

NDA Draft Strategy (published September 2015)

NDA Response to Stakeholder Feedback

January 2016

Executive summary

This document provides a summary of the feedback received to the draft Nuclear Decommissioning Authority (NDA) Strategy, published in September 2015; and the NDA responses to the feedback.

In April 2011 the NDA published their previous Strategy setting out the strategic direction and long-term objectives for the NDA.

The Energy Act (2004) requires that the Strategy is reviewed every five years. The most recent review process commenced in April 2014 and the resulting draft Strategy was published in September 2015. The engagement period closed in November 2015.

Having considered the engagement feedback to the draft Strategy the NDA has concluded that the overall direction of travel for the draft Strategy is correct. The Strategy has been reviewed and updated in response to the feedback given during the engagement period and published for public consultation in January 2016.

Contents

Executive summary	1
Contents	2
1.0 Introduction	2
2.0 Engagement Responses	2
3.0 General Feedback	3
4.0 Site Decommissioning and Remediation	4
5.0 Spent Fuels	6
6.0 Nuclear Materials	7
7.0 Integrated Waste Management	7
8.0 Critical Enablers	9
9.0 Conclusion	15

1.0 Introduction

We published our draft Strategy between 8th September and end of November 2015 for a period of engagement. The draft Strategy included a number of questions identifying specific areas where we were looking for input. During the engagement period we delivered a number of presentations around the UK to interested stakeholders and statutory consultees. These included NDA Site Stakeholder Groups, Trade Unions, Local Authority representatives from England, Wales and Scotland, and our subsidiaries and Site Licence Companies (SLCs).

In response, we received 24 sets of feedback from a wide range of stakeholders, including individuals, public bodies and private organisations. Of the 24 respondents, 20 did not directly answer the engagement questions, but provided a more general response.

This document aims to summarise respondents' feedback against each of the strategic themes and topics, and how the range of stakeholder views received has informed our consultation Strategy document. Responses varied from detailed tactical issues for specific sites to policy issues for the UK as a whole. In responding to the engagement feedback we have only considered strategic issues. Where feedback provided is relevant to the tactical delivery of our Strategy on our sites we have forwarded this to the relevant SLC, and where the feedback is associated with policy, it has been forwarded to Department for Energy and Climate Change (DECC) and Scottish government, respectively.

In reporting the overall response to the strategic themes, 'majority' indicates the clear view of more than 50% of those who provided a response to that theme; and 'minority' indicates less than 50%. 'About half' indicates an overall response within a few percentage points of 50% (either way).

The following terms have been used in summarising additional points raised for the topic strategies in the responses: 'many' respondents indicate more than 70% of those addressing a particular topic; 'a few' respondents means fewer than 30%; and 'some' respondents refers to the range between 30% and 70%.

2.0 Engagement Responses

For each of the 27 individual topic strategies the NDA has a nominated person to act as the Strategic Authority for that subject. The relevant Strategic Authority considered all the responses received against their strategic area of expertise, and assessed the likely impact on our proposed draft Strategy.

Each of the themes and topics are considered below. A number of 'general and overview' responses were also received, and these are considered in the General Feedback section of this report.

3.0 General Feedback

The majority of respondents provided general feedback on the draft Strategy and the introductory and statutory sections describing our sites, funding, how we make decisions, and SLC/site sections.

The majority of the responses we received were broadly supportive of our proposed Strategy and considered the approach to Strategy development to be appropriate. Some of the respondents highlighted the clarity provided by the hierarchy of the strategic themes and topics.

Some respondents recognised that to make greater progress within our constrained funding would require improved efficiency across our estate, while the over-riding consideration would need to be safety of the public and workers, and protecting the environment. A few respondents made clear that making tangible progress as early as possible was important. Some respondents felt that over their mission the NDA should avoid passing on liabilities created by the current generation to future generations.

While the majority of responses reflected that the level of detail presented was appropriate, a few respondents wished to see more information, particularly related to the delivery of our Strategy and an estate-level, medium-term plan with milestone delivery commitments. Some respondents wished to take the opportunity to comment on the UK policy positions in a number of areas (e.g. Nuclear New Build).

NDA Response

We welcome the generally positive feedback received about the draft Strategy and the number of supportive comments and observations received for the strategic themes and topics. The feedback supports our approach to Strategy, its development and our view that the strategy mechanism devised for our previous Strategy continues to be appropriate.

