existing partnerships and bodies in the area, members of the public, minority groups, young people, local NGOs, neighbouring communities);
- Regional stakeholders (regional bodies, communities on transport routes);
- National stakeholders (Trade Unions, NGOs, members of the nuclear industry, contractors, the supply chain, academics and learned societies);
- Government;
- Permissioning and regulatory bodies;
- International stakeholders (other Countries, Waste Management Organisations).

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

### **8.3 How to communicate**

There are a variety of communication mechanisms that can be used to keep stakeholders and other bodies up to date with the NDA's work on geological disposal including:

- The Internet;
- An email bulletin;
- Printed material (leaflets, reports etc.);
- The media (journal and newspaper articles);
- Face to face meetings, conferences etc.

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

## **8.4 Levels of detail of communication**

The NDA plans to use a tiered approach to developing communication materials for the geological disposal facility. This means that documents will be produced with different levels of detail to enable people to engage with issues at the level they feel comfortable. The levels could include:

Level 0 – leaflets and one page briefing notes;

Level 1 – overviews of the full range of activities being planned and undertaken by the NDA: these reports will be written to be readily understandable by the general public;

Level 2 – summaries of thematic programmes of work: these reports will be written to be readily understandable by readers with a general scientific or technical background;

Level 3 – detailed results from programmes of work: these reports will be written for readers with a specialist background.

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

**8.4b) Do you have any comments on the proposed levels?**

## **8.5 What to communicate about**

Geological disposal is a multidisciplinary issue, some stakeholders may be particularly interested in certain aspects of the development and some stakeholders may not be interested in all aspects of geological disposal. We would like to understand which aspects of the geological disposal facility programme stakeholders are particularly interested in receiving information about.

**8.5) Please indicate which aspects of geological disposal facility development you are particularly interested in receiving information about:**

- The radioactive waste and materials that may require geological disposal;
- The site selection process;
- Research and development;
- The design of the facility;
- Safety assessments (operational, transport and long-term safety);
- Sustainability assessments (social, environmental and economic impacts);
- Public and stakeholder engagement and communications;
- Other, please specify.

## **8.6 How often to communicate**

Different stakeholders will have different levels of involvement in the implementation of a geological disposal facility and therefore may want different levels of communication at different frequencies. The NDA could communicate with stakeholders:

- On a regular basis (e.g. every six months or annual);
- On a milestone basis;
- At a different frequency for different groups.

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

**8.6b) Do you think particular stakeholders will want a particular frequency of communication about geological disposal?**

## **9 Any other comments**

**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?**

This consultation document has been developed in line with the Cabinet Office Code of Practice on Consultations [2] which sets out criteria that consultations should meet:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

**9.0b) Do you have any comments on the extent to which this consultation document has met the Cabinet Office criteria for consultations or any suggestions how the consultation process could be improved?**

## 10 Summary of the questions

This section outlines the questions that have been posed in the consultation document.

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

3.1b) If not do you have other suggestions? (Section 3.1)

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? (Section 3.2)

3.2b) If not do you have other suggestions? (Section 3.2)

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

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

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

3.4b) If not do you have other suggestions? (Section 3.4)

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

3.5b) Do you think there are any additional objectives that should be considered? (Section 3.5)

3.6a) Do you agree that a separate PSE and Communications Strategy is needed for the geological disposal facility? (Section 3.6)

3.6b) If not do you have other suggestions? (Section 3.6)

3.7a) Do you agree with the three elements that it is proposed will underpin the Strategy? (Section 3.7)

3.7b) Do you think there are other elements that should be considered? (Section 3.7)

4.0a) Do you agree with developing engagement mechanisms tailored to stakeholders? (Section 4)

4.0b) If not do you have other suggestions? (Section 4)

4.1a) Do you agree with this approach to engaging with local and regional stakeholders about the geological disposal facility? (Section 4.1)

4.1b) Do you think there are other groups of local stakeholders who should be considered? (Section 4.1)

4.2a) Do you agree with tailoring engagement mechanisms to the topic to be discussed and the stakeholders to be involved? (Section 4.2)

4.2b) If not do you have other suggestions? (Section 4.2)

4.3a) Do you think stakeholders need a national forum to bring them all together on a regular basis to discuss the disposal facility programme? (Section 4.3)

4.3b) If yes, please explain why and what the aims and objectives of this forum might be? (Section 4.3)

4.4) Please indicate which aspects of geological disposal facility development you are particularly interested in engaging with the NDA about? (Section 4.4)

5.0a) Do you agree that the NDA should follow the Cabinet Office Code of Practice for all written consultations associated with the geological disposal facility? (Section 5)

- 5.0b) Are there other codes of practice you believe the NDA should take into account when developing its engagement plans for geological disposal? (Section 5)
- 6.0) Do you have any suggestions how the NDA can demonstrate it has listened to the views and responses it receives? (Section 6)
- 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? (Section 7)
- 7.0b) If not do you have other suggestions? (Section 7)
- 8.2) Do you have any comments on the people the NDA should be communicating with about its work on geological disposal? (Section 8.2)
- 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)
- 8.4a) Do you agree with the proposal to develop tiered information about the geological disposal facility? (Section 8.4)
- 8.4b) Do you have any comments on the proposed levels? (Section 8.4)
- 8.5) Please indicate which aspects of geological disposal facility development you are particularly interested in receiving information about? (Section 8.5)
- 8.6a) How often do you think the NDA should communicate with stakeholders about geological disposal? (Section 8.6)
- 8.6b) Do you think particular stakeholders will want a particular frequency of communication about geological disposal? (Section 8.6)
- 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? (Section 9)
- 9.0b) Do you have any comments on the extent to which this consultation document has met the Cabinet Office criteria for consultations or any suggestions how the consultation process could be improved? (Section 9)

## 11 How to submit your views

Responses from individuals and organisations may be submitted in writing to the NDA RWMD.

Comments should be received no later than 30 November 2008 and should be sent to:

John Dalton,  
Head of Communications,  
Nuclear Decommissioning Authority (Radioactive Waste Management Directorate),  
Curie Avenue,  
Harwell Campus,  
Didcot,  
Oxon,  
OX11 0RH, UK.

The consultation document and its response form may be downloaded from the consultations page on the NDA website ([www.nda.gov.uk](http://www.nda.gov.uk)) and additional hard copies may be obtained from John Dalton at the above address.

This consultation is also available on request in alternative formats.

Responses to the consultation can be submitted electronically to:

[gdf.pse@nda.gov.uk](mailto:gdf.pse@nda.gov.uk)

Please can representative groups provide a summary of the people they represent when responding to the consultation.

We will publish and make public the responses and comments received on the NDA website ([www.nda.gov.uk](http://www.nda.gov.uk)). If you do not consent to this, you must clearly request that your response be treated confidentially. A confidentiality disclaimer generated by your IT system in email responses will not be treated as such a request.

If you wish your response, if published, to be unattributable, please let us know when you send it to us. Unattributable responses will be included in any statistical summary of comments received and views expressed.

## 12 Next steps

As mentioned above, the consultation will run until 30 November 2008. The NDA will then consider the responses received and develop and submit a PSE and Communications Strategy for geological disposal to Government for agreement. We will outline how responses to this consultation have been taken into account when developing the Strategy.

## 13 References

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- 12 A. Armour, 'Modernizing Democratic Decision-making Processes from Conflict to Co-operation in Facility Siting', *The Environment in the 21st Century: Environment, Long-term Governance and Democracy*, Abbey de Fontevraud, France, September, 1996.

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