

## Deciding in public: Public & Stakeholder Engagement on the Submarine Dismantling Project (SDP)

Simon Tinling (Asst Hd, Approvals)



Submarine Dismantling Project

## Contents

- Why dismantle submarines?
- Dismantling Process
- Decision Making Process
- Stakeholders
- SDP Advisory Group
- The Communications Challenge
- The Submarine Dismantling Consultation
- Alternative Perspectives
- Other Critical Factors (OCFs) Analysis
- Outcomes and what does success look like?

## Why dismantle submarines?

- 27 Submarines covered by scope of SDP
- 17 submarines permanently moored and preserved (laid-up); seven in Rosyth and 10 in Devonport
- 10 operational submarines to be laid-up at end of life
- Current afloat storage capacity will be reached by 2020
- Becoming increasingly costly to maintain the laid-up submarines as they age
- UK Government Policy requires that “decommissioning and disposal operations be undertaken as soon as reasonably practicable”
- SDP underpins MOD’s commitment to sustainable development.

“We should not leave the problem of disposal for future generations”

Peter Luff MP – Former Minister for Defence Equipment, Support and Technology



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Slide 3



## Dismantling Process



Figure 6: Dismantling Process



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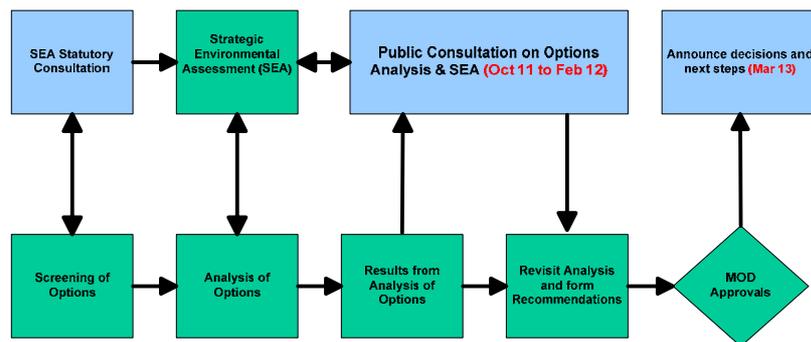


## Decision Making Process (1)

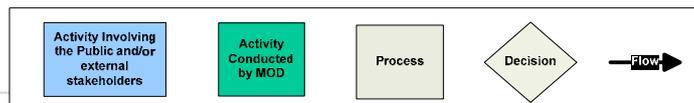
- Key strategic decisions which the MOD needs to take in order to progress the project:
  - **How** the radioactive material is removed from the submarines (decision announced 22 Mar 13)
  - **Where** we carry out the removal of the radioactive material from the submarines (decision announced 22 Mar 13)
  - **Where** we store Intermediate Level Waste (ILW) that is awaiting disposal (assessment ongoing)



## Decision Making Process (2)



Key



## Decision Making Process (3)

MOD has a well established decision process but this is designed primarily for investment decisions on defence equipments, facilities and services.



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Slide 7



## Decision Making Process (4)

- Three types of analysis were used to assess options:
  - **Operational Effectiveness (OE):** how well does each Option meet the SDP User Requirements?
  - **Investment Appraisal (IA):** what is the Whole Life Cost (WLC) of each Option and what are the financial considerations?
  - **Other Contributory Factors (OCF):** what factors, which are not quantifiable in terms of cost or effectiveness, influence the viability or attractiveness of an Option?
- In the case of SDP, all three streams of analysis were to be appropriately informed and influenced by **Strategic Environmental Assessment (SEA)** and **Public Consultation**.



