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Dear Sir or Madam,

Draft NDA Strategy 2021-26 (Strategy 4): Response to consultation

1. Introduction

Nuleaf (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. We are directly supported by over 100 local authorities and national park authorities across England and Wales and speaks on these issues for the wider local government community. We have a remit encompassing all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common, local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including Government, the NDA and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

Engagement with local government is critical to the success of the NDA mission:



- Local authorities bring a range of expertise in relation to economic development, planning, transportation, education and skills that is vital to the delivery of many elements of Strategy 4.
- Local planning authorities are regulators of NDA operations. Through Nuleaf our members have been able to provide expert advice on land use and waste planning in relation to decommissioning and the management of NDA sites.
- Councils have a clear and significant role in the Geological Disposal Facility (GDF) siting process. Without their support the NDA and RWM will not be able to deliver this mission-critical facility.
- Councils are the democratic voice of communities and important stakeholders for NDA as required under the 2004 Energy Act.

Nuleaf is an independent body, guided by our members. We are funded by NDA, RWM and local authorities.

We have been actively engaged in the process of developing Strategy 4. Our Executive Director was a member of the NDA's Strategy 4 Development Group (S4DG) and through this we have provided detailed feedback on the draft Strategy as it has evolved over the past year. We have also contributed through our participation in the NDA's Theme Overview Groups (TOGs) on Critical Enablers (CE), Site Decommissioning and Remediation (SDR) and Integrated Waste Management (IWM).

Meetings of our Steering Group and Radioactive Waste Planning Group have been used to gain the views of our member local authorities; and in September 2020 we convened a dedicated meeting on draft Strategy 4, involving key NDA staff. Nuleaf members also participated in the online engagement event organised by NDA on 19th October 2020. Finally, we have had direct engagement in the drafting of the Near Surface Disposal (NSD) Position Paper and in the NDA's evolving work on sustainability and carbon. This response has been guided by these and other activities.

We are pleased that many of our comments on earlier iterations of the Strategy have been addressed in this version. We offer further feedback below in relation to each of the Consultation Questions, and also comment on the Integrated Impact Assessment (IIA) and the Strategic Position Paper on Near Surface Disposal (NSD). Within our response, the key issues and suggested changes that we propose are set out in **bold** to aid identification.



Finally, we note that a number of our member local authorities are providing their own responses to this consultation. These offer important insight on both general themes and the specific issues and opportunities that should be addressed by NDA at a local level. We hope that the final NDA Strategy fully integrates these local perspectives as they are crucial to the effective delivery of Strategy 4.

2. Overview of Strategy 4

Strategy 4 is the central guiding Strategy for the NDA and thus a document of great significance in the decommissioning and clean-up of the UK's nuclear legacy sites.

This Strategy is published at a time of change within the NDA, both structurally and in terms of the plans for decommissioning and legacy waste management. Key aspects of this include:

- The termination of 'PBO' contracts across the main areas of operation and the development of 'One NDA'
- The ending of reprocessing and the evolution of NDA into an organisation focussed on environmental remediation
- Further progress in cleaning up the high hazard facilities at Sellafield
- A new approach to Magnox reactor decommissioning including the continuous decommissioning of one or more sites
- The application of Proportionate Regulatory Controls to site remediation, potentially leading to some radioactive material being left on site or in-situ
- Progress in the process to identify a site for the UK's Geological Disposal Facility (GDF) and consideration of the potential for one or more Near Surface Disposal (NSD) sites as an option for a portion of the HAW inventory.

Across these and all other aspects of NDA operations, the approach adopted must ensure safety, security and wider value for nuclear communities and society as a whole. This is required by the Energy Act 2004 and has been repeatedly emphasised by the UK Government and Parliamentary Committees along with the devolved administrations. The NDA's performance in socio-economics, social value, environmental protection and carbon management is therefore of central importance in assessing the success of the approach outlined in this Strategy. Effective Public and Stakeholder Engagement (PSE) is also vital and should be a thread running through all aspects of Strategy 4.

External to the NDA, a review of decommissioning policy, the first since 1995, is underway and an announcement is also expected on whether NDA will be given



responsibility for the clean-up of the EDF sites. While we accept that no final decision has been reached on plans for the decommissioning of EDF sites, our members would welcome some more information on this issue, and on other non-NDA liabilities, within Strategy 4.

