

<b>Meeting:</b>	NuLeAF Steering Group, 25 January 2011
<b>Agenda Item:</b>	4
<b>Subject:</b>	Radioactive Waste Management and New Nuclear Build
<b>Author:</b>	Fred Barker
<b>Purpose:</b>	To report on developments

## **Introduction**

This report covers:

- proposed responses to consultation on the Government's revised guidance on the Funded Decommissioning Programme (FDP) and an updated methodology for Waste Transfer Pricing (WTP) for the disposal of higher activity waste;
- NuLeAF's response to the radioactive waste management aspects of the draft revised Nuclear National Policy Statement (NPS); and
- NuLeAF input to the Somerset authorities.

## **Recommendation**

That the Steering Group delegate authority to the Chair and Vice Chair to approve final comments on the FDP guidance and WTP methodology.

(Key points that might be included in responses are outlined on pages 5 and 9 of this report)

## **Contribution to Achieving Strategic Objectives**

The activities described in this report relate to the following NuLeAF objectives:

- If Government continues to encourage the building of new nuclear power stations, to seek to ensure that its Nuclear NPS adequately addresses radioactive waste management, and is open and transparent about the interactions between new nuclear build and nuclear legacy management.
- Seek to ensure that proposals for radioactive waste management and decommissioning of new nuclear power stations are appropriate and do not prejudice effective management of the nuclear legacy.

# 1 Consultation on the Government's Revised Guidance on the Funded Decommissioning Programme (FDP)

## *Objective*

The Energy Act requires operators of new nuclear power stations to have an FDP approved by the Secretary of State of Energy and Climate Change in place before construction of a new nuclear power station begins. The Government's stated objective is to ensure that new build operators make prudent provision for the full costs of decommissioning and their full share of the costs of safely and securely managing and disposing of their waste. In doing so, the intention is that the risk of recourse to public funds is remote at all times.

## *Previous NuLeAF Comments*

The Government originally consulted on draft FDP guidance in early 2008. NuLeAF submitted comments in May of that year, which are available by clicking on [Comments on FDP consultation 2008](#). NuLeAF's main points were:

- That an approvable FDP should include the costs that an operator will contribute to packages of community benefit associated with the development and use of radioactive waste management facilities.
- The 'base case' estimate for the management and disposal of radioactive wastes should be kept under review so that it can reflect developments that lead to an increase in liabilities, including the possible need for a second Geological Disposal Facility (GDF).
- That it supports the proposed principles ie that a Fund should be: independent of the operator and government; sufficient to discharge in full the operator's liabilities as and when they fall due; ensure that moneys in the Fund are not used for other purposes; prevent recourse to public funds to meet the liabilities; and be transparent and visible.
- That the Government should express a preference for a 'shared' Fund for a single operator's stations because of the benefits in terms of further reducing the risk that public funds could be called on to meet liabilities.
- To caution against commitment to a binding schedule for the disposal of ILW and spent fuel to a GDF, as the pace of the siting process needs to be at that of participating communities and their local authorities.

## *Context for the Current Consultation*

In December 2010, the Government launched a consultation on revised FDP guidance, with a deadline for comments of 8 March. The documentation is available on the DECC website at [Consultation on revised FDP Guidance](#).

The revised guidance reflects a number of developments in the framework for financing decommissioning, waste management and waste disposal, including a draft Order arising under the Energy Act, and consultation on a methodology for pricing the transfer to the Government of title to, and liability for, intermediate level waste (ILW) and spent fuel from a new nuclear operator.

The Government also explains that the prospective nuclear operators have been developing their approach to the FDP as their development plans have progressed. In particular, it has

engaged in discussions with the three prospective new nuclear consortia – NNB GenCo (a joint venture of EDF and Centrica), Horizon Nuclear Power (a joint venture of E.ON UK and RWE npower) and NuGeneration Ltd (a joint venture of Iberdrola, GDF Suez and SSE). The purpose of these discussions was to establish whether, as a result of the work the consortia have undertaken preparatory to the submission of an FDP, they had new or different views since they responded to the previous consultation in 2008. The Government has published the consortia's views alongside the revised Guidance. The revised guidance also reflects some of the points made by the consortia.

