

**Rugby Cement Plant Stakeholder
Engagement Review: Report,
Observations and Recommendations**

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Executive Summary

This report

CEMEX, The Environment Agency (EA) and Rugby Borough Council (RBC) invited The Environment Council to conduct a review of stakeholder engagement arrangements around the Rugby Cement Plant, owned and managed by CEMEX.

The Brief agreed with The Environment Council was to conduct a series of interviews with key stakeholders and use the findings from these along with its own experience and case studies of best practice engagement to formulate a series of observations and recommendations on improving the stakeholder engagement process. These recommendations describe a best practice, optimal approach to addressing the issues specific to this context. They outline the processes, potential tools, mechanisms and models that would be applied to achieve greater trust, transparency, openness and clarity in stakeholder and community relations. These are 'ideal world' recommendations and exist outside of resource and time constraints.

The feedback received from the interviews has been carefully reviewed and collated to form the bulk of this report, and the recommendations are heavily informed by this feedback. This report is to help inform CEMEX, The Environment Agency and Rugby Borough Council identify possible future options for stakeholder engagement around the Rugby Cement Plant. The report will also be made available to the community.

Themes

In analysing the interview data, we identified a number of themes. These are as follows, accompanied by a couple of key points to illustrate each:

Communication

- There are currently many forms of communication around the plant. There are varied views as to how effective these are.
- Community members want proactive, transparent, coordinated and consistent communications from CEMEX, EA and RBC.
- CEMEX, EA and RBC want to understand what information is useful.

Information

- There are a number of key issues about which community members would like to receive information, including on their impacts on the community.
- Information needs to be provided in clear language that is easily understood, not overly technical but still provides the right level of detail.
- Information needs to be free and ideally regularly accessible via websites.

Ways of Working

- Most interviewees were of the view that current ways of working aren't productive, satisfactory, or constructive.
- There are questions of representation, differing objectives, current behaviours and resources.
- There is a will from the majority to engage, participate and work together, but the current situation doesn't facilitate it.

Trust & Transparency

- Inconsistencies in information and communications from different sources are leading to suspicion of motivations and confusion as to what information is factually correct.
- There is mutual mistrust and a need for greater transparency and different working arrangements to address this.

Engagement

- There were varying views as to the effectiveness of current methods of engagement but people were mostly aware that engagement was occurring.
- Interviewees made a number of suggestions on how they saw things potentially operating in future.

Visions & Barriers

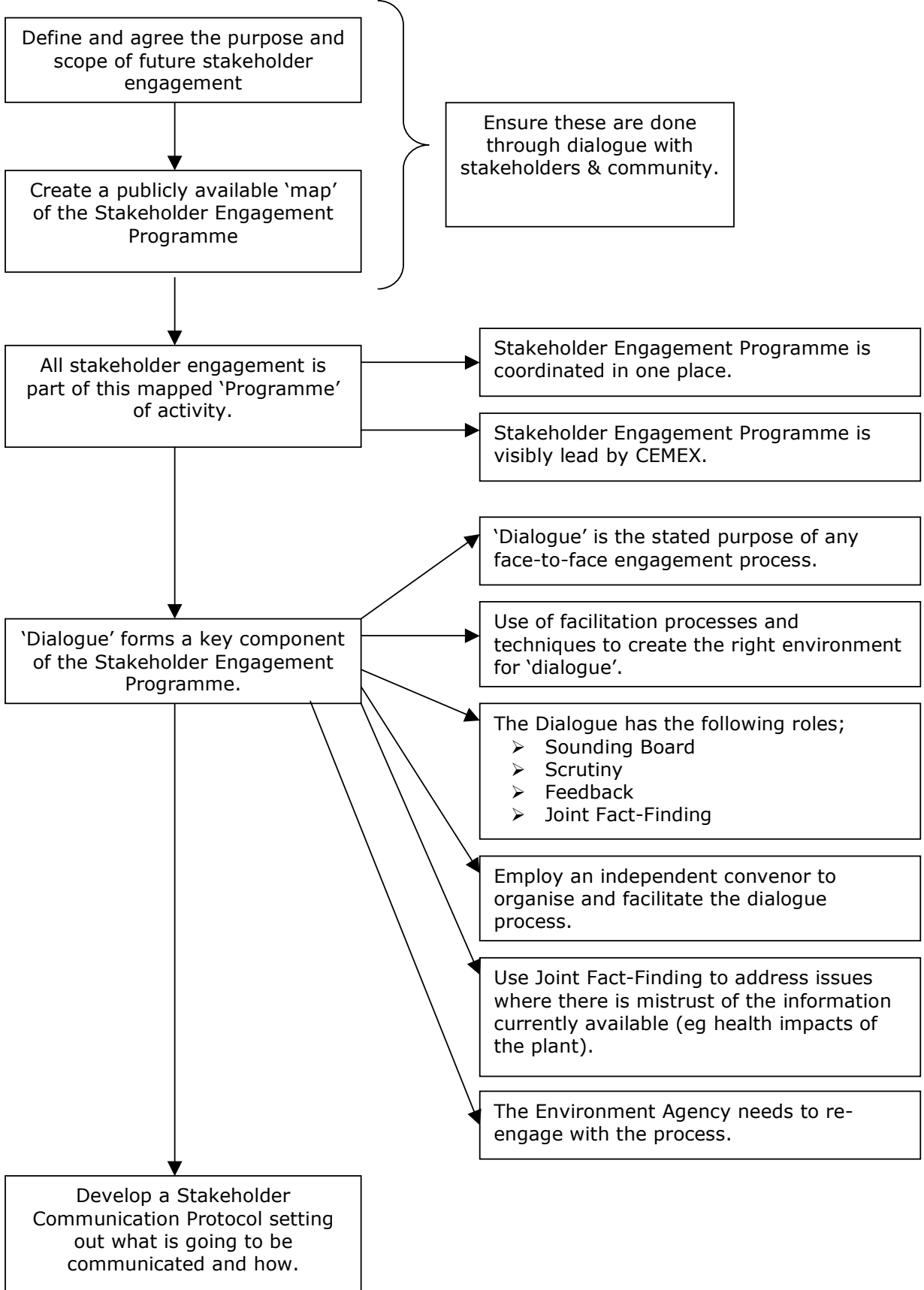
- Interviewees were quite clear on their visions of how they would like to see things working, and also what they perceived as barriers to effective engagement around the plant.
- Most want to see engagement broadened, power shared, more transparency and improved information sharing and communications.

Recommendations

The key issues with current stakeholder engagement over the Rugby Cement Plant are related to lack of trust; quality and consistency of communication amongst stakeholders; accessibility, transparency and consistency of information; and independence and accessibility of meetings and other engagement opportunities. We have made a number of recommendations throughout the report as to approaches, methodologies and tools that can be used to address these issues and establish better relations between stakeholder and community members.

Please note that the Recommendations are throughout the report, with supporting text to explain them. There is also a Table in Section 5 that summarises them. Below is a 'map' of the recommendations and a way in which they might be considered together.

Map of Recommendations



1. Introduction

1.1 Context

1.1.1 CEMEX, The Environment Agency and Rugby Borough Council invited The Environment Council to conduct a review of stakeholder engagement arrangements around the Rugby Cement Plant, owned and managed by CEMEX.

1.1.2 Ready Mixed Concrete (United Kingdom) Limited went public in 1962, later renamed RMC Group plc. RMC acquired Rugby Group Plc in 2000 to strengthen its cement capability. CEMEX acquired RMC Group in 2005, and has been managing the plant in Rugby ever since.

1.1.3 The current stakeholder engagement arrangements focus on a group called the Rugby Cement Community Forum that was established by CEMEX, and Rugby Borough Council and is made up of a variety of stakeholders. These include the Environment Agency, the Primary Care Trust, Warwickshire County Council and Rugby Borough Council, specific interest groups and representatives of the local community.

