

West Cumbria Managing Radioactive Waste Safely Partnership Interim Evaluation Report

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West Cumbria MRWS Partnership

Interim Evaluation Report

Contents

Executive Summary

Section 1

| | |
|-------------------|----|
| Executive Summary | 1 |
| Introduction | 5 |
| Objectives | 9 |
| Methodology | 10 |

Section 2

| | |
|-------------------------------------|----|
| Interim Partnership Evaluation | 13 |
| Achievements Against Objectives | 13 |
| Responding to Challenges | 14 |
| Complexity and Knowledge Management | 23 |

Section 3

| | |
|--|----|
| Interim PSE2 Evaluation | 29 |
| Summary of Achievements | 29 |
| Responding to Challenges | 34 |
| The Engagement Spectrum and the Partnership's Work Programme | 40 |

| | |
|--------------------|----|
| Conclusions | 45 |
|--------------------|----|

| | |
|------------------------------|----|
| Appendix 1: Resources | 47 |
|------------------------------|----|



1 Executive Summary

- 1.1 This report sets out the interim findings of an independent evaluation of the West Cumbria Managing Radioactive Waste Safely Partnership. The evaluation focuses on the operation of The Partnership and the second phase of its public and stakeholder engagement activities which were undertaken between the 8th November 2010 and the 11th of February 2011.

Operation of the Partnership

- 1.2 The evaluation activities found five key strengths which have enabled The Partnership to fulfil its role in the MRWS process (as defined by the 2008 White Paper) effectively, fairly, independently and impartially. These are:

- A - The existence of The Partnership as an independent body
- B - The presence of independent facilitators
- C - The use of six criteria for continued involvement to structure a work programme
- D - Regular reference to the MRWS process and the criteria to limit the complexity of the issues
- E - Two-tier membership structure creating a distinction between full and observing members which enables the involvement and technical input of organisations such as DECC, NDA, CoRWM, Environment Agency but manages their ability to influence outcomes

- 1.3 The Partnership faces particularly complex issues with high stakes, persistent uncertainty, long timescales, significant requirement for research and the application of specialist input. In this context it has made considerable achievements but despite the positive overall evaluation the report focuses on how The Partnership has responded to several challenges and identifies areas for further attention.

- 1.4 With regard to its operation, it is felt that there is a mis-match between The Partnership's name and its structure, as there is not equal partnership between all members. The Principal Authorities (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council) have constitutional privileges in terms of the chairing arrangements and in numbers of members. However, these privileges have not resulted in any pre-determination, impartiality or other significant negative outcomes.

- 1.5 The Partnership is found to be inclusive in its operation and has extended invitations to join and or to participate to a wide range of stakeholders, although not all these invitations have



been accepted. In light of this there remains scope for considering alternative ways to encourage appropriately funded self-structured input from a full range of perspectives.

- 1.6 The Partnership anticipated the complexity of the issues and has designed a set of decision making criteria and an inter-group system of working which has, as far as practical, minimised the problems associated with handling such a large and complicated set of issues.
- 1.7 The Partnership is progressing through its work programme at an appropriate pace, although significant challenges remain in creating an effective final report. In particular, unresolved technical and political issues remain as does significant uncertainty about the format and authorship implications of a final report. A later Partnership Review will comment further on this process at a more appropriate time.

Public and Stakeholder Engagement, Phase 2 (PSE2)

- 1.8 In considering the second phase of the PSE activities, The Partnership can be satisfied that it has made significant achievements against most of its objectives. A range of activities designed to inform, consult and involve communities and stakeholders have been undertaken. The major activities have been community drop in sessions, workshops facilitated by local agencies with the use of a multi-media discussion pack, a stakeholder organisation workshop, an opinion survey and a resident's panel. These activities have increased awareness of the MRWS process in West Cumbria, have recorded feedback for inclusion in The Partnership's reporting activities and have in some cases directly involved stakeholders in working with decision makers. Areas for improvement remain however, and the report focuses on identifying and explaining these.
- 1.9 The Partnership has experimented with using social media to engage communities on such a politically and technically difficult issue. Success has been limited and there remains scope for further innovation.
- 1.10 The opinion survey suggests that awareness of the MRWS process is rising in West Cumbria as a result of The Partnership's activities in the printed media and on television. However, the evaluation suggests that informed awareness remains a challenge, particularly in the West Cumbrian context where other nuclear projects may lead to confusion over the implications of the MRWS process.
- 1.11 Events organised by The Partnership have been well attended by Partnership members (both full and observing members). While many feel that this makes the events more useful and informative, some feel that it overpowers the events and reduces the diversity of opinions discussed. The way that such events are staffed and structured remains an area for further consideration by The Partnership.



- 1.12 The reporting of PSE2 represents a critical link in the chain that connects the public to decision making. The partnership has recognised this and has created a well designed system of checks and audits to ensure that this process is fair, transparent and unbiased. As evaluators we are satisfied that this process is as effective as is possible given the significant challenge of combining such a wide range of perspectives into a single document. A later Partnership Review will comment further on the success of this process at a more appropriate time.



Section 1: Introduction and Context



2 Introduction

- 2.1 Wood Holmes were commissioned by the West Cumbria Managing Radioactive Waste Safely Partnership (The Partnership) to undertake an independent evaluation of The Partnership's operation and governance and of its public and stakeholder engagement (PSE) activities.

The Partnership

- 2.2 In 2008 the UK Government invited communities across the country to talk to them about potentially hosting this site for A Geological Disposal Facility (GDF). This approach was set out in the "*Managing Radioactive Waste Safely (MRWS): A Framework for Geological Disposal*" White Paper. The process has been structured to allow for step by step progress, with clear opportunities for communities to withdraw their involvement. This is illustrated in Figure 1, taken from the White Paper.
- 2.3 In this process, The Partnership is pre- a 'Decision to Participate'. As stated on The Partnership website¹, "*The West Cumbria MRWS Partnership is an advisory body aiming to 'make recommendations to Allerdale Borough Council, Copeland Borough Council and Cumbria County Council on whether they should participate or not in the geological disposal facility siting process, without commitment to eventually host a facility'*".
- 2.4 The aim of The Partnership is to make recommendations to the decision making bodies (the three Principal Authorities) on whether they should move to the next stage of the MRWS process with the Government. The Partnership itself is not a decision making body and acts in an advisory capacity to inform and enable elected decision making bodies to decide on further involvement. The approach taken to achieving this objective is discussed in the body of this interim report.²

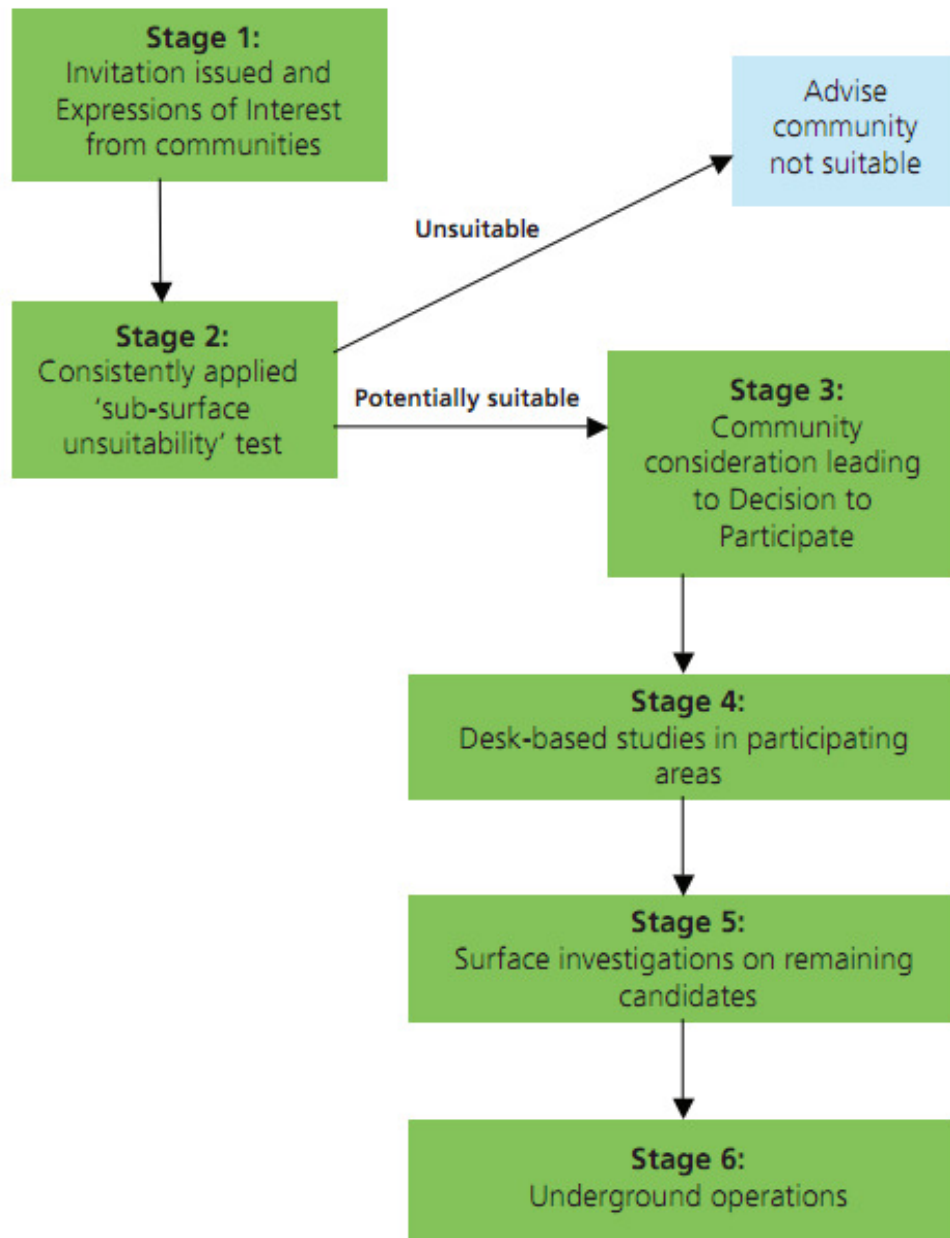
¹ <http://www.westcumbriamrws.org.uk/page/80/QA-s.htm>

² For further explanation of what a Decision to Participate means, see Partnership Document 81, available here: <http://www.westcumbriamrws.org.uk/documents.asp>



2.5 **Figure 1 - GDF Site Selection Process as Structured by DECC, 2008**

Figure 1: Stages in the site selection process



2.6 The Partnership's work is structured by criteria established in its early phase of work which it feels must be satisfied if West Cumbria is to go any further in the MRWS process.