It is clear that the respondents understand that our funding is constrained which means we must prioritise the funding allocated to us. This prioritisation is reflected in our Strategy.

We also appreciate the efficiency requirement identified by our respondents. This requirement was also reiterated by the 2015 Spending Review on which we worked with the UK government to determine what could be achieved in the current climate, balancing affordability with mission delivery.

While prioritising our work and seeking efficiencies we appreciate the over-riding need for safety, security and environmental protection in considering our decommissioning mission. Our site specific delivery plans and activities are published in our Business Plan. We make clear in our Strategy that we will not leave unassigned liability to future generations.

Responses relating to the tactical delivery of our Strategy on our sites have been forwarded to the relevant SLC, and those associated with government policy have been forwarded to DECC and Scottish government.

4.0 Site Decommissioning and Remediation

The majority of respondents showed support for our approach to the Site Decommissioning and Remediation theme. Some respondents recognised that there are financial constraints on making progress on site decommissioning and remediation, and that these constraints will significantly influence our priorities, while some respondents expressed a view that deferred decommissioning due to prioritisation could lead to higher lifetime costs to the UK taxpayer.

A few responses to the topic strategies suggested that the NDA should give a clear commitment to engaging with stakeholders (particularly local communities and Local Authorities) throughout the decommissioning journey.

Decommissioning

A few respondents recognised that decommissioning activities may themselves result in a temporary increase in risk, but these increases may be necessary to deliver enduring risk reduction.

Many respondents supported the prioritisation of decommissioning activities based on risk reduction. This approach is consistent with delivering value for money and was seen as an important issue by some of the respondents. There was recognition that site restoration activities could do harm as well as good, e.g. disturbing habitats.

Many of the respondents supported the proposed review of the deferred dismantling strategies for Magnox stations. Some respondents supported the early dismantling of Magnox reactors, while some respondents understood the potential value of deferring decommissioning.

Land Quality management

Many respondents showed support for a proportionate, risk-based approach to Land Quality Management. Respondents appreciated the benefits of in-situ solutions, with respect to minimising waste and retaining material on site rather than excavating material for disposal elsewhere.

A few respondents recognised that remediation activities could do harm as well as good (e.g. spreading contamination). Respondents stated we should avoid action where the benefits are small compared to the detriments of carrying out the remediation.

Site Interim and End States

Many respondents supported remediating sites to a condition suitable for their next planned use. Some respondents supported a pragmatic, proportionate and risk-based

approach to site decommissioning and remediation. A few respondents recognised that in these situations, it may be preferable to subject sites to long-term institutional control. However, a few respondents stated the NDA needs to reassure stakeholders that this is not an attempt to evade responsibilities.

A few respondents wanted reassurance that our aspiration is to clean up so future land use is unrestricted, however they recognised that there are situations where this is not pragmatic (e.g. grossly disproportionate costs).

Many of the respondents supported high level end state definitions with near-term focus on interim states to define the decommissioning journey. Some respondents queried whether there is adequate attention given to interim states in the draft Strategy.

A few respondents suggested that where possible the NDA should avoid interim Care and Maintenance phases for Magnox reactors prior to moving to the Care and Maintenance phase.

Land Use

Many of the respondents agreed that inclusion of Land Use as a topic strategy in Site Decommissioning and Remediation was helpful in explaining the decommissioning journey towards the next planned use.

NDA Response

We welcome the feedback on the requirement for prioritisation and efficiency. Our clear priority is to focus on those hazards that pose the greatest risk particularly with emphasis on those that are intolerable, which means directing funds towards legacy programmes such as Sellafield Legacy Ponds and Silos (LP&S), whilst making broad progress across our estate. Whatever the pace of decommissioning, our overriding consideration is always on safe, sustainable and publicly acceptable operations.

We were encouraged by the broad support for our end state topic strategy, where a number of respondents supported a pragmatic, proportionate and risk-based approach to site decommissioning and remediation.

We recognise that interim states for sites need to explain the site specific decommissioning journey. We have included some key interim states for our sites in Section 9.0 Site Licence Companies and Designated Sites with the near-term targets given in our Business Plan.

Overall the comments and observations received during the engagement period have resulted in some clarifications to the topic strategies under the Site Decommissioning and Remediation theme, but they have not resulted in any significant changes in the strategic direction.

