

Geological Disposal

A Public and Stakeholder Engagement and Communications Strategy

July 2009



NDA RWMD Report NDA/RWMD/015

**Geological Disposal: A Public and Stakeholder
Engagement and Communications Strategy**

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Executive Summary

This document sets out the Public and Stakeholder Engagement (PSE) and Communications Strategy to support the geological disposal programme for higher activity radioactive wastes in the UK.

As part of its Managing Radioactive Waste Safely (MRWS) programme, UK Government issued a White Paper in June 2008 setting out a framework for implementing geological disposal of radioactive wastes in the UK [1]. The White Paper sets out the UK Government's framework for managing higher activity waste in the long-term through geological disposal, coupled with safe and secure interim storage and ongoing research and development to support its optimised implementation. It also places various requirements on the Nuclear Decommissioning Authority (NDA), which is responsible for planning and implementing geological disposal in the UK.

The NDA has set up the Radioactive Waste Management Directorate (RWMD) to develop an effective delivery organisation to implement a safe, sustainable and publicly acceptable geological disposal programme. In this document, we use the terms 'we' or 'our' to refer to the NDA's delivery organisation.

The MRWS White Paper states that:

'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.'

It also notes that the resulting strategy must be agreed by Government.

We published our PSE and Communications consultation paper in August 2008 [2]; comments were invited during a four-month consultation from August to November 2008 and we held an open-invitation workshop in Leeds in October 2008 as part of the consultation process. We have revised and updated our strategy in response to the comments we received.

The beginning of each section outlines the comments the NDA received and how they have been taken into account. The document is structured as follows:

- Section 1 provides an introduction, explains the governance arrangements and gives some definitions
- Section 2 explains the background to government policy in this area, gives the NDA's mission and explains why we have a public and stakeholder engagement (PSE) and communications strategy
- Section 3 outlines the approach to developing a PSE and communications strategy
- Section 4 outlines the approach taken to engaging a range of stakeholders
- Section 5 outlines our approach to written consultations
- Section 6 outlines our approach to providing feedback
- Section 7 outlines our approach to reviewing stakeholder engagement on geological disposal
- Section 8 outlines our approach on communication by and within the NDA on geological disposal
- Section 9 outlines the next steps in implementing the Strategy.

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1 Introduction

The UK Government¹ and Devolved Administrations for Wales and Northern Ireland issued a Managing Radioactive Waste Safely (MRWS) White Paper in June 2008 outlining a framework for managing higher activity waste in the long-term through geological disposal, coupled with safe and secure interim storage and ongoing research and development to support its optimised implementation [1]. It sets out various requirements on the Nuclear Decommissioning Authority (NDA), which is responsible for planning and implementing geological disposal in the United Kingdom (UK). To implement geological disposal the NDA has set up the Radioactive Waste Management Directorate (RWMD) to develop an effective delivery organisation to implement a safe, sustainable and publicly acceptable geological disposal programme. The White Paper set a requirement on the NDA to develop a Public and Stakeholder Engagement (PSE) and Communications Strategy for the implementation of geological disposal.

The NDA invited stakeholders to comment on a proposed framework in a consultation document [2] to help it to develop the PSE and Communications Strategy for the geological disposal programme. All responses received have been considered and have been published [3] in a separate document.

This document sets out an engagement and communications strategy explaining the strategic approach that is going to be taken by the NDA's delivery organisation with regard to public and stakeholder engagement and communications. This work on geological disposal will be co-ordinated with the wider NDA work that is being undertaken and will use a consistent approach where appropriate.

1.1 Governance arrangements

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 of Energy and Climate Change (DECC) (formerly parts of the Department for Environment, Food and Rural Affairs (Defra) and 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.

¹ UK Government in this context means the Department for Environment, Food and Rural Affairs (Defra), the Department for Business, Enterprise and Regulatory Reform (BERR). (Some elements of Defra and BERR have been brought together in the Department of Energy and Climate Change (DECC)). The Scottish Government policy is to support long term interim storage of higher activity wastes and therefore did not sponsor the MRWS White Paper.