- Criterion 1: Safety, security, environment and planning
- Criterion 2: Geology



- Criterion 3: Community benefits and impacts
- Criterion 4: Design, Engineering and Inventory
- Criterion 5: The Siting process
- Criterion 6: Public and stakeholder views

2.7 The Partnership sought the input of an independent evaluator, in this case Wood Holmes, in relation to the public and stakeholder engagement (PSE) activities and in relation to the wider governance, operation and effectiveness of The Partnership.

2.8 The Partnership is made up of full members and observing members, as set out below:

- Full Members:
 - Allerdale Borough Council
 - Borough of Barrow in Furness
 - Copeland Borough Council
 - Churches Together in Cumbria
 - Cumbria County Council
 - Cumbria Chamber of Commerce
 - Eden District Council
 - GMB Northern Region
 - Unite
 - National Farmers Union
 - Lake District National Park Authority
 - Prospect
 - Cumbria Association of Local Councils
 - NuLeAF
 - Cumbria Tourism
 - Carlisle City Council
 - West Cumbria Sites Stakeholder Group
 - South Lakeland District Council
- Observing Members
 - Committee on Radioactive Waste Management



- Department of Energy and Climate Change
- Environment Agency
- Isle of Man Government
- Nuclear Decommissioning Authority
- Nuclear Installations Inspectorate

Wood Holmes

- 2.9 Wood Holmes Ltd (WH) is a privately owned research and strategy firm based in Newcastle Upon Tyne, with offices in London, Manchester and Singapore. The Wood Holmes team has significant expertise in delivery and evaluation of large scale construction, regeneration and infrastructure projects, stakeholder and community engagement around contested issues.
- 2.10 Being both formally and geographically independent of The Partnership, Wood Holmes has conducted its evaluation activities discretely and without involvement in the activities being evaluated.



3 Objectives

- 3.1 As described in the original project brief, the evaluation activities, analysis and reporting focus on the following:
- 3.2 Evaluation and assessment of The Partnership's general operation, including:
- Analysis of working methods used, including facilitation/mediation of partnership operations, including meetings, communication between members of the partnership and, between members and their constituencies.
 - Identification of strengths, weaknesses and key learning points or other commentary that will enable continual improvement
- 3.3 Evaluation and assessment of PSE work, including:
- Analysis of integration, consistency, effectiveness and openness/transparency of the overall PSE programme and performance assessment against aims and objectives.
 - Analysis of engagement methods used and performance against specific objectives.
 - Identification of strengths, weaknesses and key learning points and other commentary that will enable continual improvement.
- 3.4 This report constitutes an interim report. A Final Report will be submitted to The Partnership in due course.



4 Methodology

- 4.1 The Partnership encompasses several diverse stakeholder groups and quite properly utilises a range of engagement techniques to achieve its objectives. With this in mind our approach has been to collect data from a range of stakeholders using a range of appropriate techniques, as specified at commissioning.

Attendance at Events

- 4.2 Wood Holmes attended a number of community / stakeholder engagement events to interview and engage with stakeholders in the partnership and to observe how the adopted engagement techniques work on the ground. The number of events attended was in line with the timing and scope of the evaluation activities. At the events we engaged in formal and informal conversation with participants, eliciting feedback as to the effectiveness of the forum and the engagement techniques used.

Data Review

- 4.3 Wood Holmes has reviewed data relating to PSE activities and responses to inform our perspective of reach and impacts of these activities. Examples include attendance totals, response rates and social media monitoring.

Stakeholder Interviews

- 4.4 In a partnership as diverse as this one some individuals are not able to attend all meetings and some prefer to provide their feedback on a more private one-to-one basis. For this reason we undertook a number of face to face and telephone throughout the evaluation.
- 4.5 These interviews offered an opportunity to gather a wide range of views and perspectives on PSE work and the Partnership's general operation and were a core component of the evaluation methodology.

Reviewing Documented Materials

- 4.6 Literature produced by The Partnership or its contracted organisations that relate to the PSE activities and The Partnership's general operation was accessed as an input into the evaluation. A comprehensive list of documents were made available to Wood Holmes and included public documents, draft documents, correspondence and internal working documents.



- 4.7 We created a dedicated email account to catch the majority of correspondence between 3KQ and Partnership members, as well as some external correspondence. As such we feel we had an appropriate degree of access to Partnership documentation and correspondence.
- 4.8 As well as literature produced by The Partnership, Wood Holmes also undertook review of third party literature to provide reference points for the evaluation. Where appropriate this documentation is identified and referenced via footnotes in this document. A full list of resources is included as an appendix to this document.



Section 2: Interim Partnership Operational Evaluation



5 Interim Partnership Evaluation

Achievements Against Objectives

- 5.1 The Partnership has achieved a great deal in delivering its work programme thus far. We have identified five key strengths of The Partnership which we feel have played a central role in enabling these achievements:
- A - The existence of The Partnership as an independent body. The alternatives, which would most likely have involved local authority officers being tasked with this work would, we feel, have undermined the integrity of the process and left it more vulnerable to accusations of pre-determination.
 - B - The appointment of independent facilitators. All members of the partnership consulted agreed that the efficiency and integrity of independent facilitators 3KQ had been a key factor in the achievements made to date. Most commented that their approachability outside of meetings, accuracy and speed of reporting and their continued impartiality on all aspects of the work has created a strong sense of trust and professionalism which has positively affected all aspects of the work programme.
 - As independent evaluators of The Partnership we also feel that the presence of an independent facilitator has been an extremely effective way to create and maintain fairness, impartiality and independence.
 - C - The decision to manage the complexity of the issues facing The Partnership by imposing a structure based on six criteria. The early identification of these criteria (see Partnership documents 03 and 07) created a helpful framework around which the work programme hangs. Doing so reduced the number and scope of the otherwise limitless and unstructured questions facing The Partnership. This process is summarised in Partnership document 09:
 - *“The criteria will ultimately be used to guide the Partnership's final recommendations on the question of whether the Decision Making Bodies should participate or not in the Government's process of moving towards a geological disposal facility. Therefore the work programme must include activities that enable well informed judgements to be made when the Partnership is considering their recommendations.”* (Document 09, p7)
 - D - Clear and regular acknowledgement of and reference to:
 - The stage-limited nature of the partnership's brief in regard to the much longer MRWS process
 - The limits placed on activities by the criteria established in document 07



E - The two tier membership structure of The Partnership creates a distinction between full and observing members which enables the involvement and technical input of organisations such as DECC, NDA, CoRWM, Environment Agency but manages their ability to influence outcomes. This has also had impacts on PSE activities, as discussed elsewhere in this document.

5.2 It is important to point out that we feel that the evaluation is a positive one and we underline the fair and transparent way in which the work programme is being delivered. However, rather than listing achievements, we feel it most useful to focus the report on how The Partnership responds to the following challenges and as such have structured the report to enable this. We point out that the balance of the text allocated in this report to these challenges does not reflect the balance of The Partnership's achievements against areas of concern.

Responding to Challenges

5.3 The Partnership has faced a range of challenges in course of its work. These are diverse in nature and their presence is a symptom of the complex and contested nature of The Partnership's operating environment.

5.4 The issues that The Partnership is dealing with are what would be termed 'wicked' or 'messy' problems in academic discussion of decision making around environment – science – society risks. Typically, such issues are complex, difficult to define and depend on political judgement to reach some kind of closure (Bergmans et al, 2006³). Although the UK government's White Paper of 2008 creates structure and process which frame the process in which The Partnership operates, the issues surrounding MRWS process have the following characteristics which intensify its 'messiness':

- Risks perceived as very high by at least some participants
- Very long timescales
- Uncertainty
 - Institutional uncertainty re. multi-scale governmental involvement
 - Scientific uncertainty re. geology and safety
 - Democratic uncertainty re. community support
 - Geographic Uncertainty re. Siting
- Institutional trust is low in some areas as a result of local nuclear history

³ <http://webhost.ua.ac.be/carresearch/index.php?pg=10>



- Stakes perceived to be very high by at least some participants
- Cognitive load is high due to extent of research being undertaken in different domains.