We welcome the positive responses received about the strategic development activities being undertaken.

5.0 Spent Fuels

The majority of respondents supported our approach to spent fuel management which would see the Magnox fuel reprocessed and the contracts for oxide fuel in THORP completed. Some commented that the UK should retain reprocessing skills following the cessation of reprocessing operations. One respondent commented that in their view the conclusion of reprocessing operations was driven more by time than by need.

Spent Magnox Fuel

Some responses were supportive of reprocessing as much of the Magnox fuel as is practicable, whilst recognising that there could be some fuel left over, and supported NDA's proposal to undertake the necessary research and development (R&D) to develop alternative approaches for these potential remnants.

Some respondents recognised that the Magnox facilities are assets which have been in operation for many decades and that the age of the facilities and the cost for maintaining them are an important factor in deciding when to conclude operations.

One respondent challenged the justification for continuation until the stated 2020 date.

Spent Oxide Fuel

Some respondents commented on the importance of Sellafield to receive and manage AGR fuel including those arising from lifetime extensions by EDF Energy to their AGR fleet. Some respondents expressed a view that reprocessing of spent oxide fuel beyond the contractual amount could only be justified if there was clarity on future uses for the nuclear materials produced.

One respondent commented that spent fuel was better reprocessed than committed to a GDF and one respondent challenged the justification for continuation until the stated 2018 date.

Spent Exotic Fuel

Some respondents commented that further information was needed on how exotic fuels left over at the end of reprocessing would be managed.

Some respondents agreed that exotic fuel should be consolidated at Sellafield but one disagreed saying the DFR material should be managed in Scotland. One organisation commented that NDA should consider plans for its fuels alongside Ministry of Defence (MOD) owned irradiated fuels and that greater clarity is needed on plans for the MOD fuels.

There were few responses in this area, but many agreed that contingent strategies were required for the variety of spent exotic fuels within the UK.

NDA Response

We welcome the range of views regarding reprocessing operations for spent Magnox and oxide fuels and whether spent fuel should be disposed of to a GDF.

Completing Magnox reprocessing as far as practicable and having options to manage any remaining fuels in the event that it is not economic or possible to complete the programme remains a priority for NDA.

The UK has been reprocessing spent fuel since the 1950s. It is our intention that we undertake a study to capture this experience of reprocessing so that it can be used to help inform discussions around future nuclear R&D funding within government.

In line with the government 2014 white paper on geological disposal (*Implementing geological disposal*) our spent fuel strategies assume that, if it was to be declared as a waste spent fuel can be disposed of to a GDF.

The feedback has resulted in some clarifications to the topic strategies under the Spent Fuels Management theme. We will share the feedback on MOD irradiated fuel with MOD.

6.0 Nuclear Materials

Plutonium

All respondents recognised the importance of developing a long-term strategy for the management of plutonium. However, there were a range of views on the urgency of implementing a solution. One respondent recommended that the NDA should explore non-uranium based MOX fuels.

Uranics

Many respondents agreed with continuing to store our uranic materials until long-term options can be developed. Most views expressed a preference for not disposing of uranic materials to a GDF unless there was no other viable strategy.

NDA Response

In response to the feedback on the Plutonium strategy we have revised the Strategy Development section of the strategy to provide further clarity on our work on the re-use and immobilisation options.

We will continue to consider alternative approaches to the management and disposal of uranic materials.

7.0 Integrated Waste Management

The majority of respondents supported our approach to Integrated Waste Management, with the majority of feedback focused on the Radioactive Waste topic strategy.

Radioactive Waste

Many of the respondents addressed the issue of Radioactive Waste management and supported our proposed strategy of moving away from category management to a risk based lifecycle approach. One respondent suggested that moving away from category based management of waste would not always allow for best means of disposal for specific wastes.

Some of the respondents noted that use of the Waste Hierarchy supported the proposed approach to Radioactive Waste Management. One suggested that the way the waste hierarchy is applied to radioactive waste is not compatible with environmental principles.

Some respondents highlighted the importance of the GDF to waste management and wished to see the impact of different policies in England and Wales, and Scotland be described in more detail.

Some responses highlighted the importance of stakeholder dialogue on matters of radioactive waste management, noting particularly the need for engagement with local stakeholders.