3. Response to Consultation Questions

Q1. We are currently developing our sustainability strategy. How ambitious should we be in supporting UK government and the devolved administrations' sustainability targets, including their commitment on carbon reduction?

We very much welcome the commitment to developing a more ambitious response to sustainability and the net zero carbon agenda and have been actively involved in this work. Our belief is that **the delivery of wider economic, social and environmental value should be a 'golden thread' running through Strategy 4.** The outline of sustainability challenges set out in 1.2 of the draft Strategy represents a good basis on which to build.

There is a clear message from the UK and devolved governments and parliaments, as well as from stakeholders that the NDA should, wherever possible, act in ways that deliver wider economic, social and environmental value. We therefore believe that **the NDA should set ambitious targets.**

In relation to carbon reduction, this should be to deliver Net Zero Carbon across the NDA estate by 2050 at the latest, with an ambitious interim target for 2030. The target should cover direct and indirect emissions, including from the supply chain.

The NDA sustainability strategy should be developed in partnership with stakeholders, including local authorities. It should include clear targets, commitments and reporting procedures across all relevant sustainability issues.

Our recent engagement with NDA on sustainability has highlighted the expertise of local government in this field, with most local authorities already having prepared sustainability and climate action plans. We believe that in addition to a national NDA sustainability strategy, **local sustainability and carbon action plans should be developed for each NDA site, informed by engagement with local**



government and communities. They should connect with local aspirations and plans in areas such as renewable energy development, transport and infrastructure enhancement.

We also note the recent appointment by NDA of a Social Value Specialist. This is a welcome move. Social Value is closely related to and intertwined with sustainability. **NDA should aspire to be a leader in the field of Social Value. It is an important conceptual framework that we want to see applied across NDA operations as part of the Covid response and over the longer term. We would like to highlight and support the detailed way in which this issue is addressed in the consultation response from Copeland Borough Council.**

Q2. Our approach to the development of this Strategy has been to engage collaboratively with key stakeholders. In your opinion, is there anything we should have done differently during this development phase?

Nuleaf was a member of the Strategy 4 Development Group (S4DG). This was a useful means of engaging Nuleaf members and the regulators, and was beneficial to NDA in providing feedback on the emerging Strategy. The Group was well-managed, particularly given the additional challenges that Covid 19 presented to NDA operations and those of Group participants. That said:

- The timescale for the process of engagement and review by the S4DG was short and this did not lead to optimal outcomes. Drafts of sections were often circulated close to meetings, meaning that there was only limited time to review and provide comment.
- Consideration of some draft chapters only took place late in the process with little time therefore for the Group to discuss and propose change.
- The presenting of individual chapters for review in isolation proved challenging, as it was not always easy to understand the totality of what was being proposed. This was particularly the case in relation to cross cutting threads or themes such as sustainability, socio-economics or engagement.
- The resource input required to engage with the S4DG and the development of the S4 document was significant, particularly for an organisation such as Nuleaf with limited resources.

We recognise the huge effort that NDA staff put into the S4 development process, and also the difficult external circumstances within which the new Strategy was prepared. However, **looking forward we would recommend that (a) more time should be allocated early in the Strategy development process for discussion of the vision, key themes and drivers and (b) the timescale for**



review of the Strategy chapters is extended to enable stakeholders greater time to reflect and respond.

We would also note the cancellation of a planned national engagement event earlier this year due to the Covid pandemic. While NDA was able to engage with Nuleaf members online over this summer, it is unfortunate that some other key stakeholder groups were not able to participate in 'pre-engagement' discussions.

It must be hoped that the current emergency leads to **more resilient online communications in NDA Group that will enable engagement to continue effectively online if face to face meetings are disrupted by future events.**

Q3. We are planning to update the document that describes the NDA Value Framework, which was originally developed with stakeholders over 10 years ago. In your opinion, does the Value Framework still capture the factors that should be considered in our decision making?

Whilst we and our members are aware of the Value Framework (VF) we are unclear as to how exactly it is used within NDA, and what benefits that brings to the development of plans, policies and programmes.