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's² (CoRWM's) advice to Ministers on the NDA's long-term waste management planning and implementation programmes. The Steering Group may make 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.

Government has also established a Geological Disposal Implementation Board (GDIB) to manage the Government's and the NDA's arrangements specifically for the planning and delivery of geological disposal as set out in the MRWS White Paper. GDIB is a means by which civil servants from the relevant Government departments and the NDA can discuss the programme, provide advice to Ministers and prepare and publish Government decision documents. It has members from DECC, WAG, HM Treasury and the NDA (as the Government's implementing organisation).

To implement geological disposal the NDA has set up a new NDA Directorate called the Radioactive Waste Management Directorate (RWMD) to develop into an effective delivery organisation to implement a safe, sustainable and publicly acceptable geological disposal programme. 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 could then be opened up to competition, in due course, in line with other NDA sites.

As the RWMD is part of the NDA, it will support various corporate developments, including the Strategy Management System (SMS). This system has an 'enabling topic strategy' of Stakeholder Engagement. Thus the RWMD will work within the frameworks established by the NDA, but requires separate strategies to ensure they are 'fit for purpose' for implementing geological disposal. This explains why there may be some apparent differences between the NDA and RWMD's approach, although there should in all cases be broad alignment.

1.2 Definitions

It is helpful to define some of the terms that are often used when talking about public and stakeholder engagement and communications. The following definitions are based on the ones used by the Government's Sustainable Development Commission [4]:

- **Engagement** - Useful as a generic term to explore all approaches of engaging stakeholders, rather than to describe a specific process. It can be taken to cover a whole spectrum of different types of engagement and activities.

² 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.

- **Participation** – A term that has much overlap with engagement, it is associated with the importance of involving wider groups of people in decisions, services and design. It is generally used more when talking about involving citizens more in decisions.
- **Consultation** – One type of engagement that obtains feedback on policy options and decisions. Often used as a formal part of the policy-making process to inform the detail of a decision. Consultation can vary in depth and quality and may involve deliberative workshops, online tools or simply written responses to a document.
- **Dialogue** - Commonly used to mean a process within which interested parties come together to discuss an issue and develop a common resolution. Often working with a third party facilitator to manage the process of discussion, the work is usually explicitly about maximising common ground, and building consensus.
- **Stakeholder** - A generic way of referring to anyone who has an interest or 'stake' in the subject or the engagement process under discussion - from interested agencies and organisations, to local communities and individuals. It is often used to distinguish interested parties from the (general) public.
- **Public** - Used to describe those people and communities who are not (or not yet) directly interested or impacted by the issues being discussed, nor are they satisfactorily represented by any existing stakeholders. For example, a national issue such as building nuclear power stations has many active stakeholders. However, people outside of stakeholder groups and beyond local "nuclear communities" also have a stake although they may, individually, have chosen not to concern themselves with the issue thus far.
- **Communication** – Is commonly defined as "the imparting or interchange of thoughts, opinions, or information by speech, writing, or signs." It is an act or instance of transmitting and a process by which information is exchanged between individuals through a common system of symbols, signs, or behavior. Communication can be perceived as a two-way process in which there is an exchange and progression of thoughts, feelings or ideas towards a mutually accepted goal or direction.

2 Background

This section describes the background and the context to this strategy document.

2.1 Government Policy

The UK Government has decided that implementing geological disposal will proceed using a voluntarism and partnership approach. This has been described in the 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.

The White Paper confirms the NDA's 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 (PSE) and communication during development of the geological disposal facility. The NDA consulted on the framework between August and November 2008 to enable stakeholders to influence the development of the engagement and communications strategy to be developed and agreed by Government as stated in the White Paper. The White Paper goes on to explain that the Strategy is likely to include the following three elements, in no particular order:

- 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 also 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 The NDA Mission

The NDA Mission [5] 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.