### *Proposed Changes to the Guidance*

The Government points out that the guidance is intended to be principles-based rather than prescriptive and some of the changes since the 2008 consultation are intended to achieve this. It explains that by revising the Guidance to be less prescriptive in certain areas, operators will have greater flexibility to put forward alternative approaches while still meeting the Objective and complying with the Guiding Factors (see below).

The substantive changes since the 2008 consultation include the following:

- revised independence requirements (allowing operator influence but not control of the Fund);
- allowing for the return of surplus of assets during the lifetime of the Fund if it is prudent to do so and is in accordance with the approved FDP;
- greater flexibility in the arrangements between the Fund and the operator, for example, allowing the operator to provide the contribution schedule for approval by the Fund, rather than the Fund being required to set it without input from the operator;
- allowing a combination of methods to protect against an insufficient fund, including front-loading of payments into the Fund in early years, use of insurance or financial instruments and parent company guarantees;
- providing more information on the scope, structure and the anticipated level of detail in the required Decommissioning and Waste Management Plan (DWMP);
- providing flexibility for operators to propose and seek approval for alternatives to Base Case assumptions, for example, to justify alternative station lifetimes to the Base Case assumption of an operational life of 40 years.

### *Proposed Guiding Factors*

When considering whether to approve, or modify an FDP which has already been approved, the Secretary of State will consider whether such an FDP or modification satisfies the following factors (the Guiding Factors), namely that the FDP:

- provides a clear structure;
- contains realistic, clearly defined and achievable plans for decommissioning, waste management and waste disposal;
- contains robust cost estimates which take due account of risk and uncertainty;
- is transparent;
- contains clear terms and clear divisions of roles and responsibilities;
- is a durable arrangement;
- sets out a Fund structure that demonstrates: independence of the Fund; measures to ensure sufficiency of the Fund; restrictions on the use of Fund Assets; and insolvency remoteness.

The Government explains that it will be for the operator to demonstrate how its FDP meets the Government's objective and how it complies with each of the Guiding Factors.

#### *Early Transfer and Lump Sum Payment*

The guidance also contains an explanation of the arrangements for the Government to take title to and liability for an operator's spent fuel and ILW on a specified Transfer Date, or schedule of Transfer Dates, aligned with the operator's decommissioning timetable. The key points are:

- It is currently expected that the Transfer Date(s) will precede the Assumed Disposal Date (the date on which the Government expects to be able to dispose of the ILW and spent fuel in a GDF).
- Transfer will include sufficient assets to carry out the plan, in the form of a Lump Sum Payment (LSP).
- The LSP would be a full and final payment for all remaining waste management costs. The level would not be set at the outset but instead would be estimated in the operator's FDP and regularly reviewed. It is anticipated that the final level would be set out in the last quinquennial review of the operator's FDP before the Transfer Date.
- The Government would expect the operator's provision to be based on a conservative, evidence-based, estimate of the waste management costs and would expect the LSP to include a commensurate risk premium to compensate the taxpayer for taking on the risk of subsequent cost escalation.
- If geological disposal facilities are not available at the Assumed Disposal Date then the intention of Government would be to meet costs for maintaining the interim stores after the Assumed Disposal Date from the risk premium included in the Waste Transfer Price.
- The terms on which the Government will agree to take title to and liability for an operator's ILW and spent fuel will be set out in a contract that is expected to be agreed between the operator and the Government alongside the operator's FDP.

#### *Additional Points in the Guidance*

Additional points to note are:

- failure to comply with an FDP will constitute a criminal act
- operators will be expected to publish as much of an FDP as possible, taking into account commercial considerations
- there will be annual and quinquennial reporting requirements
- there are requirements for independent verification of FDP submissions and reporting
- the verifier will be expected to identify any non-prudent aspects and short-falls
- there will be a dispute resolution procedure involving independent experts
- the Base Case for cost estimation provides a bench mark based on a range of conservative assumptions (including a 40 year reactor life, on-site storage of spent fuel, and prompt decommissioning)

#### *Consultation Questions*

The consultation focuses on two consultation questions:

1 Do you agree or disagree that the draft Guidance sets out what an approvable FDP should contain to ensure that operators of new nuclear power stations (i) estimate the potential costs of decommissioning, waste management and waste disposal and (ii) make prudent provision for meeting their liabilities? What are your reasons?

2 Does the draft Guidance contain sufficient information to enable operators of new nuclear power stations to understand the matters that their FDPs should contain?