There were a few responses suggesting closer collaboration with other waste producers when considering options for radioactive waste management.

Liquid and Gaseous Discharges

There were very few responses on the Liquid and Gaseous Discharges topic strategy, but many of the responses received supported the adaptation of the UK Liquid and Gaseous Discharges Strategy as the right approach for the NDA.

Non Radioactive Waste

Similarly to Liquid and Gaseous Discharges there were very few responses on the Non Radioactive Waste topic strategy. The responses supported our strategic approach.

NDA Response

We welcome the support for NDA to develop a single Radioactive Waste Strategy and the ongoing support for using the IWM principles (including Waste Hierarchy) as a central pillar of our strategy. As some respondents felt insufficient emphasis was placed on the policy differences in England and Wales, and Scotland, the strategy text was revised to clarify the impact of the different policy positions.

On the specific point about working together with other waste producers, we believe a careful balance needs to be reached. The legal responsibility for managing waste lies with the waste producer and, whilst we can provide strategic direction, the waste management decision must remain with waste producer.

No changes have been made to the Gaseous and Liquid Discharges and Non Radioactive Waste topic strategies in light of the feedback we received during the engagement period.

8.0 Critical Enablers

The majority of respondents agreed that the Critical Enablers were an important part of the Strategy. A few respondents felt the Critical Enablers could be perceived as of secondary importance.

NDA Response

The Critical Enablers are cross-cutting and enable the delivery of the other strategic themes that address our liabilities. Many align with our obligations under the Energy Act, such as R&D, Supply Chain Development and Socio-Economic support. There is no hierarchy of importance due to their interdependence and reliance on each other to achieve overall mission delivery. The other five strategic themes cannot be implemented without the Critical Enablers.

Health, Safety, Security, Safeguards, Environment and Quality (HSSSEQ)

Very few responses were received for the HSSSEQ topic strategy, but a number of comments and observations about Health Safety and Environment (HSE) were raised in general feedback and on the SDR theme. All respondents agreed that HSE performance was critical for the completion of the NDA's mission. Much of the general feedback was supportive of our approach to HSE, while one respondent suggested that we were in breach of our environmental commitments.

There were some detailed responses that covered how HSE performance could be improved.

NDA Response

The NDA welcomes the generally positive feedback received about our view on optimum standards of HSE performance but we recognise that there is a diverse range of views on how performance could be improved. This level of detail is not appropriate for the draft Strategy, but clarification will be made in the underpinning strategy and delivery documents.

The feedback received during the engagement period has not resulted in any changes to the HSSSEQ topic strategy.

Research and Development (R&D)

Many of the consultation responses supported our R&D strategy and its ongoing development. Many of the respondents suggested that NDA focus should remain on R&D which directly benefits the NDA mission.

Some of the respondents were supportive of the NDA taking a broader co-ordinating role where it did not impact on the core mission of the NDA. A few respondents commented that they would like to see the importance of international collaboration and learning further recognised in our Strategy.

NDA Response

We welcome the generally positive feedback received about the strategic direction of the R&D topic strategy. To ensure R&D will remain effective we will continue to encourage innovation and sharing of information.

The feedback received during the engagement period has resulted in minor clarifications to the R&D topic strategy, but they have not resulted in any significant changes in the strategic direction.

People (incorporating Skills and Capability)

All respondents agreed that in order to achieve our People topic strategy, we should continue to work with the wider nuclear industry.

Many of the respondents were concerned that there are significant areas of risk to the nuclear decommissioning skills base, local economies and future capability demands of the wider nuclear sector. A few references were made to the loss of skills due to closure of sites or specific facilities.

Many respondents supported the development of training programmes, qualifications and the close working relationship of the NDA and the wider estate with local schools, colleges, universities and other training providers to create an industry with long-term attraction.

NDA Response

The NDA welcomes the feedback that we should continue to work with the wider nuclear industry on skills but recognises that there are risks which means we will need to consider the impact of skills and resources from a number of different perspectives.

The feedback received during the engagement period has resulted in minor clarifications to the People topic strategy, but has not resulted in any significant changes in the strategic direction.

Asset Management

Many of the consultation responses supported our Asset Management topic strategy and its ongoing development. Some of the respondents suggested that the NDA should move to implementing ISO 55000 asset management standard, while some were content that NDA continued to use the equivalent Publicly Available Specification 55 (PAS-55). Many of the respondents suggested that NDA asset management focus should remain on the highest priority facilities, while a few comments and observations suggested we should adopt a broad front approach to asset management.