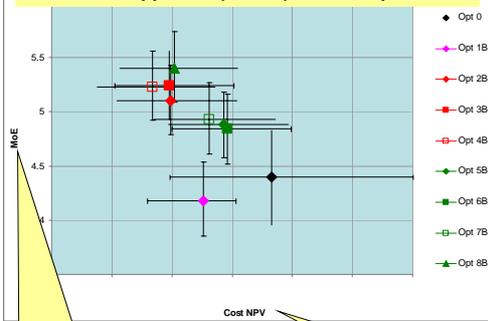
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## Decision Making Process (5)

Combined Operational Effectiveness & Investment Appraisal (COEIA) for SDP options



- Cost and effectiveness can be quantified and often perceived as more 'objective'
- OCF are non-quantifiable and often perceived as more 'subjective'
- Stakeholder interest and influence varies across all three (cost, effectiveness and OCF) and decision process must be designed accordingly

Effectiveness quantified through Multi-Criteria Decision Analysis (MCDA)

Cost quantified through structured estimating and cost modelling



## Stakeholders

- Regulators (ONR, EA and SEPA)
- Other Government Departments (Department of Energy & Climate Change & Nuclear Decommissioning Authority)
- Devolved Administrations (Scottish Government)
- Non Government Organisations & Community Based Organisations
- Elected representatives (MPs, MSPs & Counsellors)
- Local Authorities
- Statutory Bodies (eg. English Nature or Scottish Heritage)
- Industry
- Local Liaison Committees and Site Stakeholder Groups
- Local residents and general public
- MOD project sponsor, scrutineers and approving authorities



## SDP Advisory Group

- Established 2006 to provide expert advice and independent challenge to project
- Independent chair and a meeting held in public (not a public meeting)
- Membership drawn from industry, Non Government Organisations (NGOs), Community Based Organisations (CBOs), academia, local government & regulators
- Sub-groups established to advise on design and delivery of SEA and Public Consultation. Non-Disclosure Agreement allows preview / review of draft materials prior to public release.
- Appointed 'observers' to provide independent feedback on consultation events and key decision making workshops

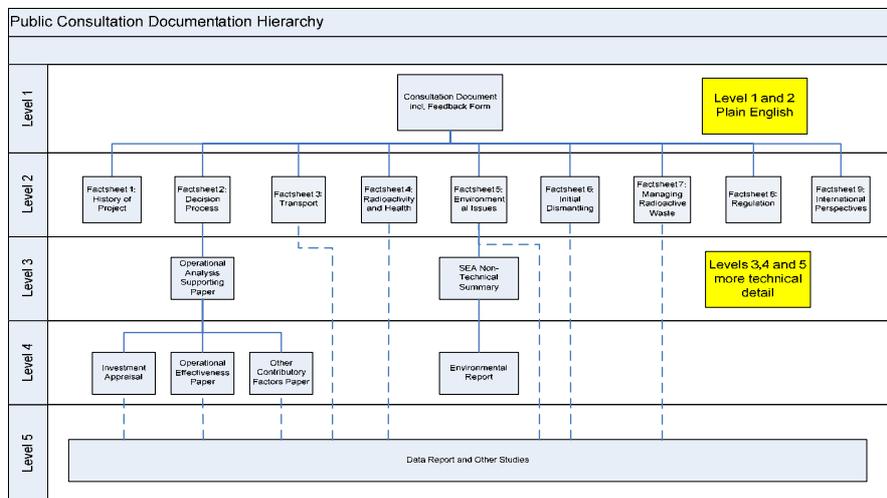


## The Communications Challenge (1)

- Complexity of options and decision process, highly technical data and extremely long timescales
- Communicating with stakeholders with different levels of expertise and prior knowledge, both inside and outside MOD
- Staying within the scope of the project
- Maintaining transparency and compliance with Freedom of Information legislation
- Anticipating different stakeholder reactions
- Providing appropriate channels for feedback



## The Communications Challenge (2)



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Slide 13



## The Submarine Dismantling Consultation (1)

- Ran from Oct 11 to Feb 12
- Designed to comply with Government's Code of Practice for public consultation
- Pre-engagement with relevant local authorities and elected representatives
- Extensive preparation of materials, Q&A and team training
- ~55,000 newsletters mailed
- Eight local exhibitions (25 days)
  - > 1,100 attendees
  - 375 local workshop participants
- Two national workshops
  - ~ 70 external participants



