

Meeting:	NuLeAF Steering Group, 27 th February 2013
Agenda Item:	7
Subject:	NDA Strategy and Operations
Author:	Stewart Kemp/Phil Matthews
Purpose:	To provide an update on developments in NDA Strategy and Operations

Introduction:

This report covers:

- feedback from the NDA National Stakeholder meeting
- NDA engagement plans
- consultation on NDA Draft Business Plan 2013-16
- NDA/NuLeAF engagement meeting
- NDA Theme Overview Groups (TOGs)
- NDA Stakeholder survey

Recommendation:

The report is for noting.

Contribution to 2012/13 Service Plan:

The activities described in this report relate to the following Key Tasks:

Represent local authorities and support member engagement with finalised IWM Strategy.

Identify key issues for members resulting from NDA Strategy implementation including PBO competitions, community benefits, and waste storage consolidation proposals.

Continue dialogue with NDA and SLCs via the NuLeAF/NDA/SLC Engagement Forum. Maximise local authority consultative opportunities through our engagement with the IWM and Site Restoration TOGs and advise members when new opportunities arise.

Via above fora, continue to clarify the practical options available to NDA for site restoration and integrated waste management and how criteria for options assessment will be identified and applied, and communities impacted.

1 NDA National Stakeholder meeting

The annual NDA National Stakeholder meeting was held on the 29th and 30th October in Manchester. The NuLeAF Chair and Vice-Chair, along with Executive Co-Director Philip Matthews, attended.

An event report has been prepared and is available on the [NDA website](#) along with the presentations made. Key issues discussed included:

- The Magnox/RSRL Parent Body Organisation (PBO) competition (see below). Discussion largely centred on the technical aspects of the procurement process. NuLeAF Chair Tim Knowles asked NDA for clarity on how socio-economic and environmental benefits to communities were to be delivered better than they have been to date. He was assured that this would be addressed and that greater clarity would be forthcoming soon as to how this would be achieved. A particular concern is the PBO process – this is being dealt with under a separate Agenda item.
- Skills, in particular the new National Skills Academy (NSA Nuclear), in Hartlepool and the need to address the ageing profile of nuclear industry workers.
- Dounreay's future plans including the development of the LLW store and how the site will be managed on a care and maintenance basis. There was also discussion on economic diversification, and particularly how NDA is engaged in helping support the development of marine renewables given the particular suitability of the Pentland Firth.
- The NDA's engagement with Japan, post Fukushima. The Agency hopes to increase business with Japan, drawing on the UK's experience of decommissioning.

2 Engagement Plans

NDA published 6 revised National Engagement Plans on 20 November (see <http://www.nda.gov.uk/stakeholders/engagement-plan.cfm>). The main points from these plans are as follows:

- **Critical Enablers** – shows NDA Parent Body Organisation (PBO) process through to end Sept 2013, but no opportunity for local authority engagement. Officers are pursuing this through the current PBO work stream and Theme Overview Group (TOG) work (see below).
- **General Activities** – reports engagement on next draft NDA Business Plan (which was anticipated in our Service Plan) and a Stakeholder survey (see below) which NuLeAF responded to.
- **Integrated Waste Management** – flags publication of NDA strategy position on graphite, an important issue for the GDF inventory. A shallow disposal pilot project at Hunterston was abandoned earlier this year (a disposal route that could have kept graphite out of GDF inventory and reduced its size by about a quarter). NDA revised approach to graphite is

now needed and officers are pursuing this through the IWM TOG (see below).

- **Nuclear Materials** – the uranium credible options paper, originally expected in 2012, is now expected early in 2013 for public comment. Mixed Oxide fuel (MOX) and alternative plutonium disposition feasibility work was flagged to be completed by the end of 2012 and then handed to government for decision. NuLeAF will need to establish whether NDA will be publishing the reasoning for any recommendations to Government. This engagement plan also signals preparatory work to make the case for justification of a new MOX Plant at Sellafield – an issue of interest to Cumbria and Copeland and possibly to many other member authorities should Government decide to subsidise 'new build' utilities to burn MOX (an option highlighted in the Government's Plutonium consultation in 2011).
- **Spent Fuel** – the Magnox strategy is flagged for publication in early March 2013. Possible further engagement is also flagged around the beginning of June re: 'flexibility' over reprocessing 'small amounts' of contracted overseas SNF through THORP. The current plan for THORP is to complete all contracts by 2018.
- **Site Restoration** – this engagement plan initially raised concerns as it created the clear impression that stakeholder engagement opportunities concluded at the end of December last year, before it had begun. Officers raised this point through the Site Restoration Theme Overview Group (see below) and a commitment to revise the Engagement Plan has been secured.

