

First consultation on the citizen's guide - log of comments and responses			
Name	Org	Comments	Response*
Question 1: Do you have any comments on the need for the Citizens' Guide and its proposed purpose?			
Andy Dietzold	Low Level Waste Repository	No	Noted
Andy Thomas	Future Solutions	Very good idea - needs to be well publicised using all forms of media, including broadcasting (radio/TV), and made widely available	For publication phase
Dr Doug Graham	UKAEA	1 It must grapple with how to communicate risk - a not inconsiderable challenge that others have consistently failed to achieve. 2 The document must not suggest that "conland = dig everything up". There are options based on the risk and other factors such as end state/use, geo-location, characterisation, feasibility, practicability, cost etc	1 Sources of information on risk and risk communication will be signposted. 2 There will be no such suggestion. As in LMGv2 the emphasis will be on assessing a range of options on their merits for the particular situation.
John Kelly	Oxfordshire CC	I fully support the need for a guide.	Noted
Kim Baines	RSK ENSR	I think it is an excellent opportunity to give a true understanding of radioactively contaminated land - rather than the skewed image the public can have about this issue.	The document will be non-partisan about radioactively contaminated land and its risks.
Mike Pearl	UKAEA	Should be a useful addition to the SAFEGROUNDS family of documents that can be used by many nuclear sites to aid the understanding of their non-technical stakeholders.	Noted
Peter Booth	Nexia Solutions	I agree that this guide will be a valuable supporting document to the LMGv2. I am content with the aims highlighted above.	Noted
Steve Handsley	Scott Wilson Ltd	I think there is a strong case for having a citizens' guide, not least to ensure that those who want to partake in a consultation process have a basic knowledge of what is involved.	Noted
Val Mainwood	Bradwell for Renewable Energy	It is vital to have such a guide - in particular a non-partisan approach, where all sides of a question can be aired without fear or prejudice.	Agreed non-partisan approach is fundamental (see note on PSG decisions).
Sue Crisp	Cumbria County Council	I think it's a brilliant idea.	Noted
Hugh Richards	British Nuclear Group Magnox Electric Ltd	No	Noted
Alison McKay	BAE Systems	I think it is essential to have such a guide to be able to communicate in a non technical way, how industry and stakeholders (and in particular the general public) can work together to achieve good, sustainable and practical outcomes. One of the key things that came out of the CoRWM work was the placement of a very high value on the need to engage with stakeholders and citizens and so this document will fit very well.	Noted

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A N Other (1)	MoD	Yes, I have some concerns over the value with respect to non-nuclear defence sites which are regulated predominantly under the contaminated land and planning regimes and where radioactively contaminated land forms a relatively small proportion of land contamination on such sites (if necessary)	The Guide will be relevant to all the types of radioactively contaminated site covered in LMGv2. It may be more valuable for nuclear sites, simply because there is more public concern about them.
A N Other (2)	MoD	No	Noted
A N Other (3)	CBO	I approve the need as stated.	Noted
A N Other (4)	Regulator	It is important to promote positive relationships with stakeholders from the outset of land management cases. Providing independent, accessible information encourages understanding and may contribute to stakeholders' sense of active and relevant involvement.	Agreed; these points will be emphasised when drafting the Guide.
A N Other (5)	Regulator	The production of the Citizens' Guide is a positive step. It should promote meaningful engagement between citizens and the community involved in the management of contaminated land.	Noted
Janet Young	Magnox (north)	No, although having read above I can see it may be of use to alert managers within organisations to the need and importance of contam. land management.	Noted
Paul Dorfman	University of Warwick	Citizens Guide is a necessary document	Noted
Richard Bramhall	LLRC	I don't see any discussion of proposed purpose but it can be inferred, and previous respondents have identified the Guide as a means of promoting constructive engagement. I think it is vital for this purpose.	
Question 2: Do you have any comments on the proposed scope? Is it acceptable to limit it to radioactively contaminated land?			
Andy Dietzold	Low Level Waste Repository	Why limit it? There are as many cause of harm on none radioactive sites albeit with less public concern.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.
Andy Thomas	Future Solutions	Scope is OK. Need to limit it to radioactively contaminated land because the non-radioactively contaminated land field is huge and already well documented	Agreed
Dr Doug Graham	UKAEA	No, limit it to rad and non-rad conland at nuclear sites or rad land at non-nuclear sites.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.
John Kelly	Oxfordshire CC	It should include radon issues and the nuclear convoy advice.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.