#### *Discussion of Points for a NuLeAF Response*

There is no doubt that the proposed approach to seeking to ensure that public funds do not have to be used to meet the costs of nuclear liabilities is a substantial advance on previous arrangements in the UK. The Government's Objective and Guiding Factors appear appropriate and it is clear that a range of conservative assumptions and safeguards have been built into the proposed arrangements. Nonetheless, the revised guidance has attracted criticism in the media and from green NGOs for bending too far to meet the needs of prospective nuclear operators.

As the Government acknowledges, the revised guidance is less prescriptive, which will allow operators greater flexibility to put forward alternative approaches to meet the Objective and Guiding Factors. However, as long as any alternative approaches do genuinely meet the Objective and Guiding Factors, the risk of recourse to public funds should remain remote. Much will depend on how the new arrangements are operated in practice, including the robustness of the Government's approval processes and of independent verification, and the adequacy of risk premiums and measures to ensure sufficiency of a Fund. It will therefore be important that operation of the arrangements is made as visible and transparent as possible, including publication of annual and quinquennial reports and the Government's response.

In terms of NuLeAF's comments on the original draft guidance, the point which does not appear to have been addressed is how an operator of a new nuclear power station will contribute to the community benefits that may be associated with development and use of radioactive waste management facilities. This is particularly important for development of a GDF and any agreement that may be reached with the relevant local authorities about the inventory of wastes for disposal. If it is agreed that wastes from new nuclear stations are to be included, it is reasonable to expect that new build operators will make a proportionate contribution to the benefits associated with GDF development. The Government should be asked to clarify what mechanism will be put in place to ensure that this would happen.

A similar point applies to other facilities that may be developed or used for the management or disposal of wastes from new nuclear power stations, including a successor facility to the LLW Repository near Drigg, and any regional or national stores for the interim storage of LLW or spent fuel. With regard to the latter, the revised guidance notes that in the event that regional or central facilities become available for either storage or encapsulation of spent fuel, it would lead to significant reductions in waste management costs. It would seem appropriate that a proportion of these savings are used to provide benefits to the host communities.

It is proposed that the above points provide the basis for NuLeAF's response to the consultation questions, and that authority to approve the response be delegated to the Chair and Vice Chair.

## **2 Consultation on an updated methodology for Waste Transfer Pricing (WTP) for the disposal of higher activity waste**

### *Purpose*

As explained above, the Government will expect to enter into a contract with the operator regarding the terms on which the Government will take title to and liability for the operator's spent fuel and ILW. In particular, this agreement will need to set out how the price that will be charged for this waste transfer will be determined (the "Final Price"). The Final Price will be set at a level consistent with the Government's policy that operators of new nuclear power stations should meet their full share of waste management costs. This second consultation is intended to assist the Government in developing a finalised methodology for pricing the transfer of title to and liability for ILW and spent fuel from a new nuclear operator.

### *Previous NuLeAF Comments*

The Government originally consulted on a proposed methodology for WTP in March 2010. NuLeAF submitted comments in June, which are available by clicking on [Comments on DECC Fixed Unit Price consultation](#). NuLeAF's main points included:

- In view of the large scale uncertainties and associated risk to the taxpayer in setting a 'Fixed Unit Price' (FUP – assumed to be equivalent to what is now being called the 'Final Price') at the time of approval of an FDP, there would be advantage in deferral and using an 'expected FUP' (eFUP) in the interim.
- A deferral limit of 10 years after commencement of the new build operation seems reasonable, as it would mitigate the risk that there will be insufficient years of operation left to make up any shortfall in the operator's fund if the FUP has been fixed at a higher price than the eFUP.
- Given that the financial health, and even existence, of the operators cannot be guaranteed over the timescales for interim storage and disposal, it makes sense for Government to take title to the liabilities as proposed, as long as adequate arrangements are put in place to recoup the costs and the risks to the taxpayer are minimised.
- Government should take a robust approach to the way cost estimates are adjusted for uncertainty, including a prudent and conservative approach to 'optimism bias' and 'contingency allowances'.
- NuLeAF agrees that the operator's contribution to the fixed costs of a GDF should be in proportion to the use it makes of the GDF's capacity. It seems reasonable to calculate that proportional contribution to fixed costs through an operator's share of variable cost, as this takes into account the quantity and the nature of the wastes involved.