5.5 The consequence of operating in such a contested environment are that The Partnership must respond to a continually changing context and a diversity of dynamic perspectives as it moves through its work programme. As evaluators we do not feel that the presence of the challenges set out below reflects poorly on the The Partnership, or that they indicate that The Partnership should be considered to be failing in the achievement of its objectives as we feel that these issues surrounding the operation of The Partnership would most likely exist no matter what process was adopted to deliver the The Partnership's work. However we comment below on the ways in which The Partnership has responded to the challenges in consideration of:

- Where in the government's MRWS process (as set out in DECC's White Paper, 2008⁴) the current Partnership is positioned
- How fair, inclusive, impartial, professional, comprehensive and effective The Partnership has been in its operation

Constitution and Governance

5.6 A key strength of The Partnership's work is, we feel, its existence as an independent advisory body facilitating the activities appropriate to the current MRWS stage, as per the White Paper, as explained above. There are issues surrounding the constitution of The Partnership which remain unresolved however, despite being raised by members as areas for concern. The most noteworthy of these issues are the formal Terms of Reference (ToR) of The Partnership and the role of the Chair in the Partnership.

The Terms of Reference

5.7 The current Terms of Reference under which The Partnership operates remains a draft and has not been formally agreed by the members of the Partnership. Although this situation is not ideal, we feel that the current draft is an appropriate document given The Partnership's emphasis on, "the *early and provisional* nature of discussions in the overall process" (Partnership Terms of Reference, p3). We feel that while it would be preferable for all members to have agreed and formalised the ToR, the provisional nature of the document is in line with the current MRWS stage.

⁴ <http://mrws.decc.gov.uk/>



5.8 Furthermore, the geographic scale of the current partnership's remit (i.e. to report to the three decision making bodies) suggests to us that while there is significant scope for re-structuring any subsequent organisation should the Decision Making Bodies (DMBs) decide to participate further, the current situation is acceptably well formalised for its purpose. This is in line with the views of the large majority of members consulted.

The Chair

5.9 Currently, The Partnership has a rotating Chair Person drawn from one of the . This has been raised by some members as a cause for concern, as it:

- Potentially undermines the impartiality of The Partnership due to the DMBs' publicly stated policies regarding the nuclear industry.
- Creates a political imbalance in The Partnership between the DMBs and other full members.

5.10 After consulting members on the this issue, and in consideration of the roles of the chair in this partnership we feel satisfied that a rotating chair is appropriate. This is based on three considerations. Firstly, the role of the chair in this partnership is not an influential one. We feel that the call for an independent chair may stem from the fact that in many other public bodies, councils and boards the chair can exert special influence and that following from this there is an expectation that good governance requires this partnership's chair to be independent. This partnership however, is not a decision making body and the chair has little more influence than other regularly attending full members.

5.11 Secondly, the work of independent facilitators 3KQ both in meetings and between meetings is sufficiently even handed and accessible that most members felt that any concerns over the non-independent chair were adequately outweighed by confidence in the impartiality and extent of 3KQ's work.

5.12 Thirdly, we feel that finding and appointing a truly independent and dis-interested chair would prove to be expensive in both time and money and would not be a popular or effective use of tax-payer's money.

5.13 The above sets out our grounds for being comfortable with a rotating chair. However, we feel that as a partnership between the full members, regularly attending representatives of non DMBs could be considered for the role of the chair. Indeed, if The Partnership seeks to be considered an equal partnership between all full members, this could be reflected in the chairing arrangements.

5.14 We understand that the Chair rotates between Principal Authorities in line with the draft ToR. However, as these are not formalised the role of chair *could* be opened to other full members



without significant impact on any aspect of The Partnership's work, although this would create potential delays in delivering an already tight work programme and would have minimal effect.

Impartiality

- 5.15 To retain credibility, The Partnership needs to remain impartial on the outcome of the DMBs decision about further involvement in the MRWS process. We feel that while it is possible that some individual members and some member organisations may have pre-dispositions on this question a clear distinction should be drawn between pre-disposition and pre-determination of The Partnership's work.
- 5.16 In light of West Cumbria's nuclear history and its various environmental, economic, moral, political and social dimensions it would be unrealistic to expect all participants to be entirely un-predisposed on this issue. We feel that it is right and proper that the independent body advising the DMBs' bring together stakeholders of a wide range of dispositions in order to deliver well rounded and scrutinised advice to the DMBs. This should be done while retaining complete impartiality and without pre-determining the outcome of the process.
- 5.17 With this in mind, we are confident that the independent facilitators have enabled this process to take place in an impartial manner and without any bias toward or against any eventual outcome.
- 5.18 Striking this balance has included commissioning a range of research and presentations to The Partnership to enable a balanced a critically informed understanding of the major issues associated with The Partnership's work. Examples include:
- The Partnership commissioned a review of the ethical implications of the CoRWM work for the MRWS process by Prof Andrew Blowers, January 2011.
 - The Partnership commissioned an independent peer review of the BGS screening study by FWS Consultants Ltd and by Professor Agust Gudmundsson, October 2010
 - The Partnership commissioned an independent review of the NDA's research and development work by Prof Stuart Haszeldine, Feb 2011
- 5.19 We comment on the impartiality of public and stakeholder engagement activities elsewhere in Section 3 of this document.

Dominance of Principal Authorities

- 5.20 In consultations conducted as part of the evaluation a minority of members have expressed concerns over the extent to which The Partnership is dominated by the Principal Authorities, for example:
- Principal Authorities take the rotating Chairing role



- Principal Authorities send more officers and elected representatives, meaning that discussions are sometimes felt by some members to be dominated by these organisations.
- Elected representatives are often more vocal, and more experienced in speaking in such forums. As a result, they are able to dominate discussions through force of personality.

- 5.21 Given the Principal Authorities' public policy positions regarding nuclear, this has been expressed as a cause for concern by a small number of members. However, the management of the meetings and the work done outside meetings by facilitators and other key members was felt by most members to offer more than ample opportunities to influence The Partnership through a range of channels – principally through email and telephone calls. This was felt to be the case by some members who felt less able to influence Partnership Meetings and we are satisfied that the impartiality of The Partnership is not compromised in this way.
- 5.22 However, that some members are dissatisfied with the dominance of the Principal Authorities may point to a structural issue in The Partnership.
- 5.23 We feel that The Partnership's name is unhelpful as it does not accurately reflect the work being undertaken. This issue sometimes confuses understanding of its work, operation and governance. Importantly however, while we feel that The Partnership is not ideally named we do not consider it to be mis-configured, as explained here.
- 5.24 The Partnership is not accurately described by the term 'partnership' for a basic reason; there is not equal standing between full members. This is seen in the charring arrangements, in the identification of three Principal Authorities, in the brief – to provide advice and information to those authorities on the criteria set out in the work programme, and has been implicit or explicit in several consultations undertaken as part of our research. Indeed several Partnership members who are not representatives of Principal Authorities did not feel equal partners in the process when consulted. We consider the current West Cumbria MRWS Partnership to act as an independent advisory forum, and that such a name (or something similar) would have been more helpful for all stakeholders.
- 5.25 While this may seem a semantic rather than structural issue, the nomenclature used has led to some members and on-lookers having different expectations of The Partnership. Our evaluation activities suggest that these issues ought to be causes for reflection and learning.
- 5.26 We are aware that The Partnership evolved into its current form and do not suggest changing its name at this stage. Furthermore, we are confident that in the main The Partnership is currently delivering its brief appropriately, despite its name.



Inclusivity and Membership

- 5.27 In order to develop ‘wise democratic processes’⁵ The Partnership must seek to involve and include all relevant perspectives so that a decision about further participation in the MRWS process has considered and understands all options, stakeholders and consequences.
- 5.28 The inclusivity of The Partnership is about the range of stakeholders and perspectives included in the process and the way in which they are and were involved. The two tier membership of The Partnership set out above includes a range of organisations. Those in regular attendance include representatives of:
- Local government
 - National government
 - Parish councils
 - Local churches
 - Local farmers
 - Local trade union
 - Tourism body
 - The Lake District National Park
 - NuLeAF

Overcoming Barriers to Inclusivity

- 5.29 As evaluators we feel that this is range of inputs into the process is modest but not exhaustive. The Partnership are aware that several factors have been barriers to the involvement of other potential stakeholders. These can be thought of as strategic, stage related and practical barriers.
- 5.30 **Practical barriers** such as resource constraints, and pressure of other non MRWS work have prevented the involvement of certain potential stakeholders, and have limited the involvement of others. The Partnership has done much to overcome these barriers with several member organisations by providing a financial compensation for time invested, etc., and have arrangements in place to overcome these barriers in future where possible.

