



# The NDA group **Strategy**

**Stakeholder response report**  
February 2026



# Executive summary

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This document is a summary of the feedback received to the public consultation published in July 2025, of the Nuclear Decommissioning Authority (NDA) Strategy, and the NDA responses to the feedback.

In March 2021, we published our previous Strategy, setting out our strategic direction and long-term objectives.

The Energy Act (2004) requires that the Strategy is reviewed, updated and consulted on every five years. We started the most recent review process in March 2024 and, in July 2025, published a draft for public consultation.

Having reviewed the consultation feedback, we conclude that the overall Strategy direction is correct, but have made minor updates to the content accordingly. The Strategy was submitted to the Secretary of State for the Department for Energy Security and Net Zero (DESNZ), and Scottish Government Minister, and has been approved for publication.

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# 1. Introduction

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The NDA published its Draft Strategy and associated Integrated Impact Assessment (IIA) for a 12-week public consultation between 7 July and 29 September 2025, in accordance with the requirements of Part 1, Chapter 1, paragraph 12 of the Energy Act (2004). As with previous iterations, the Strategy is structured around four Driving Themes and a suite of Critical Enablers, supported by cross-cutting strategic principles that guide delivery across the NDA group.

The draft document included nine consultation questions, inviting views from stakeholders on areas where further input would be valuable. Alongside publication, we undertook an extensive programme of engagement, including a virtual Strategy webinar and live Q&A; briefings with Site Stakeholder Groups (SSG), local authorities, Nuleaf, non-governmental organisations (NGO) and industry fora; and a targeted digital communications campaign delivered through multiple online platforms.

In total, we received nearly 100 responses and close to 1,000 lines of detailed comments on specific sections of the Strategy. Respondents included statutory consultees, regulators, local authorities, NGOs, academics, supply chain organisations, operating companies, employees and members of the public. Feedback on the associated IIA is addressed in the IIA Post-Adoption Statement, published alongside the final Strategy.

This document summarises the main themes emerging from the consultation feedback and provides our response to the nine consultation questions. It also highlights how the feedback has shaped the final, post-consultation, Strategy document.

Where comments relate to operational implementation, they will be taken forward through underpinning plans, and where matters relate to government policy they will be shared and discussed with DESNZ and Scottish Government as appropriate.



## 2. Public consultation responses

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Each of our strategic themes and topic strategies has a designated strategic authority who reviewed, analysed and assessed the potential impact of consultation feedback on their area. We then organised the responses by theme and considered them alongside legal advice regarding permissible post-consultation change.

General responses and cross-cutting comments are summarised in Section 3 (General Feedback). More detailed topic-specific comments are addressed in Section 4 (Responses to Consultation Questions) and in the strategic authorities' individual responses. Most of the feedback related to requests for clarification, emphasis or refinement, rather

than proposing changes to strategic direction. Where comments were too detailed or operational in nature to be incorporated into the Strategy, these will be considered during Strategy implementation, through relevant delivery mechanisms such as:

- The NDA Business Plan
- Mission Progress Report
- Site-specific strategies and engagement processes
- Underpinning topic strategies

All comments were welcomed, recorded and reviewed, even where it would not be proportionate or appropriate to amend the Strategy.

## 3. General feedback

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Overall, respondents were supportive of the NDA's strategic direction, the continued focus on risk reduction, and the greater integration enabled through the One NDA operating model. Most stakeholders agreed that the structure of Driving Themes, Critical Enablers, NDA's role within the wider UK nuclear enterprise and cross-cutting principles provides a clear and accessible strategic framework. General feedback emphasised:

- Strong recognition of the NDA's statutory mission and long-term responsibilities
- Support for the priority placed on intolerable risk reduction at Sellafield
- Endorsement of integration and collaboration across the NDA group
- Support for clearer sustainability and circular-economy messaging
- Support for strengthened commitments on socio-economic outcomes and stakeholder engagement
- Support for the NDA's role within the wider UK nuclear enterprise
- Recognition of funding constraints and the need for realistic, risk-informed prioritisation.

Where stakeholders sought more detail – such as specific targets, delivery milestones or technical information – we generally considered this more appropriate for underlying plans and implementation documents rather than the NDA Strategy itself. As with previous Strategies, post-consultation changes largely involved clarifying language, improving narrative coherence and enhancing transparency, rather than altering strategic direction. Most respondents who provided general feedback expressed support for our approach and welcomed the opportunity to contribute to shaping the Strategy.



## Site Decommissioning and Remediation

Comments on this topic supported our approach, including our aspirations for safe stewardship, and the optimisation of the use and reuse of our estate, which we specifically asked about (see Section 4, questions 4 and 5). However, the largest number of responses related to our work at Trawsfynydd. The comments reflected concerns that we might be stopping work at the site and be changing our strategy away from continuous reactor dismantling.

### NDA response

Trawsfynydd remains our lead-and-learn site for reactor dismantling as part of our rolling programme of Magnox reactor decommissioning. Its strategic importance reflects the work underway already in delivering hazard reduction, asbestos removal, demolition and the near-complete treatment of legacy intermediate level waste. These achievements provide valuable learning for reactor dismantling and other work across our sites. Furthermore, the work of Nuclear Restoration Services at Trawsfynydd is delivering new projects providing local jobs. Over the next few years, a £70 million reactor-height-reduction project will create more than 100 roles at the site, alongside cooling pond

decommissioning and pioneering onsite disposal approaches. Subject to approvals, this could set a benchmark for sustainable, affordable decommissioning across our other sites.