1.1.4 Three of the key players in the current engagement process felt that current stakeholder engagement arrangements were not actively engaging all members of the community and that the group's current method of operations meant that it was not inclusive or necessarily effective in representing a wide range of stakeholder views. The Brief agreed with The Environment Council was to conduct a series of interviews with key stakeholders and use the findings from these along with its own experience and case studies to formulate a series of observations and recommendations on improving the stakeholder engagement process.

1.2 Methodology

1.2.1 The Environment Council were chosen to conduct this review due to its independence (please see independence statement at Appendix D) and track record in effective stakeholder engagement and consensus building over environmental and sustainability issues.

1.2.2 Stakeholder Identification

The initial stakeholder list was drawn up in consultation with CEMEX, The Environment Agency and Rugby Borough Council. It was recognised that some stakeholders might have been missed at this stage, and so, when conducting interviews, interviewees were specifically asked to help identify other potential stakeholders who were not yet engaged in this or other stakeholder engagement processes around the Rugby Cement Plant. This stage of the review was intended to be a starting point from which needs, gaps and potential ways forward could be identified.

1.2.3 Stakeholder Interviews

An approach using interviews was adopted to allow each stakeholder the space to speak their mind and have this recorded. To ensure transparency, the interview questions were disseminated to those that requested them and sent a PDF copy of interview notes to interviewees who wanted them. This was to check that interviewees felt we were fairly capturing and reflecting their views.

1.2.4 Reporting

The feedback received from the interviews has been carefully reviewed and collated to form the bulk of this report, and the recommendations made in section three are heavily informed by this feedback. This report is to help inform CEMEX, The Environment Agency and Rugby Borough Council identify possible future options for stakeholder engagement around the Rugby Cement Plant. The report will also be made available to the community.

2. Emerging Themes

Through analysing the feedback of interviewees, we have identified several emerging themes. These follow;

2.1 Communication

2.1.1 Several forms of current communication over the Rugby Cement Plant were identified by interviewees. These are:

- CEMEX Newsletter 'Community Matters', which is distributed to 13,000 households on a quarterly basis. There has been a positive response to these newsletters from some. Others feel this is not widely distributed enough. Comments have also been that articles about the RCCF are not done in consultation with the group and are only told from one perspective.
- Parish Councillors and community associations impart their own information to local residents e.g. via quarterly publications.
- Regular public meetings of the Rugby Cement Community Forum (RCCF) who communicate information in the following ways;
 - Representatives feeding back to the community e.g. The New Bilton Community Association (NBCA) report through a website and quarterly newsletters to residents
 - Via a website.
- Phone calls to the Environment Agency, CEMEX and Rugby Borough Council. This has been recognised as an effective method of communication, where issues can be discussed and concerns addressed in a focused way.
- Press releases e.g. in the local paper, 'The Advertiser'. However, some feel that the press are becoming less interested in the plant. There is also concern that the readership is being frightened by newspaper headlines and not being given the facts.
- Environment Agency reports
- Public Register. It is felt that information on the Public Register is only available in theory as it can take time and money to access the information here. Previously people have travelled as far as Gloucestershire to access this information and have found that they had to pay for this when they arrived.

2.1.2 Concern was expressed that the Environment Agency does not respond to queries both written and via RCCF in spite of their responsibility to engage over the cement plant. They are also perceived to have stopped attending RCCF meetings. This is felt by some to be a source of much frustration, as they are not present to answer questions at meetings regarding the permissions they are giving to the cement plant. Similarly, several interviewees said they have had to wait several months to receive responses from CEMEX to questions (up to 9 months) and that some times the answers do not come at all.

2.1.3 There is a general concern that communications are not proactive or coordinated between the different parties involved. For example, not enough listening occurs in context of the Forum and communication does not necessarily reach the people who most need or want it outside the Forum. There is some uncertainty over how and in some cases, if, some groups that are currently engaged, are imparting information to those that they represent. Some councillors who speak to local residents and observe that these local residents are not engaged or very well informed about the cement plant illustrate this.

2.1.4 There is significant concern over inconsistencies in communication from CEMEX. For example, events that are perceived to be dust fallouts by the local community have had different explanations, for example that the cement plant dust is from the Sahara desert, or that it is pollen. Concern was also expressed that it is possible to read things in other sources that conflict with what Environment Agency and/or CEMEX are saying (including on the Public Register) which can get confusing and lead to mistrust. As such, there is a perception that CEMEX will communicate whatever story 'fits the bill'. Planned changes in the plant are not always mentioned at RCCF meetings but are published in the press, and this is of concern to some interviewees, as they understand that CEMEX and the EA are supposed to advise RCCF on activities around the plant. Many people also expressed concern that at meetings between CEMEX and Councillors, there seems to be a fear of CEMEX, which prevents discussion of the 'real' issues.

2.1.5 Some interviewees considered that CEMEX is doing its best to provide communications, yet some still feel that the statutory bodies and the cement plant give 'spin' answers. Activities such as alerting press to information, and applying for formal applications before sharing such information with stakeholders has caused tension in the past.

2.1.6 Some interviewees feel frustrated that communications are not effective, responses are very slow, that help is only given if there is a major issue and that issues are only acted upon when they get really bad (for example if there is a dramatic dust fall out), or to prevent prosecution. It was expressed that people would like to see more appreciation of the fact people are living daily with issues related to the plant.

2.1.7 Conversely it was expressed that there is a struggle for those representing the plant to know what people are interested in hearing and that a better feel for what the public are concerned about is required to help make communications more relevant. It is also a concern for those representing the plant that they have information and are unsure of the best ways to provide it. There is some uncertainty as to whether it is the case that the wider community want information and cannot access it or if they are simply not interested in accessing the information to begin with.

2.1.8 There is a wide range of perceptions about the plant and its activities. For example: concern was raised about the fact that there are different perceptions of some issues related to the cement plant. For example, many people believe that what comes out of the chimneys does have negative health impacts, yet one interviewee said there is no evidence that health is impacted by anything coming out of the chimneys at the moment, and that the health impacts in the area are actually caused by deprivation. Also, many believe that dust from the plant is coming out of the chimneys; yet one interviewee believes that this dust actually comes from lorries that aren't cleaned properly and during the transport of materials.

It is also believed by some stakeholders that air quality is getting better as a result of the bag filters but that there is no perception of this from many people.

2.1.9 Interviewee Suggestions to Address Communications

Interviewees suggested the following ideas to help deal with these issues;

- A website for the RCCF so it is seen as being owned by the community rather than CEMEX or the Environment Agency. People could raise concerns with the RCCF and these concerns could then go on meeting agenda
- Regular email updates from CEMEX and EA to keep people informed
- 'Community Matters' to be distributed to the whole of Rugby
- Feedback from a non-CEMEX RCCF member in the 'Community Matters' newsletter before it is circulated
- Immediate radio updates to stakeholders on events e.g. spillages at the plant
- One to ones with people living close to the plant and door stepping to generate debate and get local community opinion
- Open day/ family fun day at the cement plant
- Presentations to give facts to ensure perceptions are informed
- CEMEX could take over an adjacent garden to demonstrate the change in air quality (as was done on the Bayer chemical plant in Germany)
- Posters that show an improvement in air quality
- A greater understanding and tolerance that those attending meetings are unaware of how the plant operates or have been directly affected by plant themselves so may ask repetitive questions
- Set up a more relaxed tone for meetings e.g. meeting could be held in a less formal environment
- One interviewee requested that this report is sent to all simultaneously in the interests of transparency and best practice and funders have responded accordingly.

