

enhancing... improving... cleaning... restoring...
changing... tackling... protecting... reducing...
create a better place... influencing... inspiring...
advising... managing... adapting...

Our approach to stakeholder
engagement for potential new nuclear
power stations

1 Purpose of this document

1.1 The Environment Agency needs a strategic, proactive and co-ordinated approach to stakeholder engagement for its regulatory role in the development of any new nuclear power stations so as to maximise its effectiveness and efficiency, both for us and for those we are engaging.

1.2 The purpose of this document is to:

- **Explain our role** in the development of any new nuclear power stations.
- Set out the **commitments we will work to in engaging stakeholders.**
- **Provide a framework** for stakeholder engagement to make sure that we adopt a transparent and consistent approach for each proposed new nuclear power station development.

2 New nuclear power station development - our role

2.1 We are the lead public body for protecting and improving the environment in England and Wales.

Our corporate strategy for 2010 - 2015 states that we will 'use our evidence and regulatory work to support the development and use of low-carbon technologies, including renewables, carbon capture and storage and nuclear power, while minimising other environmental impacts'.

'We will work with the nuclear sector to ensure that new nuclear power stations meet world class environmental standards.'

2.2 **Our role** in the development of any new nuclear power stations in England and Wales:

- **Ensure that any new nuclear power station designs would meet high standards of environmental protection and waste management** – we work with the Health and Safety Executive's (HSE) Nuclear Directorate through our Joint Programme Office (JPO) to assess nuclear power station designs. This is known as '**Generic Design Assessment**' (GDA). It allows us jointly to begin assessing the safety, security, waste and environmental implications of new designs before applications are made to build nuclear power stations at specific sites. The GDA process started in 2007 and will take about four years. During GDA we will decide if each of the two new designs we are assessing should be capable of meeting the high standards we expect and, if so we will issue a 'Statement of Acceptability' (SODA).
- **Site specific permitting** – ensuring that any site specific proposals for new nuclear power stations meet our high standards including permitting

- **Regulation** – ensuring that the environment is properly protected during construction, that the power station that is constructed implements the proposals that we have permitted and that the operator has the resources, capabilities and managements systems necessary for construction, commissioning and operation of the station.
- **We will also participate in work towards securing a Geological Disposal Facility** for higher level radioactive waste, both from new-build and from the UK’s nuclear legacy.

3 Our commitments to engaging stakeholders

3.1 Our aspirations for stakeholder engagement

Our aspiration is that any individual, community or organisation that may be affected by our key permitting decisions will have meaningful opportunities to express their views and to understand how those views have been considered in our decision making processes.

We will follow the ‘Working with Others - Building Trust with Communities¹’ approach, which involves working with communities and other stakeholders as early as possible, in order to understand their concerns, interests and priorities. Whilst we as an independent regulator will make the final decision, our decisions will be more informed as a result of our engagement activities and at the very least, people should understand our role and the reasons why we have made our decision.

3.2 Why we are engaging stakeholders

It is important for us to engage stakeholders in undertaking our role in regulating new (and existing) nuclear power stations to ***better inform ourselves as a decision maker² and to build and maintain confidence in our decision making processes.***

Our specific objectives for engaging stakeholders in the key regulatory processes for new nuclear power stations are to:

- Provide opportunities for relevant stakeholders to engage at appropriate points in decision making process.
- Identify and consider stakeholder views, concerns and aspirations relevant to our role in nuclear new-build.

¹ Environment Agency, Working with Others – ‘Building Trust with Communities’ a guide for staff

² Environment Agency, 2002, Evaluating Methods of Public Participation R & D Technical E2-030 Bristol

- Explain how stakeholder input has informed our decisions.
- Build understanding of our regulatory role in nuclear new-build and the opportunities for people to contribute.