3 Consultation on NDA Draft Business Plan 2013-16

The NDA has published a draft business plan for 2013-16. NuLeAF submitted a [response](#) to this drawing on feedback from members. Key points of NuLeAF's consultation response are:

3.1 Overview

The Business Plan 2013-16 restates the NDA's mission statement. This includes several linked elements of particular importance to local authorities and the communities they represent, namely that *publically acceptable solutions* can only be delivered through meeting *social and environmental responsibilities* and *actively engaging with* (and sustaining the confidence of) *stakeholders*.

Given that the NDA will spend over £3Bn of largely public money per year over the period covered by the Plan, this spending must be informed by stakeholders including local government and local people, listening to and addressing their concerns. NDA programmes should seek to maximise the wider benefits to communities and the environment.

3.2 Specific issues

On the **current PBO competition**, the £7Bn due to be spent in the PBO competition for Magnox and RSRL must better address stakeholder and socio-economic goals than current arrangements do. More on the PBO competition is provided in a separate Steering Group paper.

On **Low Level Waste (LLW)**, NuLeAF notes the actions for Low Level Waste Repository Ltd (LLWR) include:

- Maintaining the momentum of the Supply Chain investment in waste treatment arrangements
- Delivery of the National Waste Programme to optimise LLW Strategy Implementation

Regarding these commitments, and in particular that regarding Supply Chain investment in waste treatment, we urged that the waste disposal options selected should not rely solely on proposals put forward by the supply chain. Such an approach has resulted in the current situation, where disposal routes are not acceptable to host communities and are not aligned with the objectives set out in the LLW Strategy.

3.3 On socio-economic issues

The increase in expenditure (from £26.4M to £31M between 2012/13 and 2013/14) was welcomed but more information as to how this money will be spent was requested. NuLeAF also requested significantly more information as to how the socio-economic needs of individual sites will be met. In particular, there seems to be virtually no information on how those sites, such as Trawsfynydd and Bradwell, will be supported as they enter care and maintenance.

The NuLeAF response also argued for a clear commitment to community benefit principles and for more information on how procurement strategies will ensure that at least 20% of expenditure is with Small and Medium enterprises (SMEs).

The final NDA Business Plan 2013-16 is due for publication by April.

4 NDA/NuLeAF Engagement Meeting

After the last Steering Group an Engagement meeting was held with NDA on 24 October 2012. Presentations were given by:

- James McKinney, Head of Integrated Waste at NDA on [developments in the Integrated Waste Management programme](#);
- Guy Robinson, Interim Minerals and Waste Policy Manager, Somerset County Council on [developments in planning](#); and
- Richard Evans, Principal Planning Officer, Cumbria County Council on [nuclear waste site management and community involvement](#).

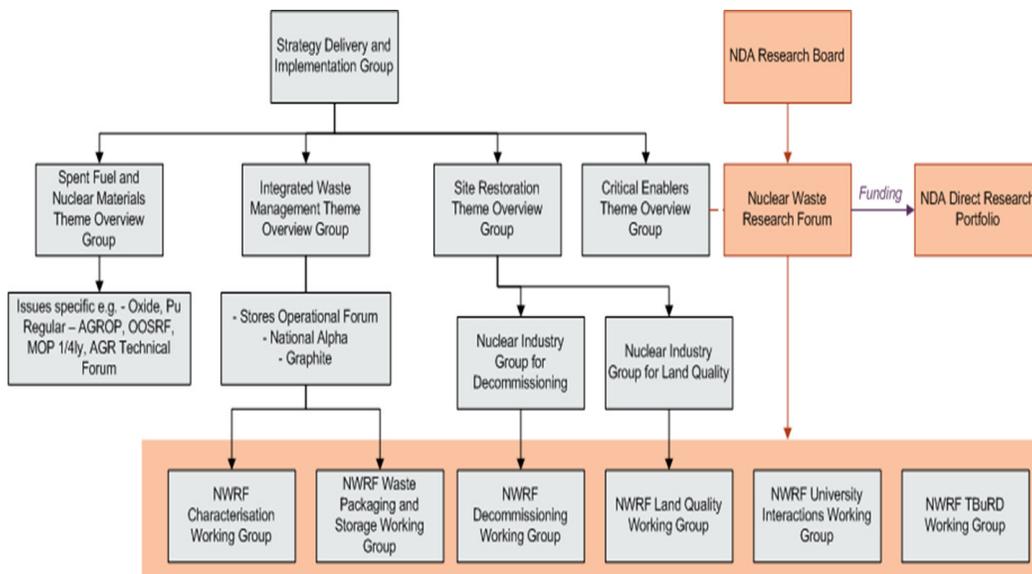
Key points raised during discussion were:

