

Meeting: Nuleaf Steering Group
Date: 15th September 2021
Item: 4
Subject: Nuleaf: Consideration of closer working with NNLAG
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Introduction

Over the last 6 months, and at the request of members, Nuleaf has been considering whether developments in the policy landscape require any changes to how Nuleaf operates.

In particular members asked that Nuleaf should explore with the New Nuclear Local Authority Group (NNLAG) whether our relationship should develop in any way to reflect the impact of the UK Government's energy vision.

Since March dialogue on this issue has been undertaken with NNLAG, the Nuclear Free Local Authorities (NFLA) and a sample of Nuleaf members that regularly attend meetings. This paper sets out the conclusions of the engagement and makes recommendations for Nuleaf's future work.

Recommendations:

It is recommended that Nuleaf:

1. Continues to work closely with NNLAG on areas of common interest, in line with our Concordat, while remaining a constitutionally distinct body.
2. Continues to engage in new nuclear issues in line with its constitution, which states '*Nuleaf's remit encompasses all aspects of the management of the UK's nuclear legacy. This includes the implications for legacy management of any developments that are likely to impact on that management.*'
3. Extends its work to include occasional discussion around (a) regional energy and net zero plans; and (b) nuclear Emergency Planning. For clarity it is proposed that, if either/both of these new work areas are agreed, a change should be made to the Constitution.

Members are invited to suggest any further areas where engagement would be useful.

1. Background

From its inception in 2003, Nuleaf has focused on nuclear decommissioning and waste management with no position on whether new nuclear power is desirable. This has enabled the group to maintain a broad membership ranging from those local authorities that are actively involved in the development of new nuclear stations, through to those that are opposed to any new nuclear power.

Alongside Nuleaf, two other local government networks on nuclear issues exist. These are the **New Nuclear Local Authorities Group (NNLAG)** which shares knowledge, information and best practice regarding new nuclear development; and the **Nuclear Free Local Authorities (NFLA)** which opposes new nuclear development. Many members of NNLAG and NFLA participate in Nuleaf meetings.

2. Review of the changing policy landscape

The policy context within which Nuleaf operates has changed significantly since the group was formed.

One large new nuclear site, Hinkley Point C, is under construction and at least one more may be developed. The 2020 Energy White Paper envisages a complete transformation of the energy system, with a huge expansion of renewables, storage and hydrogen capacity along with the development of Capture, Usage and Storage (CCUS) for industrial use. It also supports at least a doubling of nuclear capacity. It commits to the development of Small Modular Reactors (SMRs), Advanced Modular Reactors (AMRs) and a fusion power plant.

Reflecting this, a request was made at the March 2021 Steering Group that Nuleaf assess whether any changes to Nuleaf's remit and ways of working should be considered. It was agreed that a paper would be submitted to the June Steering Group.

To help inform this paper phone discussions were conducted with a number of Elected Members and Officers engaged in both Nuleaf and NNLAG. The NFLA was also invited to offer their views. Comment was sought on Nuleaf's current role, on the changing policy landscape in the UK, and on whether Nuleaf should engage in the new nuclear arena. A variety of views were expressed, with no consensus emerging.

Based on these discussions, three options were put for consideration to the June Steering Group:

1. No Change i.e. the role of Nuleaf would remain the same.
2. That Nuleaf explore the potential for a shared secretariat with NNLAG.
3. That Nuleaf and NNLAG discuss the potential for a merger.

Option 3 was rejected. The Secretariat were asked to engage with NNLAG around option 2.

Following discussion with the NNLAG Secretariat it was agreed that the best option was for the two organisations to remain separate but to continue to work closely on issues of mutual interest.

3. Conclusions

The review of Nuleaf's remit has proved timely given the very different landscape for nuclear that now exists, and the wider Government ambitions to promote Net Zero Carbon and sustainability.

The discussions both internally and with other local government bodies have been positive and useful in understanding perspectives and future plans. They have also identified some potential new areas of work for Nuleaf:

- Engagement, on a limited basis, in strategic energy and infrastructure plans such as those that have been developed for Cumbria, North Wales, South-West England and the East of England. It has been suggested that Nuleaf may wish to hold occasional stand-alone events on these issues or to invite organisations such as National Grid to present to members.
- Occasional discussion of the issues around nuclear Emergency Planning. This issue is addressed by many of Nuleaf's sister organisation elsewhere in Europe and is also one that the NFLA engages in. Occasional presentations to Nuleaf meetings on this could be organised.

Finally, the review has been helpful in clarifying and reaffirming Nuleaf's constitutional position on these issues (Annex 1).

The organisation will remain focussed on decommissioning and legacy waste management, now extending to encompass the EDF stations. It will also continue to engage in discussion around new nuclear, SMRs and fusion where these have implications for NDA sites and our member local authorities. In engaging in these issues, Nuleaf will seek to involve and represent the differing perspectives of our members wherever possible.

Annex 1: Nuleaf's constitutional position

Nuleaf's **Constitution**¹ enables the organisation to engage in new nuclear issues. Paragraph 3 states that Nuleaf's remit *'includes the implications for legacy management of any developments that are likely to impact on that management.'*

Nuleaf has adopted three 'strategic objectives' on the legacy management implications of potential new build. These are to:

- *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;*
- *to promote debate and thinking about the ways in which new build could be developed to the benefit of nuclear legacy management and in accordance with the Polluter Pays Principle, including how a more coordinated 'across site' approach could be taken in locations that have or are proposed to have multiple licensed nuclear sites; and*
- *liaise effectively with NNLAG and with local authorities addressing the radioactive waste management implications of new build and provide assistance as appropriate.*

In 2007, Nuleaf published a Briefing Paper on **New Nuclear Build: Implications for Legacy Waste Management**, with another Briefing Paper prepared in 2012 on **Radioactive Waste Management and New Nuclear Power Stations**². More recently, Nuleaf has heard speakers from the NFLA set out their objections to new nuclear and held bespoke meetings on implications of current SMR and fusion programmes for NDA sites.

The organisation also has an agreed Protocol with NNLAG, signed off in 2012. This states that:

Nuleaf and NNLAG will seek to ensure that adequate communication and liaison takes place on issues of mutual interest. The mechanisms are likely to include:

- *the mutual exchange of Nuleaf Steering Group and NNLAG meeting papers*
- *the mutual exchange of working and task group papers*
- *representation at each other's meetings - contact between secretariats as appropriate.*

Any alteration to Nuleaf's current role would require amendment of the constitution. Paragraph 21 of the constitution states that *'This constitution may be amended at an AGM with the agreement of at least two thirds of contributing member authorities.'*

¹ <https://www.nuleaf.org.uk/about/constitution/>

² <https://www.nuleaf.org.uk/policy-communications/briefing-papers/>