These strategic priorities are built upon in the Communications and Stakeholder Relations Strategy 2009/11 [6]. In this it states that:

Our approach to building the stakeholder support and confidence necessary for us to deliver our mission is to base our activity around five workstreams:

- *A programme to build new and maintain existing relationships with those integral to delivering our mission*
- *A proactive approach to communication around our role and progress*
- *A programme of stakeholder engagement and consultation on our plans and evolving strategy*
- *An employee engagement programme*
- *Socio-economic plans and partnerships in place in our priority areas.*

Developing an effective PSE and Communications Strategy for the geological disposal programme is essential for the NDA to successfully fulfil its Mission and strategic

priorities. The NDA 2008/11 Business Plan [7] is being revised, but 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.’

2.2.1 RWMD mission and objectives

In helping to deliver the NDA remit, RWMD’s programme mission is;

“To deliver geological disposal and provide radioactive waste management solutions.”

RWMD’s programme objectives are to:

- Engage with national governments, local governments and communities to identify a geological disposal facility site
- Develop the specification, design, safety case and environmental and sustainability assessments for the disposal system and obtain regulatory support
- In conjunction with waste producers, identify and deliver solutions to optimise the management of higher activity waste
- Develop and maintain an effective organisation and secure resources to deliver geological disposal
- Obtain and maintain stakeholder support for our activities
- Deliver a focused R&D programme to support geological disposal and optimised packaging solutions
- Seek sustainable, innovative and cost effective solutions that have public support and are in the best interest of the UK.

2.3 Public and Stakeholder Engagement (PSE)

Experience, both in the UK and overseas, has shown that where the public and other stakeholders have been involved in the decision making process, better decisions have been made which also stand a better chance of being implemented. Building stakeholder confidence is key to making progress with implementing geological disposal [2]. 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 [3] 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.

These are the reasons why we need to have an active public and stakeholder engagement and communications strategy. We do not see any benefit at a strategic level to separate engagement from communication.

2.4 What is a strategy?

The NDA see a PSE and communications strategy as the logical approach to help achieve the overall objective (or vision) of implementing geological disposal. A general

plan of action will be described, but it will avoid identifying the specific activities required. These specific activities of; whom, when and where, will be detailed in separate engagement plans.

3 Approach to developing a PSE and Communications Strategy

As a result of the consultation exercise, the NDA's delivery organisation has revised the proposed approach to incorporate feedback and inputs received from stakeholders.

3.1 Aim of the PSE and Communications Strategy

The majority of the respondents agreed with the proposed aim. However, there were a number of suggestions made to improve the wording and as a result we have revised this. We have also added definitions of terms (in a new Section 1.2) in response to other comments. There were also views expressed which have not been implemented suggesting that weighting of responses should be undertaken depending on who made them, together with others glad to see that all groups could participate.

The aim of this Strategy is:

- to outline the NDA's delivery organisation's approach to enable a wide range of stakeholders to be involved in and influence the implementation of geological disposal to improve decision making and build public confidence in the proposed way forward.

This will help ensure that real engagement takes place, so that better and more informed decisions can be taken.

The NDA's delivery organisation will work with the Host Community, Decision Making Bodies, Wider Local Interests and the Community Siting Partnerships³. The engagement and communication work will need to sit within the agreed approach of the PSE and Communications Strategy, but will be discussed and agreed with the local communities involved.

3.2 When to engage stakeholders

None of the respondents disagreed with the proposed text in this section. It was suggested that stakeholders shouldn't be involved in identifying contractors and this bullet point has been removed. There was also a comment made to make a commitment to providing feedback to stakeholders and this has been added.

The NDA's delivery organisation recognises that engagement will be taking place on a number of different levels throughout the siting, development, construction, operation and closure of the facility. We plan to engage appropriate stakeholders throughout the development of our work programme on geological disposal. This is likely to involve the following:

- Engaging appropriate 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 appropriate and reviewing the work at key stages prior to finalisation
- Discussing preliminary results and their implications with stakeholders

³ The terms Host Community, Decision Making Body, Wider Local Interests and Community Siting Partnership are all defined in the MRWS White Paper.