Name	Org	Comments	Response*
Kim Baines	RSK ENSR	I think it is acceptable to limit it to radioactively contaminated land however a brief overview of the management of non-radioactively contaminated land and definitely reference to suitable guidance on non-radioactively contaminated land would be advantageous.	Agreed
Mike Pearl	UKAEA	The context of all contamination on a nuclear site must be considered though the emphasis of the guide should be on radioactive contamination.	Agreed
Peter Booth	Nexia Solutions	Scope seems fine and I think it should be limited to radioactively contaminated land.	Scope will be limited primarily to radioactively contaminated land, in line with original intent. See note on PSG decisions.
Steve Handsley	Scott Wilson Ltd	It should be limited to radio-active contamination (although I can see the need for a similar document for chemical contamination).	Scope will be limited primarily to radioactively contaminated land, in line with original intent. See note on PSG decisions.
Val Mainwood	Bradwell for Renewable Energy	How about prospectively contaminated land? For example, if LLW from Magnox reactors is to be stored on site, then this needs to be brought in. What is contaminated land? Is it accidental or deliberate? (ie in the form of storage). The industry might object to the idea of storage being described as contaminated. But if you do shallow burial, however efficiently and deliberately, then the ground is still contaminated, and its status changes.	Prevention of contamination and storage and disposal of radioactive wastes are outside the scope of SAFEGROUNDS. But contamination due to old disposals is included.
Sue Crisp	Cumbria County Council	The limit is acceptable, but mention should be made of the regulatory guidance available for non-radioactive contamination on the same site.	Agreed
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Yes, limit to radioactive contamination. However, the term 'radioactively contaminated land' should not be used due to potential regulatory implications. Use of a term such as 'land (potentially) affected by radioactive contamination' would be preferable.	See response to same point in first consultation on LMGv2. Unfortunately all terms have some regulatory connotation.
Alison McKay	BAE Systems	I think for the general public the document needs to cover both conventional and radioactive contamination. As the LMG guidance is being widened to any sites where radioactivity is expected or identified then the Citizens' Guide should also cover the same circumstances. In some instances it may actually be the non-radioactive contamination that is driving the risk and this should be highlighted. I do not believe there is much literature out there dealing with risk communication for land contamination (SNIFFER is probably the most referred to in my experience) and so it is not as though there is a wealth of other documents that could just be referred to. I do think though that the document should have an emphasis on any issues particular to radioactive contamination and differences from non- radioactive contamination.	Scope will be mainly radioactive contamination, in line with original intent. See note on PSG decisions.