Nonetheless, we must balance priorities across our sites, including demands on key skills and capabilities as well as funding, to ensure we can continue to deliver work at an affordable pace and share learning. Consequently, we are reviewing and expect to adapt the pace of our work at Trawsfynydd and at our other sites.

Our strategy remains the pursuit of continuous reactor dismantling at Trawsfynydd, sharing learning with Dungeness as our other 'lead-and-learn' site. However, we may need to adjust the pace of delivery. We have no plans to change this strategy, but we keep all our strategies under review as explained in the Strategy document under Decommissioning. Doing so allows us to take account of additional or more accurate information that confirms our existing strategy or makes the case for change.





## Spent Fuels

There were relatively few responses on spent fuel management. Of those received, half stated a preference for a closed fuel cycle and future reprocessing on a variety of grounds including sustainability, energy security and commercial opportunities. One response noted the development of the strategy and another pointed to perceived gaps in government policy and issues of fuel ownership that limit strategy development and planning. (Under current policy, owners decide how their spent fuel will be managed.) The same response also raised concerns over the management of 'non-standard fuels' stored at Sellafield.

### **NDA response**

We welcome the range of views regarding spent-fuels management options.

As noted by some of the consultation responses, the decision to reprocess spent fuel or not is primarily one for the spent-fuel owners. We understand the point about the current mixed ownership of spent fuels in storage at Sellafield but do not consider this to be holding back progress on developing management plans.

We are undertaking technical and development work on the management of a range of spent fuels both under NDA programmes (such as Nuclear Research Portfolio – see Research and Development under Critical Enablers) and in partnership with Sellafield Ltd and Nuclear Waste Services (NWS). This includes technologies for the drying of Advanced Gas-Cooled Reactor (AGR) and other oxide fuels, and examining the options for packaging of so called 'non-standard fuels' such as those associated with Steam-Generating Heavy Water Reactors (SGHWR). We are also supporting work by Sellafield and NWS to use the existing process plant at Sellafield to package small quantities of a range of non-standard fuels for disposal where that can be shown to be a safe, secure and environmentally responsible option. In this respect, we envisage steady progress on the management of a range of spent fuels at Sellafield during the Strategy period.





## Nuclear Materials

The management of the UK's plutonium inventory, in particular the updated immobilisation and disposal strategy in line with government policy as of January 2025, is a key issue for the NDA. Some respondents supported the clarity this provided, while others felt that a reuse approach should be adopted, in which civil plutonium is turned into Mixed Oxide Fuel (MOX) and irradiated. There were also some requests for communication and engagement, particularly with local authorities and communities, to understand the implications of this strategy for local infrastructure, investment and workforce. Some responses expressed support for the continued safe and secure storage of our uranium, and the potential reuse in the nuclear fuel cycle, in support of advanced nuclear reactors.

### **NDA response**

We welcome the range of views received regarding safe and secure storage of our nuclear materials.

We are aware that there are a range of views on the future management of the

UK's civil plutonium stockpile and that there are some stakeholders who would prefer for the material to be managed via re-use in new-build reactors. However, the NDA's strategy aligns with UK government policy to immobilise and dispose of the UK's civil plutonium stockpile.

With respect to communication and engagement, the new government policy was announced in January 2025 and we are focusing on selecting appropriate technology solutions and standing up a programme to deliver the relevant capability. As this process progresses, we and our site licence companies will engage with relevant stakeholders, including the local community, to ensure that relevant information is communicated effectively.

In relation to uranium, the uranium consolidation programme continues to promote safe and secure storage and plays a key role in our national decommissioning mission. We continue to review and implement the optimum management strategies for our varying forms of uranium.





## Integrated Waste Management

Most respondents supported our risk-informed approach and appreciated further consideration of non-radioactive wastes, especially in line with circular economy principles.

We received specific comments on our Radioactive Waste topic and have made slight modifications to the Strategy accordingly. Some respondents sought greater detail on how we would implement the strategy. We will consider this feedback as we review and update our 2019 Radioactive Waste Strategy, which will be subject to stakeholder engagement.

Only very few responses related to the liquid and gaseous discharges topic, and most supported the adoption of the UK Liquid and Gaseous Discharges Strategy as the right approach. We welcomed all comments and, upon review, have made minor clarifications in each of the topic strategies and lifecycle stages.

### **NDA response**

As a result of these comments, we have made minor changes to our Integrated Waste Management strategic theme where the overall position remains essentially the same. We will begin reviewing our Radioactive Waste Strategy in 2026 and aim to finish in early 2028.



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## Critical Enablers

**Health, safety and wellbeing**

Very few general responses were received on the health, safety and wellbeing (HSW) topic strategy, with most respondents choosing to answer the consultation question. Of those received, a couple focused on quality control of graphics in the document, one endorsed the strategy and its alignment with key large projects, and the remainder stressed the strength of using the HSW strategy as a tool for supporting mission delivery.

**NDA response**

We welcome the positive feedback. In response, we have changed the graphic referred to and strengthened the wording related to mission delivery of this Critical Enabler.

We welcome the recognition of the importance of stakeholder alignment and agree with this feedback.

We have updated the resulting HSW topic strategy as described and will be developing a detailed plan for its delivery.

**Environment**

Feedback on the environment Critical Enabler was varied and generally constructive, with many comments cutting across other strategic areas. Stakeholders emphasised the importance of environmental protection, carbon reduction and climate resilience, while recognising the need to innovate within funding constraints. There was strong interest in further integrating circular-economy principles and explaining the potential benefits more clearly. Some respondents sought specific targets in the Strategy and greater commitment to open and transparent reporting against environmental and sustainability objectives. The separation of environment from health, safety and wellbeing as a standalone Critical Enabler was welcomed. Several comments focused on land use, green space, landscape sensitivities, habitat restoration and site-specific issues such as noise, vibration, light pollution, traffic and local habitat improvements.