- Engaging stakeholders in reviewing the results of work.

The NDA's delivery organisation will work with appropriate stakeholders to agree which approach will be suitable for individual topics. We are keen to obtain relevant input so that we can take account of this. We also intend to provide clear and timely feedback to stakeholders on actions taken and, if inputs are not acted upon, to explain why in a timely manner.

3.3 A needs driven approach to engagement

There were many useful comments made on how this section could be improved. As a result we have amended this section to make it more positive. It was also suggested that detailed planning requirements were added and this has also been addressed.

It is recognised that the NDA's delivery organisation has a requirement to deliver value for money. Therefore the PSE and Communications Strategy will be developed to enable an efficient and effective use of resources. This will include ensuring that the engagement and communication activities will be proportionate to the issues being addressed. The NDA plans to develop a needs driven approach to this Strategy i.e. one where there is the greatest need for some form of engagement. In no particular order this needs driven approach will be based on:

- involving stakeholders to define the processes which allow their needs and issues to be considered and, where appropriate, addressed
- statutory requirements
- the stage of the geological disposal programme and the key issues that need to be addressed at that time
- good practice in the UK and internationally.

As part of the detailed planning work, and in consultation with those involved, the NDA's delivery organisation will develop a detailed protocol setting out what PSE it needs to undertake, when, with whom, and how. We will also consider if it is possible to work in partnership with local authorities, and others, to make the most efficient use of resources.

3.4 Developing a flexible Strategy

All respondents agreed with the need for a flexible approach and recognised that changes will take place over time.

This 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, this 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.

3.5 Objectives of the PSE and Communications Strategy

All respondents agreed with the proposed objectives and provided comments to improve the text. We have added some clarification on reimbursement of stakeholder expenses as suggested. Other comments made included ensuring value for money is achieved and proportionate use of resources. These have been addressed in Section 3.3.

The PSE and Communications Strategy will be developed to adhere to the NDA commitments as outlined in the NDA stakeholder charter [8] including:

- establishing open and transparent relationships with stakeholders

- providing 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 issue of reimbursement of costs, where appropriate, has been raised on a number of occasions. The NDA believes that stakeholders generally should not be 'out of pocket' as a result of participating in an engagement exercise. Thus, in general, reasonable travel and subsistence expenses are reimbursed. However, paying for stakeholder's time to participate in an engagement activity changes the relationship and could be seen as turning the stakeholder into a contractor. There may be special circumstances when it may be appropriate to pay for peoples' time e.g. to participate in a focus group, but not to attend a workshop.

The objectives of the PSE and Communications Strategy, in no particular order, include to:

- work with stakeholders to maximise public confidence in the process to enable the programme to move forward
- understand stakeholders' issues and concerns so that they can be considered during the implementation of the geological disposal programme
- 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
- provide information on all aspects of the programme to implement geological disposal
- 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 all requirements for engagement with the public under domestic and European legislation, including the Directives on Strategic Environmental Assessment and Environmental Impact Assessment.

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

All respondents agreed that the geological disposal programme should have a separate PSE and Communications Strategy, but some concerns were raised about how it was going to be co-ordinated with the rest of the NDA. It is recognised that the PSE and Communications Strategy for the geological disposal facility will need to be co-ordinated and aligned with the various other parts of the NDA. The NDA's delivery organisation will be responsible for the delivery of the geological disposal programme and in due course its ownership can be opened up to competition in line with other NDA sites. Therefore a stand-alone PSE and Communications Strategy for the implementation of geological disposal has been developed.