⁵ The International Association of Public Participation (IAP2) suggests that, “*Wise democratic processes are those which utilize a community’s or society’s diversity to deepen shared understanding and produce outcomes of long-term benefit to the whole community or society.*” (see http://www.involve.org.uk/evaluation-guide/annex4_2.shtml)



- 5.31 **Stage-related barriers** have limited the involvement of a small number of other members. By stage-related barriers, we mean that some members feel that it would be inappropriate to increase their involvement in the MRWS process at this stage due to its inherent uncertainties and provisional nature. We feel that The Partnership can not be held responsible for DECC's structuring of the MRWS process and as such, we are comfortable with some organisations having only a limited involvement at this stage.
- 5.32 **Strategic barriers** are faced by certain groups surrounding The Partnership who have not accepted invitations to become more involved as either members or participants at events. We refer here to environmental NGOs including:
- Cumbrians Opposed to a Radioactive Environment (CORE) (invited to join The Partnership)
 - Greenpeace (invited to join The Partnership)
 - Cumbria Friends of the Earth (invited to join The Partnership)
 - Radiation Free Lakeland (invited to participate)
- 5.33 As well as being strongly pre-disposed against further involvement in the MRWS process, these organisations seek to challenge the national MRWS process and the conclusions of work undertaken prior to the publication of the White Paper (⁶see CoRWM, 2006⁷) which established deep geological disposal as the preferred long term solution to the safe management of the UK's nuclear waste. With this in mind they have decided against formal involvement, but continue to engage in other ways.
- 5.34 While The Partnership has invited CORE, Greenpeace and FOE to be represented in The Partnership on several occasions these offers have been declined. As non-members of The Partnership, representatives of these organisations have played an active role in partnership events including partnership meetings by contributing as observing members of the public, and at several public and stakeholder events. The manner of their involvement at PSE events is dealt with in Section 3 below, however, in terms of efforts made to include these organisations in the MRWS process The Partnership has extended its invitation to participate at several points in time, and in several ways including the following:
- Offer of full or observing membership

⁶ This comment is based attendance at Partnership meetings as well as informal conversation with members of listed organisations at PSE events.

⁷ Committee on Radioactive Waste Management, "*Managing our Radioactive, Waste Safely- CoRWM's Recommendations to Government*", July 2006. CoRWM, Document 700. Available at www.corwm.org.uk



- Invitation to participate in all stakeholder events
- Invitation to co-design / structure a workshop or workshops to be financed by The Partnership.
- Open correspondence with independent facilitators 3KQ at all times.

5.35 The environmental NGOs have declined offers of further involvement and have instead continued to be involved in the process from a position of independence. We understand this preference, but as evaluators our task is consider whether The Partnership has been fair and sincere in its attempts to include these groups and or their perspectives in its work. An interesting reference point on this issue comes from the stakeholder engagement process which led to the Onkalo RWM facility in Finland. Here, a two day workshop which “provided the opportunity to present the history leading up to the Decision in Principle (DiP), and to examine future perspectives with an emphasis on stakeholder involvement” (NEA, 2002, p8), reported the following in its summary of proceedings:

5.36 *“A majority of workshop participants shared the view that the EIA process provided sufficient opportunities for stakeholder participation. The leader of a local protest movement, however, claimed that chances provided for various stakeholders to participate and influence decisions were far from equal.”* (NEA, 2002, p14)

5.37 We do not present this to suggest that such an outcome is inevitable, but to provide an international comparator for the performance of The Partnership in regard to the fair inclusion of challenging perspectives.

5.38 Our comments are set out below Table 1:



5.39 **Table 1 - Evaluating the Approach to Involving Environmental Groups**

| Involvement Criteria | Involvement Characteristics |
|---------------------------------------|---|
| When was involvement initiated? | <p>⁸ In October 2008 The Partnership offered a single place on The Partnership to an individual who would be asked to represent local environmental campaigning groups. The environmental groups were asked to decide who the representative would be. This invitation was addressed to representatives of West Cumbria and North Lakes Friends of the Earth, Greenpeace and CORE.</p> <p>In December 2009 this situation changed. At this time The Partnership offered two seats to the same three groups.</p> <p>This offer has been maintained up until the start of the Partnership's decision-making process, in June 2011.</p> |
| What form of involvement was offered? | <p>Full membership of The Partnership.</p> <p>Invitation to stakeholder events.</p> <p>Bi-lateral discussions.</p> <p>Invitation to design or co-design a workshop.</p> <p>In addition, the NGOs referred to above were invited to suggest preferred / acceptable engagement formats.</p> |
| How was involvement to be resourced? | <p>As has been the case with other members, the options for compensating members for their time invested in partnership work were made available for discussion but were not pursued by the three NGOs named above.</p> |
| How has non-involvement been managed | <p>As indicated above, The Partnership has commissioned research from contractors and academics independent of The Partnership to provide challenge, scrutiny and review of the major issues regarding safety, impacts, geology, ethics and others.</p> |

⁸ This cell in Table 1 and the text in paragraphs 5.40 and 5.41 have been re-drafted in this draft of this document (Partnership Document 158.1).



- 5.40 The degree of inclusivity sought by The Partnership has increased over the period 2008 – 2011 and the form of potential involvement broadened, although the issue of representation for environmental groups remains a cause of frustration for the groups involved.
- 5.41 At this interim stage in our evaluation work and in light of the above we are satisfied that to date The Partnership has attempted to be reasonably inclusive in the way it has sought to involve environmental groups in its work programme. Reviewing ways to enable groups seeking to challenge the process to be fairly represented on The Partnership will be an area of further attention in our Final Evaluation Report.
- 5.42 However, there are lessons to be learned from the continued tensions between the environmental groups and The Partnership. Most clearly, the terms on which The Partnership has sought to involve environmental groups have been framed by its own brief – as is to be expected. The consequences of this are that environmental groups have been asked to feed into a process which is based on premises they do not accept and / or seek to challenge.
- 5.43 More broadly, in a situation as complex as this one (referring here to the national MRWS process as being framed as one of siting a GDF, a situation challenged by the environmental groups) we feel that there could have been other less structured ways to include and involve challenging perspectives in the MRWS process in West Cumbria. In this we include perspectives seeking to challenge The Partnership and the MRWS process for any reason (environmental, safety, economic, etc.). For example, a budget could have been set aside which pre-disposed groups, such as academics other researchers as well as groups seeking to influence the outcome, could have bid for. We stress that this is only intended to be an example of an alternative means of enabling the articulation of alternative perspectives. We are also aware that The Partnership has commissioned work offering different perspectives on geology, safety and tourism among other issues, but that this has been done via short term, structured commissions.
- 5.44 Whether the creation of such a budget or other means of enabling appropriately resourced, self-structured alternative input ought to be the responsibility of DECC or The Partnership is unclear. However we do feel that some means of doing so in future may improve the inclusivity and therefore the integrity of any outcomes.

Complexity and Knowledge Management

- 5.45 We describe the MRWS process as a ‘wicked’ one (Bergmans, 2006), referring in part to the range and extent of the uncertainty being managed by the members. This is a common problem in many policy contexts involving social, technical, economic and risk factors which are dynamic and interactive. However, we feel that the MRWS process has, across the six criteria, an unusually high degree of complexity and as a result presents a knowledge



management problem for The Partnership. The knowledge management problem has the following characteristics:

- Breadth of issues requiring clarification
- Degree of specialist knowledge rather than general analysis skills required in each area
- The blurred boundaries between the perceived impartiality of science and scientists with predispositions and / or previous connections to the issues facing West Cumbria.
- The amount of reading and understanding required of members

5.46 In creating a clearly structured MRWS process in the White Paper DECC have framed the process in such a way as to create a step by step process through which communities can proceed, an approach identified as an important part of the equivalent radioactive waste management process undertaken in Finland⁹, where it is described as 'stepwise decision making'. Overcoming these knowledge management issues is central to the remit of The Partnership and we recognise the creation of six criteria and associated sub-groups as the principle ways in which this has been handled, which also provide a helpful framework in which the complexity of the work is managed.

Inter Group Working

5.47 The Partnership has framed its delivery of the current stage of the White Paper process by the creation of the six criteria, and the sub-groups assigned responsibility for the management of discrete packages of work.

5.48 There are a number of strengths and weaknesses to this approach, as observed in our research activities and reported by members in consultations:

⁹ See, NEA, 2002, Stepwise Decision Making in Finland for the Disposal of Spent Nuclear Fuel, Available at OECD bookshop, <http://www.oecdbookshop.org/oecd/bookshelf.asp?CID=&LANG=EN&pl=20>



5.49 **Table 2 - Strengths and Weaknesses of Inter-Group Working**

| Strengths | Weaknesses |
|--|---|
| <p>S1. Members are able to choose to work on areas of the work programme suited to their interest and expertise.</p> <p><i>Evaluators comments: Members reported that this is an aspect of the sub-groups which worked well.</i></p> | <p>W1. Requires trust between sub-groups, steering group and wider partnership.</p> <p><i>Evaluators comments: Members consulted feel that this has not been a problem.</i></p> |
| <p>S2. Removes the need for all members to know all aspects of the work programme, thereby reducing reading and thinking burden.</p> <p><i>Evaluators comments: Some members, particularly steering group members, feel that this potential benefit was not realised as they still felt the need to read across all aspects of the work programme.</i></p> | <p>W2. Encourages sub-groups to operate as discrete units, thus requiring strong reporting and communication of work at partnership and steering group meetings.</p> <p><i>Evaluators comments: This is an area where some members feel that some sub-groups have not been as effective as hoped. Concerns were expressed over the limited time allocated for sub-groups to report to the Partnership Meetings through verbal updates by individuals.</i></p> |
| <p>S3. Allows for the development of expertise in subject areas.</p> <p><i>Evaluators comments: In combination with the comments on S1 and W1, Members felt that they trusted sub-group members to develop expertise to deliver their sub-group work.</i></p> | <p>W3. Creates the potential for 'blind spots' in members' knowledge of the issues.</p> <p><i>Evaluators comments: At the time of the evaluation this was felt to be a potential problem, but one which members hoped would be resolved in forthcoming meetings and the proposed Final Reporting process.</i></p> |
| <p>S4. Creates clear responsibility for delivery of sections of the work programme.</p> <p><i>Evaluators comments: Most members consulted felt that this had worked well.</i></p> | <p>W4. Creates risks for The Partnership if key sub-group members leave their current roles.</p> <p><i>Evaluators comments: Many members felt that The Partnership was vulnerable in this respect, particularly in light of forthcoming elections. While this concern is not restricted to inter-group working, and is a threat to the Final Reporting tasks in general, the sub-group structure heightens the risks.</i></p> |

5.50 Alternatives to the creation of sub-groups could have included:

- Further use of independent contractors to manage sub-group issues.
 - This would have still required contract management by named partnership members. It would have increased the vulnerability to weaknesses, decreased



the benefits associated with inter-group working and would have been a more expensive option.