**NDA response**

The NDA welcomes the constructive feedback received on the environment topic strategy.

In response, we have strengthened the Strategy text on circular-economy principles and their potential benefits. While we do not consider the Strategy to be the right place to set detailed objectives and targets, we have reinforced our commitments to developing and monitoring against an environmental plan, using environmental key performance indicators, and improving transparent sustainability reporting. We have also clarified our aim to meet or exceed relevant regulatory standards.

More detailed and site-specific matters are not appropriate to address within the NDA Strategy itself. However, all comments have been carefully considered and will inform implementation during the Strategy period, including site-level planning, engagement with regulators and local stakeholders, and the development of supporting plans and programmes.

**Security and resilience**

Stakeholders provided only a small number of comments directly related to the security and resilience (SAR) Critical Enabler, all of which were constructive and came from individuals working within the civil nuclear sector. Feedback focused on clarification of the Strategy content. One comment queried whether security and resilience activities might be deferred prior to achieving site end states. Another response questioned definitions and the extent to which the SAR scope should be set out in the Strategy text.

**NDA response**

The NDA welcomes the feedback received on SAR. Given the limited nature of the comments, which largely asked for minor clarification, no changes are proposed to the SAR Critical Enabler text. We remain clear that security and resilience are not activities that can be deferred and must be proportionately maintained throughout the decommissioning lifecycle. We will continue to work with local authorities, government and other stakeholders to ensure that SAR implementation remains fit for purpose across all NDA locations, rather than through further changes to the NDA Strategy wording.

## Cyber security

Stakeholders recognised the importance of cyber security as a Critical Enabler and welcomed the Strategy's acknowledgement of the need for a strong, group-wide cyber capability. Feedback highlighted the rapidly evolving threat landscape, including emerging risks associated with artificial intelligence (AI) and new technologies. Respondents supported the Strategy's emphasis on continuous improvement, regular assessment of cyber risk, and alignment with national security requirements. Some comments encouraged us to maintain flexibility in adapting to new threats and to ensure that cyber considerations remain central to mission delivery.

### NDA response

The NDA welcomes the constructive feedback received on cyber security. The Strategy already reflects our commitment to maintaining robust, proportionate and adaptive cyber-security arrangements across the group. The feedback aligns with our existing programme of work, including strengthening group-wide cyber services, enhancing resilience and ensuring alignment with national policy and regulatory expectations. We will continue to monitor the evolving threat landscape and update and enhance our cyber-security approach as part of routine strategy and risk reviews. No changes to the wording of the Cyber security Critical Enabler within the Strategy are proposed following consultation feedback.

## Research, development and innovation

Respondents were supportive of research, development and innovation (RD&I), recognising its key role on a local, regional and global level. Our collaborative approach with the supply chain, academia, regulators and the wider nuclear sector was endorsed, with an appetite for us to continue to extend collaboration. Respondents also emphasised that innovation should be sought across all areas of mission delivery.

Strong support was shown for sustained RD&I funding, moving beyond annual funding cycles. Many have encouraged us to continue exploring longer-term procurement methods such as competitive flexible procedures to support development of innovative treatment solutions, and build supply-chain confidence and increase accessibility for smaller companies.

The role NDA RD&I plays in developing skills and retaining talent was emphasised, with strong support for existing partnership approaches such as the Plutonium Ceramics Academics Hub. The role of UK universities as global leaders in decommissioning and key partners in delivering innovation and skills was also recognised.

A minority of respondents have urged us to be ambitious as economic constraints increase the need for innovation, supporting the development of integrated land reuse solutions that could foster local innovation hubs or increased funding to high-risk, high-return projects.

### NDA response

The NDA welcomes, and is grateful for, the engagement. The level of feedback was significant, informative and useful.

Most responses were supportive of the RD&I strategy. We are pleased that our key themes of collaboration and learning, delivering innovation, building confidence in new solutions and developing future talent were well received. We fully agree with seeking innovation across all aspects of delivery, and this is covered more fully in our Innovation Strategy. We continue to be committed to creating socio-economic impact through our RD&I activities.

We will continue to expand our collaborative approaches, building on experience from, for example, Robotics and Artificial Intelligence Collaboration, to work with wider sectors, nuclear new build, supply chain, problem holders and new partners. We note that the cancellation of the Asbestos Innovation

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Partnership has affected supply chain confidence and certainty, and we remain committed to exploring ways to encourage innovation within and through our procurement mechanisms. We are also partnering across the sector to access new supply chains through collaboration with the Defence and Security Accelerator.

Where respondents recommended specific areas of technical development or interest, such as precision measurement, remote sensing, characterisation technologies and materials reuse, we will consider them as part of our Areas of Research Interest update, to be published in early 2026.

### People

Feedback on the people theme was broadly supportive, highlighting the need for future-focused skills development, structured knowledge transfer and strong partnerships across the nuclear sector. Respondents emphasised apprenticeships, training and education initiatives, workforce mobility and proactive planning to address job reductions and retention challenges. There was also a call for transparent reward mechanisms and resource allocation aligned with strategic priorities.