2.2 Information

2.2.1 Information the community would like to have in terms of possible impacts on them of the cement plant's operations;

- Transport movement
 - Will there be a change in the number of lorries?
 - Will there be a change in the routing of the lorries?
 - The Rugby Western Relief Road (developments and impacts)
 - Some vehicles are too heavy for the roads they are driving on – will this be addressed?
- Emissions and air quality
 - Level of emissions from various point sources around the plant
 - Where are the low emission points?
- Alternative fuel types and potential impacts from burning
- Health effects of waste fuel being burned
 - Different chemical contents of the different fuels likely to be used now and in the future
- Health impacts in general e.g. asthma. Several interviewees would like to see a detailed, comprehensive and independent health survey.
 - Levels of different chemicals and what people are being exposed to
 - Dust from lorries not cleaned properly – what is in the dust and should I worry that my kids are breathing it in?
- Permissions granted to the cement plant/planning applications
- Physical developments at the plant
- Technique development at the plant and how it fits into the national development of the plant

- Physical appearance of the site
- Would like to see a plan of the plant with all the areas and layers of production
- Impact on the watercourses
- Waste disposal issues
- Possibility of bypass dust from cement that goes to landfill at Southam
- Employment

2.2.2 Regarding the above issues, stakeholders would like to know what is happening and how they will be affected, and for this to be communicated in layman's terms on a regular and pro-active basis by CEMEX. Many interviewees request that regular reviews of performance are conducted and sent to local residents and a wider audience.

2.2.3 A large number of people we spoke to would like simplified information to be provided including facts about what CEMEX is doing. These people want to know the above information in simple terms, e.g. what is being burned, whether air quality is getting better or worse and for any technical information used to be made clear in terms of the implications for them. Many people feel that there is often too much technical detail, which makes the information provided inaccessible. Having said that, some people feel that a level of detail is required, but that this could be tailored to be relevant to the target audiences.

2.2.4 There was varied feedback to the 'Community Matters' newsletter ranging from it being good and informative, to satisfactory and comprehensive, to difficult to access in terms of language. It is also recognised that the Environment Agency communicate through this newsletter, demonstrating what they are doing and this is welcomed. It is felt by some that the relevant detail is often lost in this communication (i.e. 'Community Matters'), and that this in particular feels like too much of a PR exercise. As such, it was felt by several interviewees that although 'Community Matters' and other forms of communication from CEMEX do demonstrate that they appear to be working within regulatory frameworks, this doesn't reflect the reality that people see on the ground.

2.2.5 Information that CEMEX, the EA and Rugby Borough Council want to communicate to the community;

- Issues affecting the plant and its operation and how to communicate these to the community
- What CEMEX do and why
- Detail of the sustainable impact of the plant
- The context of the Environment Agency's position, the changes Environment Agency have made through regulatory process and the wider picture of waste burning in the context of fossil fuels and climate change.

2.2.6 Access to information is available from a number of sources as mentioned in 2.1.1 above. Many people are content that they have access to the information they require and it is felt by many that there is no attempt to stop information getting into the public domain. However, others while acknowledging there is access to information feel that this is 'in principle' and that in reality accessing the accurate information they need is difficult. For example, information may be incomplete or arrive on the day or afternoon of a meeting, leaving no time to read it properly.

2.2.7 It is felt by some that there was an apparent reluctance on the part of the previous plant operator to give information. Since CEMEX took over it is felt that this has improved but that there is still reluctance to give some information. Specifically concern was expressed that there is denial about the amount of

pollution that arises from tyre burning and that a planning application was posted in a place where few people saw it, which they felt was bad practice. However, where information is provided, it is felt that some stakeholders do not accept or believe it, for reasons discussed under 'Trust and Transparency'.

2.2.8 Interviewee Suggestions for the better provision of information

- More resident open day such as the one CEMEX ran to discuss Climafuels. It was felt this was effective as it included a presentation from CEMEX to share information, only residents were allowed to speak and this gave them an opportunity to ask their questions and receive answers. It was suggested that such meetings ought to happen on a regular basis
- Regular email, newsletter and website updates from CEMEX and the EA
- Information should be posted on an easily accessible website
- Information should be more directly passed to residents to improve the accessibility of this information to them in particular.
- Consistent, regular newsletter in layman's terms
- Direct hotline through to someone with the relevant knowledge who can answer questions about the cement plant
- Independent monitoring
- EA and CEMEX to provide adequate and timely documentation before RCCF meetings
- Publish information on the Public Register in the library, and on the internet–this information needs to be accessible to all
- More information and response to queries needs to come from the Environment Agency as they no longer attend meetings
- Different types of information for different groups e.g. raw info for specific interest groups possible to be made available on a website

2.3 Current Ways of Working

2.3.1 There is a representative elected group that currently exists called the Rugby Cement Community Forum (RCCF). The community represented by the RCCF is within the area served by Rugby Borough Council. This area is also served by Warwickshire County Council and 40 Parish Councils. The aim of the RCCF is to provide a forum for representation of local community interests in relation to the Rugby Cement Plant and all its associated operations, operated by CEMEX, or their successors. The objectives of the RCCF are to serve as a channel of information and communication on issues relating to the plant that may affect the local community or the environment and to provide an opportunity for representatives of the community along with CEMEX and other agencies including the Environment Agency, the Primary Care Trust, Warwickshire County Council and Rugby Borough Council, to scrutinise plans and activities relating to the plant that may impact upon the community.

2.3.2 It was recognised by both RCCF members and non-members that membership of the RCCF is not as inclusive as it could be, and many people felt that local residents are under-represented on the group. It was expressed that the RCCF are and always have been committed to improving the community representation on the group and that members of the public are indeed invited.

For example, the RCCF strive for local meeting venues to make sure people can attend, and have requested that notification of meetings be sent out with CEMEX newsletters to inform people of meetings and invite comment on activities. It was recognised that County, Borough and Parish Councils are represented, which is good, and that the presence of Warwickshire County Councillors adds knowledge to the group. It is felt attempts are made by the RCCF to engage the community in dialogue but that these are hampered by resource constraints.

2.3.3 There seems to be a lack of clarity around who the RCCF represent. Some feel that this group do not necessarily represent their local communities and some people fed back concerns about whether these representatives were communicating information from and back to their communities. Some interviewees felt that local residents don't see the RCCF as a way of raising issues and that there is no discourse between local residents and the RCCF.

2.3.4 It was expressed that there is a lack of clarity around who is leading the RCCF, and that there is little understanding of what it is doing by those not on the group and that this can appear to be inconsistent. Concern was also expressed that there is not currently enough knowledge within the RCCF to answer the questions about the cement plant's operations. It was put forward that these are possible reasons why some people do not attend meetings.

2.3.5 It was suggested that some of the issues of representation are borne out of the fact that there is a fundamental difference in objectives between some members of the RCCF. Some are perceived to have the aim of shutting down the plant, and others want the plant to remain open. It was suggested that this issue arose from the formality of the constitution when it was drawn up, where (it was suggested), that the cement plant owner and those invited to join the RCCF had a different understanding of the objectives of the group from the start. It is felt that CEMEX didn't realise they were establishing the expectation that RCCF would be a self-governing group – which is very different from the type of liaison group that exists around other CEMEX operations.

2.3.6 Another possible explanation may be in the fact that some RCCF members feel they were given a constitution from Rugby Borough Council that actively disengaged people, and feel the 'top-down' approach was too exclusive. For example, it took three years for members to get voting rights, and the Chair and Vice Chair were elected for them, without any consultation. It is also highlighted that the RCCF was run by Rugby Borough Council for the first 5 years of its existence, and only relatively recently have the group become independent and revised the constitution. It is felt that the less official setting over the last few months has been good, and that previously there has been too much emphasis on presentation and not content.