3.6 The basis of the Strategy

All respondents agreed with the proposed three elements, but some made additional comments. These included: that local communities may have different views from their elected representatives; adding specific references to such topics as waste conditioning and transport; that the concept and siting process should be open to challenge; there should be some balance between the interests of the local stakeholders and those with a UK wide focus. It was also suggested that key consultations should be shown on a timeline to allow stakeholders to see the bigger picture. These useful comments will need to be addressed as part of the detailed engagement plans.

The approach is to base the Strategy as outlined in the MRWS White Paper on the following 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.

Engagement and communication with a wide range of stakeholders will include those bodies that have a formal role in regulating, permissioning or overseeing NDA's delivery organisation's activities. This engagement with statutory bodies will be visible and transparent to all stakeholders. This is discussed further in Section 4.5.

4 Engaging a range of stakeholders

All respondents agreed with the proposed text. However, there were some useful comments that will need to be considered including: that engagement needs to be planned to avoid stakeholder overload; that engagement will depend on the topic; that using a small set of engagement mechanisms will ensure some consistency; that the Site Stakeholder Groups⁴ (SSGs) could be used. These issues will be addressed in the detailed engagement plans.

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
- UK wide
- Government
- Permissioning and regulatory bodies
- International.

⁴ The NDA has established separate Site Stakeholder Groups (SSGs) which are independently chaired at each of its sites. Local interested parties discuss issues associated with their site.

Under each of these categories there will be different groups of stakeholders with different interests, needs and knowledge of the geological disposal programme. We believe that engagement mechanisms will need to be tailored to the different stakeholders. However, the engagement mechanism will need to be developed to be 'fit for purpose'. By this, we mean that the form of engagement, including the subject matter, the participants, the timing and the method must be attuned to the subject of engagement and the reason why external views are being sought. This will be developed in the separate stakeholder engagement plans.

Although we will engage stakeholders according to their interests, we will also ensure that there is feedback from these engagement activities. This will assist everyone to understand what the various outcomes are and allow interactions between the various groups.

4.1 Engaging local and regional stakeholders

Many respondents provided input to this section of the consultation document. There was some concern expressed that the NDA should not dictate the details of what interaction a community siting partnership has with the local Site Stakeholder Group. There is an argument that these groups have a different role and should not necessarily be interacting. The local community siting partnership (CSP) should be allowed to establish its own stakeholders. It was also noted that some of the groups identified will not have the same access to resources, support and independent expertise as others. An approach to correcting this imbalance will be needed, since taking part in CSP is likely to be onerous in various ways. We have tried to address some of these comments in the revised text below.

The Government White Paper sets out the proposal that communities who decide to participate in the site selection process set up a Community Siting Partnership (CSP). This will be a key body and although Government does not wish to be prescriptive about the forms of CSP that are established, guidance has been provided in Annex C of the White Paper. Sections C.17 – C.19 provide information on costs and funding of CSPs and make it clear that this funding will be provided by Government.

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.

Each local community that participates in the site selection process will be unique and will include a range of stakeholders. 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 plan, in collaboration with the communities themselves, to develop a local engagement plan. We envisage that the CSP will develop approaches for engaging with a range of local stakeholders that could include:

- Local elected representatives
- Existing partnerships and bodies in the area
- Members of the public
- Minority groups

- Young people
- Local voluntary and community organisations (e.g. Trade Unions, environmental groups, Women's Institute, trade bodies, religious groups etc.)
- Neighbouring communities
- Regional bodies working in the area
- Communities on transport routes.

The important thing will be to retain flexibility to allow others to engage as appropriate and to ensure all involved stakeholders are fully aware of the basis of engagement on any particular occasion. Everything must be done in as open and transparent a way as possible to avoid any potential misinterpretation.

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.

4.2 Engaging UK wide stakeholders

None of respondents disagreed with the proposals. However, some provided additional useful points including: that the most important aspect of this process is that it is seen to be independent; that a small set of mechanisms should be developed in conjunction with stakeholders to try to encourage consistency in the engagement process; that recognition is needed of the required additional capacity needed within those local communities which have expressed an interest to deal with the significant amount of consultations which will occur both locally and UK wide. This may need to manifest itself in additional resources.