### NDA response

The NDA welcomes the feedback received on the people theme, which reinforces our intent to develop programmes of activity collaboratively across the NDA group and with our wider stakeholders. We are conscious of the links to socio-economic and supply chain strategies and, while these do not require material changes to the content of the people strategy, they will shape the way we work in the future. We will ensure that feedback on skills development, knowledge transfer, apprenticeships, training and education, workforce planning, mobility, retention, reward and resource allocation informs our implementation plans. We will prioritise adaptability, resilience and collaboration across the nuclear enterprise, supporting

current and future mission requirements. These currently do not require any material changes to Strategy content.

### Asset management and continuous improvement

A significant number of consultation responses were received regarding the asset management and continuous improvement topic strategy. Most respondents expressed strong support for the strategic approach and its delivery, continued development and relevance in managing our ageing asset base. Some feedback called for clearer articulation of goals linked to broader strategic themes such as climate change and the driving strategies, and detailed responses with regards to our activities. These elements are embedded within our underpinning plans and consistent with ISO 55000 principles, which focus on aligning and optimising activities to deliver mission objectives. Several comments outlined specific operating company issues. Although these fall outside the NDA's direct remit, the rigorous application of the strategy by the operating companies will help address these concerns effectively.

### NDA response

The NDA welcomes the positive and supportive feedback received about our approach to asset management and continuous improvement. We appreciate the feedback and support being provided and look forward to continuing engagement as an essential part of bringing good practice to our group.

Our approach will continue to develop and be delivered, in collaboration with our operating companies, as a Critical Enabler to the delivery of our mission.

## Commercial and supply chain

The responses received for the commercial and supply chain critical Enabler mainly related to small and medium enterprises (SME), engagement with local supply chains, and funding.

Although some suggestions extended beyond the direct remit of the commercial and supply chain function, we greatly value the input provided. Each comment was considered, and many align closely with the priorities and actions already outlined in the Draft Strategy. We remain committed to delivering a strategy that reflects stakeholder priorities and drives meaningful impact across our activities. More information is provided in the consultation question response.

### NDA response

We are grateful for the time spent by stakeholders in providing feedback on the commercial and supply chain Critical Enabler and will continue to focus on these areas through supply-chain engagement. The feedback helps us ensure our strategy remains aligned with our stakeholders' priorities. We remain committed to delivering on the objectives outlined in the commercial and supply chain strategy in compliance with legislative requirements.

## Information governance

Feedback on information governance was supportive, recognising its critical role in enabling effective delivery of the NDA mission, particularly in areas such as Integrated Waste Management. Respondents emphasised the importance of prioritised and coordinated knowledge-management activities, long-term stewardship of information, and appropriate handling of heritage and legacy records. The role of Nucleus, the Nuclear and Caithness Archives, was highlighted as vitally important for the secure preservation of records over long timescales. Helpful suggestions were made for areas of continued focus, most of which align with work already underway across the group.

### NDA response

The NDA welcomes the supportive and constructive feedback received. Information governance is fundamental to safe, secure and transparent mission delivery, and we remain committed to continuous improvement in this area. Many of the suggestions provided during consultation are already being progressed through our established programmes on knowledge management, records retention, data stewardship and long-term archiving. Given this alignment, no changes to the information governance Critical Enabler text in the Strategy are considered necessary. All comments will be taken into account as part of implementation.

## Socio-economics

Feedback on the socio-economics Critical Enabler was broadly supportive, with respondents recognising the importance of delivering meaningful social and economic benefits for communities around NDA sites. Stakeholders welcomed the continued engagement with local authorities, Nuleaf and other community partners, and acknowledged the progress made since the publication of the Social Impact and Communities Strategy in 2024. Comments reinforced the value of evidence-based socio-economic interventions, the use of social return on investment measures, and transparency around local investment and outcomes.

Respondents emphasised the importance of long-term planning, noting the significance of refreshing the economic impact studies and the need to maintain consistent, well-governed decision-making across the group. Several stakeholders highlighted the importance of sustained engagement as the NDA portfolio evolves – particularly with communities transitioning from generation to decommissioning, such as AGR communities. There was strong support for locally co-created interventions and for maintaining a flexible grant-giving approach that responds to local need.

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**NDA response**

The NDA welcomes the constructive and supportive feedback on the socio-economics Critical Enabler. The comments align closely with the strategic direction set out in the Social Impact and Communities Strategy (2024) and reinforce our commitment to delivering long-term, evidence-driven socio-economic benefit across our communities. In response to feedback, we have;

- Strengthened our strategic narrative by confirming that we will further develop our socio-economic approach in line with changes to our estate, updated independent economic studies and continued improvements in group-wide grant-governance arrangements
- Made a new forward-looking commitment to undertake a comprehensive review of the Social Impact and Communities Strategy and publish a new strategy in Financial Year 2027/28
- Reaffirmed our commitment to transparent reporting, including publication of the refreshed Economic Impact Studies and continued development of Social Return on Investment evaluation across socio-economic investments.

We will also continue strong engagement with local authorities, partners and community organisations to ensure interventions remain locally co-created, strategically aligned and responsive to emerging needs.

The feedback received does not require changes to the NDA Strategy text, but all comments have been noted and will inform implementation planning and the forthcoming refresh of the Social Impact and Communities Strategy.

**Digital, data and artificial intelligence**

Stakeholders agreed with the importance of digital, data and artificial intelligence as a Critical Enabler. Feedback was constructive and forward-looking, emphasising the

need for a programmatic, well-governed approach that prioritises value creation, clear business outcomes and long-term planning. Respondents highlighted the importance of robust data foundations, effective governance and practical application of digital technologies – such as digital twins, AI for operational efficiency and integrated data platforms. The need to develop digital capabilities and skills across the workforce was also emphasised.