Nuleaf has been involved in separate discussions on the VF through the NDA's Site Decommissioning and Remediation (SDR) Theme Overview Group (TOG) and has fed back a number of comments on the Framework and plans for its refresh. These can be summarised as:

- The 7 factors of the Value Framework (Figure 3) still seem appropriate. However, the factors include both those that are mandatory (e.g. Security) and those which form part of good practice (e.g. Socio-economic impact). **We would suggest therefore that, while the conceptual framework is fine, the focus on the VF should be on those areas (Socio-economic Impact, Environment, Enabling the Mission, Hazard/Risk Reduction) where significant added value can be achieved.**
- In a similar vein, **the VF should focus less on assessment tools or methods that are expected e.g. ALARP and should instead highlight additional tools that enable better assessment of economic, social and environmental outcomes.**
- The refreshed framework **should be shorter and more targeted. It should employ more graphics to demonstrate conceptually where it**



fits within processes. A public facing version should be prepared to enable better understanding by stakeholders of how it is applied.

- Efforts should be made to **embed the use of VF across the NDA through its use in induction and other training and through monitoring** of how it is applied.
- **Clearer links should be made to current cross cutting agendas including on sustainability, Net Zero carbon, the circular economy and social value.**
- **Greater reference should be made not just to engagement with the public but with local government and communities.**

Q4. This section (Our Evolving Strategy) summarises our current strategic position. In your opinion, what are the key issues the NDA should address and are they adequately covered by this Strategy?

This section provides a clear summary of the NDA's strategic outcomes and themes. We support the general approach to decommissioning and the clean-up of sites and facilities.

From our perspective, it is welcome that this section acknowledges the need to add value to the core mission through the integration of wider concerns into the way the NDA works. Throughout the Strategy the **key issues that NDA should address are:**

- **Safety**
- **Security**
- **The delivery of maximum economic and social value**
- **Sustainability, carbon reduction and environmental enhancement**
- **Skills and the development of an inclusive and diverse workforce**
- **Engagement**

These issues are acknowledged within this section. They are also addressed throughout the Strategy though not always to the extent and in the way we would wish. We highlight where they are inadequately covered in our response to other questions.

Q5. The NDA is committed to reviewing the way in which we express the level of concern presented by a facility to help us prioritise our work and to track our progress in reducing the level of concern. What other aspects of



progress would you like us to track? How would you like to be engaged in the development of this work?

We welcome the commitment to review the Safety and Environmental Detriment (SED) score and through correspondence with NDA have proposed a number of ways in which this approach could be improved.

In our dialogue with NDA over the accelerated decommissioning of Magnox sites, **we have argued that a range of other factors should be assessed in determining the case for action at individual sites.** These include:

- The economic benefits of an early clean up. Consideration of this factor must include an assessment of the scope for future development of the site e.g. new energy infrastructure projects.
- The potential for interim uses of the site.
- The ability to develop and maintain employment and skills at sites and across the NDA estate.
- The scope for action to deliver benefits in terms of sustainability and carbon reduction.

We would welcome further engagement in this work and **would propose that this includes national level discussions through Nuleaf and local engagement around sites with the local authority, Site Stakeholder Group (SSG) and others.**

Q6. Do you agree with our aspiration to re-use waste for a purpose on site (e.g. void filling and landscaping) where it represents a net benefit and allows the site end state to be achieved? What factors should we consider?

Local authorities, through their land use and waste planning function, should be central to any discussions and decisions on whether waste is re-used for a purpose on site. Nuleaf has engaged in dialogue with Government, NDA and regulators on this issue over a number of years and has been active in shaping the response to Proportionate Regulatory Controls (PRC) and upcoming planning guidance on in-situ disposal.