- Asking that all steering group members be involved in delivery of all criteria / objectives.
 - This would have intensified the perceived complexity, increased cognitive load and would have placed even greater reliance on a small number of critical partnership members able to manage this work load. It would also be likely to have created hidden 'blind spots' as steering group members struggled to manage the breadth and depth of the issues, rather than the identifiable blind spots created by inter-group working.

5.51 In light of the above, we feel that the alternatives to inter-group working would have been less effective in managing the complexity and cognitive burden associated with the work programme, and as such consider the current arrangements to be a least worst option.

Pace

5.52 Another implication of the work programme adopted by The Partnership is that it has dictated the pace of progress toward a decision on further participation in the MRWS process. Within The Partnership there are mixed feelings about the pace of this work, with some members deeply frustrated that a process fraught with such a high degree of uncertainty and explicitly billed as provisional in nature is absorbing as much time and public money as is the case.

5.53 This is not a widely held concern however, and most members feel that the pace set has been appropriate to the work required to achieve the objectives of The Partnership. We feel that the pace at which the current work has been achieved is in line with the demands of the work programme and that a faster paced delivery would not have afforded the breadth of perspectives, peer review or scrutiny that have made valuable contributions to the process. However, time spent opening up issues to aid understanding has created a more time-pressured reporting phase.

Moving from Exploration to Resolution

5.54 Since our involvement in the project as evaluators, we have observed a change in the discourse around unresolved issues from one of exploration to one of resolution among only the facilitators and a small number of steering group members.



- 5.55 For many members there appears to be a sense that the issues have been discussed and debated to good effect¹⁰. However, for most of those consulted in our evaluation there remains much uncertainty in terms of what the Final Report will contain or how it will be pitched in terms of the strength of its conclusions or the degree to which it can represent the views of The Partnership. While this might be expected at this stage in the process, and we understand that members should not be expected to agree at this stage on the content or conclusions of the final report, we suggest that there is important communication work to be done to ensure that full members have a shared understanding of the potential format, authorship and implications of the Final Report. This ought to be a priority in the proposed review and reporting activities in order to enable the creation of an effective Final Report.
- 5.56 Although Final Reporting is beyond the scope of this Interim Evaluation Report, we would like to underline the challenge presented by the reporting phase and to highlight the importance of efforts already underway to clarify and drive forward the scheduled activities. We also feel that the scheduled Partnership Review will afford better evaluation of The Partnership in this regard.

¹⁰ As indicated in consultations, and by the responses to the Review of Work Remaining activity at the Partnership Meeting in March 2011.



Section 3: Interim Public and Stakeholder Engagement Phase 2 (PSE2) Evaluation



6 Interim PSE2 Evaluation

6.1 The Partnership's second round of public and stakeholder engagement (PSE2) took place between 8th November 2010 and 11th February 2011. The Partnership identified priorities for PSE2. These were:

- Objective 1: Demonstrate that public input from previous six months has led to real changes
- Objective 2: Build understanding of the MRWS programme and the Partnership's activity, including the implications of the BGS study results
- Objective 3: Seek input from stakeholder organisations and the public on key topics in order to inform the Partnership's judgements against criteria for recommending whether to participate:
 - a. How public and stakeholder views will inform the work of the Partnership
 - b. Impacts and community benefits
 - c. Community involvement in the siting process
- Objective 4: Understand stakeholder and public issues and information needs
- Objective 5: Provide a response to issues and adapt activity accordingly

Summary of Achievements

6.2 In its work to achieve these objectives The Partnership has completed the following PSE related activities:

- 10 community 'drop in' events were held at locations across Cumbria in November and December 2010.
 - 483 attendees
 - 248 questionnaires were completed
 - 166 further written comments were received.
- A Partnership exhibition stand at Dunmail Park, Workington in November 2010
 - Attended by over 200 people.
- Two newsletters sent to 79,000 households in November 2010 and January 2011
 - These were also made available in public buildings, such as libraries and leisure centres.
- An update to all Cumbrian households in the County Council magazine, Your Cumbria.



- A one day residents' panel event, 7th January 2011.
 - 16 attendees, eight from Allerdale and 8 from Copeland areas.
- A 'Stakeholder Organisations Workshop' (ShOW) on 13th January 2011.
 - 18 attendees
- Advertorials in all local newspapers.
- Regular press releases. Generated over 40 pieces of coverage about the MRWS process in Cumbria during November and early December.
 - Items on Border TV, Radio Cumbria and the BBC Politics Show in the North East and Cumbria.
- Took part in a facilitated discussion about GDF at the Keswick Film Festival, February 2011.

6.3 As well as undertaking these activities, The Partnership also received a moderate amount of feedback and enquiries from the general public through their email, free-phone and social media channels.

- 0800 Number: 22 calls with substantive comments, around 100 more calls (as per data provided by partnership facilitators) with general enquiries or clarifications.
- Email or Freepost contact: 41 substantive comments were received to the central email address and the freepost address during PSE2
- Dunmail Park Stand¹¹: The Partnership reports that around 200 people came to the stand to talk or read the material, with 86 comments cards completed.

6.4 The Partnership is reporting on its delivery against these objectives at the time of writing this interim report and as such it is difficult to fairly assess all activities at this stage. We comment here where we feel it is appropriate based on the scope of the evaluation activities.

6.5 Also, as in Section 2, the report is structured to prioritise coverage of how The Partnership has anticipated and responded to challenges rather than listing achievements. With this in mind the remaining part of this section discusses The Partnership's response to challenges presented by the PSE2 objectives.

¹¹ The Partnership hired an exhibition stand in Dunmail Park Shopping Centre Workington, for one day on Saturday 27th November 2010.

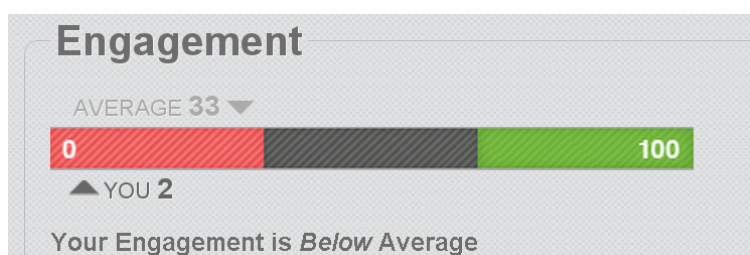


Social Media

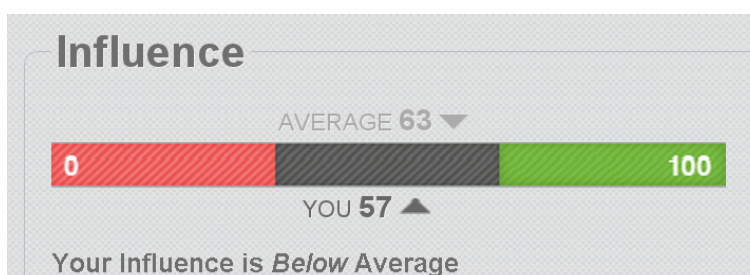
6.6 We provide a brief analysis of Social Media activity here as it is unreported in other PSE documents. The Partnership recognised the potential application of social media in raising awareness, but also that the context in which The Partnership operates created several constraints on social media activity. They decided to 'trial' the use of the methods in a small scale way in order to experiment with their usefulness and application. Results of these activities are as follows:

6.7 **Twitter:** The Partnership's twitter account westcumbriamrws has 42 followers¹². Two key metrics for performance on twitter are 'engagement', a measure of how interactive communication is, and influence, a measure of how interested the wider twitter community is in The Partnership's account. On these measures The Partnership performed as follows:

6.8 **Figure 2 - Engagement Score of 2 out of 100, Average is 33**



6.9 **Figure 3 - Influence Score is 57 out of 100, Average is 63**



6.10 The above scores suggest there is significant scope for further development in engaging in two way conversations in the twitter domain, as the account has so far been used as a broadcast / dissemination channel rather than an engagement channel. This reflects the challenges of adopting an appropriate style and voice for social media interaction in such a controlled communications context as The Partnership's.