### *Context for the Current Consultation*

In December 2010, the Government launched a consultation on a revised WTP methodology, with a deadline for comments of 8 March. The documentation is available on the DECC website at [Consultation on an updated Waste Transfer Pricing Methodology](#).

The Government reports that a range of views was expressed in response to the original proposals. Many responses were broadly supportive of the Government proposals but raised comments or concerns about specific points, for example some responses expressed the view that the consultation was too conservative in its approach to uncertainty around waste disposal costs. Other responses were critical of the proposals, for example concerns were raised that

the proposals exposed the taxpayer to unacceptable risks and represented a subsidy to new nuclear power.

The Government states that it does not agree that taking title to radioactive waste, including spent fuel, for a fixed price, is a subsidy to new nuclear power, provided that the price properly reflects any financial risks or liabilities assumed by the state. The Government acknowledges that the approach to risk and uncertainty set out in the March consultation is conservative but, given the level of uncertainty around estimates of disposal costs, believes that such conservatism is necessary to ensure the taxpayer is protected.

#### *Proposed Changes to the WTP Methodology*

There are two significant changes proposed to the methodology set out in the March consultation:

- The March consultation said that in seeking a deferral the operator would be accepting the risk that a Price set at a later date could be higher than the Price on offer at the outset, if estimated costs escalate sufficiently in the intervening period. Having considered the responses to the consultation, the Government's view is that it will be difficult for an operator to accept such a risk, given that there is very little the operator can do to manage and mitigate it. In contrast, the Government does have capacity to manage risks around waste disposal costs, as these costs will be heavily influenced by the manner in which the Government implements geological disposal. Therefore the Government's view is that it is reasonable for nuclear operators to have some certainty over their maximum exposure to these risks from the outset. The Government therefore proposes to specify a maximum Final Price the operator would be expected to pay (the "Cap"). The Cap (which will be indexed for inflation) will reflect the Government's current analysis of risk and uncertainty and will be set at a level where the Government has a very high level of confidence that actual costs will be lower than the Cap. The Government recognises that, in setting a Cap, the small residual risk that actual cost might exceed the Cap will lie with the Government. Hence in return for setting a Cap the Government will charge the operator an appropriate fee (the "Risk Fee") and incorporate this into the Final Price.
- The second proposed change is that the Deferral Period should last for 30 years after start of generation. The Government's view is that a 30-year Deferral Period should enable the Final Price to be set when the site for a GDF is known. This will allow a Site Specific Cost Estimate to be prepared, based on a good deal of actual cost data and with only a small amount of residual uncertainty. The current planning assumption is that GDF Site Selection will be in around 2025. In the event that GDF Site Selection has not taken place by the end of the Deferral Period, a Default Pricing Mechanism will be used to determine the Final Price. In practice, given that uncertainty may not have been reduced significantly it is considered likely that the Default Price will be at or near the level of the Cap.

#### *Key Principles underpinning the WTP Methodology*

The key principles underpinning the methodology are that:

- The Government's objective is to ensure the safe disposal of ILW and spent fuel from new nuclear power stations without cost to the taxpayer and to facilitate investment through providing cost certainty. The Government is not seeking to make profits over and above a

level consistent with being compensated for the level of risk assumed, but does expect operators to meet their full share of waste disposal costs.

- Prospective new nuclear operators should be provided with certainty over the maximum Final Price they will be expected to pay the Government for the provision of a waste disposal service.
- The Final Price charged by Government for the provision of a waste disposal service should be set at a level over and above expected costs and include a Risk Premium to compensate the taxpayer for taking on the risk of subsequent cost escalation.
- Where possible the Final Price should be set in relation to actual cost data, to ensure that that any Risk Premium is proportionate and properly reflects the financial risks being assumed by the Government. Therefore in order to enable greater certainty over expected costs, the setting of the Final Price should be deferred for a specified Deferral Period, provided that in certain circumstances it will be possible for the final Price to be set before the end of the Deferral Period.
- During the Deferral Period the operator must make prudent provision for their waste disposal liabilities, based on an Expected Price provided by the Government

#### *Main Features of the WTP Methodology*

The Government proposes that the Final Price should be set in accordance with a Cost Estimating Methodology, which will set out clearly how waste disposal costs will be estimated and uncertainty in those estimates handled. The Cost Estimating Methodology will generate a distribution of estimated costs and a conservative cost estimate (the “Pricing Cost Estimate”) will be set at a level where there is expected to be a 95% probability that actual cost will be lower than estimated cost and a 5% probability that actual cost will be higher than estimated cost.