As outlined in Section 3.3 the NDA plans to develop a needs-driven approach to PSE and communications for the geological disposal programme. 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, web based approaches or other mechanisms as appropriate. The NDA plans to talk to stakeholders to agree the most appropriate mechanism to use on particular topics and will involve stakeholders in the development of the agenda for events.

Again feedback from these events needs to be easily available for all to see.

4.3 A national forum for geological disposal

There were a range of views expressed in response to this section of the consultation document. Some thought a national forum was a good idea, others disagreed, with the

majority providing no clear statement albeit with suggestions. We have tried to address these comments below.

At the UK wide level the NDA has a National Stakeholder Group (NSG) that currently meets twice a year. The NSG, including representatives from the Site Stakeholder Groups, enables stakeholders to explore issues and submit proposals for consideration by the NDA. Updates on the geological disposal project are provided to the NSG and issues discussed with them. This will continue in future.

There is some support for another UK wide standing committee, but rather than establish such a committee it is suggested that meetings can be convened as required at particular stages in the geological disposal programme or when there are specific issues to discuss. There needs to be flexibility in the approach taken. As outlined above we plan to use a range of engagement mechanisms tailored to the topic to be discussed and the stakeholders to be involved rather than set up a new standing committee.

4.4 What to engage stakeholders about

The majority of respondents stated that they would be interested in all the categories mentioned below. Another respondent suggested that “it is not helpful to categorise stakeholders in accordance with their interest in particular aspects of geological disposal. Much will depend on the context at the time of the engagement.” It was also noted that cost and timescale are not specifically mentioned. Both these comments have been addressed below.

Geological disposal is a multidisciplinary issue, some stakeholders may only be interested in certain aspects of the development. However, to allow stakeholders to make an informed decision about which topics they want to engage on, we need to be clear about the purpose as well as the content.

Topics that stakeholders are particularly interested in engaging with include:

- The overview of the programme with cost and timeline information
- The radioactive wastes and materials that may require geological disposal
- Waste treatment and handling processes
- 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 processes.

4.5 Engaging regulators and permissioning bodies

As outlined in Section 3.6, the NDA is working with regulators and permissioning bodies to develop a permissioning schedule for geological disposal [6]. This will outline how early and continuous scrutiny of the geological disposal programme will be developed

through engagement with the relevant regulatory and permissioning bodies. This will be made publicly available.

Most regulatory and permissioning regimes require public consultation to take place as part of the permissioning process. We will ensure that the permissioning schedule is kept under review to allow timely engagement with stakeholders and we will work with the regulators and permissioning bodies to bring about a suitably co-ordinated approach to stakeholder engagement.

4.6 International stakeholders

The NDA will use existing Government mechanisms for engaging with 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

Most of those respondents who addressed this question agreed that the NDA should adopt the Cabinet Office Code of Practice.

Formal written consultations are one approach to engagement. The Cabinet Office Code of Practice on Consultations [10] 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.

We will follow the Code of Practice on Consultations for all formal written consultations associated with the geological disposal programme. These formal 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.

6 Providing feedback

A majority of respondents replied to this question. Providing feedback was seen as essential by many and several had suggestions as to how best to do this. These included comments such as: feedback is best facilitated by ensuring that all inputs are recorded and categorised so that they can be considered in a systematic manner; the reasons why and the criteria by which decisions and judgements have been made should be made clear; provide timely documents that explain how views have been addressed. We have addressed these in the text below.

We believe that the inputs we receive from stakeholders are extremely valuable and useful in developing our work programme and will help to inform our proposed approach to implementing geological disposal programme. Given that the nature of the inputs we will receive from stakeholders will be diverse it is difficult to be prescriptive about how we will respond.

However, we believe it is important to provide feedback to stakeholders on how their comments have been considered and, where appropriate, taken into account. We intend that all inputs received will be recorded and categorised so that they can be considered in a systematic manner. We will aim to produce clear, timely reports that are well publicised

and readily obtainable, identifying the responses received and their impact on our thinking.