A few respondents commented that a reference is made to facilitating the sharing of facilities/assets across the estate (e.g. waste management facilities).

NDA Response

The NDA welcomes the generally positive feedback received about our approach to asset management. We recognise that there is a need to review the application of ISO 55000 across our estate, and we have made a commitment to review the benefits of adopting this as an alternative to PAS-55. We agree with the comment on asset sharing, and have tried emphasising this in other sections of our strategy (e.g. Section 6.1 Radioactive Waste and Case Study Consolidation).

The feedback received during the engagement phase has not resulted in any significant changes to the Asset Management topic strategy.

Contracting

Many of the respondents for the Contracting topic strategy were positive about the NDA having a range of available contracting models. Some of the respondents suggested that there should be more focus on the socio-economic aspects of contracting.

Some of the respondents recognised and welcomed the involvement of the private sector in the decommissioning mission and suggested that more could be done to encourage local suppliers to participate in the mission.

NDA Response

We welcome the strong support to our contracting approach. We are encouraged by the support of the supply chain in delivering our mission. Our intention has always been to encourage local Small and Medium Enterprises (SMEs) to participate in our mission. The proposed approaches to this have been discussed in Section 7.8 Socio-Economics.

The feedback received during the engagement period has resulted in minor clarifications to the Contracting topic strategy, but they have not resulted in any significant changes in the strategic direction.

Supply Chain Development

Many of the respondents identified the importance of the Supply Chain for the NDA mission. A few comments and observations suggested that NDA should develop requirements for the supply chain, while a few respondents suggested that the supply chain should be more open for local SMEs to benefit from the NDA mission.

One of the respondents identified that, in accordance to the Energy Act, the NDA has a responsibility to maintain and develop a robust and successful supply chain and suggested that we should also link the development to new missions and economic sustainability.

NDA Response

We are confident that through our programme of competitions we have secured world class contractors from the supply chain to manage our sites. Through our contracts with the PBOs and SLCs we incentivise innovation and efficiency to drive down the costs of delivering our mission. We will continue to build relationships with the wider supply chain and we have seen our efforts being beneficial for the wider nuclear industry (e.g. supply chain event).

Our intention has always been to encourage local Small and Medium Enterprises (SMEs) to enter our supply chain. The proposed approaches to this have been discussed in Section 7.8 Socio-Economics.

The feedback received during the engagement period has resulted in minor clarifications to the Supply Chain Development topic strategy, but it has not resulted in any significant changes in the strategic direction.

Information Governance (including Information & Knowledge Management)

Very few responses were received for the Information Governance strategy. All respondents agreed that Information Governance was important for the NDA mission. The capture of knowledge and retention of information was mentioned in a number of responses on other strategic themes and topics. Many of these comments and observations highlighted the need to capture and retain knowledge and information.

NDA Response

We welcome the generally positive feedback received about the Information Governance topic strategy. We acknowledge that the primary focus of the Strategy is to ensure that current know-how is passed on effectively to others within the industry and that any information held will be managed appropriately.

The feedback received during the engagement period has not resulted in any significant changes to the Information Governance topic strategy.

Socio-Economics

Many of the respondents were concerned that the amount of funding available for socio-economic projects would be reduced due to UK government spending restrictions. Some respondents were of the view that either the NDA should review its policy of having four priority areas for socio-economic expenditure or that a different approach should be taken and applications considered solely on their merit regardless of where they were from.

Many respondents were of the view that local communities should be more involved in the decision making concerned with the allocation of funds. There are issues here over governance and accountability of what is public money.

NDA Response

We welcome the generally positive feedback received on the Socio-Economic topic strategy and acknowledge the concerns about funding and prioritisation.

The feedback received during the engagement period has not resulted in any significant changes to the Socio-Economic topic strategy.

Public and Stakeholder Engagement

Most respondents to the public and stakeholder engagement section selected one of the options for how we should engage going forward. Answers to the question were mixed with a number of people suggesting we should continue with the current process and others suggesting we move to regional events. Some respondents believed it should be a mix of the two.