The Final Price set at the end of the Deferral Period will be set according to the formula:

$$\text{Final Price} = \text{Pricing Cost Estimate} + \text{Risk Fee}$$

This is subject to two exceptions: the Final Price cannot be higher than the Cap; and in the event that the Final Price is set before GDF Site Selection, it will be determined through a Default Pricing Mechanism.

Note that the pricing cost estimate includes a Risk Premium. The distinction between the Risk Premium and the Risk Fee is:

- the Risk Premium compensates Government for accepting the risk of cost escalation after the Final Price has been set; and
- the Risk Fee compensates Government for accepting, at the outset, the risk that actual cost might exceed the Cap.

The Expected Price is the Government’s projection of the level of the Final Price when it is set at the end of the Deferral Period. The level of the Expected Price will be reviewed, and if necessary revised, at each Quinquennial Review to ensure that it remains an up-to-date projection of the level of the Final Price.

It is expected that by the end of the Deferral Period the Cost Estimating Methodology will be applied to a Site Specific Cost Estimate for the GDF. In the interim, and for the purposes of

deriving an Expected Price, a simplified Cost Estimating Methodology needs to be applied using NDA's current cost estimates, which have been derived with regard to a reference case.

### *Consultation Questions*

The consultation focuses on three questions:

- 1 Do you agree or disagree that the level of the WTP should be subject to a Cap and that in return for setting a Cap the Government should charge a Risk Fee? What are your reasons?
- 2 Do you agree or disagree that the Deferral Period should be 30 years after start of electricity generation, in order to enable uncertainty over waste disposal costs to be reduced? What are your reasons?
- 3 Do you have any comments on the updated WTP methodology? Comments are sought in particular on the proposed approach to setting an Expected Price and a Risk Fee.

### *Discussion of Points for a NuLeAF Response*

As with the overall approach to the FDP, there is no doubt that the Government's proposals are a substantial advance on previous arrangements in the UK. The objective and principles that pertain to the policy that new build operators should meet their full share of waste management costs are welcome and appropriate. It is notable that prospective operators have argued that the proposals are overly conservative, whilst opponents of new build have taken the opposite stance.

With the exception of the two specific changes outlined above, the updated WTP methodology is in line with NuLeAF's comments from June 2010. On the two specific changes, the following comments may be appropriate:

- In principle, it could be appropriate to specify a cap on the Final Price, as long as there genuinely is a very high level of confidence that actual costs will be lower than the cap, and that a sufficiently robust risk fee is incorporated in the Final Price. It will be particularly important for the Government to be able to publicly demonstrate the basis for confidence in both aspects.
- The question of the period of deferral before a Final Price is set is a matter of balance and judgement. This is because there are both advantages and disadvantages to longer deferral periods. The advantages relate to the progress that should be made in the GDF siting programme, thereby allowing reduction in uncertainties and more accurate cost estimation. The disadvantage is that deferral increases the risk that there will be insufficient years of operation left to make up any shortfall in the operator's fund if the Final Price has to be fixed at a much higher price than the Government's interim Expected Price. Where the balance in deferral period should be struck also depends on judgements of what constitutes a reasonable assumption for new build reactor lifetimes. If at 40 years as assumed by Government in its Base Case, a 30 year deferral period could be argued to be too long; if at 60 years as anticipated by prospective operators, a 30 year deferral period appears appropriate.

It is proposed that the above points provide the basis for NuLeAF's response to the first two consultation questions, and that authority to approve the response be delegated to the Chair and Vice Chair.

### **3 Revised Draft Nuclear National Policy Statement (NPS)**

At its meeting in October 2010, the Steering Group agreed to delegate authority to the Chair and Vice Chair to approve the submission of comments on the radioactive waste management aspects of the revised draft Nuclear NPS. It is anticipated that the comments attached in the Annex to this report will have been submitted by the time of the Steering Group meeting.