Name	Org	Comments	Response*
A N Other (1)	MoD	Yes, I am concerned that there is a danger that Part 3 could raise expectations unnecessarily and conflict with the level of stakeholder involvement required under the planning and contaminated land regimes	Citizens' Guide will be consistent with LMGv2 on levels of stakeholder involvement. See note on PSG decisions.
A N Other (2)	MoD	In an ideal world it would include non RA however this could be achieved when non RA guidance is being updated.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.
A N Other (3)	CBO	No, it is not acceptable to limit the scope to radioactively contaminated land.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.
A N Other (4)	Regulator	Yes, if the aim of the Guide is to provide clear and accessible information on the specific and complex issues of RCL.	Noted
A N Other (5)	Regulator	I agree that the scope should focus on radioactively contaminated land, rather than all contaminated land since radioactively contaminated land has specific issues distinct from general contaminated land. The guide should provide a basic awareness of the special considerations for sites with radioactively contaminated land, and how such sites are managed in order to be useful to citizens.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.
Jack Armitage	NUKEM Limited	Yes limit to RA contaminated land but provide sign posts to other guidance on conventional contaminated land	Agreed
Janet Young	Magnox (north)	Yes, although there may be a benefit for drawing parallels, where applicable, with other non- radiological (and therefore less contentious) examples.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.
Paul Dorfman	Universiry of Warwick	For the time being, scope and format seem fine	Noted
Richard Bramhall	LLRC	The scope seems comprehensive with the caveat that this document should include explicit advice on sources of advice and technical expertise. Other documents commit us to signpost such sources and it's very important to have the information pitched in the accessible language the CG is likely to be written in. My strong preference would be to limit it to rad contaminated land but include other contamination insofar as it might affect the radioactivity.	
Question 3: Are there any topics that you think should be added or omitted?			
Andy Thomas	Future Solutions	Something on qualitative (and quantitative) impact/consequences assessment for option evaluation so that stakeholders can make truly informed choices	This will be covered in the guide to comparisons of land management options and summarised in the Citizens' Guide.

Name	Org	Comments	Response*
Dr Doug Graham	UKAEA	Risk, technical options, context, decisions being made as part of a whole site strategic vision, suggested stakeholder involvement levels. On the latter there should be NO promising that every con land decision needs to go out for full stakeholder consultation since stakeholder burn out and ensuring that stakeholders are only involved when it is important enough, and they need too be involved - because it is contentious, it has ramifications and impacts beyond the site or in the long term for the end state vision. A sensible approach and raising of aspirations needs to take place so that there is real and valuable stakeholder input that really convinces everyone that their input is worthwhile and having an impact. Just getting a tick in the box on all decisions is not the way to go.	Citizens' Guide will be consistent with LMGv2 on levels of stakeholder involvement.
John Kelly	Oxfordshire CC	As above with a precis on nuclear convoys safety advice.	Scope will be limited primarily to radioactively contaminated land in line with original intent. See note on PSG decisions.
Kim Baines	RSK ENSR	Not sure about the 'Part 3 - typical types of decision...' without actually seeing what will be included.	Noted
Mike Pearl	UKAEA	Generally OK but perhaps something on: How radioactivity is measured, what are the different types of radiation, what are the units of measurement and of dose – what do these mean in terms of a measure of significance. Also how you might become exposed to radioactive contamination from the ground.	Agreed. Will be done by reference and short summary
Peter Booth	Nexia Solutions	No, although please see thoughts under "other comments" below.	Noted
Steve Handsley	Scott Wilson Ltd	It would be useful to have a section at the beginning on what radioactivity is (rather than starting from a point at which the definition of radioactively contaminated land is land contaminated with radionuclides). I know that there are other references which can explain radioactivity, but I think it would be useful as a starting point in this document.	Agreed. Will be done by reference and short summary
Val Mainwood	Bradwell for Renewable Energy	See above.	Noted
Sue Crisp	Cumbria County Council	No	Noted
Hugh Richards	British Nuclear Group Magnox Electric Ltd	The document should convey in some way that, through a combination of factors including public concern about radioactivity, strong regulatory regimes, the relatively short history of the nuclear industry and the 'public service' culture of most users of radioactivity, land and groundwater affected by radioactive contamination has been and continues to be subject to more rigorous assessment and clean-up than has been the case for non-radioactive contamination with comparable potential for harm.	Guide will be non-partisan.

