



NGO Forum Minutes
Thursday 18 January 2018
Church House, Westminster, London
13:00 – 15:40

1. Welcome, Preliminaries and Discussion with the Minister

Co-chair Stephen Speed (BEIS Director, Nuclear Directorate) opened the meeting and welcomed all delegates to the NGO Forum, and gave his particular thanks to Minister Richard Harrington MP (BEIS, Minister for Energy) for attending the Forum.

Minister Richard Harrington reported a positive meeting held with Andrew Blowers (Co-Chair of the Forum) on Thursday 7 September 2017 and thanked him for this correspondence. Minister Richard Harrington noted Stephen's acknowledgment of the importance of the NGO Forum, stating that he had been updated on the Forum and encouraged the expression of a wide range of opinions, and noted the seniority of those from BEIS in attendance. Minister Richard Harrington stated his particular desire to engage on National Policy Statement (NPS) consultation, Euratom exit and Geological Disposal. He hoped attendees would find the Forum useful, and suggested beginning with an NGO Forum paper provided by Andrew Blowers and NGO member Neil Crumpton (People Against Wylfa B).

Andrew Blowers noted that it was a pleasure to meet Minister Richard Harrington last September, but expressed his frustration over the way the Forum has been operating, and that this was the first meeting held with Ministers for some time. He stated papers produced by NGO member Neil Crumpton and himself bring together many of the Forum's concerns:

- Frustration that the Forum does not engage effectively and that BEIS are unresponsive to the issues presented by NGO members. The Forum feels there is a need for BEIS to provide proper responses and to engage effectively so that NGOs may more effectively represent their communities.
- Concerns over the Minister's speech given at the Nuclear Industry Association (NIA) Annual Conference 2017, noting how supportive of the nuclear sector it was.
- There are concerns that the Government's new-build policy doesn't make sense on a monetary basis, and that public accounts make this clear.
- The latest NPS is a rerun of the previous NPS of ten years ago. Among the reasons for this was pressure from potential operators like the Chinese CGN to have sites properly designated. He feared there was very little chance of any substantial changes to the NPS arising from the consultation.
- All these points have been previously made by the Forum, but no response from the Government has been delivered. He expressed his frustration that the Government listens to nuclear lobbying groups extensively but little time is given to the concerns of NGOs.
- He questioned the value of the Forum and whether the effort put in on a voluntary basis by NGO members was a valuable use of their time. He would be having further discussions with Stephen Speed on making the Forum more valuable in the future.



Minister Richard Harrington stated that the Government takes a different view on many of the concerns the Forum has, and understands the Forum's disagreement on the argument for nuclear power as a baseload power source, and the Forum's health and safety concerns. However, even though the Government disagrees with several concerns of the Forum, its democratic rights and views are extremely valuable to the Department. Decisions are not black and white and the views of the Forum are heard.

NGO member Jo Brown (Parents Concerned About Hinkley) questioned whether Minister Richard Harrington understood the urgency of the current situation within the nuclear sector, and raised a number of points:

- She raised papers from The American Environment Protection Agency (AEPA) and from the Nuclear Information and Resource Service on the health effects of exposure to radiation, which links radioisotopes to specific health concerns. She expressed the opinion that the paper is game changing.
- She has produced an urgent action list to ensure the Government enforces the Health and Social Care Act 2012. She reinforced her opinion that the situation is very urgent and that the nuclear sector needs to be stopped.

Stephen Speed addressed the comments of Andrew Blowers and stated that having attended three NGO Forum meetings, he shares some of the members' concerns and offered several comments and suggestions:

- Meetings are not set up to allow for the right level of dialogue that is desired. He raised a paper produced by Andrew Blowers, noting the eight areas described within the paper, and stating that this has not been properly responded to.
- He suggested that rather than the meetings acting as a series of updates, the next meeting could use the eight areas as an agenda, with a Government response to each provided within the meeting.
- He also expressed the desire to have an open conversation on the conduct of these meetings, and that every effort must be made to ensure the meetings do not dissipate.

Action 1 - The next NGO Forum meeting to use the points raised in the “NGO Nuclear Concerns “paper and “Civil Nuclear Energy Policy – An Alternative Perspective” paper as a basis for the next NGO Forum agenda.

Stephen Speed responded to the comments made by Jo Brown, stating that a response to her action list would be given at the next Forum meeting.

Action 2 – BEIS to provide a response to each urgent action point provided in Jo Brown's urgent action list at the next NGO Forum.

Jo Brown questioned what would it take for the Government to decide to abandon nuclear power.



Minister Richard Harrington responded that the current policy would change if nuclear was proved to be too expensive, if other parts of the energy mix could replace nuclear in an appropriate way, and if relevant authorities agreed with the health and safety concerns that had been raised. He stated that, given the Government's Industrial Strategy, support given to an industry is only possible if it passes the criteria of being clean, scalable and exportable.