3.3 The principles of our stakeholder engagement

Our stakeholder engagement processes will:

- 1 **Be planned, to optimise opportunities for stakeholder input.**
In practice this means:
 - Engaging early, before relevant decisions are taken.
 - Being clear about how and when stakeholders can make input.
- 2 **Be clear and transparent.** In practice this means:
 - Clearly communicating the aim and scope of the engagement process.
 - Clarifying which decisions can or cannot be changed as a result of stakeholder input.
 - Publishing relevant information, stakeholder input and our response.
- 3 **Be accessible.** In practice this means:
 - Publicising engagement opportunities as clearly, widely and early as possible in decision-making processes.
 - Considering the use of more than one method to engage the right people, at the right times, in the right way; including closed (eg meetings by invitation) and open access methods (eg websites).
 - Understanding who our stakeholders are, and being mindful that some stakeholders may need support and encouragement to participate effectively and some may be hard to reach.
- 4 **Respect and value stakeholders.** In practice this means:
 - Listening to stakeholders and explaining how their input has informed our decision-making.
- 5 **Respond to stakeholders.** In practice this means:
 - Publishing promptly a summary of stakeholder input.
 - Explaining how stakeholder input has informed our decisions and where stakeholder suggestions are not implemented, identifying why.
 - Communicating progress made throughout the process, and any final decision, promptly.
- 6 **Build the competence of our staff in delivering stakeholder engagement.** In practice this means:
 - Building the skills and confidence of our staff in planning for and engaging with stakeholders.
 - Providing high level organisational support and coordination for stakeholder engagement activities and learning.
 - Sharing and responding to findings and lessons from evaluation and/or other research.

- 7 Be evaluated to improve practice.** In practice this means:
- Communicating measurable objectives for engagement activities.
 - Identifying staff to take a lead in reviewing and evaluating.
 - Commissioning in-house and/or external evaluation for audit and learning purposes, with stakeholder input to evaluation processes.
- 8 Comply with legal duties and appropriate codes or guidance.**
In practice this means:
- Meeting requirements of the Regulators Compliance Code - to establish effective accountability and transparency to make activities accessible and open to scrutiny.
 - Meeting requirements of the SEA Directive to consult stakeholders.
 - Operating within HMG's Code of Practice on Consultation.

3.4 Our stakeholders

In Appendix A we have identified who we think our stakeholders are together with types of approaches to engagement.

Local stakeholder engagement related to specific sites and proposals, will be led by our area teams, within the framework provided by this national document. Stakeholders will be identified and a specific engagement plan developed for each proposed site.

4 Timing and activity for stakeholder engagement

We will manage our stakeholder engagement according to the following key milestones:

- the Generic Design Assessment (GDA) process
- site specific permitting and regulation
 - pre-construction
 - construction
 - operation

A stakeholder engagement plan will be developed for each milestone and we will make these available. As we progress, we will review lessons learned to inform our plans for stakeholder engagement in later phases.

The actual engagement methodology will be selected as part of our planning for each milestone.

5 Contacts

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APPENDIX A

Our stakeholders

- Academics (nuclear/energy)
- Government agencies
- Government (European/International)
- Industry
- International bodies
- International regulators
- Local communities (<25 miles of sites listed in DECC's draft NNPS)
- Local Authorities & Regional Government Agencies (<25 miles of sites listed in DECC's draft Nuclear NNPS)
- MPs/MEPs
- Members of the public (>25 miles of sites listed in DECC's draft NNPS)
- NDA Site Stakeholder Groups & British Energy Local Community Liaison Councils
- Non Government Organisations & interest groups
- Trade unions
- UK Government (central and devolved)

Types of approaches to engagement

INFORM

Provide information, for example to help people to understand the context, issue, choices, decisions and so on.

Examples: Leaflets, newsletter, briefing note, displays, advertising, newspapers, TV, radio, video, internet.

GATHER INFORMATION

To gain insight into people's thoughts, concerns and ideas. This will also include getting feedback to help us understand what people know and what they value.

Examples: Staffed displays, surgeries, seminars, meetings, surveys, questionnaires, interviews, internet (inviting feedback).

INVOLVE

Provide opportunities for stakeholders involved to talk and listen often together, with us. Although we make the final decision, there is a real opportunity for people to have an influence. There must be the potential to influence and/or change current strategy or decisions as a result of their involvement.

Examples: Workshop, focus groups, surgeries, liaison groups (different groups representing specific communities of interest). Facilitated meetings (meeting managed by a third party who is independent from the issues).

Please note that this list is not fixed. We are asking stakeholders how they would like to be engaged and will seek to accommodate as many reasonable requests as is practical for us.