2.3.7 The value of the RCCF is recognised by many interviewees. The RCCF is a generally representative body that involves a cross section of the community from different perspectives and the majority of people on the group attend meetings in the best interests of the community. Opposition groups are represented as well as people who are broadly supportive of the cement plant – there is felt to be an issue as to how to co-ordinate these varying opinions in a coherent fashion. It is felt that the RCCF have proved they can be effective in communications, for example through logistics reporting and responses to developments at the cement plant. The group are also recognised as an effective scrutiny mechanism for the Cement Plant. For example, they have been successful in ensuring that bag filters were fitted into the chimneys.

2.3.8 Many feel that communication amongst RCCF members is an issue of contention and there is a concern that there are some groups on the RCCF membership list who don't attend meetings, such as the Environment Agency and the Primary Care Trust. For example, some participants expressed they have felt intimidated; that they are not always extended courtesy, and feel that things they say can get manipulated. As such, there is reluctance from some attendees to attend meetings or express their opinion when they do. Some felt that engagement of the RCCF is deliberately limited due to fear of misuse and

misinterpretation of information. It is also felt that some methods of communication adopted are aggressive, that there is not enough diplomacy and willingness to collaborate, and that meetings can be long, drawn out and boring due to the level of detail that is explored over issues which some participants find exclusive.

2.3.9 There is a concern that the atmosphere generated by such interaction is what has alienated many from the group, including a number of RCCF Chairs, and it is felt by some that there will be no progress while the group communicates in this way. It is recognised by many that all have the right to hold and express certain opinions, but that in the case of this group, sometimes the methods used to do this are not constructive, and that although there is substance in the points being made, this can become obscured by way these are communicated.

2.3.10 It is recognised by some RCCF members that the group may currently be dysfunctional. However, it is felt the solution is not to opt out but to take responsibility and think more laterally about how to address the issues and really get to grips with people's concerns. At one or two recent meetings, when all attending have had the shared objective of moving things forward, one interviewee expressed that they felt hope as people were 'taking off the armour' and 'dealing with each other as human beings'.

2.3.11 As mentioned, one issue is seen to be the lack of resources available to the RCCF to carry out future work. The constitution has just been re-drafted but there are no funds to deliver new work, which includes:

1. It is felt that the priority for the community is a detailed, comprehensive and independent health survey
2. A pooling of all information collected since the set up of the RCCF
3. It is felt that training would help to build understanding

2.3.12 Interviewee suggestions

- It is felt that due to the large amount of time spent on some agenda items, others are missed out completely, such as discussion of information provided by CEMEX and the EA. As such, having more frequent meetings with amended agendas might allow these issues to be dealt with.
- At the end of RCCF meetings, the Chair should put out a press release to allow all in borough to know what was said at meeting and a chance to get more involved if they wish (this is now in the constitution)
- A website developed by the RCCF for providing information to the community
- Funding – the RCCF constitution has just been re-drafted but there is no money to deliver the new work
- Independence from the cement plant – it is felt important that the RCCF is seen to be independent

2.4 Trust and Transparency

2.4.1 There is a distinct absence of trust between some of the parties involved. On the one hand there is a desire for information and a desire to provide this information in an accessible way. On the other hand there is anxiety about how the information provided by CEMEX and the EA will be used, and as such a seeming reluctance to provide it. Information that is provided is often mistrusted and some interviewees expressed concern that they are reliant on the Environment Agency asking the right questions to check that the plant meets national standards. It is felt that CEMEX will not admit that the cement plant has an impact on health where this may be the case. One explanation that has been suggested (and much concern has been expressed over this) is that CEMEX are

self-monitoring and as such, people are not reassured that they are being impartial. There is also some doubt among some that the Environment Agency is not monitoring effectively.

2.4.2 Related to this, some interviewees feel that the RCCF needs to be independent from CEMEX and any other organisation. Independence would ensure that the RCCF are not seen as being supportive of the Cement Plant by members of the community as it is felt there is an entrenched distrust of the cement plant, which makes independence of high importance in terms of reassuring stakeholders that information is balanced and trustworthy.

2.4.3 Another explanation for mistrust of information provided is that information provided by the EA is often seen to be contradictory to that from other sources such as the Public Register. There is also a historical issue of mistrust around the cement plant – feedback suggests that the previous owners were very dishonest about their activities. However, it was also expressed that CEMEX have tried particularly hard with trust building and on one or two occasions have made significant breakthroughs.

2.4.4 Some interviewees considered that CEMEX are striving to be as transparent as possible yet there is an issue with the transparency of CEMEX managing the current secretariat of the RCCF. For example, minute taking of meetings is conducted by CEMEX and on several occasions, participants' recollection of the meeting discussions has been different from what was recorded. Also, it is felt that inappropriate venues have been booked (far away from the plant therefore it is felt they are less likely to attract stakeholders) and there has been failure to adequately publicise meetings. It is felt by some that these are examples illustrating the imbalance of power in the current set up which increases anger and mistrust, perpetuating the current difficult situation.

2.4.5 There is concern about the EA 'averaging out' the performance of the plant, and not offering the National Incident Reporting System (NIRS) number to complainants (a number that can be used for tracking complaints). It is felt that not offering this to complainants so they can trace the progress of their complaint means that the EA do not have an intention of dealing with the issue. It is also felt by some that CEMEX use legal arguments to 'hide behind' and there is too much fear to admit when something goes wrong. It is also a source of frustration that when an incident does occur, and CEMEX are asked for an apology and explanation, the response does not address people's main concerns. For example, after a dust fall out, there may be an offer to clean up the dust, but no admission of the mistake, apology and answer to questions about what is in the dust and how will it impact health. Instead, some interviewees feel they are 'fobbed off' and patronised by responses that they simply 'shouldn't worry'.

2.4.6 Many reflected that they would like to see more openness all round. It was felt that there needs to be independent scrutiny of information and greater transparency in presenting the findings. The point was made that scrutiny does not necessarily have to be negative, and that it is often more a case of gaining understanding. It is felt that organisations like CEMEX and others tend to think that people will always be against them, yet more often it is the case that people just want mitigation of impacts.

2.5 Engagement

2.5.1 It is felt there is no lack of willingness from all parties to engage. Those identified as being represented through current engagement activity include (in no particular order); Rugby Borough Council, Borough Councillors, the Rugby

Cement Community Forum, CEMEX, The Environment Agency, Warwickshire County Council, campaign groups, local environmental groups, New Bilton Residents Association, the whole of Rugby. Some feel that due to the emotive nature of this issue, there is a tendency to get 'one kind' of stakeholder, which could serve to create bias and there is an issue in understanding how to represent those directly affected by the plant's activity who aren't part of a forum and only represent themselves.

2.5.2 Concern was expressed that a large percentage of the people identified for interview for this process are Councillors, most of whom have never been to RCCF meetings or taken an interest in the group as it is felt this may have led to a biased review. This is felt to be particularly disproportionate in relation to the fact that Rugby Borough Council no longer engage with the RCCF.

2.5.3 Feedback also suggests that there are people who have views but don't want to be involved, perhaps due to apathy or because people think others will express views on their behalf. One interviewee described the demographics of the area in terms of residents' possible non-motivation for engagement. Many residents in the area are economically disadvantaged, and might have lower aspirations, self-belief and self-esteem, meaning they may have a view but don't believe their view will make a difference in any case. In this case, the interviewee suggests that this is why door stepping as an engagement technique is so important in terms of beginning to build trust. It was also expressed that there are many who have no issues with the cement plant and for this reason, are unlikely to engage.