Stephen Speed added that a large legacy of waste exists whether New Nuclear goes ahead or not. NGOs suggested that not increasing this legacy was also a concern.

He reiterated that there is still a large problem to be dealt with, and raised that radioactive waste also comes from other sectors such as health.

NGO member Neil Crumpton stated he was heartened by the comments of both the Minister and Stephen Speed regarding more direct engagement, response and rebuttal. He said that the paper he has authored addresses the three Industrial Strategy rationales, and also addresses the confusion regarding why the Government is so committed to nuclear. He noted the paper also addresses the concern that a military objective may exist regarding the Government's nuclear policy.

NGOs recommended that the ethics of intergenerational liabilities transfer should be included in the three rationales along with security, as this was a very specific concern for the whole nuclear industry.

Minister Richard Harrington stated that he was not downplaying security, and had he more time he could have discussed each point in detail.

Helen Shirley-Quirk (BEIS Director, Nuclear Directorate) introduced herself to the Forum, explaining her remit regarding safety, security and safeguards. She suggested that this is an area which should be explored going forward, and that she was keen to get the Forum's perspective on these issues.

NGOs noted that at the NIA conference Minister Richard Harrington called arguments against nuclear naïve and simplistic, but argued the Forum has always given evidence based responses.

Minister Richard Harrington stated that these issues should not always be portrayed as black or white, and that the discussion is often entirely pro or anti-nuclear. He stated his opinion that the challenge to all Government policy is very strong across the civil service, including nuclear policy.

Andrew Blowers suggested that Government policy is now so pro-nuclear that it runs energy policy, and is focussed on how much nuclear energy we can achieve.

NGO member Jill Sutcliffe (Nuclear Waste Advisory Associates) noted that in Sweden objectors are involved in Radioactive Waste Management decision making, making a final decision more thoughtful and strengthening the process.

Minister Richard Harrington asked Jill Sutcliffe what part of the decision making process she wished to be involved with and what this would consist of. He stated that written submissions and meeting attendance is how all the nuclear industry interacts with the Government on policy.



Jill Sutcliffe replied that decisions in Sweden were communally shared. This led to issues being tackled that weren't obvious to Government officials.

NGOs questioned whether based on current economics the real reason all governments have pushed ahead with nuclear is for nuclear weapons purposes.

Minister Richard Harrington replied that this is not the case.

Andrew Blowers thanked Stephen Speed for the discussions that had been had, and his joint desire to move the Forum forward in a more engaging way.

Action 3 - Produce written briefs on topics discussed (e.g. Euratom update) in order to allow NGO members, including absent members, to consider this information and formulate a response.

Andrew Blowers felt a more positive response had been gained during this meeting, and welcomed the opportunity it presents.

Stephen Speed made a number of observations:

- The Government has a policy to deliver, and the Forum allows for increased understanding and interaction;
- The group is incredibly important as they have such a keen interest;
- At the last meeting it was noted that the Department can't always provide the Forum with the information they need as this is the remit of other Departments, but they are attempting to organise the appropriate meetings.

2. BEIS Update on the National Policy Statement for New Nuclear

BEIS gave an update on the consultation of a new National Policy Statement (NPS) for new nuclear.

- The NPS includes proposals on the criteria for site selection and proposals for site nominations in 2020s.
- It establishes the case for nationally significant infrastructure projects.
- There are currently six energy NPSs in place, with nuclear designated EN6.
- Eight sites are listed for potential deployment of new nuclear sites.
- This is targeted at the deployment of potential nuclear sites up to 2025.
- The NPS will also consider the development of a new NPS for 2026-2035.
- The new NPS will apply to sites having one or more nuclear reactors producing over 1 GW of electricity, and be producing from 2026-2035.
- The criteria in the initial consultation are contained within the existing NPS, developed with regulators and public bodies, including environmental protection and health and safety.
- Hinkley C will no longer be considered a potentially suitable site as development consent has already been given.
- A scoping report for an Appraisal of Sustainability will be included.



- NGO Forum will have the opportunity to respond to the consultation until 15 March, and a response to the consultation is expected by Summer 2018.
- Draft NPS will hopefully be taken forward by the end of the year, and want the NPS taken forward in early 2020.

A further meeting was offered to the NGO Forum for a more detailed discussion of the NPS consultation.

ACTION 4 - BEIS to circulate website link to NPS consultation and arrange a workshop with NGO Forum members to discuss NPS consultation in more detail.

