

5<sup>th</sup> February 2010 Ref: DSG(2010)C013

Professor Brian D Clark Area 3D 3 Whitehall Place London SW1A 2AW

## Please respond to:

June Love
DSG Secretariat
Dounreay.com
Traill House
7 Olrig Street
Thurso, Caithness, KW14 7BJ

Tel: 01847 806082 Fax: 01847 804615

Email: june.love@dounreay.com

## **Dear Brian**

## DSG's response to CoRWM on Public and Stakeholder engagement (PSE)

Thank you for your letter inviting the Dounreay Stakeholder Group to comment on public and stakeholder engagement programmes.

Since DSG does not formally own a process of engagement but is regularly involved in various consultations this letter does not cover the questions you set out in your paper but rather comments on the specific issue of consultation on higher activity wastes.

DSG has been involved in consultations with the following organisations:

DECC Scottish Government CoRWM NDA Dounreay Site Restoration Ltd

The DSG also led the consultation on the Dounreay site end state and the site provided both technical and administrative support to carry this out. The consultation on site end state followed the Dounreay site's recognised process of consultation and was a thorough, open and transparent process which we are very proud of.

Specifically on the subject of higher activity wastes DSG is in the process of considering the newly published consultation from Scottish Government on higher activity wastes and have been involved in the pre-consultation workshops to help shape the documents which have just been distributed.

DSG has had a good working relationship with CoRWM over the years and it is unfortunate that the differences in Scottish and Westminster policies means that we are now considering a different approach to that of which we had originally been involved in.

In general there are too many consultations taking place and this can lead to confusion and stakeholder fatigue.

The most sensible approach would be for one organisation to lead the consultation. which should start with a pre-consultation to identify all issues relating to all sites. From there all common issues could be consulted on by one organisation to inform the strategic direction. Once the strategy was finalised any issues which had been identified at the pre-consultation which related only to specific sites should then be carried out at a local level but bounded by the strategic direction.

The information provided in many consultations can be difficult to understand for the majority of stakeholders and those who lead consultations should take this into account. It has to be remembered that stakeholder groups and individual members of the public give up their time freely to respond to consultations and many of the documents are so cumbersome and technical to allow informed responses. Organisations should consider providing 'layers' of information ranging from short, easy to understand summary documents to the detailed technical documents. This would allow stakeholders to read as much or as little as they wish.

It would also be useful if one organisation took responsibility for gathering a rolling programme of forthcoming consultations which would allow stakeholder groups to arrange their meetings at appropriate times. Too often consultations are simply launched with a 12 week period to respond with no prior notification which increases the workloads of already busy groups responsible for the scrutiny of their specific site.

The DSG hopes that CoRWM find these views useful and we would be happy to discuss these further with you if required.

Yours sincerely

Bob Earnshaw Acting chair, DSG