- 25-30% of the whole Geological Disposal Facility (GDF) inventory will comprise encapsulated graphite removed from reactors. NDA will incorporate lessons learnt as part of the Hunterston project as Scottish policy on dealing with Higher Activity Waste (HAW) develops.
- The proposed new Waste Management Plan does not include radioactive waste. The group felt that this was a serious oversight. NuLeAF would pursue enquiries with the appropriate government organisations.
- It was agreed that further work was needed on how to engage with operators and waste consignors in order to resolve issues around community engagement and NuLeAF undertook to produce a paper.

5 NDA Theme Overview Groups

NuLeAF officers attended meetings of the Integrated Waste Management Theme Overview Group (IWM TOG) on 13 December 2012 and 24 January 2013, and meetings of the Site Restoration Theme Overview Group (SR TOG) on 11 December 2012 and 22 January 2013. Two other TOGs have been created to aide NDA strategy implementation – a Nuclear Materials and Spent Fuel Management TOG and a Critical Enablers TOG. The Former TOG is meeting on a regular basis and officers are seeking representation for NuLeAF on the Group. The latter TOG has not yet met.

Figure 1 below illustrates how the four TOGs fit within the NDA's overall strategy delivery and implementation programme and inform NDA research and development. Besides NDA and NuLeAF, TOG members include representatives from the Environment Agency, SEPA, ONR, DECC, MOD, Scottish Government and LLWR Ltd.



Key points of interest for NuLeAF from the IWM TOGs in December and January follow.

The December meeting discussed:

- Strategy for Higher Activity Wastes post 2023. What will be the risks? Credible treatment options? Costs? Barriers? Supply Chain opportunities? To inform this work NDA need to complete the current Radioactive Waste Inventory update and scope out scenarios for nuclear 10 years from now. Seven scenarios have been 'identified' but not yet 'populated'. A financial model has also been developed but not yet 'populated' with figures. Generally, much of this discussion at the TOG meeting was cost driven.
- Management of 'sleeve graphite' from spent nuclear fuel. Could the graphite be blended/diluted to meet LLWR acceptance criteria? No answers, but discussion was indicative of NDA willingness to consider 'innovative solutions'.
- NDA reported that a HAW Treatment Options 'Gate 0' Paper will be circulated for discussion and comment before the end of FY 2012/13, and that a 'position statement' on graphite would be published early in 2013. It was reported that Radioactive Waste Management Directorate (RWMD) are considering disposal of vitrified Higher Level Waste (HLW) to a GDF without 'over packing', and disposing before 2075, to reduce costs and potentially reduce GDF 'foot print' by 10%.
- LLWR Ltd described 'resolution (clarity) of the LLW inventory' as 'not good'. It was reported that Low Activity-Very Low Level Waste (LA-VLLW) disposal locations outside Sellafield licensed area could be developed 'based on geology' but other factors affect feasibility. Existing Sellafield site landfill is expected to be full by 2016. Incineration was viewed as a 'stronger option'. Sellafield Ltd will have its strategy in place for managing LA-VLLW 'by 2013'. Generally, because of improved rates of LA-VLLW diversion (via more rigorous application of the waste hierarchy), it was considered that 'on-site disposal' is becoming increasingly uneconomic (due to decreasing volumes remaining after diversion to other treatment methods). The consequence, it was argued, is that more 'King's Cliffe's' will be needed – i.e. regional facilities to accept wastes from multiple sites.

The January meeting discussed:

- A presentation and discussion about High Level Waste/Intermediate Level Waste (HLW/ILW) treatment options post 2023. It was assumed by then that Harwell, Sellafield, Aldermaston and some EDF sites will still generate HLW. An estimated 100,000m³ of raw HLW would be generated post 2023 which 'bulks up' after treatment to 250,000m³ for disposal. Better 'encapsulants' seen as route for HLW waste volume reduction pending GDF disposal. An investment decision in new treatment plant was likely to be needed.
- For much larger volumes of ILW discussion centres on availability of decontamination agents post 2023 to 'clean' wastes and meet acceptance criteria for disposal at the LLWR.