We are **not opposed to the re-use of waste on site or in-situ, but this approach should only be adopted where there is a clear net benefit. Factors that should be considered are:**



- **Environmental impact (noise, dust, carbon, transport, etc)**
- **Worker safety**
- **Helping move the site towards next planned use at a faster pace.**

The leaving of waste on site is a departure from the previously agreed commitment to clean up sites to a pre-nuclear state and could see some areas of sites remain out of bounds to the public for hundreds of years. It is also an approach that will lead to savings of many hundreds of millions of pounds to the NDA. Given this, we believe that **a commitment must be made to the provision of benefit packages to communities that host sites where this is the case. This should be part of a wider approach to community benefits that recognises the service to the nation of communities that host waste stores and legacy sites.**

The Strategy notes the use of Nuclear Industry Group for Land Quality (NIGLQ) as a forum for regulators to engage with the nuclear industry. In terms of land management and remediation, **local government planners are regulators but have no engagement in this group. We would like to see a dialogue as to how this could be addressed.**

We would also like to see a commitment from NDA and Magnox, working with local authorities, to adopt a Masterplanning approach at all decommissioning sites. Masterplanning has been employed to great benefit at Winfrith and should be used elsewhere.

Finally, we welcome the commitment to reporting on land quality and contamination. It is important that **reports are accessible to local communities and presented in ways that aid their understanding.**

Q7. As well as ensuring that remediation of our sites is safe, sustainable and publicly acceptable, we also aspire to enabling their beneficial reuse as early as possible. What are your views on using controls (e.g. land use restrictions) to protect people and the environment from residual hazards so that the site can be used in a restricted way until it is suitable for unrestricted use?

We and our local authority members have worked closely with the UK Government and NDA on the Proportionate Regulatory Controls (PRC) agenda, including in the development of guidance for planning authorities on in-situ disposal.



As outlined in response to Question 6, we have no objection to waste being left in-situ and protected by land use restrictions of other controls, but **only if this approach can demonstrate clear net benefit, is consistent with local waste and development plans and has community acceptance.**

Q8. Do you think it is appropriate for us to seek interim uses of our land and in your opinion, what should these include?

Yes, in fact we believe that **interim uses of sites should be sought wherever this is practical and adds value.** A wide range of interim uses are appropriate. Some of these are identified in Strategy 4 and include renewable/low carbon energy development and carbon sequestration (e.g. tree planting) along with socio-economic activities.

The potential and options for the interim use of NDA sites, and for the early release of parts of nuclear licensed sites, should be **determined through active engagement with local authorities, Local Enterprise Partnerships (LEPs) and communities.**

Q9. To support the development of a suitable range of treatment technologies we need to invest now in creative thinking and innovation to secure significant benefits in the long term. Do you believe the NDA should continue to adopt this approach recognising that there could be a short-term cost burden, as delivery of the next generation of treatment facilities will take time to implement?

Nuleaf supports the development of new and innovative technologies to aid enhanced management of nuclear waste, including treatment technologies. We agree with the principle of short-term investment and cost to deliver long term benefits.

Q10. We implement the Waste Hierarchy and minimise the amount of waste we have to dispose of. However, to complete our mission we do need a range of disposal facilities to accommodate our diverse radiological and non-radiological waste inventory. Do you think our overall disposal vision is clearly articulated and do you support our key messages?



We think the vision is clear and are supportive of the development of a range of disposal facilities, as a final element of a waste management programme based on the application of the waste hierarchy.

The Disposal Vision **does not recognise clearly the need for public acceptability and community consent to be integral to all waste management and disposal options. This should be addressed.**

The newer waste management options outlined in the Vision, namely In-Situ Disposal/Disposal for a Purpose and Near Surface Disposal are being developed in part because they offer the potential to reduce the NDA's costs by many hundreds of millions of pounds. At the same time, they will result in wastes being retained on sites, or new waste facilities being constructed, and will thus impact on host communities. In recognition of this, **community benefits packages should be provided to communities affected by such changes in waste management and disposal options.**

New Near Surface Disposal (NSD) facilities will take part of the inventory previously destined for the GDF. Given this, **we believe that any siting process for such facilities must be based on clear community engagement and consent.**

Q11. How should we develop our HSSEW strategy to better support NDA group operations?

We support the commitment to '*excellent standards of performance, continuous improvement, good practice and learning*' and also the greater emphasis on sustainability, carbon reduction and physical and mental well-being. These are all critical issues for the NDA to address as an employer, a government funded organisation and in terms of corporate performance and reporting.

Nuleaf has been actively working with NDA in the development of its approach to sustainability and carbon management. As the Strategy acknowledges these are new areas for the organisation and further thought is required. In developing the HSSEW Strategy further we **recommend:**

- **Establishing more clearly the different strands of work and the extent to which they are independent from, or interact with, other strands. For example, conventional Health and Safety management**



is well established within NDA and has only limited links with other agendas such as mental well-being or carbon management.