There were some requests to clarify the role of the SLC's and the role of the NDA with regard to engagement and a number of responses requested closer working relationships between NDA and Local Authorities.

NDA Response

We welcome the broad range of feedback in response to which option we should choose for engagement going forward. As there didn't appear to be a favoured option, we have modified the question in the consultation draft so that it is more open. It now asks how regional engagement could work rather than just selecting from a list of options.

In response to the feedback received, we have added a paragraph on the responsibilities of the NDA and the SLC's and also strengthened our commitment to working with Local Authorities.

Transport and Logistics

Consultation respondents generally agreed that transport is an important consideration for the movement of radioactive materials between sites. Specifically, respondents highlighted that transport was a stakeholder sensitive issue and early engagement with Local Authorities and communities was recommended where local transport plans were being developed.

In terms of preferred transport mode, many of the respondents provided their preference of rail over road, while one response also highlighted the possibility of sea transport. A few respondents also suggested that National, Regional and Local transport plans and strategies should be developed to support the mission.

One respondent was highly concerned that future transport requirements were not fully understood especially in terms of availability of the necessary transport infrastructure.

NDA Response

We welcome the feedback that several respondents support NDA's strategic preference of rail movements over road movements. We still consider sea transport as

a possible supporting alternative, especially when dealing with the long timescales associated with our site decommissioning plans.

To ensure we have a good understanding of future infrastructure requirements, we have given a commitment to review the infrastructure for the different transport modes.

The feedback received during the engagement period has resulted in minor clarifications and reorganisation of the Transport and Logistics topic strategy, but they have not resulted in any significant changes in the strategic direction.

Revenue Optimisation

Respondents recognised that securing maximum value for the UK taxpayer and considering the impact on local communities were key issues to be considered when disposing of assets.

Some feedback strongly supported maximising commercial income. Positive comments and observations were received about the potential for the NDA to benefit from the nuclear new build programme, with one respondent suggesting that the NDA should seek to integrate their sites with the proposed nuclear new build sites.

NDA Response

The NDA welcomes respondents' feedback and agree that they generally align with what we do now, and plan to do in the future. Through the execution of revenue strategies, we will ensure that we do not compromise either the Spent Fuel Strategies nor dispose of assets which are required to complete our site restoration mission.

The feedback received during the engagement period has not resulted in any changes in the Revenue Optimisation topic strategy.

International Relations

Many of the respondents for the International Relations topic strategy were positive about the proposed approach and suggested that the balance of the approach was correct. Some of the respondents suggested that there should be more focus on the learning of best practice from other decommissioning programmes.

Some of the respondents recognised the role of the NDA in promoting the UK nuclear industry abroad where it did not negatively impact on the NDA mission.

NDA Response

We welcome the generally positive feedback received about the International Relations topic strategy and acknowledge the comments and observations on learning from others decommissioning programmes and our role to share our work in the UK.

The feedback received during the engagement period has resulted in some minor clarifications to the International Relations topic strategy, but these have not changed our strategic focus.

Land and Property Management

Very few responses were received for this strategy. All the respondents recognised that securing maximum value for the UK taxpayer and considering the impact on local communities were key issues to be considered when disposing of assets. Some comments and observations about Land and Property Management were included in the Land Use topic strategy and Revenue Optimisation topic strategy.

One respondent suggested that all of the NDA assets should be included in an Asset Management plan.

NDA Response

The NDA welcomes respondents' feedback, and we agree that they generally aligned with our proposed approach.

There were some detailed responses that covered how Land and Property Management could be improved. These comments and observations were considered valid, but the level of detail was not considered to be appropriate for the draft Strategy. They will however be taken into consideration in the underpinning strategy and delivery documents.

The feedback received during the engagement period has not resulted in any significant changes to the Land and Property Management topic strategy.

9.0 Conclusion

This report summarises the key and common feedback points received during the engagement on our draft Strategy, published 8th September 2015. It does not attempt to cover all points received from respondents.

All feedback received from the 24 responses has been considered by the NDA Strategic Authorities. The feedback was broadly supportive and therefore no significant or substantive changes have been made to our proposed strategic direction. Any changes have generally involved providing additional detail or clarification to help understanding and inform our stakeholder community; in addition the more detailed comments and observations received will be taken into consideration in the underpinning strategy and delivery documents.

The revised draft of the Strategy was published for consultation on the 5th of January 2016.