- The meeting also discussed creation of a new category of waste – Short Lived ILW – estimated at around 7,000m³, that would decay to LLW within a 300 year timeframe. Shallow burial was proposed to divert this waste stream from a GDF.

Two other presentations were made:

- By RWMD on the management of 'orphaned wastes' (generally small volume materials, though some high volume, that are difficult to treat). Total volumes currently estimated as circa. 20,000m³. RWMD is assembling an 'orphan' inventory and database from information provided by site license companies. Intention is to publishing a 'high level overview' but no timeframe as yet.
- By LLWR Ltd on 'Boundary wastes' (a grey area between ILW and LLW). LLWR Ltd issued a paper for public comment before the meeting considering the barriers to recategorisation of ILW as LLW and the treatment options available for these wastes. (NuLeAF Secretariat can provide copies of the LLWR Ltd paper on request.)

Key points of interest for NuLeAF from the SR TOGs in December and January included:

The December meeting discussed:

- service plans for each organisation with a view to alignment of work programmes where possible. A presentation on NuLeAF's Service Plan was welcomed. General agreement that there needed to be a continuous process of engagement.
- DECC nuclear policies. DECC circulated a useful summary of their nuclear policies (copies available from NuLeAF Secretariat on request).
- Scottish Environment Protection Agency (SEPA) and Environment Agency (EA) are seeking to review respective roles and responsibilities of environmental regulators and local authorities under the land use planning regime. Regulators are keen to clarify regulatory 'handshakes/overlaps' in safety, environmental and planning legislation. (Lancashire County Council to lead for NuLeAF on this work).
- SEPA also raised a draft scoping note for development of a 'Strategy for LLW arising from non nuclear sites'. Local authority help with development of a draft strategy was requested (and again, Lancashire County Council will lead for NuLeAF on this work).
- discussion highlighted a question for the current Magnox/RSRL PBO competition – that is, without an agreed SR strategy at each site how do prospective PBOs know what it is they are competing for? – is it a decommissioning contract or a care and maintenance contract?
- NuLeAF challenged the lack of target dates against SR TOG work streams. NDA say they will address this though there was some nervousness about committing to target dates and then being criticised when they are missed.

- NDA asked for NuLeAF comments on a draft 'Next Use of NDA Sites' 'Gate 0' paper.

The January meeting discussed:

- NuLeAF's submission of comments on NDA of draft 'Gate 0' 'Next Use of NDA Sites' paper after seeking member authority officer views in December. See Annex 1. Draft paper now with NDA Integrated Waste Management (IWM) and Strategy Management staff for 'sense check' and review before further draft 'Gate A' paper published later this year.
- A new web portal for NDA Strategy Delivery Implementation Group in development which should bring more visibility to NDA Strategy delivery work. Target date for going 'live' with new portal is March 2013.
- Presentation and discussion about Strategy Development Implementation Group.
- Discussion about publicly communicating site restoration work and PSE. Agreed to include an agenda item about this at a future SR TOG in first half of 2013. NDA accepted SR TOG 'Engagement plan' was out of date and needed updating.
- NuLeAF urged greater visibility for the sites restoration indicative time lines and key milestones which the meeting agreed for both SR TOG and IWM TOG.
- Whether there was a need to revise Government Decommissioning Policy which EA considered was out of date. EA tabled a critique of current policy. It was agreed that a small sub-group (not NuLeAF) draft revisions for DECC to consider. The whole TOG will have a chance to comment on revisions.
- A presentation on Magnox stations decommissioning timelines. Current policy is 85 year deferred decommissioning (to allow for radioactive decay within reactors) but further examination by NDA and regulators indicate that all 'decay' benefits likely to be achieved after 40 years and that costs of early decommissioning may be only slightly greater than for deferred decommissioning. This work will feed through to an NDA Credible Options (Gate '0') paper for eventual consultation though NDA stated this may be some years away as much more detailed work to test preliminary findings would be needed. NDA very cautious and very concerned NOT to raise expectations that may later not be met.
- A scoping document for a sites restoration 'road map'. This work is still at a preliminary stage and NuLeAF commented on the document after the meeting.
- MOD decommissioning issues will be an agenda item for next SR TOG meeting.