- **Explaining how work on Social Value is to be integrated into HSSEW.**
- **Developing a programme of active engagement with stakeholders to fully define and take forward strategies and action plans on sustainability, carbon, social value and wellbeing. We believe local authorities have a great deal of expertise in these areas, having already developed detailed strategies, action plans and reporting.**
- **Taking forward the NDA's national vision into local, site level plans in sustainability and carbon management. These should connect with local authorities and Local Enterprise Partnerships (LEP) plans on areas such as renewable energy or infrastructure development, to the benefit of all parties.**
- **Further development of indicators and reporting. In particular it is important that stakeholders and the public are aware of, and have access to, easily understandable NDA reporting in these areas.**

Q12. Security and Resilience is a new topic strategy for the NDA. Does it cover everything that you would expect? Should more emphasis be placed on group resilience?

We agree that it is appropriate to develop a new Topic Strategy on Security and Resilience (SAR) – as the Strategy states it *'is a fundamental element of all civil nuclear operations.'*

We support the aim to become a leading UK SAT organisation and the range of commitments that are set out in the section. Overall, the section seems to focus more on security than resilience and **we would like to see more on the latter, including in relation to group resilience.**

Q13. Cyber security is a new topic strategy for the NDA. What are your views on adopting this approach and what else should we be doing in this area?

Cyber security is an important issue for all organisations but should be a particular concern for the NDA given the risk of a radiological release. We support the establishment of a group-wide Cyber Security Resilience Programme and the ongoing work with Government and ONR. We are content with the proposed approach and have nothing further to add.



Q14. What are your thoughts about the scope of the RD&I strategy going beyond traditional STEM subject boundaries? What areas of research would maximise benefits to the NDA group?

Research and Development have a huge role to play in the delivery of the NDA's mission, helping reduce risks and speed up action on the high hazard facilities. Such developments can also deliver wider economic value to the UK through the creation of new businesses and export opportunities. As the Strategy acknowledges, there is great potential for synergistic relationships with other industrial sectors and with academia.

We **very much support the proposal for the scope of RD&I going beyond STEM subjects**. Across much of the NDA's work, but particularly in relation to the GDF siting process, it is the socio-economic and political factors that will be crucial to success. We are also engaged in the NDA's developing work on sustainability and net zero carbon and RD&I in these areas will be of great benefit to NDA operations and wider society.

Q15. Do you think the encouragement of a culture which promotes innovation is an important topic for the NDA, and do you support the approach being taken?

Yes. The scale and complexity of the UK's decommissioning challenge requires innovative technologies and ways of working. We support the approach taken and the priority areas for action to improve productivity, efficiency, effectiveness and sustainability.

Q16. We are keen to have greater diversity in the NDA group workforce; what more should we be doing to achieve this?

Any successful organisation needs to attract and retain a highly skilled workforce, and this is particularly the case in the context of the NDA. As acknowledged, the People Strategy also has implications for the communities that host nuclear decommissioning sites. Clear links therefore need to be made to the NDA's work on socio-economics and social value and to local authority and Local Enterprise Partnership (LEP) plans for economic development and skills.

The commitment to a more diverse workforce is welcome. Progress in this area requires an integrated programme of action that:

- Considers how best to encourage interest in working for the NDA



- among under-represented groups
- Supports the training and skills development required for people to access jobs (through apprenticeships and links to academic programmes)
- Creates a workplace culture that is positive and welcoming to people of all backgrounds
- Sets targets for diversity and monitors and reports on these.

The proposals for diversity address these issues and a range of other supporting activities. The challenge for NDA will be to embed them effectively across the organisation.

Q17. How far should we engage our supply chain in meeting any future sustainability targets?

We support the commitment to a '*resilient, sustainable, diverse, ethical and innovative supply chain.*' The NDA spends £1.8Billion of largely public money every year on its supply chain, and it is essential that this contributes to wider benefits for society. Procurement is one of, if not the, greatest lever by which NDA Group as a significant spender of public funds can generate positive social outcomes.

Mechanisms to ensure Social Value creation must be fully integrated.