**NDA response**

The NDA welcomes the positive and detailed feedback received. The focus on governance, prioritisation, data foundations and value-driven innovation is consistent with the approach outlined in the Strategy and with work already underway across the group. We recognise the importance of ensuring that digital and AI technologies are deployed where they can deliver measurable mission, safety, environmental and socio-economic benefits. No changes to the Strategy text are proposed, but the insights provided will be used to inform implementation planning, capability development and future digital initiatives across the NDA group.

**Public and stakeholder engagement**

The vast majority of comments on the public and stakeholder engagement Critical Enabler supported our overall approach, drive for openness and transparency, and focus on building understanding, confidence and trust in the NDA mission. Stakeholders emphasised the importance of maintaining and strengthening engagement with SSGs and local authorities, particularly on decommissioning plans, land reuse and the interaction with new nuclear and other developments.

A recurring theme was the need for early engagement on emerging proposals, better coordination of a "One NDA" approach across operating companies, and more diverse and inclusive engagement – including attempts to reach seldom-heard groups and those communities transitioning from generation to decommissioning (for example, some AGR communities).

**NDA response**

The NDA welcomes the constructive feedback on the public and stakeholder engagement Critical Enabler. In response to the comments received, we have strengthened the Strategy text to place greater emphasis on widening participation in our engagement, including a clearer focus on supporting more diverse voices at local and regional levels and on continuing to use a broad range of outreach methods, such as social and digital media.

We have also added an explicit commitment that: "We will endeavour to engage in a timely, proportionate and appropriate manner on matters of stakeholder interest, considering the different needs of our audiences." This reflects stakeholder expectations regarding earlier, targeted engagement and a recognition that audiences have different preferences for how we conduct that engagement.

We will continue to work closely with our operating companies, building on the SSG review and other improvement plans, to support locally tailored community outreach while improving coordination under the One NDA model.

More detailed, site-specific points raised through consultation will be taken forward through our ongoing engagement with SSGs, local authorities, NGOs and other partners as part of the Strategy implementation rather than by making further changes to the NDA Strategy text.

**Transport and logistics**

A few respondents welcomed the NDA Strategy's preference for the use of rail rather than road for transport. The NDA strategy is to look to use rail where this is appropriate, as this can minimise the impacts on communities and on the environment.

One respondent noted that the bulk of radioactive waste destined for the GDF arises from Sellafield, and a GDF remote from

Cumbria would present a transportation challenge. This is well understood and, for this reason, transport is an important consideration in the GDF siting process. A few respondents called for local transport strategies and traffic management plans, including risk assessments and engagement with affected communities. Where such plans and assessments relating to specific sites and routes are required, these would be produced at a lower level than the overarching NDA Strategy document.

Some of these responses referred to increases in traffic and construction due to new nuclear build, which is not the NDA's responsibility but a matter for new build organisations.

A couple of responses asked for a more detailed roadmap, for example, for transport decarbonisation. Our view is that the NDA Strategy should set out high-level intent rather than detailed delivery targets.

One respondent asked whether communities should be compensated for radioactive materials being transported through their area. Radioactive material is transported in accordance with regulations which ensure that the public are properly protected, and compensation is therefore not considered appropriate.

**NDA response**

The NDA welcomes the comments on the transport and logistics section. Feedback has been carefully considered. While we have not changed the Strategy text, we will, where appropriate, use the feedback to improve the way we deliver the Strategy.

**International relations**

Most responses relating to international relations were positive. Respondents supported the NDA's targeted international relations strategy, noting the importance of facilitating mission delivery, demonstrating global leadership and generating wider UK benefits. The approach of leveraging peer-to-

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peer collaborations, influencing international standards and promoting UK supply-chain expertise was supported.

A small number of responses encouraged us to expand our focus to broader topics, such as shared global challenges, sustainability, climate change, employment and skills, and public engagement.

A minority of respondents encouraged us to further support and enhance opportunities for the broader UK decommissioning supply chain by sharing experience and skills on the global stage or commercialising products and services developed by the NDA group.

**NDA response**

The NDA welcomes the feedback from stakeholders and support for the international relations strategic objectives.

Our bilateral engagement and work through the International Atomic Energy Agency (IAEA) and Nuclear Energy Agency (NEA) give us the opportunity to learn from other countries on a wide variety of topics, including stakeholder engagement, sustainable development goals and communications strategy, and we have expanded the text in the strategy to be clearer about this.

The strategy sets out our objective to “Provide international leadership on decommissioning and radioactive waste management and disposal” and notes that “Where appropriate, we will take advantage of international opportunities to generate revenue” and “to enhance the reputation of the UK nuclear industry, enable commercial opportunities for the UK supply chain”. The NDA does not have an objective of growing its international commercial activity beyond what is set out in the current strategy.



## 4. Responses to the consultation questions

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The remainder of this document provides a high-level summary of the public consultation feedback and the NDA's response to these.

### **Q1. Do you think the introduction to our Draft Strategy provides a clear and accessible overview of our purpose, challenges and approach? Is there any other context or information you would find helpful?**

Most respondents agreed that the introductory section provided a clear and accessible overview of the NDA's purpose, statutory responsibilities and long-term mission. Stakeholders valued the high-level explanation of the One NDA group model, the scale and complexity of the mission and the strategic context in which the NDA operates.