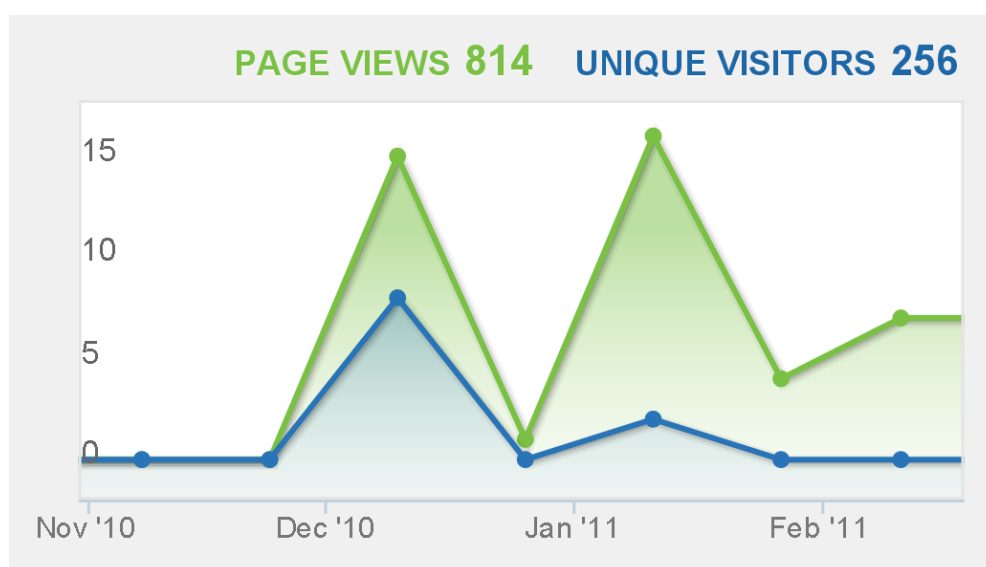
¹² Data regarding The Partnership's twitter account is based on data gathered by HootSuite, <http://hootsuite.com> and Sprout Social, <http://sproutsocial.com>



6.11 However, evaluating The Partnership's use of twitter in this light, it can be seen that the account achieved a middle range performance in terms of raising awareness and stimulating interest, which can be viewed as a modest achievement, although still below average for UK twitter accounts. Its performance is further compromised however when considering that several of the 42 followers are members or contractors of The Partnership.

6.12 **Facebook:** The Partnership's Facebook page has a total of 51 'fans'¹³. The activity on The Partnership's Facebook page throughout the PSE2 period is illustrated below:

6.13 **Figure 4 - Facebook Views and Visitors During PSE2**



6.14 Figure 4 shows that activity on the Facebook page rose significantly at the start of PSE2 in November, fell off over the Christmas period, then climbed again in January, dipping as PSE2 closed. The page then rose again after the close of PSE2, suggesting that awareness of and interest in the page has been sustained beyond the end of formal PSE2 period.

6.15 We feel that this chart illustrates that the Facebook page, although not hugely popular, has been utilised by stakeholders and members of the community, with 256 unique visitors. It also shows that the Facebook page acts as a barometer for the effectiveness of wider PSE activity in this period, following as it does the activity levels associated with community drop-in and discussion pack sessions.

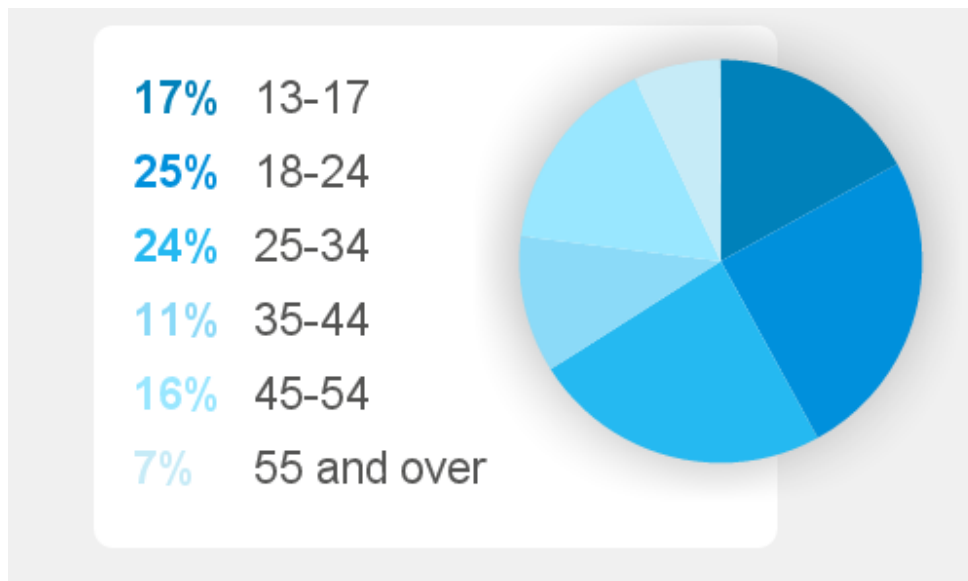
¹³ The analysis of The Partnership's Facebook page is based on data gathered using social media analysis tool Sprout Social, <http://sproutsocial.com>.



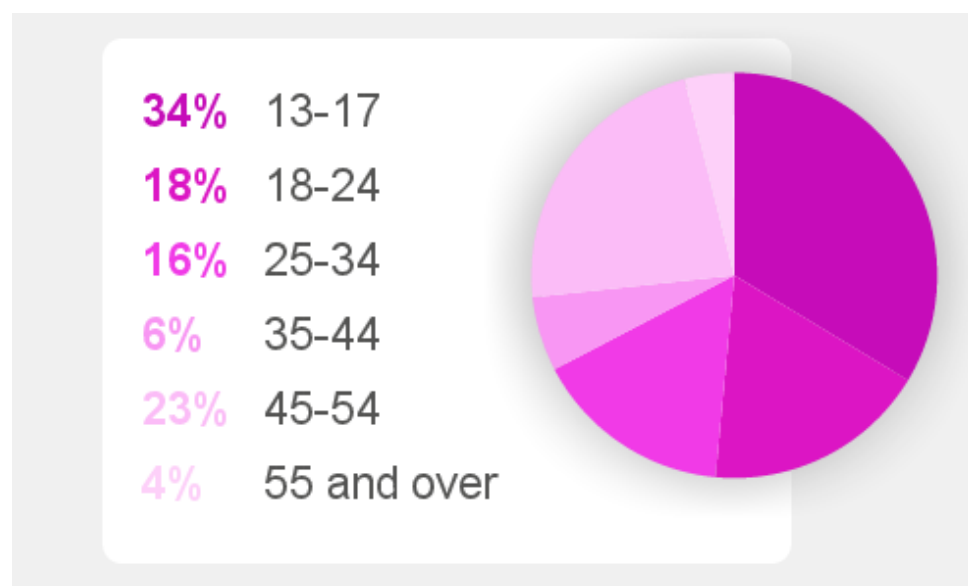
6.16 Furthermore, the 'engagement funnel' seen in the relationships between numbers of views (814), visitors (256) and fans (51), although small in volume, is in line with our expectations of conversions of views to fans.

6.17 The charts below show the spread of male and female Facebook 'fans' by age. Although they show a range of age groups interacting with the Facebook page, two thirds of all users were 34 or under.

6.18 **Figure 5 - Male Facebook Fans by Age**



6.19 **Figure 6 - Female Facebook Fans by Age**





- 6.20 In summarising performance in the social media domain, we feel that The Partnership has made only limited progress and that the numbers of followers / fans remain small. This should however be viewed with trial nature of the activities in mind.
- 6.21 We feel that acting as ‘the official’ Facebook page or twitter account of The Partnership creates an asymmetrical relationship between The Partnership’s PR contractor Osprey and members of the community using these channels with whom engagement is sought. The casual nature of typical activity on social media channels does not match the cautious, constrained and risk-averse environment in which the partnership’s communications contractors must operate, and we feel that continued use of the accounts in the current way is unlikely to lead to wider engagement.
- 6.22 This presents opportunities for innovation and or modification of approach. Alternative strategies, include:
- Using guest bloggers to generate interest and enable one to one engagement rather than Partnership to individual engagement (as is currently the case)
 - Using individual profiles rather than an official group profile may lead to different results, particularly if the formality and risks associated with The Partnership’s use of social media can be reduced.
 - Using alternative platforms, such as Foursquare which offers other incentives for engagement, including virtual badges.
 - Using other already existing or bespoke games to engage users digitally.
- 6.23 We suggest that the PSE Group considers a range of alternative strategies going into PSE3 in order to take full advantage of social media opportunities.

Responding to Challenges

- 6.24 We comment below on how The Partnership has responded to what we see as five core challenges in PSE2:
1. Reaching and engaging multiple audiences
 2. Structuring engagement fairly
 3. Achieving the appropriate mix of information dissemination and consultation
 4. The West Cumbrian nuclear context
 5. Fairly and accurately reporting the activities and input from stakeholder and members of the public



- 6.25 We feel that The Partnership has anticipated these challenges well and has created a PSE strategy designed to overcome them. This strategy is characterised by 5 strands of activity in addition to what The Partnership refers to as the ‘miscellaneous’ activities surrounding telephone, email, freepost as well as its social media presence and its website.
- 6.26 This approach enables The Partnership to adopt several modes of engagement across the Spectrum of Public Participation (SoPP)¹⁴. The SoPP is a tool for practitioners involved in deliberative governance, in which the Decide-Announce-Defend mode of governance is replaced by Engage-Deliberate-Decide. The SoPP can be used as a framework for planning and / or assessing activities such as those undertaken by The Partnership and is applied here to provide a means of viewing PSE2 through a commonly accepted lens¹⁵.
- 6.27 The SoPP distinguishes between 5 kinds of engagement, with increasing level of public impact. These are shown in Table 3, with the PSE activities mapped onto the framework below.
- 6.28 Importantly, through the lens of the SoPP, The Partnership itself embodies a process through which stakeholders are directly involved with representatives of the DMBs. The operation of this intra-member involvement is evaluated in Section 2, above. The SoPP framework is used below to consider the activities commissioned and conducted by The Partnership in engaging non-members.