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Alison McKay	BAE Systems	The introduction should make it clear who the regulators are for the various aspects of contaminated land assessment and remediation and under what circumstances - change of use, part IIA etc. Differences should also be highlighted between regulatory responsibilities in Scotland and England.	Agreed. Will be done in overview and by reference to LMGv2 and SAFEGROUNDS website's regulatory area.
A N Other (1)	MoD	I have concerns over Part 3 and the proposed content. There is a danger that this could conflict with the level of consultation and stakeholder involvement required under the planning and contaminated land regimes for non nuclear defence sites.	Will be consistent with LMGv2 on levels of stakeholder involvement. See note on PSG decisions.
A N Other (2)	MoD	No	Noted
A N Other (3)	CBO	Yes, the scope should include the moral implications of leaving contamination in all its forms including genetic, geological, atmospheric, land and sea, for future generations.	These points are covered in LMGv2 and the guide to comparisons of land management options.
A N Other (4)	Regulator	Links to more explanatory, or more technical information, could be useful, given that stakeholders will bring with them a broad range of prior knowledge and understanding.	Agreed.
A N Other (5)	Regulator	I think the document should include a non-technical glossary explaining terms and acronyms as this is quite a complex technical area.	Agreed; there will be a glossary of terms and acronyms used in the Guide and references to other sources of information.
Jack Armitage	NUKEM Limited	Maybe mention the smaller, simpler RA contaminated site types as there are far more of these than nuclear licensed sites	These types of sites will be mentioned.
Janet Young	Magnox (north)	I'm not sure as I'm not sure of the clear purpose of this document - is it to reassure communities, to facilitate effective stakeholder involvement...or?	It is primarily a source of information.
Paul Dorfman	University of Warwick	Scope gives good coverage	Noted
Richard Bramhall	LLRC	No. I am aware that a number of additional topics have been proposed. They will be discussed in PSG.	
Question 4: What are your views on the audience for the guide and the proposed format?			
Andy Dietzold	Low Level Waste Repository	Proposed format must include pictures for the layman to understand. The guide should be easy enough for the lay reader to understand but also of sufficient use to the 'experts'. It should therefore, link to the detailed technical guidance	Agreed
Andy Thomas	Future Solutions	Audience should be as wide as possible by means of good use of English for the "layman"	Agreed
Dr Doug Graham	UKAEA	The format and audience looks fine, but perhaps it will be worthwhile asking some non-technical stakeholders to contribute to this project? If they don't respond to this trawl for views, then you should choose some somehow.	Agreed. It is planned to do this during drafting.
John Kelly	Oxfordshire CC	This will be a difficult audience to determine as it will fall between the too basic and not basic enough.	Noted

Name	Org	Comments	Response*
Kim Baines	RSK ENSR	I agree it should be a substantial document to show that we are serious about informing the public about the issues. I think it is important to consider what type of forums we will be presenting the guidance into – we need to make sure it is readily available but maybe try to target groups to which it is most pertinent e.g. communities where radioactively contaminated land is present.	Agreed
Mike Pearl	UKAEA	See response to Q1	Noted
Peter Booth	Nexia Solutions	The audience should be any stakeholder interested in this subject bearing in mind these may be "internal" as well as external.	Yes, but internal stakeholders may find main LMG better in some cases.
Steve Handsley	Scott Wilson Ltd	Audience: interested lay-person.	Noted
Val Mainwood	Bradwell for Renewable Energy	Would like to see proactive involvement of community groups in these decisions. Would like CIRIA to have the power to proactively engage such groups as the WI, the Wildlife Trusts, etc.	SAFEGROUNDS can encourage sites to involve a range of groups when this is appropriate and the LMG will do so. But the LMG has no regulatory status.
Sue Crisp	Cumbria County Council	The targeted audience seems fine, as does the format to inform them.	Noted
Hugh Richards	British Nuclear Group Magnox Electric Ltd	No comments.	Noted
Alison McKay	BAE Systems	I agree with the audience for the guide and the proposed format.	Noted
A N Other (1)	MoD	The Audience seems OK, but Part 3 is a concern. Also I have concerns over the proposed size and level of detail proposed. I was expecting a 3 to 5 page guide.	Concern about Part 3 is noted but what is said will be consistent with LMGv2. If the Guide is to be a valuable resource it has to be longer than a few pages.
A N Other (2)	MoD	I think it is pitched about right and is covering the key aspects without getting bogged down in the detail.	Noted
A N Other (3)	CBO	There should also be a one-page summary of this guide with pdf links to the full guide on as many relevant websites as possible.	Agreed
A N Other (4)	Regulator	Independent position/design is encouraging. Testing on lay audience will be helpful.	Noted
A N Other (5)	Regulator	I support the groups listed in Section1 Introduction as the audience. However, I raised the point at the PSG meeting about the need to ensure the document is adequately tested by a lay audience representing citizens. Section 4 next steps, refers to testing by a lay audience	Agreed that this will be done.
Jack Armitage	NUKEM Limited	Audience would be local authority staff, environmental consultants, landowners/developers and informed general public	Noted
Janet Young	Magnox (north)	Without clearly understanding the purpose, I can't meaningfully comment.	Noted
Paul Dorfman	University of Warwick	The range of stakeholders seems pretty comprehensive	Noted