2.5.4 It was felt that those not currently adequately represented include the following:

- Primary Care Trust
- Many of the relevant County Councillors, District Councillors (it was felt by some that District Councillors representing local residents are 'surprisingly' detached from what is going on), Borough Councillors (who are involved but could be more so)
- Technical staff from Rugby Borough Council who can answer specific questions about the cement plant
- Community representatives (not Councillors) from wards particularly affected by fallout from the plant including Newbold, Brownsover, Admirals, New Bilton, Waterside and Long Lawford (especially as Newbold is where the new plant is planned)
- Community groups in urban areas in particular
- Immediate residents
- Rugby elected members
- The Environment Agency (who have stopped attending meetings but continue to submit written reports)
- Members of the business community

There was a spread across interviewees, with some feeling that those currently engaged over the Rugby Cement Plant do represent their views, and others feeling that this wasn't the case at all.

2.5.5 Current methods of engagement include the RCCF, CEMEX newsletter, Community Matters, phone calls to the Community Affairs manager at CEMEX. Also, people are able to raise matters with the forums e.g. issues with lorries can be reported to the VRSG (Vehicle Routing and Standards Group) with the reassurance that action will be taken. The VRSG is felt to be a good model of engagement. It is made up of representatives of Borough and Parish Councils.

Both the RCCF and VRSG are opportunities to find out what is happening with the plant.

2.5.6 Some feel CEMEX may have a different definition of who their stakeholders are as compared with others who have an interest in the plant. There is concern that they may not know where to draw the line in terms of engagement and knowing whether or not to engage beyond their statutory requirement.

2.5.7 Some people feel that engagement is active and effective, with regular meetings and information from CEMEX, the EA and Rugby Borough Council, and that the Councillors represent a large consensus of people who are most affected. Many local Councillors do participate and have interaction with CEMEX, and it was felt that this engagement is dismissed by some. However, the majority of respondents feel that engagement is not currently effective. One local resident expressed they have had real problems with the plant but are not 'against' it – they just want people to listen and act.

2.5.8 One interviewee felt that under Ready Mix Concrete, there was an excellent communications manager – individuals were taken round the plant, and had things explained to them well. Currently it is felt that the public relations manager mainly communicates the corporate position of the company and that the plant manager would be the first point of contact for explanations about the technicalities of the plant. It is a similar situation with the Environment Agency – there was previously a good spokesman who was prepared to listen and talk and it is now felt that this opportunity no longer exists.

2.5.9 Genuine support for community engagement was expressed by many interviewees, yet it was felt by most of these that existing arrangements do not allow this to happen. It is felt that ordinary people who are local to the plant are put off engaging for a variety of reasons as discussed under section 2.3. *Current Ways of Working*.

2.5.10 It is felt by some interviewees that although responsibility for engagement lies mainly with the EA and CEMEX, that if engagement is not effective, then Rugby Borough Council have a role in making this happen. It was suggested that CEMEX cannot achieve effective engagement without the good will, expertise and knowledge of the community, as the community are far more expert in understanding who the stakeholders are than anyone else.

2.5.11 Some interviewees feel CEMEX are currently engaging in a tokenistic manner and that this is the one enemy of community engagement. It is recognised that the engagement may have begun with good intentions but that it has become tokenistic due to the lack of trust and that now it is 'like two sets of kids fighting'. It is felt the reason for this is related to the fact that those who set up the RCCF have no understanding of partnership working. For example, the previous Cement Plant owners 'didn't go out of their way' to invite community representatives to the forum, which has caused some difficulty. Also, when Rugby Borough Council managed the RCCF, they only gave themselves votes and then without discussion (and it is felt because things were not going their way) they opted out. Under CEMEX, who took over management from Rugby Borough Council, it is felt to be too 'top down' and that meetings are managed with short notice (at 2 weeks). However, there is no option for these meetings to become funded and self-run. As such, some feel uncertain that CEMEX, Rugby Borough Council and the EA are willing to engage in a meaningful and comprehensive way.

2.5.12 It was expressed that this review is a good example of how CEMEX are operating at the moment. There was a lot of contention from the RCCF about how this review is taking place, and it was felt that their opinions over the review were 'brick walled'. No one from the RCCF was allowed to input to developing this review process, even those with significant experience of community engagement. It was felt the fact that people were told this is what was happening, and not engaged in any way, is not conducive to partnership working and empowerment of the community. Relating to this, concern has been expressed over what will happen after this report comes out. There is a fear that the report will be discussed by the EA, CEMEX and Rugby Borough Council only, and that they will then take a top-down decision as to what they think should happen, without engaging the opinion of other stakeholders. Some interviewees feel that some local residents are unlikely to become engaged specifically for this reason; that they view things as a 'fait accompli' and that their voice won't be listened to.

2.5.13 Interviewee suggestions

- CEMEX should invite the previous Chair of the RCCF, the EA and several other key individuals who can debate and try to understand the issues
- An independently facilitated session to look at the recommendations that come out of this report and decide on steps forward
- More sub group meetings for the RCCF as often, smaller groups lead to more constructive meetings (this will only work if the rest of the RCCF forum accepts the work of the sub groups)
- Regular open days where only residents can speak
- Door stepping to engage hard to reach groups and ask people what kind of involvement they would like
- Occasional phone calls to local residents to see if there is anything that can be done to help them.

2.6 Visions and barriers

2.6.1 People expressed different visions for engagement over the Rugby Cement Plant, and these had one or more of the following characteristics. Although there were different ideas about the levels of autonomy of, and responsibility for the engaged groups, there was general consensus that engagement should be broadened, and seek to involve more people than it currently does. There is also a need to readdress the power balance so that all stakeholders are treated as having equal value and importance.

2.6.2 There is a need for a mechanism for CEMEX to share their plans before they are cast in stone so they can let stakeholders know about plans and consult on how to do it better, providing an opportunity for plans to be challenged and improved in a constructive way. Likewise there is need for a mechanism for people with concerns to have these answered in a timely fashion. The purpose of all this is to ensure that CEMEX are examined closely and proper procedures are followed.

2.6.3 People felt it was important that CEMEX take the lead in facilitating and delivering these changes. It is felt that it is not for the Environment Agency or Rugby Borough Council to do this, as they lack the resources and regulatory powers to deliver such work.

2.6.4 This engagement needs to be inclusive and representative. A wide range of people should be involved, and the group be as representative as possible including the relevant elected members, community members, representatives from Parish and other Councils neighbouring the plant and the media. The

representative group needs a conduit for communication with the wider audience. Meetings need to be at times that suit people better and need to be advertised better. The purpose of all this is to ensure that everyone involved understands what the cement plant is doing and what will happen in the future.

2.6.5 The effectiveness of the engagement and communication is improved. Agreed communication protocols need to be in place, public meetings, progress reports and press releases on a regular basis to keep people informed about what is happening and what is planned for the future. These need to deliver clear, concise and simple messages and don't need to be on specific subjects but can also be to keep people up to date more generally with what is going on. The purpose of all this is to create more confidence and interest in the way the plant is regulated and operated because the cement plant owner can offer reassurance of good environmental performance and controlled impact.

2.6.6 The representative engagement group should be able to respond to changes that happen related to the cement plant and quickly reflect the views of local residents on this. The community should get involved with planning applications as this is the best way for people to understand the outcomes of the activity and operations of the plant.

2.6.7 Engagement should be more of a forum for sharing information with local communities leading to more effective collaboration rather than a technical forum. CEMEX should have someone 'streetwise' who is involved with the local communities and works with locally elected members and residents that are affected in getting to grips with the issues on the ground.

2.6.8 There is a need for fast and effective dissemination of information e.g. when there are trials, information is accessible (e.g. on a website). Language used should be accessible and in simple terms, there is not too much technical information but the relevant detail is there. The implications of any activity for local residents are explained clearly and effectively. More detail is accessible to those who want to access it. There is a further need for a sound body of evidence that provides enough information for people to make their own judgements on issues.

2.6.9 The Environment Agency specifically needs to communicate their activities better. These should be aligned, upfront and honest responses to questions.