Several respondents asked for greater clarity on how the Strategy relates to other NDA publications (for example, the Business Plan and Mission Progress Report) and suggested that the introduction could more clearly signpost where detailed commitments, milestones and performance information can be found. A small number of comments requested clearer explanation of the NDA's role in the wider UK nuclear sector, and the distinction between NDA's statutory mission and areas where it has a supporting or advisory role. There were also requests to reference the NDA's sustainability commitments earlier in the narrative.

#### **NDA response**

The NDA welcomes the feedback. In response to suggestions for further clarity, the introductory section has been strengthened to:

- More clearly set out the Strategy's statutory basis under the Energy Act 2004
- Explain how the Strategy links to other NDA publications (Business Plan, Mission Progress Report, Annual Report and Accounts)
- Clarify the boundary between the NDA's core statutory mission and its supporting

- role in the wider UK nuclear enterprise
- Highlight earlier in the document the importance of sustainability as a cross-cutting principle.

These refinements do not change the strategic direction but improve transparency and readability. More detailed operational information continues to sit outside the Strategy in the appropriate governance documents.

### **Q2. Do you agree that our Strategy embeds sustainability throughout – including alignment with the UN Sustainable Development Goals and the NDA group sustainability definition? Are there any areas where our approach could be strengthened?**

Respondents broadly recognised and agreed with the strategic importance of aligning with the United Nations (UN) Sustainable Development Goals (SDG) and the NDA group's sustainability definition but recognised that the definition itself was not included. They also recognised that the strategy had made attempts to integrate and hardwire sustainability throughout. Many respondents were supportive of moving sustainability to a cross-cutting theme rather than keeping it as a Critical Enabler. However, some were concerned that this move could risk that sustainability is not maintained and assured in its own right. Many respondents also requested further detail around material topics, links to SDGs and how the NDA is expecting to measure progress against each of the goals, topics and targets. Detailed suggestions were made on the continued hardwiring of sustainability and how this can be done.

#### **NDA response**

The NDA recognises the importance of sustainability in delivering its mission and wants to implement the approach to sustainability that was included in the 2024 DESNZ policy framework. We therefore moved sustainability from being a Critical Enabler,

instead making it a hardwired, cross-cutting theme. Following feedback, we have included the NDA group sustainability definition in the strategy, and modified it to clearly show that sustainability is no longer a Critical Enabler, but hardwired across the Driving Themes and Critical Enablers. This approach is also reflected visually in section 9 of the Strategy, where we have updated the “components of our strategy” diagram to show sustainability explicitly positioned between the Driving Themes and the Critical Enablers, reinforcing how it is embedded across the whole Strategy.

We also now reference the recent Sustainability at the NDA publication, which has more detail on how the NDA mission interacts with different SDGs. In addition, our refreshed sustainability strategy will give further detail on material topics and performance against these topics. This is also made clear in the final NDA Strategy.

**Q3. Do you support the approach set out in our group Strategy and its focus on collective delivery across the NDA group? Are there any significant activities or opportunities you think we should also highlight?**

Respondents were broadly supportive of the group-wide approach set out in the Strategy and agreed that collective delivery under the One NDA model is essential to mission success. Many welcomed the clear 25-year expectations and the 2050 vision, the articulation of the strategic principles (mission first, waste-informed decommissioning, proportionality and efficient use of group resources), and the emphasis on safe stewardship across the estate.

Some respondents asked for greater clarity on how group-level priorities are set and how decisions on pace, sequencing and deferrals are made, particularly where there are competing demands across sites. Some people sought reassurance that new

missions (for example, AGR decommissioning or defence-related liabilities) would not compromise progress on the core legacy mission. Others encouraged the NDA to make the role of circular-economy principles clearer, and to highlight more explicitly the socio-economic benefits of group-wide delivery across regions, not just at Sellafield.

**NDA response**

The NDA welcomes the strong support for the group Strategy and the One NDA approach. In response to feedback, we have refined Section 3 to improve clarity and transparency while keeping the overall strategic direction unchanged. In particular, we have:

- Reinforced our strategic imperatives by explicitly stating that safety, security and environmental protection remain our highest-level imperatives for all group activity
- Made circular economy more explicit by setting out that we will apply circular-economy principles across the group – reusing assets, reducing waste and maximising resource efficiencies wherever practicable – as a core underpinning of sustainability and long-term value
- Strengthened transparency on deferrals by recognising that not all work can be delivered at the same time and committing to managing any delay or deferral transparently
- Restated our top strategic imperative by making clear that addressing intolerable hazards and risks at Sellafield remains our highest strategic imperative within the group strategy
- Clarified how major interventions are delivered by expanding the description of Group Action Plans and their oversight, emphasising that these are the primary mechanism for aligning the NDA, operating companies, strategic authorities and regulators around the most impactful strategic interventions
- Provided reassurance on new missions and wider benefits by clarifying that,

## 4. Responses to the consultation questions

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where new missions are received (for example, AGR decommissioning), associated funding and governance arrangements will be agreed with government and prioritisation across our core mission will remain risk-led.

### **Q4. Do you think our aspirations for 'safe stewardship' – the safe and sustainable management of our estate – are clear and appropriate? What other aspirations should we consider?**

We received significant support for our aspiration for safe stewardship. There were no comments to suggest that our aspirations were not clear and appropriate. Instead, respondents commented on the value of what we proposed, including ensuring that roles and responsibilities for estate management were made clear, and that the NDA has the appropriate infrastructure and arrangements in place to deliver decommissioning. Suggestions of other aspirations we should consider included:

- Greater standardisation and shared resources across the Group relating to knowledge management
- More proactive asset risk management approaches to provide a stronger focus on anticipating and mitigating emergent high-risk or high-cost asset issues
- An 'adaptive stewardship' approach which considers the ability of the NDA to respond flexibly to changes in situation.