Name	Org	Comments	Response*
Richard Bramhall	LLRC	It's good, especially on the <i>non-partisan</i> criterion. I note that the concerns I have expressed above in answering Q2 are met; the drafting will be an interesting challenge. The proposed length seems about right. I wouldn't want to see it any shorter.	
Other comments: Please enter here any other comments on the proposed Citizens' Guide or any aspect of the revision of the SAFEGROUNDS guidance.			
Dr Doug Graham	UKAEA	No, it looks good, and as long as it raises the right aspirations.	Noted
John Kelly	Oxfordshire CC	To be published with a link on www.ukresilience.info	Agreed
Peter Booth	Nexia Solutions	1)It is important not to present the readership with any false hopes about the extent stakeholder engagement may ultimately take place. 2) Need to clearly think how the guide will be made available and how stakeholders will be made aware of its existence. 3)With the inference of providing useful contacts, how will this process be managed and importantly kept up to date. I assume contact names will be given on a voluntary basis?	1) Statements on stakeholder involvement will be consistent with LMGv2. 2) Agree. This will be done as drafting proceeds. 3) Contact names not proposed - organisations and websites will be given.
A N Other (1)	MoD	The level of stakeholder involvement advocated by any of the guidance must be balanced and appropriate ie proportionate and consistent with that advocated by the relevant legislative regimes.	This point is for LMGv2, with which the Citizens' Guide will be consistent.
A N Other (3)	CBO	Glossary: to enable ordinary citizens to engage in the more technical information, an ONLINE glossary (therefore updatable) should be available including acronyms.	Agree that an on-line glossary for contaminated land would be useful but producing one is outside the scope of the current project. Will provide links to existing on-line glossaries.
A N Other (5)	Regulator	The document should clarify who in terms of organisations is committed to the Safegrounds principles as Jamie noted in the PSG meeting.	There would be problems with updating any statement of commitments. If organisations wish to make commitments they should do so in their own publications and on their own websites. Agree that SAFEGROUNDS could better to link to these on its website.
Jack Armitage	NUKEM Limited	Caution advised in making the document too simplified.	Agreed
Janet Young	Magnox (north)	There is a need for a non. tech layman's guide, but I think you need to more clearly establish the purpose of such a document before you can develop it. It will be impossible to produce a single document that is ALL	See responses above.
Paul Dorfman	Universiry of Warwick	I fully support the need for a Citizens Guide	Noted

Name	Org	Comments	Response*
Richard Bramhall	LLRC	<p>An accessible guide to options comparisons needs to be available (meaning accessible to lay people). I don't think it matters whether it's in the Citizens' Guide or in the Options Comparison Guide but a decision needs to be made. If it goes in the Options Comparison Guide it needs to be signposted from the Citizens' Guide.</p> <p>Please note that at the time of responding, I have seen the summaries of other people's responses and have discussed them in the team meeting January 2007. I did raise this issue of privileged access and was urged to make a response anyway. Obviously my explicit endorsement is sought! You have it.</p>	
<p>*Note on PSG decisions is 'Revision of SAFEGROUNDS Guidance, First Consultation on Citizens' Guide, Summary of Responses and PSG Decisions'</p>			