¹⁴ http://www.iap2.org/associations/4748/files/IAP2%20Spectrum_vertical.pdf,

<http://www.iap2.org/displaycommon.cfm?an=3>

¹⁵ There are several examples of its use in the UK. For example see BIS, http://www.iap2.org/associations/4748/files/IAP2%20Spectrum_vertical.pdf and the SDC, http://www.eeac-net.org/conferences/sixteen/Presentations/Internal%20day/Thursday_16h_Lee.pdf



6.29 Table 3 - PSE Strands Against the Engagement Spectrum

| | Inform | Consult | Involve | Collaborate | Empower |
|--------------------------------------|---|---|---|--|---|
| | Increasing Degree of Community Impact → | | | | |
| Goal | Provide balanced and accurate information and to assist understanding. | Collect feedback from community. | To work directly with the community. | To make community members partners in the decision making process. | To place decision making in the hands of the community. |
| What the Community can Expect | Access to information. | Access to a channel for providing feedback. To be listened to and be able see how their feedback has affected outcomes. | Opportunities to work directly with governance organisations to ensure that their perspectives are heard and are influential. | Opportunities to have significant, direct influence on outcomes. | To have their wishes implemented. |
| PSE Strands | | | | | |
| Discussion Pack Sessions | The Discussion Pack events provided community members with information and opportunities to access more detailed information. | Reporting process is relied upon to ensure visibility of impact. | | | |



| | Inform | Consult | Involve | Collaborate | Empower |
|-------------------------|---|---|--|--------------------|----------------|
| Community Events | These sessions provided information as per the discussion packs but added to this by having representatives of DECC, NDA, BGS and others to provide detail and well informed answers. | Feedback captured at these events was included in the respective strand report, and in Final PSE Reporting. | No. Attendees were not directly involved in decision making, beyond providing perspectives, questions and other comments. | | |
| Residents Panel | This activity provides detailed information to the extent it is available, but informing is not a main objective of the activity. | The Residents Panel collected detailed feedback from Panel Members. Reporting is relied upon to ensure visibility of impacts. | Partly. Panel members worked through contracted facilitators rather than directly with partnership members, although representatives of the member organisations and 3KQ were available to answer questions. | | |



| | Inform | Consult | Involve | Collaborate | Empower |
|---|--------|---|--|---|--|
| Stakeholder Organisation Workshop (ShOW) | | Attendees were consulted and a range wide of opinions expressed and reported. | Attendees were able to work directly with those in governance organisations to ensure that their views and were heard. Some expressed concern that their views are not influential as those of The Partnership members. We comment further on impartiality elsewhere in this document. | No. Attendees are not directly involved in decision making. | |
| Opinion Survey | | | | The opinion survey acts as a quantitative indicator of community support which is intended to have direct influence in decision making. | No. We understand that there are no current plans to carry out a referendum on further involvement in the MRWS process, so the community can not be said to have been given decision making power. |



| | Inform | Consult | Involve | Collaborate | Empower |
|-------------------------------|--|--|----------------|--------------------|----------------|
| Miscellaneous Channels | The website and social media platforms provide information in electronic format. This is the most up to date source of information among the PSE activities. | The social media, email, free telephone and postal channels have received incoming messages, as reported above. These are captured and included in final reporting, which is relied upon for visibility of impact. | | | |



The Engagement Spectrum and the Partnership's Work Programme

6.30 In reviewing the PSE2 activities through SoPP framework and in reference to its stated objectives we return to the five core challenges identified above:

Reach

6.31 There has been a considerable investment in reaching multiple community and stakeholder audiences in PSE2 across a range of channels. Ipsos Mori 's opinion and awareness survey has shown that in the PSE2 period awareness of the MRWS process in West Cumbria has grown, particularly in the Allerdale and Copeland areas. Print media and television appear to have been the most effective channels (responsible for 67% of awareness in wave 3 of the survey) and although some media channels have been less effective (such as social media) we are satisfied that progress has been made in raising public awareness, a key objective of PSE2.

6.32 We do however feel that there is scope for further raising *informed* awareness of the issues surrounding GDF, particularly as the most common reason for residents being unable to make a decision was that they felt they needed more information. This point connects to potential confusion created by the West Cumbrian context (see below) and the extent to which the several aspects of the GDF remain undetermined, such as inventory and the potential distance between the GDF and surface facilities.

6.33 Lower than expected attendance at events has also been raised as an issue by some members of the partnership, with community events, residents panel and stakeholder organisation workshops all registering fewer attendees than may have been hoped for. We feel that the communications activities used to promote these events were well designed and covered all major channels. Furthermore, invitations to the ShOW were distributed widely and that so few organisations turned up is more likely to reflect the pressures under which such organisations operate rather than shortcomings in The Partnership efforts to involve them.

6.34 We feel that the attendance is not significantly lower, or higher, than could be expected for other activities with such uncertain impacts, undefined geography and long timescales. Indeed, much of the conversation we observed at events was about the way that these uncertainties made engagement difficult if not 'pointless' at this stage. We feel that any future community siting partnership working with a more defined area of impact would generate a higher response. In addition, the PSE2 activities were scheduled in one of the UK's coldest ever winter periods, with some of the events taking place in seriously challenging conditions, particularly for those using public transport.



- 6.35 We are aware that some in The Partnership feel that more needs to be done to raise awareness and stimulate engagement via broadcast media. We feel that The Partnership can be satisfied that the current level and breadth of media activities have been in line with the scope of its brief and that increased investment in awareness raising will be likely to enjoy diminishing marginal returns.
- 6.36 However, there is certainly scope for further creative engagement, taking the Into Eternity film based on the Onkalo facility in Finland as an example. This relates to the point made elsewhere in this report that there is scope to encourage creative approaches to public and stakeholder engagement from all perspectives. This should be well resourced and self-structured, although there may not be time to implement such a suggestion in the remaining work programme.
- 6.37 We also feel that it is important that The Partnership continues to work to develop relationships with local stakeholders such as schools and community groups and continues to disseminate discussion packs to build understanding further.

Structure of Engagement

- 6.38 The PSE events were designed and structured by The Partnership, 3KQ and with advice from independent contractors. Despite receiving much positive feedback about the engagement activities from most attendees that we spoke to, we are aware that the approach taken has been criticised for having too heavy a presence from The Partnership and for conversations being structured by a pro-GDF discourse. Some attendees felt that alternative perspectives were framed as adversarial and that discussions at the events were felt to focus more on telling than listening.
- 6.39 We can understand these perspectives and, at the events we attended we noted that the number of Partnership members in attendance, particularly from DECC, NDA, BGS could have been interpreted in a number of ways. Some attendees felt that the presence of these organisations created a valuable source of accurate information and that it showed a real commitment to engagement. Others however interpreted it as a show of force, or an attempt to 'bribe' or 'charm' residents, particularly in light of the fact that no other area has come forward and that the government is not considering any alternative to a GDF.
- 6.40 With this in mind The Partnership should consider the various impacts of over-staffing events, and be prepared to re-calibrate agenda's and activities when actual attendance no longer suits the planned agenda.
- 6.41 It could also consider ways to avoid over-structuring discussions. We noticed that it is very easy for conversations in PSE events to become framed as adversarial, and although the PSE events we observed were very well facilitated, anti-GDF participants often left feeling



dissatisfied by the process. Resolving this issue is not straightforward and we encourage The Partnership to continue to talk to dissatisfied stakeholders about the full range of engagement techniques available in order to find a way to enable all stakeholders to feel that they have been fairly consulted. We are reassured by correspondence between dissatisfied stakeholders and The Partnership that this is happening. As discussed in our comments regarding inclusivity however, we feel that this is an area where creating opportunities for well-resourced self structured critique would be beneficial, although doing so within the time frames of this Partnership may be difficult.

Mix of Communication and Consultation

- 6.42 Most work done so far has been identified as being on the left of the SoPP, suggesting that the focus has been on informing and consulting rather than directly involving, collaborating or empowering the community or non-members stakeholders. We feel that this is appropriate for the objectives of PSE2 - to raise awareness and understanding, and seek input from the community.
- 6.43 We suggest that this will need to change in any future stages of the MRWS process in which more impactful public participation should emerge as more clarity is found regarding geography, geology and impacts. Furthermore, PSE3 will need to feature direct involvement of stakeholder input into the reporting phase of The Partnership's work. Doing so in PSE3 will satisfy the requirement that the views of stakeholders and community members are influential and we will return to this issue in a Final Evaluation Report. With this in mind we see the PSE2 reporting process as the only current formal channel through which feedback gathered in PSE2 can have impact.

West Cumbrian Context

- 6.44 The local nuclear context and history is such that it creates a number of challenges for The Partnership. First, there is a need to be very specific about what the MRWS process is referring to so as to avoid confusion with other features of the local nuclear landscape, such as the facility at Drigg, or the prospect of new nuclear development. This makes it difficult to engage in conversational media channels, such as social media, as the terms of the conversation need to be very particular rather than casual. Our evaluation activities at PSE events suggest that the discussion packs provide an important visual guide as to the size and significance of the project and have been an important part of overcoming this challenge. However, this issue creates risks for The Partnership's quantitative indicator (the Opinion Survey). If there remains misunderstanding over the scale, inventory and significance of the proposed GDF because of the presence of other nuclear projects in the area then the validity of the opinion survey may be questioned.