### **4 NuLeAF input to Somerset Authorities**

At the Steering Group meeting in October 2010, the ED reported that he had been in discussion with officers at Somerset CC about input into a potential work programme on the radioactive waste management aspects of EdF's proposals for new build at Hinkley Point. On the approval of the Chair and Vice Chair, it was proposed that NuLeAF fulfil an advisory and peer review role. This proposal was incorporated in a Topic Paper that was considered by the Somerset Strategic Project Board late last year. It is understood that discussions are on-going with EdF about a potential programme, but that at the time of writing agreement has not been reached. It is hoped that a verbal update can be provided to the meeting.

## **Annex**

Energy NPS Consultation  
Department for Energy and Climate Change  
3<sup>rd</sup> Floor A  
3 Whitehall Place  
London  
SW1A 2AW

Dear Sir/Madam,

### **Comments on the Revised Draft Nuclear NPS: the Management and Disposal of Radioactive Waste**

I write on behalf of the Nuclear Legacy Advisory Forum (NuLeAF) with comments on the radioactive waste management aspects of the revised draft nuclear NPS.

These comments are based on a review of the key changes that have been made to the revised draft nuclear NPS, judged against our comments on the earlier draft nuclear NPS, dated 16 February 2010.

As stated in our earlier comments, NuLeAF is neither pro nor anti-nuclear and has a remit that is limited to issues associated with radioactive waste management and decommissioning.

We note that the Government has made three key changes to the wording in the revised draft nuclear NPS relating to the management and disposal of radioactive wastes, and that these changes are intended to:

- demonstrate the Government's confidence that geological disposal will be implemented;
- clarify the Government's expectations in relation to the likely duration of the on-site storage of higher activity waste; and
- clarify the role of the IPC in relation to the arrangements for the management and disposal of wastes from new nuclear power stations.

We would like to comment on each of these points in turn and then add a fourth point.

#### **Confidence that geological disposal will be implemented**

We welcome the statement that the Government is committed to making the voluntarist and partnership approach to site selection work through the MRWS process.

As stated in our comments on the original draft nuclear NPS, we consider that the prospects for effective arrangements will be enhanced by:

- (a) maintaining adequate levels of Government funding for the GDF programme;
- (b) not imposing rigid deadlines for achieving key steps in the voluntary siting of a GDF;
- (c) ensuring openness and transparency in radioactive waste management strategy development and implementation; and
- (d) pursuing strategies for managing radioactive wastes that pay full and proper regard to the views of potential host communities and their local authorities.

We note the Government's strengthening of arrangements to provide oversight of the GDF programme, and the need to reconcile effective programme management and leadership with the approach based on voluntarism and partnership. In seeking to reconcile these requirements, it will be particularly important for the Government and NDA to be sensitive and responsive to the views of potential host communities and their local authorities.

### **The storage of higher activity waste**

We welcome the clarification of the potential duration for on-site storage of spent fuel that may be required prior to geological disposal, and the statement that Government does not wish to preclude alternative storage arrangements, for example, central storage.

As stated in our comments on the original draft nuclear NPS, we consider it essential that potentially affected local authorities are fully involved in a timely way in assessment and decision-making about interim storage options, particularly where multi-site options are under consideration. To that end, we would welcome any encouragement that Government can give to developers to ensure that appropriate local authority involvement takes place.

### **The role of the IPC in relation to the arrangements for the management and disposal of wastes**

We welcome the clarification that there may be planning issues relating to the on-site management of radioactive wastes that it will be appropriate for the IPC to consider as part of the development consent process.

We think it would be reasonable for affected local authorities to raise questions in their Local Impact Reports about the robustness of proposals for on-site storage of higher activity wastes in the light of progress with siting of a GDF. As such, when considering applications for new nuclear power stations, we would expect the IPC to pick up the question of GDF siting, but only to the extent that it bears on proposals for on-site storage.

### **The management of low level radioactive wastes (LLW)**

We note the Government's acknowledgement in its response to the consultation on the original draft nuclear NPS of the concerns we expressed about the challenges of devising new publicly acceptable disposal routes for LLW. The response re-iterates that new build LLW will be managed in accordance with the UK's LLW strategy and states that it will have a small impact on LLW disposal capacity.

Nonetheless, we would like to re-iterate our doubts about the extent to which implementation of LLW strategy will increase the availability of alternative waste disposal routes, whether for legacy or new build LLW. We would suggest that early dialogue between LLWR Ltd, the supply chain and waste planning authorities at a stage when a range of options are being considered is more likely to be successful than an approach that does not engage the relevant local authorities until a strong commitment to a preferred option has been developed.

Yours faithfully,