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Slide 14



## The Submarine Dismantling Consultation (2)

- Responses:
  - 147 Feedback forms
  - 102 Letters / Emails
  - 157 'Plymouth Says No' postcards
- Post Consultation Report published in July 12 documenting the consultation process and the responses received
- Every discrete comment 'triaged' and allocated to the review of cost, effectiveness and / or OCF analyses
- MOD's Response to Consultation Report published Mar 13 followed by further briefings to local stakeholders at dismantling sites



## The Submarine Dismantling Consultation (3)

Key response themes included:

- Health and safety concerns
- Need to achieve public confidence
- Environmental principles (e.g. ALARP / ALARA) and discharges
- Support for SDP aims and the need to get on with dismantling
- Further public & stakeholder engagement
- Benefits to local communities
- 'Proximity principle' vs. opposition to storage of ILW in the Dockyards
- Implications of Scottish Government policy and devolved powers
- Defuelling in Devonport



## Alternative Perspectives (1)

- MCDA results were subject to sensitivity analysis by altering weightings of individual criteria (one at a time)...
- ... but a different perspective may give a completely different weightings profile. So would MCDA results still be robust when viewed from differing perspectives?
- Invited SDP Advisory Group to provide alternative weightings from different perspectives according to members' sectors / constituencies:
  - NGOs / CBOs
  - Industry
  - Local government
  - Regulatory / consultancy
- Completed in a 2 hour evening workshop!



## Alternative Perspectives (2)

Category	Criterion Title	MOD Baseline	NGO/ CBO	Loc. Auth.	Ind.	Reg.
<b>Waste Management</b>	<b>Top Level</b>	<b>25.2%</b>	<b>31.4%</b>	<b>27.5%</b>	<b>25.5%</b>	<b>20.0%</b>
	Flexibility to cope with change	4.8%	6.3%	3.9%	3.6%	3.3%
	Compliance with waste and decommissioning strategy	9.4%	11.8%	12.4%	12.9%	8.0%
	Scope and extent of transport	4.3%	5.6%	4.8%	4.4%	3.3%
	Security and unauthorised access	6.6%	7.7%	6.4%	4.4%	5.3%
<b>MOD Operations</b>	<b>Top Level</b>	<b>32.2%</b>	<b>4.5%</b>	<b>16.2%</b>	<b>23.6%</b>	<b>16.0%</b>
	Impact on current and future operations	19.3%	1.1%	6.6%	12.3%	3.9%
	Threat to skills/experience base	8.3%	3.3%	5.1%	5.7%	8.2%
	Benefits from knowledge transfer	4.6%	0.2%	4.5%	5.7%	3.9%



## Alternative Perspectives (3)

Option	Baseline Ranking	NGO / CBO	Local Authority	Industry	Regulatory / Consultancy
9B	1	2	1	1	2
9D	2	3	3	2	3
2D	3	1	2	3	1
3-4D	4	6	5	4	5
2-4B	5	5	4	5	4
8B	6	9	7	6	7
8D	7	10	8	7	8
5D	8	4	6	8	6
5-7B	9	7/8	9	9	9
6-7D	10	12/13	10	10	10
1R	11	12/13	11	11	12
1D	12	11	12	12	11
0	13	7/8	13	13	13

Change in Options Ranking with Alternative Perspectives



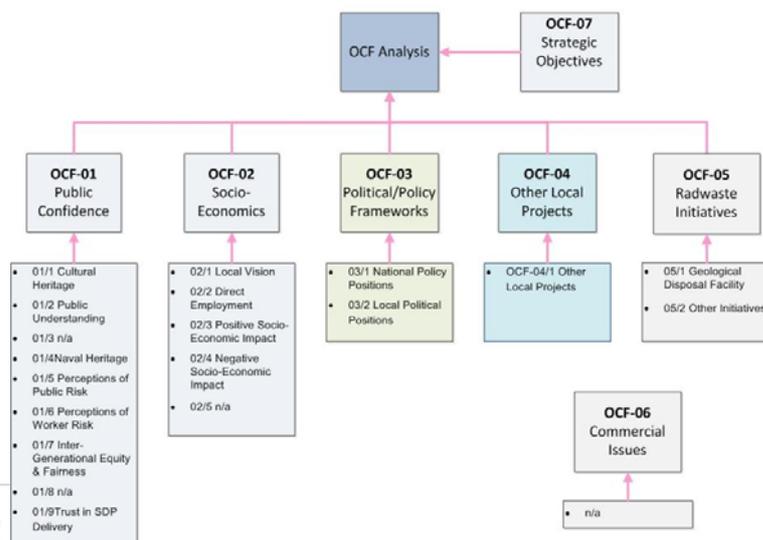
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Slide 19