2.6.10 There is need for an attitude shift from all for the engagement to work. People should get back round the table again, prepared to be a bit more open, honest, rational and transparent in their communications. People should work together on a common set of goals. Communication needs to become more non-confrontational, non abusive and is constructive, and people can debate without rudeness. Stakeholders should attend a workshop 'to see if we can start again' and the group should have an independent secretariat.

2.6.11 Perceived barriers to achieving this vision

- There is an issue that local people are currently disengaged and it will take some work to engage these people.
- Engagement must be seen to be accessible, as people need to be reassured that they will have their views heard and that meetings will not be dominated by certain interests. It was also felt that the levels of secrecy and distrust by people living around the plant could be a barrier to future engagement.

- People seem to only get involved in an issue when they see a major threat.
- Some are nervous of being attacked for agreeing to work together with CEMEX to address issues.
- The Environment Agency need to be involved again, it as felt that their absence is a big barrier to progress.
- There is concern that not all stakeholders will be able to find a vision that they share and there is uncertainty as to how to manage engagement when people have such different views.
- There is concern that CEMEX may not be able to share certain plans as if these become accessible to competitors it may jeopardise their business position.
- It is felt that one barrier is CEMEX wanting to be in control and not understanding that truly meaningful community engagement requires the sharing of power.
- Concern was expressed over the cost implications of managing effective engagement.
- There is a concern that Rugby Borough Council cannot do anything to 'upset' CEMEX due to the financial relationship between them.
- Some feel that the current levels of secrecy of the cement company would be a barrier to effective engagement.

2.7 Responsibility

2.7.1 Some interviewees expressed concern that the cement plant will try to 'get away with whatever they can'. They feel that the community has been abandoned, and that no one really cares about their concerns. Others feel that the plant puts right its failures and that the atmosphere is now much better than it used to be.

2.7.2 Most people feel that CEMEX (or whichever company owns the cement plant) should have responsibility for managing stakeholder engagement around the cement plant. Some feel that ultimate responsibility for stakeholder engagement is indeed with the cement plant owner but that the extent of involvement and number of stakeholders should not solely be the decision of the company and instead should be agreed with all interested parties. Some feel that managing stakeholder engagement is the responsibility of the Environment Agency because they are the government agency that decides whether CEMEX meets the criteria, and authorise the trials. Some feel that Rugby Borough Council should be taking leadership and that they should champion the people in terms of safety, traffic management and dust issues. There is a sense that Rugby Borough Council, having been elected by the community, should be acting on behalf of the community in finding out what could be done to allay people's fears about the plant. However, it is felt that they seem to be disinterested in the issue. Many feel that it is in fact a joint responsibility that should be shared and that success depends on cooperation of the different groups.

2.7.3 It is felt that the Environment Agency need to take responsibility for engaging and going to meetings, that CEMEX need to take responsibility for listening and acting on complaints and that stakeholders need to take responsibility for making proactive contact if they are interested, and for working together and compromising. Many people feel that all stakeholders may need to change their approach before things can happen, for example, it was expressed that there needs to be an acceptance that there is always a root cause of people's anger and it would be constructive to accept this, then understand how to move forward on this basis.

2.7.4 It was felt by one interviewee that those employed by a large company or statutory organisation, are the professionals in the room and thus have duty to maintain the highest standards. Ideally there would be an acceptance that some people will hold diametrically opposed views, and that there should be a recognition and respect for the fact that some are attending meetings on a voluntary basis and are there because something is affecting their home, family, property or community.

3. The Environment Council's Observations & Recommendations

This section sets out the observations and recommendations that we have drawn from the stakeholder interviews and from our own experience of convening a wide range of Stakeholder Engagement programmes.

It has been apparent throughout the interview process that there is a confusion over terminology and what is understood by 'stakeholder engagement'. To attempt not to perpetuate this confusion we use the concept of a 'Stakeholder Engagement programme' to describe the range of engagement activities that we recommend be undertaken and 'Stakeholder Dialogue' to describe the face-to-face processes that we are recommending should be at the heart of the programme.

The key issues with current stakeholder engagement over the Rugby Cement Plant are related to lack of trust; quality and consistency of communication amongst stakeholders; accessibility, transparency and consistency of information; and independence and accessibility of meetings and other engagement opportunities.

3.1 Define the purpose and scope

3.1.1 It is likely that there was a clear purpose for the current stakeholder engagement programme at its outset but this has got lost or confused overtime. This has meant that there is a wider range of expectations among the parties involved and it is this difference in expectations that often lays at the heart of the mistrust that is evident in the current arrangements. **Therefore our first recommendation is that the starting point for any potential reorganisation of the arrangements should be to define and agree the purpose and scope of future stakeholder engagement.** Developing an answer to the question;

"What do you want at the end of the process that you have not got now?" will help to define the aims and objectives that you hope to achieve through the engagement process and what outputs you hope to see.

Table 1 sets out a theoretical framework, which allows a systematic approach to the planning of a stakeholder engagement programme. It identifies four types of engagement along with a purpose and expected outcome for each. It also highlights what stakeholders can expect when involved in each type. These engagement types are not mutually exclusive and taken together would form a comprehensive engagement programme.

Table 1 – Framework for Stakeholder Engagement

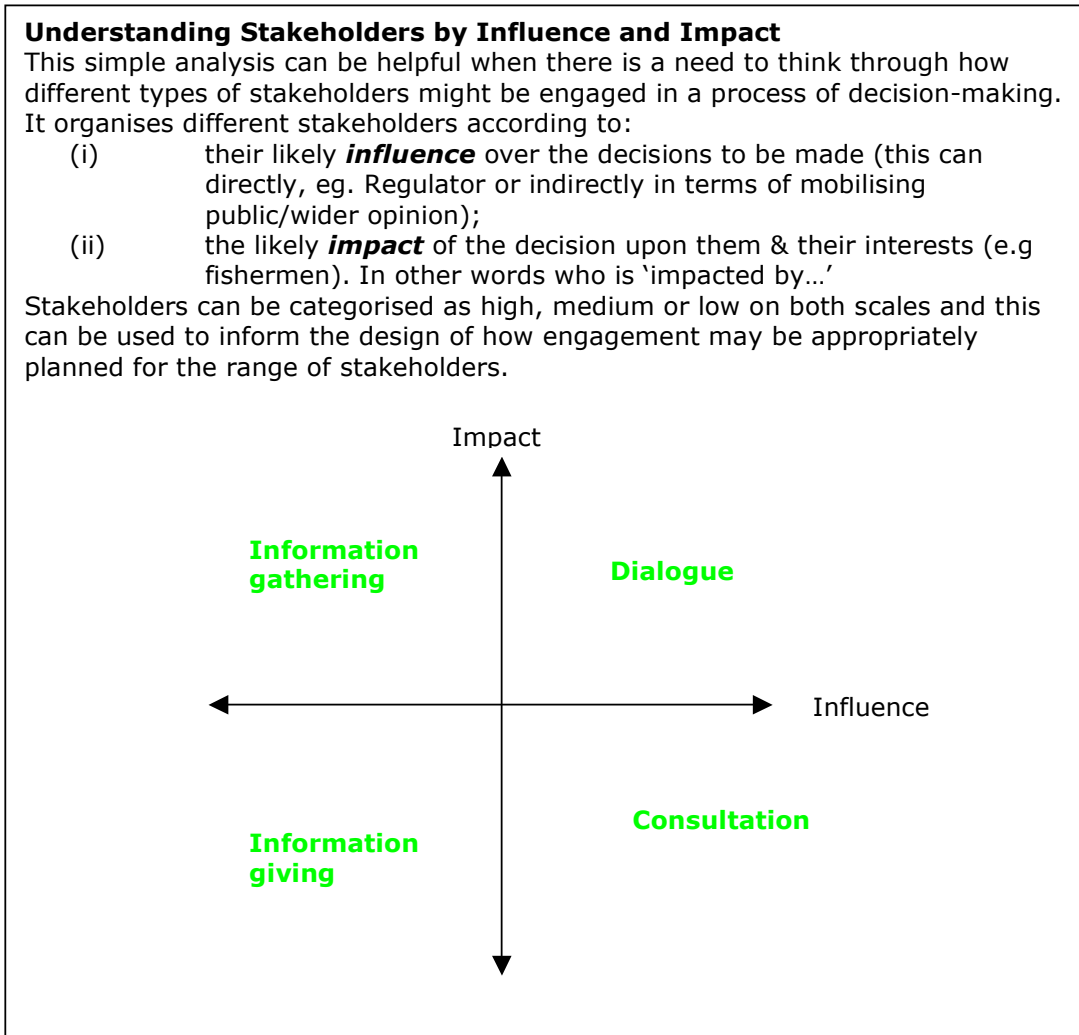
Type of engagement	Purpose	Product or outcome	Stakeholder Expectations
Information Giving	To provide people with information to assist their understanding or to raise awareness of an issue or initiative.	People are better informed about the issue or intention. Pro-active communication increases trust and builds stakeholder relationships.	That information given will be accurate, balanced and up-dated as necessary.
Information Gathering	To gather general information to improve understanding of stakeholder views and needs. Provide space for stakeholders to voice their opinions and have these heard.	There is a better understanding of stakeholders' views and strength of opinion on a particular issue, as well as their needs. A greater understanding of the complexity of information that exists and an increased understanding of other stakeholder's perspectives.	Information gathered will be used responsibly and ethically.
Consultation	To obtain feedback on specific policies or proposals. Offers people an opportunity to become more engaged.	Decisions are influenced by feedback and stakeholders understand what they've influenced. Asking for stakeholders' opinions and acting on these increases trust and builds stakeholder relationships.	That feedback will be taken seriously, decisions will be able to be influenced, and people will be informed of the influence they have had, as well as the outcome of the consultation.
Dialogue	To involve people actively at the right time to ensure their concerns are understood and considered, and to give them some influence on and ownership of decisions.	People can have influence over decisions and therefore shared ownership within a defined agenda. Other benefits include improved relationships and trust, common understanding and information sharing.	That people will be able to shape the process, that it will be transparent throughout, and that they will have some influence over decisions.