The Forum offered several comments regarding the update:

- Andrew Blowers suggested that siting is given a backseat role in the nuclear debate; however it is a key issue. The NPS feels like a lazy update from a decade ago, given the only eight sites available by 2035 are the same as those available by 2025, and that the policy seems to suggest that we need nuclear energy at all cost. He stressed that up to date forecasts of rises in sea level forecasts must be considered, as they may have a significant impact on the criteria in the consultation.
- NGOs asked why the Government is pursuing this policy, considering that originally these plants were to be generating electricity by 2025 yet none will be. NGOs questioned whether foreign countries' desire to promote exports of their technology was behind this and whether risks to communities with poor infrastructure had been considered.
- Neil Crumpton suggested this could be a response to one of the Forum's papers. He questioned whether coastal questions could bring into question the rationale for nuclear deployment.
- Jo Brown suggested the original NPS accepted there would be risks to public health detriment, but priority should be to not hurt public health. She suggested that if near-surface storage of Pu was undertaken, there would be no need for small modular reactors (SMRs).

BEIS responded:

- The NPS only enables the possibility of providing development consent; it is not a guarantee of deployment.
- Developers must themselves consider infrastructure issues when projects are taken forward.
- Helen Shirley-Quirk stated that near-surface storage is separate from this NPS.
- Stephen Speed stated this NPS only covers sites that produce over 1 GW, and does not include SMRs.

3. BEIS update on consultations on Working With Communities and the NPS for Geological Disposal

BEIS gave an update on the Working With Communities and National Policy Statement for Geological Disposal consultation launches:



- The first consultation is on an NPS for Geological Disposal Facility (GDF) infrastructure. This will cover a GDF and deep investigatory boreholes in England only, and is non-site specific. An accompanying Appraisal of Sustainability and Habitats Regulations Assessment will also be included.
 - The second is Working With Communities. This is a joint England and Northern Ireland consultation, with Wales launching a consultation in parallel with BEIS. This will cover how the developer will work with willing communities to find a suitable site for a GDF.
 - The consultations will offer a means to increase understanding of how geological disposal will be implemented and what the proposals are for finalising the policy.
 - Within the consultations, the public and stakeholders are the target audience, and the timing has been sought to align with other outgoing Government publications.
 - Both consultations will last twelve weeks, and in the case of the NPS, parliamentary scrutiny including BEIS Select Committee scrutiny and parliamentary debate will be undertaken. Aiming for a designated NPS by the end of 2018 or early 2019.
 - For Working With Communities, BEIS are hoping for a final policy in the late summer.
- BEIS also offered meetings with the Forum to discuss these consultations in detail.

ACTION 5 - BEIS to arrange workshop with NGO Forum Members to discuss GDF consultation.

The NGO Forum asked whether the public could attend stakeholder events and whether the events would be near specific sites.

- Andrew Blowers also raised the need for the NGOs to have a mechanism for producing a collective response to the consultations.

BEIS responded:

- The stakeholders events will mainly be focused on NGOs and stakeholders, but public will be able to attend; although we may need to limit numbers depending on level of interest in the events.
- The GDF events will be non-site specific, but make it easy for people from all areas to attend. Officials from the Nuclear Directorate central team stated that they will work with the Forum to develop the best practice for producing a response.

4. Euratom Update and Response to Paper by Mike Taylor

Andrew Blowers apologised for Mike Taylor's absence due to adverse weather. He stated Sean Morris was to discuss the paper instead.

NGO member Sean Morris stated that the paper is very self-explanatory and that concerns exist that parts of the Directive have not been consulted on. He stated that public consultation should have been used throughout, rather than looking at bits of the Directive separately.



Katrina McLeay (BEIS) stated that the Euratom policy was being gradually revealed. She added that preliminary information had been provided to the Forum at the last two meetings, and more would follow during this update. She passed on her gratitude to Mike Taylor for the paper.

Rhiannon Harries (BEIS) noted that the public consultation on emergency preparedness and response was shared with the Forum in the Autumn. She offered several comments:

- BEIS are currently analysing the responses to the consultation and hope for a public response in the Spring.
- She reiterated that safety will come first and BEIS are looking at the latest international and IAEA guidance.

Katrina McLeay addressed the issues surrounding peer review raised by Mike Taylor:

- Neither side in the negotiations wants to compromise on nuclear safety and safeguards. There is a spirit of wanting to work together productively.
- The recent ministerial statement clearly states the direction of travel.
- There is no reason why peer review should stop after we have left Euratom, and IAEA could also be invited to do this.
- BEIS are very conscious of keeping this capability available.

Sean Morris raised his concerns that this new process will be self-policing and has not involved the public. He raised concerns regarding the clarity of maintaining safety standards post leaving Euratom. He asked if the Office for Nuclear Regulation (ONR) had the capability to maintain standards, and asked what their role would be.

Katrina McLeay responded by stating ONR already has a safety and security responsibility, but that their safeguards responsibility will grow. This will have no impact on pre-existing functions, and that resources are available for this.