## Other Contributory Factors Analysis (1)

20130814 OCF Criteria Tree V0\_1.vsd



## Other Contributory Factors Analysis (2)

- Having characterised OCFs from consultation responses and other sources, the impact of each OCF was assessed through qualitative, logical analysis:
  - Does it differentiate between options?
  - Can it be converted to broad, qualitative issues impacting estimates of risk, WLC or effectiveness?
  - How does inter-relate to other OCF?
- OCFs were a significant qualifier to understanding the cost effectiveness of some options and directly influenced the options recommended to approving authorities



## Outcomes and what does success look like? (1)

- Decisions actually taken?
- Sufficient volume, diversity and quality of engagement?
- Has stakeholder engagement increased the rigour of the decision process?
- Have consultation responses demonstrably influenced the decisions taken?
- Have downstream risks been reduced?
- Has stakeholder confidence in the decision process increased (even for those who dislike the outcome)?
- Would we be allowed or want to do it again?



## Outcomes and what does success look like? (2)

CND slams MOD Submarine Dismantling Project as advisor resigns

MP's fears over Rosyth nuclear 'dump'  
Dunfermline Press, Nov 09

Don't make us nuclear scrapyards  
Plymouth Herald, Oct 09

**MOD'S £1.5BN NUCLEAR SUB DOCK-UP**  
Daily Star, Nov 10

Call to end 'childish' buck-passing on Rosyth submarines  
Aug 10, Fife Courier



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Slide 23



## Outcomes and what does success look like? (3)

Hundreds have say on N-sub dismantling plans  
Saltash People, Nov 11

Devonport Dockyard is the 'best place' for N-sub work, says commander  
Plymouth Herald, Nov 11

Plans to dismantle N-sub at yard explained in workshops  
Plymouth Herald, Dec 11

Go along to public consultations  
Plymouth Herald, Nov 11

Nuclear sub dismantling discussed at Dunfermline event  
BBC News Fife Nov 11

Devonport nuclear submarine dismantling details on show  
BBC News Devon, Nov 11



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Slide 24



## Outcomes and what does success look like? (4)

### Local Peace Action Web Site:

*"I attended the public consultation on the Nuclear Dump at the Plymouth Guildhall this afternoon, and was **heartened by the potential for public influence on the proposals**. The Government's Submarine Dismantling Project has been years in preparation, **with our own reps such as \_\_\_\_\_ having clearly influenced the process...**" I believe that our years of campaigning, including highlighting the risks associated with Plymouth becoming the "Sellafield of the South West" have produced results. There is now real potential to prevent cutting-up and storage of Intermediate Level Waste in Plymouth..."*



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Slide 25



MINISTRY OF DEFENCE



Questions?

## Government's Code of Practice for Public Consultation

- The Code sets out the Government's approach and general policy on formal, public, written consultation exercises. The Code does not have legal force and cannot prevail over statutory or mandatory requirements.
- The Seven Consultation Criteria:
  - **When to consult** - *at a stage when there is scope to influence the policy outcome*
  - **Duration of consultation exercises** – *normally lasts for at least 12 weeks*
  - **Clarity of scope and impact** - *Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals*
  - **Accessibility of consultation exercises** – *accessible and clearly targeted*
  - **The burden of consultation** – *keep to a minimum*
  - **Responsiveness of consultation exercises** - *Consultation responses should be analysed carefully and clear feedback provided to participants following consultation.*
  - **Capacity to consult** - *Officials running consultations should seek guidance in how to run an effective consultation exercise and share lessons learned.*

<http://www.bis.gov.uk/policies/better-regulation/consultation-guidance>