7 Review of the NDA stakeholder engagement on geological disposal

All those who responded to this section felt that it was important for the NDA to conduct some form of review. Several respondents thought that CoRWM should fulfil this function. The useful suggestions made have been incorporated in the text below.

Good practice in stakeholder engagement 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.

However, it will not be appropriate to rely on CoRWM to provide on-going quality assurance to us on our PSE work; we will seek this assurance independently. The key elements of any review undertaken will include an assessment of our effectiveness at addressing public and stakeholder concerns and building and maintaining confidence in the programme. We will need to determine what our indicators of success should be so that we can effectively measure our performance against these.

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 for geological disposal and that issues raised by stakeholders are fed into the appropriate work areas and are properly addressed. In external communications it means being an authoritative source of information ensuring that consistent messages are delivered, feedback on inputs are provided to stakeholders and appropriate behaviours are demonstrated by NDA staff. We must not be too driven by process or timescale milestones, but allow a partnership approach to be developed.

8.2 Who to communicate with

Nearly half of the respondents addressed this question. Additional stakeholders have been added to the list below in response to the suggestions made.

The previous sections have outlined a range of stakeholders who might be interested in geological disposal and may want to receive information about our work on geological disposal, including:

- Local stakeholders (local elected representatives, the Community Siting Partnership, Local Strategic Partnerships, Site Stakeholder Groups, other existing partnerships and bodies in the area, local minority groups, youth groups and young people, local NGOs, neighbouring communities)
- Regional stakeholders (regional bodies, communities on transport routes)
- UK stakeholders (Trade Unions, NGOs, members of the nuclear industry, contractors, the supply chain, academics and learned societies)
- Nuclear industry workforce

- Members of the general public
- Government
- MPs, MEPs and regional politicians (where applicable)
- Permissioning and regulatory bodies
- International stakeholders (other Countries, Waste Management Organisations, International Atomic Energy Agency (IAEA), etc.)
- Universities, schools
- Media and journalists.

We plan to introduce a web based sign-up system for those people interested in receiving information so that we can provide relevant material. In working in partnership with a local community it is expected that a general community capacity building / information programme is needed before any engagement starts to ensure all those who want to be involved are at the same level of knowledge.

8.3 How to communicate

Nearly 60% of respondents addressed this question. Their comments have been incorporated in the text below.

We recognise that no one communication package will fit all requirements – it will depend on various factors including the topic, the audience, the timing, etc. Also that communications are an on-going activity that must be maintained, both in producing materials and listening to what stakeholders have to say.

There are a variety of communication mechanisms that we intend to use to keep stakeholders up to date with the NDA's work on geological disposal, including:

- The Internet
 - Create a project web site
 - Develop interactive web based tools
 - Send and receive targeted emails, including an email bulletin
 - Create a 'sign-up' system to allow people to receive targeted information
- Printed material (leaflets, reports etc.)
- The local, regional and UK wide media (television, radio, journal and newspaper articles)
- Face to face meetings, including on the doorstep in local areas
- Existing forums and where appropriate new opportunities including, public meetings, conferences, exhibitions (town halls, supermarkets, libraries), etc.
- Efforts will also have to be made to communicate with hard to reach groups which may often be through direct meetings and/or through groups which deal with them

- Engagement with schools (through the national curriculum) is an important means of reaching parents as well as children and teachers.

Whichever mechanism is deemed appropriate, we will also need to consider the environmental impact of the communication work we propose in terms of travelling, use of resources, etc. There will also be the need to alert stakeholders of other relevant contributions that have been made to the discussions. This will be done via the project web site by referencing independent, third party bodies such as respected scientific and professional bodies.

8.4 Levels of detail of communication

The vast majority of those who responded to this question thought that the tiered approach to providing information was essential. However, there were useful comments made including the need to ensure all levels of information are written in a way to make the technical underpinning comprehensible to local publics and decision makers. We have incorporated suggestions made in the text below.