Comments also noted the potential for multiple nuclear and other developments close to NDA sites, and suggested that the strategy should consider cumulative impacts. Some respondents offered suggestions on the capabilities and support they might offer in this area, citing examples of experience and good practice elsewhere.

### **NDA response**

We welcome the support our proposed strategy received and the range of

constructive suggestions of other aspirations we might consider. There was no suggestion that our approach should change and so we have not amended our Strategy. As we develop our estate management plan, we will consider the suggestions, comments, and examples of good practice and learning from other areas. We will reach out to a broad stakeholder group to help inform our thinking.

### **Q5. Do you think our objective to optimise the use and reuse of our estate is clear and appropriate? Are there other opportunities we should explore to achieve this goal?**

Responses supported our objective to optimise the use and reuse of our estate, and commitment to working with others as we consider how best to do this. Many commented on the importance of early engagement with a wide range of stakeholders including communities and potential developers, and transparency on potential future land availability. Respondents also urged caution in this area, noting that we must retain the land needed to support our mission and, in the event of land being released, be confident that proposed developments do not compete with the resources and infrastructure needed for NDA mission delivery. We had several comments that emphasised the need for the reuse strategy to consider long-term UK growth as a clear aspiration, suggesting that the NDA estate should be leveraged for redevelopment and to support UK growth including new nuclear development, fusion and other research. Given the new nuclear opportunities, some people queried whether our aspiration to 'minimise the nuclear footprint' was justified.

### **NDA response**

We welcome the support for optimisation of our estate use and note that there are a range of diverse potential opportunities which this could realise. Our ability to deliver the mission has, at its heart, the interest of

supporting UK growth in whatever form that may take. We recognise that our desire to reduce our nuclear footprint may seem to be at odds with the interests of others in the development of further nuclear activities – but a reduction in ‘our’ nuclear footprint does not preclude nuclear developments in these areas. Our responsibility is for the delivery of decommissioning and clean-up of our sites, enabling the further, site-specific, beneficial reuse, whatever that use may be.

We agree with the importance of early and timely engagement and transparency relating to how we use our land and the opportunities that may come forward. We also agree that we should be cautious not to release land until we are confident that it is surplus to our needs, and we will improve the transparency of our assumptions and considerations in this regard. Developing local and regional masterplans should help mitigate the risks to our mission of any developments that take place on land we release.

These considerations do not alter our proposed strategy and we have not changed it as a consequence of these responses, but they will inform our further work in this area.

**Q6. Do our updated set of Integrated Waste Management (IWM) principles reflect the nature of our mission and cover the key areas of focus for waste management?**

Most responses were positive and recognised the importance of the IWM principles. These principles provide a clear strategic framework that highlights our priorities and expectations, including the effective use of the Waste Hierarchy and the aim to reduce overall waste volumes.

**NDA response**

The NDA welcomes the supportive feedback received in this area. There have been no significant modifications to the IWM principles as a result of stakeholder feedback.

**Q7. Are there any specific opportunities or considerations you think we should take into account when developing solutions for deriving value from non-radioactive materials, such as through reuse and recycling?**

Respondents were mainly supportive of the increased focus on non-radioactive waste and the application of circular-economy principles. Many recognised that non-radioactive arisings offer material opportunities to reduce costs, carbon and landfill use, provided safety and regulatory requirements are met.

A common theme was the need to apply circular-economy thinking across the full lifecycle of materials, not only at end of life. Stakeholders encouraged us to link reuse and recycling more clearly to procurement, design and end-state planning, and to optimise across non-radioactive material groupings. Several comments highlighted practical options such as on-site or near-site reuse of excavated materials and rubble, closer collaboration with conventional waste-management sectors and clearer pipelines of reuse opportunities. Many respondents also emphasised early and ongoing engagement with local authorities, SSGs and communities, especially where new facilities or in-situ management of large volumes of material are proposed.

**NDA response**

The NDA welcomes the strong and largely supportive feedback on non-radioactive waste. This section already reflects our intent to apply IWM principles and circular-economy thinking to all wastes, while remaining compliant. We agree that non-radioactive materials could present significant environmental, socio-economic and value-for-money opportunities where reuse and recycling are safe, practicable and affordable.

We do not propose major changes to the strategic direction. However, we have

## 4. Responses to the consultation questions

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made minor clarifications to strengthen the narrative, including making more explicit our intent to optimise across key non-radioactive material groupings. The more detailed, operational suggestions will be considered through integrated waste implementation plans and site-level planning rather than in the NDA Strategy itself. Overall, the feedback supports our current approach, with the emphasis now on effective implementation and optimisation, rather than changing strategic direction.

**Q8. Our Strategy sets out the NDA's role in supporting the wider UK nuclear enterprise, while maintaining our focus on core mission delivery. Do you think the Strategy clearly defines our position? Are there any additional areas we should consider or clarify?**

Many respondents agreed that the Strategy provides a clear and proportionate description of the NDA's role within the wider UK nuclear enterprise, and several welcomed the inclusion of the diagram illustrating the interfaces and boundaries of this role. We received a broad spectrum of views. A small number of stakeholders encouraged us to take a more proactive and ambitious role, while a similar number urged caution. Overall, respondents considered the articulation of our role to be balanced and appropriate.