6 Stakeholder Survey

In consultation with the Chair and Vice Chair, NuLeAF officers responded to the NDA's 'online' stakeholder survey in the terms set out in Annex 2.

Annex 1

NuLeAF response to NDA of draft 'Gate 0' 'Next Use of NDA Sites' paper, December 2012

Via email to NDA 22 December 2012

1. Generally it is recognised that the decommissioning 'landscape' has changed over the past 5 years. Proposals for new nuclear build (NNB) at some NDA sites particularly impacts on the existing site end states. For example, South Gloucestershire Council (SGC), that hosts the Oldbury site, would welcome a revisiting of the end state proposals for decommissioning, particularly in view of the nomination of an adjacent land area for NNB. SGC's Core Strategy (currently at Examination) encourages the integration of the existing station with a proposed NNB. Yet the existing end state proposals are to restore the site to 'green field'.

2. As currently drafted, it is considered that the Paper does not sufficiently highlight the potential for interactions between NDA sites and how changes to site interim or end states in one location could impact at another location e.g. as a consequence of proposals for waste co-location. Interactions between NDA work streams also need to be brought together. For example, when consulting on a review of site interim or end states it would be essential to consult on the local impacts of integrated waste management proposals. NDA needs to be joined up in its approach towards local authorities and other stakeholders.

3. NuLeAF also considers that where significant changes to site end states are proposed that benefit the delivery of NDA's national decommissioning mission, but may adversely impact locally, then socio economic support to affected areas should be considered. Incentivising consensus building locally will facilitate effective site restoration programme delivery. The above document should recognise this point.

4. Para 1.1 '...pragmatic risk based restoration objectives...' need also to 'inspire public confidence' in accordance with NDA stakeholder engagement principles. Any 'restoration objectives' – interim or long-term – cannot claim to be 'optimised' unless host local authorities and communities give their support. Consideration needs to be given on a site by site basis to measures necessary to incentivise broad agreement and support for any changes to currently agreed end states.

5. Para 1.3.1 NuLeAF would expect this paragraph to list the sites that the NPS identifies for NNB. The wording implies use of the NDA sites for hosting NNB when in reality land outside the licensed area has (at least for Oldbury and Sellafield) been identified for this purpose. NuLeAF suggests that this should be made clearer.

6. SGC would very much encourage the review of site end states to consider the potential for reuse of individual sites, parts of sites and/or buildings and facilities for NNB i.e. integration of new build with existing nuclear sites. SGC has "...the impression that local communities do indeed perceive nuclear sites as one, and may not differentiate between organisational or other differences/separations between the existing/decommissioning nuclear sites and the proposed NNB sites."

7. Para 1.3.2 (Interest from developers) It may be obvious, but nonetheless worth stating, that the interests of developers do not always align with those of a host community.

8. Para 1.3.3 (Involvement of local authorities) As suggested above, host local authority support for any revised interim or end state will be essential if public confidence in site restoration plans and 'next use of NDA sites' is to be maintained. NuLeAF considers that clearer recognition should be given to the need to align specific site restoration plans with Local Development Plans and Minerals and Waste Local Plans.

9. Para 1.4.1 SGC suggest "...the research should take into account that economic reuse of sites may or may not be sustainable or appropriate, depending on the social, economic, environmental and transport context of the particular site being considered. Oldbury for example is locally remote and poorly connected by transport links and set in a highly sensitive environment. Careful consideration would need to be given to whether particular economic reuses would be appropriate given the particular context of the locality."

10. Para 1.5.1 NDA needs to agree with its national stakeholders what the consultation process and change control process for revised site end states should be. Both 'process' and 'outcomes' need to inspire confidence. The current draft Paper is far too vague about this. Generally, any engagement around review of site interim and end states needs to consider impacts upon site host communities and the extent to which they are advantaged or disadvantaged by changed decommissioning priorities and/or site waste management plans.

11. There will be a need to consult closely with host local authorities responsible for delivery of local economic strategies. In the case of the Sellafield site, for example, the host local authorities will want to fully understand the impacts of any proposed revisions to site interim and end states and how other NDA strategic programmes e.g. IWM plans, impact on the economic aspirations contained within the recently agreed Economic Blueprint for West Cumbria.

