

**REVISION OF SAFEGROUNDS GUIDANCE
FIRST CONSULTATION ON
GUIDE TO THE COMPARISON OF LAND MANAGEMENT OPTIONS
SUMMARY OF RESPONSES AND PSG DECISIONS**

Comments were received from 14 respondents, mainly from the nuclear industry and associated consultants but including a respondent from an academic institution, an NGO and a community based organisation. The responses are summarised below, according to the questions posed in the consultation document. Decisions made by the SAFEGROUNDS Project Steering Group (PSG) about the way forward for the document are also given. The respondents are listed in the table at the end of this summary and referred to in the text by the letters in the table, eg [B].

Question 1: General Principles

With the exception of one respondent [M] there was consensus that general principles for option comparisons should be described. Views differed as to what principles were important – some considered all to be important, some believed that there was a need to distinguish between strategic and technical issues. Some offered specific principles although these varied from specific objectives (seeking practicality, reliability, cost, risk approaches) to process-orientated issues (understand problem, define objectives, and document the evidence). It was noted that the principles should capture the need for stakeholder involvement (with due “proportionality” in respect of the magnitude of the issue under consideration) and recognise the importance of communication to non-technical audiences. The respondent [M] who did not consider that general principles were needed was of the view that those undertaking such work would be aware of the issues, and that the guidance should have limited scope – just considering the technical merits of options. The PSG agreed that possible principles should be suggested in the outline contents of the document (to be the subject of the second consultation).

Question 2: Range of Methods

With the exception of one person [M], there was consensus among respondents that there is a need to refer to a range of methods. Guidance was felt to be necessary on the applicability, pros and cons, and resource requirements of methods. The scope should include qualitative and quantitative methods, perhaps illustrated with case studies, and properly appreciating information needs is important.

The respondent [M] who thought that discussion of the range of options comparison methods was not needed was of the view that experience was necessary to properly appreciate the merits of options, and there was a danger in providing a “handbook” that could be used by a wider body of persons. However, the response appears to relate to the range of management options rather than methods for comparing management options.

The PSG agreed that the document should cover a range of option comparison methods. The feedback on what should be considered and how the methods can be described will be taken into account in drafting.

Question 3: Guidance on the Practical Use of Option Comparison Methods

8 respondents thought such guidance would be useful. Those in favour stressed that there was a need to help users with the practical application of the approaches, without “directing” them. Those against [D, E, H, I & M] thought it might make for too extensive a document, and noted that case studies could be an alternative way of achieving the same thing. One person [O] was unsure and did not express an opinion. The PSG decided that guidance on practical use would be helpful as long as it was objective and brief, perhaps referring to examples (real or hypothetical).

Question 4: Involving Stakeholders

Respondents agreed that there should be guidance on involving stakeholders. It was felt that guidance would be especially valuable on the degree of consultation appropriate to a particular problem, as those managing contaminated land were often uncertain as to the appropriate extent of involvement. Guidance should not provide routes by which stakeholder involvement could inappropriately be avoided – e.g. by “salami slicing” a site into lots of “small” problems that require limited consultation.

The principles offered for involvement of stakeholders included: involvement from the start of the process, an open and honest approach, and respect for a range of views. It was noted that stakeholders can become overloaded, and that the ‘liability holders’ need to manage the process and generally must make the decision. Another respondent stressed the importance of providing understandable information.

The PSG agreed that there should be guidance on involving stakeholders in option comparisons and that this guidance should be consistent with LMGv2.

Question 5a/5b: Different Types of Contaminated Land

The majority (11 respondents, D and I disagreed) thought that there should be guidance on different types of contaminated land. These respondents were equally divided on whether emphasis should be different for each of the three types of contaminated land.

It was noted by many respondents that there is already considerable guidance for non-radioactive contaminants. Experience with non-radioactive contaminants was felt to be important when dealing with radioactive contaminants. It was also thought that mixed radioactive and non-radioactive contaminated land should be considered, including acknowledging issues such as potential synergy of radioactive and non-radioactive contaminants.

The PSG decided that the types of contaminated land considered and the amount of detail for them should be as agreed for LMGv2.

Question 6: Technical Options

12 respondents thought that information on technical options should be included. In general, a brief summary concentrating on key features was favoured, although one person thought that more detail should be presented. Other suggestions included reference to specific attributes relevant to options comparison methods (e.g. health and safety, environmental, technical, social and economic, and cost) and that the description should note potentially detrimental externalities of options. Those expressing an objection to including technical option descriptions [I & J] believed that it would be a major undertaking and that other documentation covered the issue anyway. The PSG agreed that a summary that gives key features of options should be included, perhaps referencing supporting published information.

Question 7a/7b: Proposed Function

All but two [N & O] agreed with the proposed function (these two respondents did not offer an opinion). One [O] expressed concern, however, that the content might be too technical for a lay readership and this should be avoided. Other suggested functions included better case studies and specific reference to fulfilling EA/SEPA requirements for BPEO/BPM. One respondent [J] expressed the fear that the core function of guidance could be diluted if too much was covered in the document and another favoured a function as an “aide memoire” for practitioners. One respondent [N] was very concerned that, by making reference to regulatory guidance and requirements and how these might affect the approach adopted, the choice of option comparison method could be inappropriately constrained by the regulatory structure.

The PSG decided that the proposed function was appropriate. Although there will be reference to existing guidance (and regulations), the document should be broader than this.

Question 8: Different Option Comparison Methods (in turn or grouped)

Nine respondents thought it best to describe methods in turn. One person [C] suggested they could be described individually at a high level, then grouped in terms of practical application. This suggestion will be considered when drawing up the outline contents of the document.

Question 9: Description of Option Assessment Methods

The suggested approach was generally felt to be satisfactory and appropriate, although one person [G] believed that there should be specific reference to the merits (and otherwise) of weighting. Another person [M] wanted reference to regulatory guidance on BPEO. One respondent [N] also commented that there should be a more detailed discussion on the range of interpretations of risks associated with options. The PSG decided that it was not appropriate to constrain the guidance to following specific methodologies (e.g. involving weighting, or a BPEO method based on current regulatory guidance).

Question 10: Other Comments

Other comments on document structure and content included suggestions to:

- recognise the importance of site context to options – e.g. applicability of options across a complex site [C];
- ensure that there was a description of option comparison suitable for a lay readership (here or in the Citizens' Guide) [O];
- include a “long list” of attributes [D];
- refer to future uses of cleaned up land and timescale of clean-up [F];
- refer to waste management issues; and
- discuss weighting [G]

The recommendations on recognising site context and striving for readability by non-technical audiences will be taken account of in the next stage of the development of the document. Other issues are covered, are considered to be too specific, or outside the scope of the document. Respondent [D] will be asked for further details on the idea of including a long list of attributes.

Respondents to First Consultation on Guide to Comparisons of Options

	<i>Name</i>	<i>Organisation</i>	<i>Responding as individual or organisation</i>
B	Andy Thomas	Future Solutions	organisation
C	Dr Doug Graham	UKAEA	individual
D	Hugh Richards	British Nuclear Group Magnox Electric Ltd	individual
E	Mark Hill	DE	organisation
F	Mike Pearl	UKAEA	organisation
G	Peter Booth	Nexia Solutions	individual
H	Susan Crisp	Cumbria County Council	organisation
I	Alison McKay	BAE Systems	individual
J	Sean Amos	AWE	organisation
K	A N Other	CBO	organisation
L	Jack Armitage	NUKEM Ltd	individual
M	Janet Young	Magnox (north)	individual
N	Paul Dorfman	University of Warwick	individual
O	Richard Bramhall	LLRC	organisation