3.2 Mapping the Engagement Landscape

3.2.1 In the situation under review there is a need to work across the range of approaches and employ a variety of different engagement tools and techniques. Having said that it is very important to use the right approach at the right time and in the right circumstance. Again it is about managing expectations. If stakeholders are invited to a meeting where they feel that they have some influence over the decision but in fact the purpose of the meeting is only to inform, much frustration results. **We recommend creating a 'map' of the stakeholder programme and making this publicly available so all stakeholders can see where and when they can engage and to what purpose.**

3.2.2 The first part of this mapping exercise should be a review of the current stakeholder lists, the interviews showed that there is much concern over who should be involved in future stakeholder engagement and to address this issue we recommend undertaking a comprehensive stakeholder analysis. We would suggest using the framework set out in Figure 1. as the best way to proceed with this work.

Figure 1 – An Approach to Stakeholder Analysis



3.2.3 When setting out to identify who your stakeholders are using the Impact/ Influence approach the following questions are helpful.

- Who is directly responsible for decisions on the issue?
- Who is influential in the area, community of organisation?
- Who will be affected by any decisions on the issue?
- Who holds positions of responsibility in stakeholding organisations?
- Who can promote a decision providing they are involved?
- Who can obstruct a decision if they are not involved?
- Who has been involved in the issue in the past? (use existing lists as a reference)
- Who has not had a voice in the issue before, but should have?

This of course is not an exhaustive list but gives you a clear place to start.

As the selection of stakeholders can be such a politically charged responsibility, it is useful to make the selection process as transparent as possible. Ideally, it will be carried out through dialogue with existing stakeholders. It is wise to ensure that the reasons for selection are noted so that any questions about selection can be answered.

Stakeholder analysis is not a one off process but should be viewed as iterative. Continually review your stakeholder lists with your stakeholders. Ask them who is missing right from the start, at every meeting and in occasional letters that you send to them.

Through the mapping exercise key stakeholders will emerge who for whatever reason they have high levels of impact and/ or influence. This is an important group and one that we will return to in this section.

3.2.4 The second stage in creating the Engagement Map is to identify the processes (tools & techniques) that are to be used. The Impact/ Influence approach can help identify the high level approach – Information giving etc... but this then needs to be broken down into a series of practical activities that will deliver the engagement's purpose. Table 2 provides information on the type of processes that could be applied in each situation. This is not a definitive list but a guide to the options as we see them

The final recommendation in this section is that this mapping exercise is undertaken in cooperation with stakeholders through some form of dialogue process, which should help create a more robust process and wider ownership.

Type of engagement	Stakeholders	Process (examples)
<p>Information Gathering</p>	<p>Local and wider community, RCCF, the Press, CEMEX, EA, RBC employees.</p>	<p>CEMEX: After any engagement and gathering of information, send participants an unambiguous account of how and why their contributions have – or have not – influenced the outcome, and ensure there are routes for follow up including reporting on final decisions, strategies and implementation plans. (See above for methods of giving information).</p> <p>CEMEX: Invite ongoing feedback on the operations of the plant</p> <p>CEMEX, EA, RBC: Arrange to generate a body of evidence in conjunction with stakeholders</p> <p>Gathering Methods: Questionnaires/ surveys Websites Market Research Direct Contact Focus Groups Media Doorstepping</p>
<p>Consultation</p>	<p>Local and wider community, RCCF, the Press, CEMEX, EA, RBC employees.</p>	<p>Define at the outset what you're asking them, what the boundaries are/ what can change.</p> <p>Manage expectations and give a clear, honest rationale as to why they can't influence some things (legal reasons, profit etc)</p> <p>Methods: Consultation papers Focus groups Surveys Public meetings e-consultation Presentations on options</p>

Type of engagement	Stakeholders	Process (examples)
<p>Dialogue</p>	<p>Key stakeholders</p>	<p>Stakeholder dialogue processes: Independently facilitated meeting(s) or ongoing dialogue Define at the outset what you're asking them, what the boundaries are/ what can change. Manage expectations and give a clear, honest rationale as to why they can't influence some things (legal reasons, profit etc)</p>

3.3 Managing the Engagement Programme

3.3.1 'The whole is greater than the sum of its parts'... or so it should be. Currently there is a considerable amount of engagement taking place but there is an inconsistency of approach that means that the experience of stakeholders is at times variable, leading to the potential for 'divide and rule'. In the same vein there appears to be little linkage between these different aspects of the engagement so stakeholders are not necessarily aware of the range of views within the community.

3.3.2 To overcome this **we recommend that all stakeholder engagement to do with the CEMEX plant forms part of a 'programme' of activity which is co-ordinated in one place.** As stated above this 'programme' should have a defined purpose, an Engagement Map and a calendar of activities. Additionally it should have in place protocols that set clear quality standards for the engagement process (We specifically recommend one to cover 'Communication & Information' in Section 3.5). A website for the 'programme' could be established which would act as the 'co-ordination' point, providing stakeholders and the public information on the engagement process. The Management of the programme could rest with CEMEX or could be carried out by an independent third party.

3.3.3 There is stakeholder confusion about who is responsible for stakeholder engagement, is it CEMEX, EA or RBC. There is good historical reason for this but in moving forward it will be important to clarify this situation because again lack of clarity provides opportunities for different parties to be played off against one another. **We would recommend that CEMEX take responsibility for the stakeholder engagement programme in an up front and visible way.** The ultimate responsibility for the plant rests with CEMEX and therefore the relationship it has with stakeholders and the community is of paramount importance to it. This does not necessarily mean that CEMEX either has to control everything or do all the work but does mean that they should play a leadership role.