12. There is a concern that the Paper may seem to imply that the end state proposals determine the clean-up programme. SGC point out that it would be of concern if a site is deemed not suitable or attractive for economic reuse,

and is not a safety priority, and that local host communities may be disadvantaged by having site clean-up programmes deferred or slowed.

13. Para 3.2 NuLeAF considers there would be value in recognising within the Paper what has been achieved at the strategic level since the initial site end state consultation between 2006/7. Stakeholders invested considerable time and effort assisting NDA in the development of site end states and the value of this work should be recognised.

14. Para 1.7.2 (last main bullet) should consider the environmental sensitivity of the site and its surroundings. And the 'sub' bullets should include all other relevant aspects of the surroundings, including for example, the landscape and visual, noise, air quality etc.

Annex 2

NuLeAF response to the Nuclear Decommissioning Authority: Stakeholder Views Survey 2012/13

30 January 2013

*(NDA text in italics. **NuLeAF text in bold**)*

Please take just a few minutes to complete this quick survey and let us know how you think we are getting on.

1. Which of the following best describes the viewpoint from which you are responding?

...Local Authority official

2. To what extent are you aware of the following NDA activities in the last 12 months?

Unaware/Partially aware/Fully aware

*John Clarke was appointed as NDA's new Chief Executive Officer. **Fully aware***

*The National Audit Office has published a Report which provides a useful external check on NDA progress and how we can improve performance further. **Fully aware***

*NDA completed its strategic review of the options for the management of oxide fuels. As a result, by 2018, THORP will complete reprocessing contracts and cease reprocessing activities. **Fully aware***

*NDA launched one of the UK's largest public procurement exercises as it embarks on the competition to appoint a new Parent Body Organisation for the two companies that operate 12 historic nuclear sites: Magnox Ltd and Research Sites Restoration Ltd. **Fully aware***

*NDA successfully completed a competition to find a new parent body to manage the Dounreay site. The winners were the Babcock Dounreay Partnership. **Fully aware***

*Wylfa Power Station has been given the go-ahead to transfer fuel between its reactors, enabling electricity generation to continue until September 2014, almost four years beyond its original closure date. **Fully aware***

*As part of NDA's asset disposal programme, which has now brought in well over £1billion for the UK taxpayer, NDA has completed the transfer of its Capenhurst site to a URENCO group company. **Fully aware***

NDA is a co-funder (along with The Technology Strategy Board; Engineering and Physical Research Council and the Department of Energy and Climate Change) in a £15 million initiative to stimulate innovation in the civil nuclear supply chain via the award of funding to a range of research and development projects. Partially aware

Comment on Qu 2: **We recognise it is important for NDA to have feedback on how well it is communicating key developments, but for stakeholders there is little opportunity to comment on these developments (other than via Qu 6 below). Generally, we consider this survey method to be unsatisfactory. Survey objectives are not explained. The purposes to which information gathered will be put are not explained. How this information will help NDA improve its stakeholder engagement is not explained. Whether or not there will be any published report on survey results is not explained.**

*3. To what extent do you agree with the following statements?
Disagree/Partially agree/Fully agree/Don't know*

I understand the role of the NDA and feel sufficiently well informed about its plans and activities . Partially agree. (You have asked two questions. Yes, we understand the role of the NDA. No, we do not feel sufficiently well informed about its plans and activities.)

Clear plans are in place to deal effectively with the decommissioning and clean-up of the NDA's sites Disagree. There is a process of continuous review of the key work streams within NDA Strategy informed by better understanding of site decommissioning requirements and public expectations. This is as it should be. NuLeAF considers it would be more helpful to both NDA and stakeholders to communicate a clear iterative process (and the role of stakeholders within that process) particularly as NDA is about to commence development of its third Strategy for the period 2016-21.

NDA is making good progress in the technical and strategic development of the deep Geological Disposal Facility. Partially agree, though this needs greater visibility, and an honest assessment of uncertainties and how NDA will address them, in order to build public confidence.

NDA is engaging openly with its stakeholders on the implementation of its strategy. Disagree. At times NDA appears to approach stakeholder engagement (as with this exercise) as a box ticking exercise rather than an opportunity for meaningful engagement. (See further comments under Qu.4 below)

NDA is making effective progress in tackling the nuclear legacy. Partially agree. We consider that there has been significant progress since the establishment of the NDA, but stakeholder expectations are also

rising. The recently published NAO report on the clean up at Sellafield showed that there is scope for improved project delivery and raised significant questions about organisational arrangements for delivery of NDA's mission.