We believe that **the NDA should:**

- **Actively engage with the supply chain to explain the organisations commitments to sustainability, local economies, net zero carbon and social value.**
- **Include the supply chain in target setting and reporting on corporate carbon management and sustainability impacts.**
- **Provide support and advice to local and SME businesses to enable them to properly consider the sustainability of their operations.**

Q18. We are developing our group-wide digital vision; in your opinion, how ambitious should we be?

More than perhaps any other industry, nuclear decommissioning requires accurate records that continue to be accessible over long periods of time. The NDA's digital vision is therefore to be supported.



The NDA should be ambitious in its approach, working towards continuous improvement in information and knowledge management and ensuring that information is available to all those that require it in a usable format. Transparency and public availability of information is also important in building confidence among stakeholders.

Q19. How should we reduce the barriers for entry into the supply chain for local SMEs?

As the Strategy recognises, the NDA's supply chain supports a significant number of jobs, particularly in West Cumbria but also around other sites. The NDA has a responsibility to support local communities, as required by the 2004 Energy Act, and we have worked closely with the organisation in developing their socio-economic strategy and work on skills.

An important aspect of socio-economic support is the ability of local SMEs to win supply chain work, and the Public Accounts Committee (PAC) in their report on **Risk Reduction at Sellafield**¹ highlighted the need for more and better support.

There are a number of barriers to this but there is scope to reduce these significantly by active engagement. We believe that the NDA's procurement and investment processes should optimise opportunities for local businesses and meet the commitment to enhance the social impact of the supply chain. **Critical areas for action are:**

- **To use the Sellafield Social Impact Strategy and Transformation Plan, and the new governance arrangement for Magnox to drive forward action that better supports local businesses and SMEs. NDA should work with stakeholders, including local authorities and LEPs, to review procurement processes and identify how to overcome barriers to local suppliers and SMEs winning contracts.**
- **To ensure that local businesses and SMEs included in framework agreements and consortia actually receive a fair and appropriate amount of work when contracts are awarded.**
- **To take on board in full the requirements of upcoming legislation on Social Value in Government Procurement.**
- **Better monitoring and reporting of progress against targets.**

¹ <https://publications.parliament.uk/pa/cm201719/cmselect/cmpubacc/1375/137506.htm>



In terms of socio-economics, one issue that the Strategy fails to address is that of Community Benefits. Nuleaf believes that **a clear, consistent, fair and ambitious approach is required for nuclear decommissioning and radioactive waste management in the UK. This should recognise the impacts on communities of hosting (a) nuclear decommissioning sites (b) long term nuclear waste stores (c) radioactive waste management and disposal infrastructure such as landfill sites and (d) radioactive waste left in-situ or on-site.**

Many of the potential changes to approach outlined in Strategy 4, such as the leaving of waste on-site/in-situ or the development of new Near Surface Disposal (NSD) sites will deliver substantial financial savings to NDA, but will also place additional burdens on host communities. At a time when comparable sectors such as renewable energy and fracking have developed commitments to community benefits, the NDA still has no overall approach to this issue. **Nuleaf and our members would like to engage with NDA to address this.**

Q20. How can we involve more people in our work and better coordinate our engagement activities?

Nuleaf continues to have a constructive dialogue with NDA on the issues of public and stakeholder engagement. We are pleased that the important role of local government is more clearly recognised within Strategy 4 than in previous iterations.

In recent years the value of engagement with Nuleaf and local government has become ever clearer. Local authorities are the democratic voice of communities. They are also, through land use and waste planning, a regulator and can contribute to the skills agenda through schools and colleges. Finally, they possess expertise in public engagement, transport management, environmental protection, sustainability and carbon management.

The Strategy is correct in recognising that proper engagement is key to building trust and support and must be based on a two-way dialogue where stakeholders are able to express views and concerns and see these addressed by the NDA.

We support all efforts to involve more people, and especially under-represented groups, in the NDA's work both at a national and a local level. We believe the NDA should be **more active in reaching out to different sectors of the community and engaging through new means, particularly online and through social media, to address the poor levels of engagement with younger people. Consideration should also be given to the timing and format of meetings to**



enable different groups, for example those with children, to be able to participate.