Rhiannon Harries stated that ONR already have a safety inspection role, and that Euratom has a remit regarding safeguards. She noted that ONR implements the safety standards set out by Euratom, and that Ministers have been clear that standards and safeguards will be maintained.

Helen Shirley-Quirk noted that, on independent verification, IAEA will continue to participate in the safeguard inspection regime and will be expanding this role.

Sean Morris noted that he was happy with the responses given, but that with such a fundamental change the Forum would want to be consulted on these constitutional changes.

Ian Ralls raised concerns that leaving Euratom may be an attempt to reduce oversight on decommissioning and SMR development.

Katrina McLeay stated that the decision to leave the EU has been made, and that it is tied to Euratom, but that BEIS is doing its utmost to retain those elements of Euratom that are extremely positive.



She explained that new regulations that underpin the Safeguards regime would shortly be published, and that she would appreciate pre-consultation informal discussions on these regulations with the Forum.

Allan Jeffrey raised issues that may affect the Hinkley project, in particular with regard to the movement of materials and workers. He questioned whether any changes to Euratom will apply during a transition period. He also questioned what training new ONR inspectors would need, and if European specialists would be required.

Katrina McLeay responded that it is difficult to know regarding Euratom, as the negotiations have not yet started. On Hinkley, she stated these issues are for the industry as a whole, and some of the issues are within other Departments' remits. ONR's recruitment is open to those who meet the required specifications.

5. Update on Decommissioning of Reactors

BEIS gave an update on the decommissioning of UK nuclear reactors:

- BEIS notes that in the NGO Forum paper published there were concerns regarding decommissioning and funding, and the cross-subsidisation of new plants and old plants.
- Decommissioning funding is divided into three parts:
 - Magnox (managed by the NDA).
 - The AGR and PWR reactors (managed by EDF) covered by the Nuclear Liability Fund (NLF).
 - New build, funded by the Funded Decommissioning Programme.
- There is no cross-subsidisation of this funding.
- Bulk of funding comes from the EDF purchase of the AGR fleet.
- The Forum noted that there may be a shortfall in funds for decommissioning.
- Decommissioning estimate for AGR and PWR fleet is £20 billion, and NLF currently holds around £9.5 billion.
- This figure covers the whole of the decommissioning process over time, and the NLF will be managed to ensure that funding is available, including engaging in other renewables and projects.

Andrew Blowers asked for a formal written response answering every point raised by Mike Taylor's paper.

Action 6: BEIS to provide formal response to Mike Taylor's paper.

6. Closing Remarks

Andrew Blowers thanked all the attendees, and noted the meeting felt very positive. He stated that he will take forward comments with Stephen Speed in the coming weeks. He thanked the Minister for attending, and will also contact the Minister after the meeting.



Attendees list

Attendees NGO Members	Organisation
Andrew Blowers Co-Chair	BANNG
Varrie Blowers	BANNG
Mike Taylor	TASC
Neil Crumpton	People Against Wylfa B
Jo Brown	PCAH
Ian Ralls	Friends of the Earth Nuclear Network
Roy Payne	GDF Watch
Nina Schrank	Greenpeace
Rod Donington Smith	Cumbria Trust
Allan Jeffery	Stop Hinkley Campaign
Sue Aubrey	Stop Hinkley Campaign
Ruth Balogh	Friends of the Earth - West Cumbria and North Lakes
Sean Morris	Nuclear Free Local Authorities (NFLA)
Phil Davies	Nuclear Waste Advisory Associates
Dr Jill Sutcliffe	Nuclear Waste Advisory Associates
Attendees Regulators	Organisation
Dr Janet Wilson	CoRWM
Caroline Richards	Environment Agency
Alan McGoff	Environment Agency
Simon Napper	Radioactive Waste Management
Bill Hamilton	NDA
Chris Hannaway (observer)	ONR
BEIS Officials	Organisation
Parliamentary Under Secretary of State Richard Harrington	
Stephen Speed Co-Chair	BEIS Director
Helen Shirley-Quirk	BEIS Director
Rhiannon Harries	BEIS
David Wagstaff	BEIS
Katrina McLeay	BEIS
Craig Lester	BEIS
BEIS NGO Secretariat	



Summary of Actions

Action	Owner	Lead official
Action 1: The next NGO Forum meeting to use the points raised in the “NGO Nuclear Concerns “paper and “Civil Nuclear Energy Policy – An Alternative Perspective” paper as a basis for the next NGO Forum agenda.	BEIS Secretariat	BEIS Secretariat
Action 2: BEIS to provide a response to each urgent action point provided in Jo Brown’s urgent action list at the next NGO Forum.	BEIS Secretariat	BEIS Secretariat
Action 3: Produce written briefs on topics discussed (e.g. Euratom update) in order to allow NGO members, including absent members, to consider this information and formulate a response.	BEIS Secretariat	BEIS Secretariat
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