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Dear Sir/Madam

Draft ONR Strategy to 2025 – consultation response

1. Introduction

NuLeAF (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. NuLeAF is directly supported by over 100 local authorities and national park authorities across England and Wales and speaks 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.

Local authorities have a critical role in nuclear decommissioning and waste management and are thus an important stakeholder for ONR. Our member councils are the democratic voice of nuclear communities. Their importance is recognised in the 2004 Energy Act, and NuLeAF is funded by NDA, RWM and our members.

We sit alongside ONR in the UK Government's Radioactive Waste Policy Group (RWPG) and in the Nuclear Decommissioning Authority's (NDA) Theme Overview Groups (TOGs) on Site Decommissioning and Remediation; Integrated Waste Management; and Critical Enablers.

In addition:

- Local planning authorities fulfil a regulatory function. Through NuLeAF our members provide expert advice on land use planning in relation to decommissioning and the management of NDA sites.
- Local authorities have a clear and significant role in the Geological Disposal Facility (GDF) siting process. Without their support RWM will not be able to deliver this critically important facility.
- We have an important relationship with LLWR with regard to Low Level Waste (LLW) infrastructure and disposal.
- We are a key partner for NDA in the development of Strategy 4 and plans for Magnox Accelerated Decommissioning.
- We are working closely with Government on Proportionate Regulatory Controls (PRC), the preparation of Planning Guidance for In-situ disposal and in the development of the planned Nuclear Policy and Radioactive Substances White Paper.
- Councils have a central role in nuclear Emergency Planning.

NuLeAF also has an increasing international presence. We work closely with the International Atomic Energy Agency (IAEA) in their evolving engagement with the local government and communities. Our Executive Director was selected as one of two external advisors on the IAEA's first ever report on the importance of the local level to decommissioning and waste management. This will be published next year. NuLeAF also sits on the managing council of GMF, the main European network on nuclear issues for local government, and through this is involved in influencing European policy.

Below we offer our comments on the Draft Strategy.

2. Comments on draft strategy

ONR has a critical role to play in ensuring the safe operation of current and future nuclear power stations, and the effective decommissioning and clean-up of former sites. The UK has a substantial and complex nuclear legacy. Communities that host former and current nuclear sites must have confidence that all regulation drives the highest possible standards of safety and protection for people and the environment.

The draft Strategy is a concise and high-level document, developed against a backdrop of great change in the regulatory environment, following the decision that the UK should leave the European Union and thus the Euratom arrangements. Given the significant implications of this for ONR, we are surprised that Brexit, and its consequences for nuclear regulation, is not referred to within the Strategy.

As Section 2 of the Strategy recognises, there are also substantial changes underway in the UK Policy sphere, the NDA's Strategy and operations, and the wider nuclear sector.

We are pleased that under Section 2, the need to respond to stakeholder demands for transparency and engagement at all levels is recognised; and that **Inspiring Stakeholder Confidence** is one of the four strategic themes for the next 5 years.

In Section 7 the Strategy states that *'We'll continue to strive for excellence in discussion our regulatory judgements and decisions, particularly with duty holders and interested communities.'*

These commitments are welcome. However, at present there is only very limited direct engagement between ONR and NuLeAF, outside of NDA and Government meetings. Contact between ONR and individual local authorities is also low whether that is on the management of nuclear legacy sites or on emergency planning.

We would therefore welcome an opportunity to explore with ONR how the aspirations of the Strategy can be translated into effective and appropriate plans for engagement with local government and communities. We also believe that the Strategy should recognise local government explicitly as an important stakeholder and partner.

I hope these comments are helpful but am happy to provide further information.

Yours faithfully,

A handwritten signature in black ink that reads "Philip Matthews". The signature is written in a cursive style with a long horizontal stroke at the end.

Phil Matthews
Executive Director, NuLeAF