Some comments focused on broader matters relating to the UK nuclear enterprise (e.g. Sizewell C or the Submarine Dismantling Programme), which fall outside the NDA's remit. Stakeholders mainly asked us to clarify two areas:

- Funding and financial arrangements associated with the transfer of non-NDA liabilities
- Our relationship with Great British Energy – Nuclear (GBE-N), given its emerging role in the nuclear landscape.

### **NDA response**

The NDA welcomes the constructive and largely positive feedback on this section. Stakeholders recognise the clarity of our position and the importance of maintaining a strong focus on our core mission while supporting government policy objectives where appropriate.

In response to the feedback, we have:

- Clarified the finance and funding position in the AGR case study and reflected that liability transfers are considered on a case-by-case basis with bespoke financial arrangements
- Added an explanatory paragraph on our evolving relationship with GBE-N, to ensure transparency on respective roles and responsibilities.

We consider that these refinements strengthen the accessibility and accuracy of the section without altering its strategic intent. Broader comments relating to areas outside our statutory remit have been noted and, where relevant, shared with the appropriate bodies. The overall consultation feedback indicates strong support for the role described in the Strategy.

**Q9. Our mission and strategy delivery are underpinned by our Critical Enablers. Do you agree with the proposed Critical Enabler strategies and that we have focused on the most important issues in each topic? Are there further suggestions you might have for the NDA to consider, whether general or on a specific Critical Enabler?**

Most respondents agreed that the set of Critical Enablers is comprehensive and reflects the most important factors underpinning safe, secure and effective mission delivery. Stakeholders broadly supported the level of ambition and direction set out across areas such as people, environment, RD&I, socio-economics, commercial, and security and resilience.

Feedback highlighted several themes, including the need for long-term skills planning, opportunities to strengthen supply-chain engagement (particularly with SMEs), continued focus on digital innovation and the importance of early engagement with local authorities and communities. Some comments related to operational or site-specific issues, which are more appropriately addressed through implementation plans rather than in the NDA Strategy.

**NDA response**

The NDA welcomes the comprehensive and constructive feedback on the Critical Enablers. In response, we have updated the Strategy to:

- Strengthen circular-economy messaging
- Clarify long-term skills needs and the

- importance of early planning
- Enhance sustainability reporting transparency
- Reinforce commitments to proportionate, early and meaningful stakeholder engagement
- Improve clarity on the role of RD&I, digital and innovation across the mission.

These refinements provide greater clarity and alignment with stakeholder expectations while maintaining the overall strategic intent. Operational and site-specific suggestions will be taken forward through Business Plans, delivery frameworks and thematic implementation plans rather than through the NDA Strategy.



# 5. Conclusion

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This document summarises the key themes raised during the public consultation on the Draft NDA Strategy, held from 7 July to 29 September 2025, including responses to the nine consultation questions and topic-specific feedback. It does not attempt to restate every point received. However, all comments were reviewed in detail by the relevant strategic authorities and considered in finalising the post-consultation Strategy.

Feedback was broadly supportive of the Strategy's overall direction, the One NDA approach and the continued focus on intolerable risk reduction at Sellafield. Consistent with this, no substantive or strategic changes were required to the direction previously approved by the NDA Board. Post-consultation refinements have been editorial in nature, improving the clarity, accuracy, transparency and accessibility of the document. The changes include strengthened descriptions of sustainability, circular-economy principles, remit boundaries, regulatory context, prioritisation, and links to delivery mechanisms such as the Business Plan and Mission Progress Report.

In a small number of areas, consultation feedback has resulted in clear, forward-looking commitments that will be taken forward during the Strategy implementation rather than incorporated as substantial changes to the NDA Strategy text. These include:

- A commitment to review and republish the Social Impact and Communities Strategy in Financial Year 2027/28, reflecting stakeholder interest in strengthened socio-economic outcomes
- A commitment under Public and Stakeholder Engagement to engage in a timely, proportionate and appropriate manner, recognising the differing needs and expectations of stakeholders and communities
- A strengthened commitment under the environment Critical Enabler to integrate

circular-economy principles across strategic approaches, supporting environmental compliance, economic value and wellbeing alongside mission delivery.

In addition, feedback relating to implementation detail, site-specific issues or matters outside the NDA's statutory remit has been captured and will be taken forward through relevant delivery plans, operating companies, or – where appropriate – shared with sponsor departments and regulators.

Overall, the consultation has reinforced confidence in the Strategy and demonstrated strong engagement across a broad stakeholder base. The final Strategy maintains continuity of strategic direction while benefiting from improved clarity and transparency. It provides a robust foundation for delivering the NDA mission and for working collaboratively with stakeholders as we enter the next Strategy period.

## 6. Abbreviations

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AGR	Advanced Gas-Cooled Reactor	SDG	Sustainable Development Goals
AI	Artificial intelligence	SGHWR	Steam-Generating Heavy Water Reactors
ALARP	As Low As Reasonably Practicable	SME	Small and Medium Enterprises
BAT	Best Available Technique	SSG	Site Stakeholder Group
DESNZ	Department for Energy Security and Net Zero	UN	United Nations
GBE-E	Great British Energy – Nuclear		
GDF	Geological Disposal Facility		
HSW	Health, Safety and Wellbeing		
IAEA	International Atomic Energy Agency		
IIA	Integrated Impact Assessment		
IWM	Integrated Waste Management		
MOX	Mixed Oxide Fuel		
NDA	Nuclear Decommissioning Authority		
NEA	Nuclear Energy Agency		
NWS	Nuclear Waste Services		
OSPAR	Oslo and Paris Conventions		
RD&I	Research, Development and Innovation		
SAR	Security and Resilience		