Better co-ordination would also be welcome. Nuleaf offers a method of reaching local authorities from across the NDA estate and **should continue to be a focus of engagement with local government.**

In terms of NDA events, where engagement on a number of issues is being sought from stakeholders at one time, consideration should be given to the hosting of single meetings that cover all issues.

Finally, as the Covid crisis has shown, there is great scope for the appropriate use of online meetings and fora to enable more people to participate and reduce the time commitment of travel to physical events.

Q21. We recognise the value of international engagement to our mission. Where our core mission allows, how best could we utilise the capabilities of the NDA group to progress broader UK interests?

The commitment of NDA group to international engagement is very welcome and could lead to significant benefits economically and in terms of learning, collaboration and international influence.

Other organisations are also engaged internationally on nuclear issues, including the UK and Devolved Governments, ONR and the Environment Agencies. At times it has appeared that co-ordination of activities is lacking, and it is therefore important that a better understanding of the work of all organisations is achieved, and information on international meetings is effectively shared. The UK Government would appear best placed to lead on this.

Nuleaf is increasingly involved in work outside the UK. Our Director is Vice President of GMF Europe, an international network of local authorities. We have also had a significant role within the IAEA's work on the community aspects of radioactive waste management and sit on the Civil Society Group of the current EURAD programme. Through these networks we have the potential to influence policy and learning. **The work of our network should be factored into the NDA's international engagement plans.**



4. Comments on Integrated Impact Assessment (IIA)

Nuleaf was involved in the process of preparing the Scoping report for this IIA and provided a range of detailed comments at that stage. We are pleased to see that these have been largely addressed within this IIA but offer some additional comments on the Non-Technical Summary:

Environment (2.2)

- We are surprised there is no reference to asbestos as a significant environmental hazard, either in this section or elsewhere in the Summary.
- While energy and carbon are noted, reference should be made to the significant carbon emissions generated from wider NDA operations, including offices, travel to work and the supply chain.

Storage and disposal

Comment on storage and disposal options is very limited except with regard to Spent Fuel and Nuclear Materials. Storage of HAW is a significant issue for host communities, as demonstrated by the recent refusal of Somerset County Council to permit the importation of ILW. Regarding the GDF, no site has been identified for this and there is no guarantee the current siting process will identify one. These community concerns and uncertainties should be acknowledged.

Other Comments

Some further proof reading of the text is required. For example, on page 8 under 5.2.1 Strategy the same sentence is repeated twice.

5. Comments on Near Surface Disposal (NSD) Strategic Position Paper

Our members have a significant degree of interest in proposals for Near Surface Disposal (NSD) within England and Wales. We recognise that NSD may be an appropriate approach to the management of some of the nation's HAW inventory and it therefore merits further consideration. This is particularly the case if it enables the earlier disposal of some material and consequent reduction in hazard. However, the Position Paper is right to clarify that NSD will only ever be a solution for a small part of the HAW inventory, and that a GDF will continue to be required.

Also welcome in this paper is:



- The recognition that any decision to seek a NSD option will only be as a result of a detailed risk-based assessment that identifies it as the most appropriate disposal route.
- The provision of detail on the various NSD options under consideration, and their relative merits.
- The indication of construction costs and a timeline for waste arisings, along with the various options that may be considered over different timescales and in relation to different waste streams.

That said there is still a significant degree of uncertainty as to how the process of evaluating the merits of NSD will be taken forward. This is particularly the case in terms of the assessment of possible sites. The paper refers to '*a new NSD facility being available within the next 10 years*', but some have suggested that rather than a new facility, NDA will repurpose vaults at the existing LLWR to accept some material currently not permitted at that site. This requires clarification.

As the paper recognises, it is crucial that '*effective engagement with all interested parties is required as work progresses*.' A critical part of this will be to define how the process to identify a site or sites for NSD will engage with potential host communities and also recognise their contribution to this national issue through suitable community benefits.

The GDF siting process recognises the need for both local consent and a generous package of community benefits. Community benefit packages have also been established in relation to the LLW facilities in Cumbria and at Dounreay. Any siting process for a NSD must therefore be based on full engagement and deliver added value to any host community.

I hope these comments are helpful.

Yours faithfully,

Philip Matthews
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