4 November 2016

Dr Carl-Magnus Larsson Chief Executive Officer ARPANSA PO Box 655 Miranda NSW 1490, Australia

Nuclear Safety Committee

Advice to the CEO of ARPANSA

Dear Dr Larsson

I refer to Agenda Item 2.2 of the Nuclear Safety Committee (NSC) meeting held on the 18 March 2016 where the Committee provided you with their advice and recommendations relating to the ARPANSA Communication Strategy and Plan for the National Radioactive Waste Management Facility (NRWMF). The Committee discussed this topic further at the 17 June 2016 NSC meeting as additional information regarding project timeframes and progress was presented to the Committee.

The Committee considers the ARPANSA Communication Strategy and Plan for the NRWMF to be well developed and to contain elements that are required to manage the regulatory process and community expectations successfully. However, in both meetings, the Committee identified several components of this plan that will require ongoing focussed resources for successful engagement. Such engagement is essential if ARPANSA is to be effective in developing and maintaining the confidence of stakeholders as a trusted regulator. The components identified by the Committee are generally consistent with those identified by ARPANSA and include but are not limited to:

- The ongoing requirement to clearly and effectively engage all stakeholders, including those
 along transport routes. The purpose of this engagement is to communicate the role of
 ARPANSA as the independent regulator and to be transparent in the reasoning for future
 decisions made regarding the NRWMF. Lessons from other industries show that a significant
 amount of time is required to build a relationship of trust with such a wide range of
 stakeholders. The objective is to allow stakeholders to consider the regulator as
 independent and to allow ARPANSA to identify, understand, and address the range of
 potential concerns raised by stakeholders.
- The continued need for ARPANSA to be aware of, and informed by, case studies for similar scale projects in Australia and internationally. These case studies provide a range of examples of both successful and unsuccessful communication of technical and non-technical risks with stakeholders. The Committee discussed several case studies, highlighting the importance of identifying, understanding and managing technical, social, and economic

concerns raised by stakeholders. Those concerns are likely to vary between stakeholder groups and stakeholder concerns are likely to change over the course of such a long-term project. ARPANSA will need to be able to respond effectively and promptly to such changing concerns.

- The importance of integrating learnings and experience derived from effective stakeholder engagement in other industries and in the international nuclear community into the plan, and the requirement for the plan to be responsive and flexible for the duration of the project.
- The Committee emphasised the need to continue to engage with, rather than to just inform, stakeholders.
- The wide range of tools available for facilitating communication between stakeholders and ARPANSA was discussed with the recognition that ARPANSA will need to identify those tools that are considered most effective for reaching the wide range of stakeholders, and to develop an approach to the consistent and moderated use of such tools.

The Committee notes that ARPANSA has included the above in the ARPANSA Communication Strategy and Plan for the NRWMF; however, it is not clear that ARPANSA is adequately resourced to develop and maintain a capability so that ARPANSA is able to learn the lessons from Australian and overseas experience of the concerns stakeholders are likely to raise in connection with technological processes they are unfamiliar with. Experience from overseas and from other industries strongly suggests ARPANSA will need an ongoing capacity in this area.

Given the recognised examples where similar projects have failed both in Australia and internationally, the Committee requests further information from ARPANSA to confirm that sufficient resources are available within the organisation for continued and independent engagement with stakeholders at the frequency, locations, and in the form appropriate to specific issues throughout the duration of this nationally important and long term project.

Yours sincerely

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Dr Tamie Weaver Chair of the Nuclear Safety Committee