4. In terms of its supplemental responsibilities, how do you view the NDA's focus in the following areas?

Too little/About right/Too much/Don't know

Socio-economic support for communities. **Too little.** Communities have expanded over decades around the many sites that NDA now has responsibility for. Economic dependencies have developed. This has not been NDA's doing, but it has inherited these sites and the obligation towards host communities and their future wellbeing. Where plans are developed to progress the NDA mission more cost effectively, but plan implementation potentially disadvantages some areas, then any national gains should be shared with those host communities that are disadvantaged. Local authorities hosting NDA sites are best able to advise NDA on the needs of local host communities. NuLeAF continues to consider that a national community benefits protocol could bring greater transparency to the basis upon which levels of socio economic support are determined and allocated.

Investment in skills infrastructure. **Don't know.** NuLeAF recognises the importance of investing in and maintaining an adequate national skills base to deliver NDA's mission, but this is not a subject area where we feel sufficiently well informed to comment further.

Stakeholder engagement and communications. **None of the above.** The following comments are pursuant to NuLeAF policy statement 6, May 2009, 'Taking Account of Public and Stakeholder views in Decisions about Managing Radioactive Wastes':

Our sense is that stakeholder engagement, and the advice provided, is becoming more marginalised as cost drivers increase. The annual national stakeholder engagement meeting does not now provide the opportunity for in depth engagement with stakeholders as it once did. The suite of NDA Stakeholder Engagement Plans provide a useful 'heads up' for stakeholders but little reliance can be placed on them by stakeholders themselves and the expectations these 'plans' raise often go unfulfilled. NDA stakeholder principles are very good, but they are not always acted upon. In NuleAF's view NDA should survey stakeholders and seek feedback against the benchmark standards in the Statement of Principles document.

Some parts of NDA do better than others. RWMD, perhaps as a consequence of the voluntarist community led approach within

Government MRWS policy, is more proactive in its engagement, or at least that is how NuLeAF experiences this engagement. Clearly, the MRWS policy and the former MRWS Partnership's PSE practice sets a very high standard but it is a standard NDA should strive to match. NDA should always explain PSE objectives clearly and how information and advice will be used, listen to and record what it said in response, collate responses and report publicly on how engagement will influence practice. Where NDA disagrees with stakeholder views, as it is entitled to, then reasons should be given. NuLeAF considers it would be helpful to NDA to have its stakeholder practice independently audited. Further suggestions are set out under Qu. 6 below.

Research. Don't know. NuLeAF recognises the importance of investing in and maintaining an adequate research base to support delivery of NDA's mission, but this is not a subject area where we feel sufficiently well informed to comment further.

5. To what extent do you agree with the following statements related to our communications?

Disagree/Partially agree/Fully agree/Don't know

I can usually find out what I need to know when I visit the NDA's website.

Partially agree

*I am registered to receive updates from the NDA by email. **Fully agree***

*I follow NDA on Twitter. **Disagree***

*The NDA's publications are clear and easy to understand. **Partially agree***

I find the NDA's Insight Stakeholder Magazine useful and informative.

Partially agree

*I am kept up to date in a timely way on NDA developments that are relevant to me. **Partially agree***

*I know in advance about when NDA engagement opportunities relevant to me will take place. **Partially agree***

6. Please add any other comments on the work of the NDA:

Generally, we find 'Survey Monkey' an inappropriate tool for NDA to use to engage with its stakeholder community on complex issues. We recognise it is a small part of NDA's PSE work, but nonetheless, in NuLeAF's view, asking stakeholders to "Please take just a few minutes to complete this quick survey and let us know how you think we are getting on" signals a superficial commitment to PSE. In NuLeAF's view NDA should be asking itself and its stakeholders how it can improve its stakeholder performance. Establishment of an independent advisory panel is one mechanism that might help:

strengthen NDA's internal advice; maintain PSE standards; and help shape programme delivery to ensure high levels of public confidence are maintained. Establishment of an independent 'stakeholder council' to provide expert advice, help NDA develop its approach to stakeholder engagement, periodically independently survey stakeholders on their engagement experience, and annually audit and publicly report on NDA's stakeholder practice, is another option NDA could consider to signal the value it attaches to stakeholder engagement. NuLeAF would welcome the opportunity to explore these options further with NDA.