There will be a large amount of information available from us and other interested parties. In order to make this as accessible and understandable as possible, we will use a tiered approach to developing our communication materials associated with geological disposal. The intent is that anyone with an interest will be able to access whichever documents they require via our web site and that where appropriate most will have an executive summary that will be accessible and in plain English. Our web site will adopt an integrated approach so that people can readily see where to access the information they need at the level of detail they are seeking. In addition, our web site will have a search facility to assist users to find the materials that are relevant to their interests and provide links to other useful web sites.

Documents will be produced with different levels of detail to enable people to engage with issues at the level they feel comfortable. It will be important to ensure sufficient links exist between levels of documentation to enable a stakeholder to be able to access more detailed information on a specific topic if they feel this is desirable or required. The levels will 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's delivery organisation
- Level 2 – summaries of thematic programmes of work
- Level 3 – detailed results from programmes of work.

8.5 What to communicate about

Over half the respondents addressed this question with the majority expressing interest in receiving information on all the aspects suggested.

Geological disposal is a multidisciplinary issue, some stakeholders may be particularly interested in certain aspects of the development whereas other stakeholders may be interested in only certain aspects of geological disposal.

In order to target relevant materials to each stakeholder we will require further work to understand which aspects of the geological disposal facility programme each stakeholder group is particularly interested in receiving information about. This will include both good and bad news and may well change over time and so we will need to be flexible in our approach. However, topics have been included in Section 4.4.

8.6 How often to communicate

Over half the respondents addressed this question and the comments have been incorporated in the text below. Many agreed that there needs to be a mixture of regular reports and ones linked to specific milestones.

Communications will need to be both proactive and reactive so it is difficult to say how often the NDA's delivery organisation will need to communicate with stakeholders. The frequency of communication is also likely to depend on the channel being used, for example, a website will need to be updated regularly to maintain stakeholder interest while other forms of communication might be less frequent and linked to specific events or progress statements. However, regular six monthly updates will be provided, even if we do not have much to say, to keep everyone up-to-date.

The strategy will need to take notice of local circumstances and be flexible enough to consider the requirements of a 'participating' community or run the risk of losing community confidence. Therefore, communications and engagement activities will be organised, timely and driven by the needs of the different stakeholders. Details will be worked up in the development of specific engagement plans.

9 Next steps

We have developed our PSE and Communications Strategy over the last year through a process of consultation. We have been very pleased by the level of interest shown in our geological disposal project, through both the responses during our consultation process and the attendance at the workshop in Leeds (October 2008). Many groups and individuals provided very helpful comments which have guided the production of this updated document and we would like to thank everybody who has contributed.

In setting out our PSE and Communications Strategy for geological disposal, we recognise that we are at the start of a project which will last for several decades. We will need to respond to the changing needs of the project as it proceeds to construction and operation of a facility and adapt our communications approach accordingly. At this stage we are primarily providing support to Government and local communities. Government does not wish to be over-prescriptive about the way that the voluntarism and partnership arrangements should work at the outset as individual local circumstances differ and, to a degree, a tailored approach to any discussions will need to be taken.

However, in due course we plan to re-visit our strategy probably at the start of the desk-based studies in participating areas stage of the programme, following a "Decision to Participate" when communities wish to continue their involvement in the process.

Looking ahead, we want to build on the foundations we have established and increase the involvement of our stakeholders in the planning of our programme. In particular, we will consider mechanisms for improving our understanding of stakeholders' needs. We also intend to make the results of our geological disposal programme more accessible to enable more involvement of our stakeholders.

Later this year, we plan to work with various stakeholders to develop proposed stakeholder engagement plans.

Finally, we would like to reiterate that we continue to welcome feedback on all aspects of our PSE and Communications Strategy. Details of how to send feedback are given inside the front cover of this document.

10 References

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