



11th May 2017
Ref: DSG(2017)C018

NFLA Secretariat
Nuclear Policy
City Policy
Level 5
Town Hall Extension
Manchester
M60 3NY

Dear Sir/Madam

NUCLEAR SITE STAKEHOLDER GROUPS AND LOCAL LIAISON COMMITTEES – ARE THEY FIT FOR PURPOSE? AND HOW SHOULD WIDER NUCLEAR POLICY STAKEHOLDER MANGEMENT IMPROVE?

The Dounreay Stakeholder Group (DSG) is represented by over 20 organisations and therefore this response is one that is generally agreed by most organisations/individuals. However, there are some who may not agree entirely with this submission and therefore have been encouraged to provide their own response.

DSG members noted the NFLA report which was published on the 14th March and were disappointed that the NFLA had made no attempt to contact the chair or secretariat, in the interests of NFLA transparency, to inform us that this study was being undertaken. We are also slightly confused as to how you selected those respondents who responded on behalf of each SSG. The survey appears to be looking at NGOs but from a Dounreay perspective, it appears that you approached a co-opted member of the public and we were slightly puzzled as to your selection process.

For your report it may have been useful to know that we were in the process of carrying out a review of DSG, as we do every five years, to consider how best to go forward in terms of focus, membership etc. This review has been finalised and we are in the process of considering whether changes are required to ensure the group continues to be current.

As a group we try our best to ensure everything we do is carried out in an open and transparent way and all documents are published on our website. We are pleased that you consider our website amongst those that is informative.

We note discussion around the civil and defence nuclear sites and that the DSG does indeed combine the Vulcan (MOD) and Dounreay (NDA) sites together in one stakeholder group. We have found this beneficial and will be looking to develop the interaction with MOD (Vulcan) which is consistent with the interaction of the Dounreay site.

Please respond to:

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On specific Dounreay Stakeholder Group responses from our co-opted member, we would like to point out the following:

- **Q1: How easy is it for your group/Council to formally join a SSG/LLC?** The respondent said it was not easy as he did not think HANT could become a member.

This is not correct and a letter dated 1st May 2014 sent to the respondent clearly indicated a suggestion that if the respondent wished to resign as a DSG co-opted member he could consider requesting membership on behalf of HANT. This offer would not have been made if the SSG would not have considered HANT as a suitable and useful member of the group.

- **Q2: Are you allowed the opportunity to put forward your group / community / Council's viewpoints or concerns on relevant issues?** The respondent stated that as he was there as a co-opted member he was careful not to speak as a HANT spokesman.

We agree that the co-opted member balances any questions to ensure these are wide ranging and specific questions raised on transportation of nuclear materials had been done, as he rightly says, by referring to general concerns or reports. Indeed the number of questions raised on transportation of nuclear materials has been collated into one document, along with responses and extracts of discussions from meeting so that this information is consolidated in one place. This can be found on our website.

- **Q3: Does the constitution of the group allow for full, free and fair discussion and voting.** The respondent felt that members did not really provide challenge.

This seems to be too much of a sweeping statement – where challenge has been required, the DSG has challenged. Where questions have been raised, these have been answered. All our minutes – including sub group minutes – are available on our website and there are a number of challenges we could point to which sit outside the normal DSG meetings but are also included on the website.

- **Q4: What is your view of the role of Council representatives on such groups? Do they scrutinise and challenge the site operators and regulators enough?**

We see the response of this question as very disappointing. The Highland Council, itself, has set out their nuclear policy. One Councillor, out of the four who attend, was many years ago employed by the nuclear industry. One Councillor who sits on the DSG at present also represents KIMO.

- **Q5: Is the Membership of the group a correct representation of relevant local communities?**

The DSG's remit is to scrutinise and oversee the operations of the NDA and site operator. From a socio economic view, the Terms of Reference are clear that this sits within the Dounreay Travel to Work area but that on matters of environmental issues etc the 'community' is far wider. That is why we have places at the table for both Orkney and Shetland Councils. Whilst recognising that there is a much bigger remit when it comes to the transportation of nuclear materials it is not for the DSG to ensure that everyone is 'consulted' with. This is for the NDA to consult on their strategy going forward. We also feel that the NDA reached out to all local authority areas in an attempt to engage with each area on the subject of nuclear material transport.

DSG has no objection to any group/organisation making contact to ask questions or to raise serious concerns. These would be discussed and dealt with on a case by case basis. Further, if organisations

from outside the Caithness & North Sutherland area wished to apply for membership these applications would be discussed and agreed via the DSG business meeting with all members encouraged to provide their views.

We have, and continue, to look at membership demographics and indeed recognise that Sutherland needs a stronger voice. However, representation from the Sutherland area has been invited previously. This is something we continue to look at.

- **Q6: What role should the NDA have in the operation of the SSGs?**

The NDA set guidance for SSG to operate but these groups should, under the chairmanship, provide independence. The NDA has a clear strategic role to play and we are sure that if requested a specific NDA person would be nominated to attend any meetings where questions were being placed from an environmental point of view. However, we would like to point out that SEPA sits on the group as an observer who is able to provide responses on any environmental issues that relates specifically to the site and in our view the regulators (both SEPA and ONR) are very open and honest when responding to direct questions.

- **Q7: Are you satisfied with the role of nuclear regulators who attend the SSGs/LLCs?**

We appreciate that the respondent does not attend sub group meetings because of the distance and cost involved in attending meetings in Caithness. However, DSG's collective view here is that our regulators (both SEPA and ONR) are very open when it comes to responding to any questions raised.

- **Q8: Should the NDA run and fund SSGs? If not, who should? Would it be good if they were made more independent on the industry?**

While the respondent is entitled to his views, this is simply not the views of the members of the DSG. While the NDA provides guidelines and, through the Site Licence Company, provides funding and secretarial support we have never felt constraint in any way.

- **Q9: With LLC's, how can they become more transparent and open to the wider community?**

We are uncertain as to whether these comments are inclusive of the DSG as it is now or whether this is a general LLC question. Given the response we would like to point out that we have, as mentioned above, representative from Orkney and KIMO continue to be included while in the past we have also had a representative from Shetland Islands Council and from Caithness Against Nuclear Dumping.

- **Q10: What other useful views do you have to the future operation of SSGs/LLCs?**

Your respondent noted that DSG only pays expenses for travel outside Caithness to NDA arranged events and visits. This is true and has always been the case for all DSG members who attend DSG meetings. Indeed when the co-opted members were recruited it was made clear that no expenses would be paid as these were voluntary posts. While we have sympathy for the expenses incurred by individuals it is their choice to become a DSG co-opted member. The DSG review, currently undertaken, also raised this issue and again this has been discussed and views will come forward sometime soon.

The honorarium for both Chair and Vice-chair is consistent with all other NDA SSGs.

The DSG holds its four public meetings in the evening to ensure that public can attend and would be interested in understanding what time would be a more suitable one for both public and members to attend if not held in the evening.

While the respondent has argued for alternative venues this has been tried unsuccessfully before but again this is part of the DSG review and will be reconsidered.

- **General**

While we appreciate each individual has a right to their opinion, we as a group are disappointed that there was no opportunity to discuss or factually correct some of the responses made in terms of the DSG.

In the spirit of openness and transparency we request that you publish the DSG's response on your website alongside the NFLA report to allow alternative views to be available to those who wish to understand the full picture of SSGs.

Yours sincerely

A handwritten signature in black ink that reads "Roger Saxon". The signature is written in a cursive style with a large, prominent 'R' and 'S'.

Roger Saxon
Dounreay Stakeholder Group
Chairman