- 6.45 The Partnership recognises and has responded to this risk in identifying building understanding as an objective for PSE2. We feel that this has been achieved as well as can be reasonably expected by operating the across the PSE strands set out above. This does not remove the risk however. Several members of the community arrived at the PSE activities that we attended unclear about the differences between the proposed GDF and other local nuclear waste activity, suggesting that understanding of the GDF is not necessarily accurate among wider population. Without wider primary research it is impossible to gauge the accuracy of understanding across the West Cumbrian community, but we would suggest that any future PR or communications should consider wherever possible using visual representations of the GDF from the Discussion Packs and / or explicit references to Drigg, Sellafied etc. in order to highlight the differences.
- 6.46 A second major feature in the West Cumbrian context is the NIREX process. We are aware that The Partnership anticipated that NIREX would be a major feature of conversations around radioactive waste management in West Cumbria. It has produced a range of resources to explain the differences between the current process and NIREX and to set out The Partnership's perspective on why it makes sense to consider a GDF in West Cumbria. Despite these efforts NIREX has been raised by members of the community at each PSE event that we attended. In light of this we feel that there is room for developing The Partnership's capacity to respond honestly and accurately to public and stakeholder references to the NIREX issue at events and in prepared resources.
- 6.47 We also feel that there is scope for further developing members' understanding of the issues surrounding NIREX. We found in consultations with members that some are not-clear about the implications of NIREX for the MRWS process, and we identify this as an area for development to ensure that members communicating with their colleagues and other stakeholders are able to represent this issue accurately and fairly.

Reporting

- 6.48 Mapping PSE activities into the SoPP framework highlights the critical reliance on fair and accurate reporting of PSE2 activities and feedback from the community and stakeholders. We see this reporting process as the only formal way in which feedback from 'consultation' activities goes on to be incorporated in the decision making process.
- 6.49 Representing the involvement of such a diverse range of stakeholders presents a significant challenge but we are satisfied that the reporting has been conducted thoroughly and fairly. This is in large part due to the reporting structure created by The Partnership which includes well designed internal audit and sense checking of reports from the various PSE 'strands'.
- 6.50 The step by step creation of the PSE report involves the following stages:



1. Creation of individual 'contractor' reports by the commissioned third party delivering each strand (we understand that a full list of these contractors reports will be available on The Partnership website). These are not standardised and, in the main, are not published by The Partnership but by independent contractors.
2. These are then checked for accuracy and completeness by dedicated 3KQ team member who then creates standardised 'strand reports' based on the contractor reports. These reports enable common processing of the reports and aid comparability.
3. These 'strand' reports are subject to internal audit whereby members of the PSE sub-group check the strand reports for accuracy, fairness and completeness.
4. A final PSE2 Report is then created by the integration of the audited strand reports.

6.51 We feel confident that this process is as fair and thorough as can be expected of The Partnership. We are aware that some observers may feel that including public and stakeholders in this process may further have increased the validity of the reporting but we are unsure that doing so would have improved on the current process. Furthermore with the time constraints in which The Partnership is operating and with all reporting conducted in the knowledge that all reports will be made public, we feel that the current situation is more than adequate.



7 Conclusions

- 7.1 The Partnership faces particularly complex issues with high stakes, persistent uncertainty, long timescales, significant requirement for research and the application of specialist input. In this context the evaluations of The Partnership and its PSE activities both reach broadly positive conclusions. In the main the West Cumbria MRWS Partnership is a well managed, fair and effective body that is delivering a work programme appropriate to its remit. With regard to PSE activities, these include a broad range of well chosen engagement techniques which enable information dissemination, consultation and in some cases the direct involvement of stakeholders in working with decision makers. The Partnership itself can be seen as the most directly empowering engagement mechanism in the process, creating opportunities for stakeholders to directly influence the outcome of the MRWS process in the area.
- 7.2 The evaluation has identified a number of areas where there is scope for development and or improvement, with some of these requiring more urgent attention as The Partnership approaches the next stage of its work programme.
- 7.3 Unresolved issues around the chairing arrangements, Terms of Reference and relative standing between members from Principal Authorities and other full members are highlighted as areas for review. The need for resolution of these issues is heightened as The Partnership approaches the drafting of a final report as several members remain unclear about the implications and authorship of any formal documents produced by The Partnership to advise the decision making bodies.
- 7.4 As yet these issues have not resulted in any pre-determination, impartiality or other significant negative outcomes, but several of the political, ethical and technical issues The Partnership is working through remain unresolved. Rather than further explorative research and review, focus should now be placed firmly on closing down remaining issues wherever possible in order to reach the degree of resolution required to enable the creation of an effective final report.
- 7.5 While the Opinion Survey shows awareness of the MRWS process rising in West Cumbria, there are areas where our evaluation activities suggest understanding could be better developed. In particular, the past and present West Cumbrian context presents challenges.
- 7.6 First, other nuclear developments and projects in the area create the potential for confusion around what a GDF will mean. Wherever possible The Partnership should reference these and use visuals in communications to be as clear as possible about how this process differs from others.



- 7.7 Secondly, despite efforts to resolve this issue there remains a significant lack of clarity about the implications of the NIREX process for the MRWS process among the community, stakeholders and some members of The Partnership. We feel that this is an area for urgent attention.
- 7.8 Reporting of community and stakeholder feedback in PSE2 is identified as a critical link in the consultation chain and while we are satisfied that there is a well designed and audited reporting process, the later Partnership Review will be sure to assess the impact that this reporting process has on final outcomes.
- 7.9 While the partnership has invited participation from a wide range of local stakeholders, and can be satisfied that it has been adequately inclusive, some organisations and individuals have not been satisfied with the format of the suggested involvement. We feel that there remains scope for innovation and or development in encouraging appropriately funded self-structured input from a full range of perspectives.
- 7.10 Despite these areas of concern and others discussed in the report, The Partnership is in the main found to be working effectively in a challenging environment and is pro-actively responding to and managing issues on an ongoing basis. The independent nature of its constitution, the presence of independent facilitators, the design of the criteria and work programme and the two-tier membership structure have all contributed to the achievements of The Partnership to date.
- 7.11 This interim evaluation has reported positively in the main however the extent to which The Partnership can overcome the issues raised here will be addressed in the scheduled Partnership Review.



8 Appendix 1: Resources

- 8.1 The ARGONA Project, <http://www.argonaproject.eu/>
- 8.2 The OBRA project, for assessing the feasibility of creating an observatory for long-term governance on radioactive waste management in Europe, <http://www.obraproject.eu/index.php>
- 8.3 COWAM Network, <http://www.cowam.com/>
- 8.4 STAGE (Science, Technology and Governance in Europe), Discussion Paper 25, http://www.stage-research.net/STAGE/documents/25_Swedish_nuclear_waste_final.pdf
- 8.5 Evaluation Of The Environment Council's National Waste Dialogue, http://www.sharedpractice.org.uk/Downloads/Waste_Dialogue_Main_Evaluation.pdf
- 8.6 IDEA Consultation Methods Resource, <http://www.idea.gov.uk/idk/aio/68967>
- 8.7 Evaluation of the DEW nuclear waste process in Sheffield, <http://www.dew.uk.net/pdf/DEW%20Summary-May%2009-Final-Final.pdf>
- 8.8 The Public Engagement Triangle, BIS, <http://interactive.bis.gov.uk/scienceandsociety/site/all/files/2010/10/PE-conversational-tool-Final-251010.pdf>
- 8.9 The Central Office of Information, *Effective Public Engagement*, <http://coi.gov.uk/documents/guidance/effective-public-engagement.pdf>
- 8.10 UCL, *Evaluation Methods For Public Engagement Projects*, http://www.ucl.ac.uk/public-engagement/research/toolkits/Methods/100831_Methods_for_evaluation.pdf
- 8.11 Jseph Rowntree Foundation, Auditing Community Participation, <http://www.jrf.org.uk/sites/files/jrf/jr082-community-participation-assessment.pdf>
- 8.12 Partnerships Online, Framework for Participation, <http://www.partnerships.org.uk/guide/frame.htm>
- 8.13 Rowe, G and Frewer, L. J., 2005, *A Typology of Public Engagement Mechanisms*, http://independent.academia.edu/GeneRowe/Papers/143023/A_typology_of_public_engagement_mechanisms



- 8.14 Involve, *A Guide To Evaluating Public Participation In Central Government*,
<http://www.involve.org.uk/evaluation-guide/>
- 8.15 People and Participation, Methods Resource,
<http://www.peopleandparticipation.net/display/Methods/Home>
- 8.16 World Energy Council, *Towards Implementation Of Spent Nuclear Fuel Management In Finland*, <http://www.worldenergy.org/documents/p000915.pdf>
- 8.17 Canada Nuclear Safety commission, *Regulating Canada's Geological Repositories*,
<http://nuclearsafety.gc.ca/eng/about/regulated/radioactivewaste/regulating-canadas-geological-repositories-fact-sheet.cfm>
- 8.18 CARL (an independent, self-supporting consortium of organisations from countries that have experience with stakeholder involvement in radioactive waste management),
<http://webhost.ua.ac.be/carlresearch/index.php?pg=29>
http://www.skb.se/upload/publications/pdf/MKB.2008_Eng_30.6E.webb.pdf