3.3.4 It is important to spell out the resource implications of the engagement at the outset and identifying the scope of the engagement can help achieve this. Consider that good engagement processes need both time and money and running out of either can actively undermine everything previously achieved. In our previous experience of cases where trust and confidence needs to be built, we have found that it has helped to allocate resources and in doing so, demonstrate your genuine commitment to stakeholder engagement, and your willingness to understand and incorporate other opinions.

3.4 Building Trust

3.4.1 Once a framework for stakeholder engagement has been determined, thinking needs to move onto how this engagement should be conducted. Key to this process is the need to build trust among all stakeholders. This component is at the heart of most stakeholder engagement processes but is particularly important in this situation as many of those interviewed identified it as a key issue. Trust is a difficult concept to define and it tends to be easier to identify when it is not present rather than when it is. However, we believe that cooperation between different groups of people is built upon trust and therefore increasing cooperation and collaboration suggests an increase in trust.

3.4.2 Trust works at a number of levels; there is talk of 'trusted brands' and some organisations and institutions clearly have the public perception of being 'trusted' or not. However, in a stakeholder engagement process it is often the action and behaviours of individuals that sets the tone of the process and leads towards and away from increasing levels of trust. The interviews suggested that there were both organisational and personality issues around trust that needed some form of resolution. Sections 3.5 and 3.6, although important in their own right are key component of a framework for building trust.

3.5 Communication and Information.

3.5.1 Issues have arisen in the past around what information is provided, in what format and to whom. An inconsistent approach has led at best to confusion and at worst to suspicion. **We would recommend improving upon this situation through the development of a Stakeholder Communication Protocol.** This would be a public document that set out what was going to be communicated and how it is to happen. The presumption behind the protocol is one of 'proactive communication', making publicly available as much information as possible within the constraints of legal and commercial confidentiality. Where there are constraints these should be explained and where there are formal channels (such as Freedom of Information) for accessing such information these should be made explicit.

We suggest that the Protocol should cover the following;

- Purpose of the Protocol, who it relates to and who the audience is.
- Responsibility for the implementation of the Protocol.
- The type of information that will be made public, in what form and to what timescale.
- The type of information that cannot be made public and why.
- Mechanisms, if they exist, for obtaining this information.
- Routes and process for obtaining additional information
- Opportunities for reviewing the working of the Protocol.

We would suggest that the Protocol is developed with key stakeholders and reviews are carried out in a similar fashion. We would also suggest that an individual is given the job of overseeing the implementation of the Protocol to ensure consistency of approach, and a centralised contact point.

3.5.2 Communication from CEMEX, the EA and Rugby Borough Council with stakeholders should express what is happening and how they will be affected and seek their views where appropriate. This should be communicated in accessible and multiple formats e.g. via newsletter, email and website, in simple terms (but including the relevant detail about what is happening and how people will be affected and any proposed plans and planning applications) on a regular basis. Care should be taken to understand which audiences require what information and in what formats.

Proactively sharing information would increase transparency, reduce suspicion and mistrust and also would begin to reach out to the wider community in keeping them up to date with proposed plans for the cement plant. If the community received this kind of communication on a regular basis, they would grow used to it and learn to recognise that it does not necessarily mean plans are final and need exposing or challenging.

3.5.3 The style of communication is as important as the content. Consideration of the nature of communication and how the language might sound to others, especially when using methods of communication like email, where meaning can be lost. Communication where possible should aim to be inclusive and avoid language that suggests 'them & us', 'expert & non-expert', powerful and powerless etc. Above all communication needs to be honest and free of spin.

3.5.4 A key issue in many engagement processes (and this one appears to be no exception) is the perceived validity of the information provided. If information does not support a particular viewpoint it is denigrated and disregarded. This situation then develops into a tit-for-tat process and a situation is reached where no information provided by a third party is trusted. This situation can be overcome using a process of 'Joint Fact-Finding' or 'stakeholder led research' whereby the stakeholders collectively agree a research brief, select the researchers and help manage the research activities. Having been involved in such a way the research findings carry more weight for all those involved. This process of Joint Fact-Finding often sits at the heart of a stakeholder dialogue process. Stakeholders identified through the interview process that there was a wide range of views around the apparent poor health experienced by people in the vicinity of the plant. **We recommend that this issue could be appropriately addressed through a process of Joint Fact-Finding carried out as a key component of the dialogue process set out in section 3.7 below.**

3.6 Attitudes and Behaviours.

3.6.1 The interviews highlighted that there are concerns in many quarters about the approach taken by some parties in the current engagement process. This is seen by many to be standing in the way of a more constructive way forward. These are difficult issues to address as people have different ideas as to what constitutes acceptable behaviour. However, drawing on experience from other engagement processes we feel that the following is relevant.

3.6.2 A variety of attitudes and behaviour become most evident at the 'dialogue' end of the spectrum when stakeholders are in a face-to-face environment. Space has been created for such dialogue (RCCF) but in the view of many of the participants it is not making much progress. We feel that there is confusion between dialogue and campaigning. Dialogue should be a collaborative activity where all views are given the chance to be heard and considered. Agreements are reached through the better understanding and negotiation of 'trade offs' that occur in such situations. Its process can be typified by the saying... "it's not about winning an argument but about changing an outcome". Campaigning on the other hand is much more black and white, being either for or against something, where having a strong position and winning the argument is of paramount importance. **We would recommend that 'dialogue' is the stated purpose of any face-to-face engagement process.** Those wishing to take part have to sign up to the concept and respect that there will be a range of views and to work cooperatively. In other words it is not a campaigning 'space'. This is not to say that campaigning should not take place and should do democratic society but it needs to do so in a different space.

3.6.3 As we understand it the face-to-face component of the current engagement arrangements are carried out within a traditional meeting format with a chair, agenda's minutes etc. This is a very efficient format for conducting 'business' where specific things have to be achieved. However, it is not necessarily the best format for creating dialogue and dealing with potentially difficult behaviours. **We**

recommend the use of facilitation processes and techniques to create the right environment for 'dialogue'. Traditional meeting formats require participants to state their positions and then through strength of argument prove why their position is better than any other. The purpose of facilitation in situations where there is high contention is to move beyond 'positions' to try and identify areas of common interest and need. This then provides opportunity for collaborative working and outcomes that are satisfactory to all parties. A range of tools and techniques that encourages cooperation and attempt to ameliorate difficult behaviours typifies this approach.

3.6.4 The expectations on those perceived to be 'in power' are greater than for most other stakeholders and therefore their attitudes and behaviours often set the tone of the engagement process. These parties need to proactively and openly engage and be seen to do so. The approach needs to be professional but approachable with listening skills high on the competency list. The tone needs to be respectful and understanding while being clear about what is possible and what is not. **We strongly recommend that the Environment Agency re-engages with the process, as their continued absence will devalue the efforts of others.**

3.7 Creating the space for dialogue

3.7.1 The Rugby Cement Community Forum has existed for a number of years to provide the opportunity for stakeholders to meet together and discuss issues of mutual concern. This section is not a critique of that process which is in itself currently being reviewed by its membership but our view on what we would recommend should be created if the RCCF did not exist.

Firstly we strongly recommend that dialogue is a key component of the Stakeholder Engagement Programme. The benefits that should emerge from a well run process would be all or some of the following.

- Opportunities for deeper understanding of the issues and people's perception of them
- Improved communication
- Access to community knowledge and ideas
- Improved stakeholder relations
- Evidence of an open, transparent and accountable process.

3.7.2 The stakeholders who should be invited to attend should be those that have been identified as 'key' in the Stakeholder Analysis. In other words those who have the largest amount of influence or experience the greatest amount of impact. These key stakeholders should also be 'representatives' of the local community, with a clearly defined constituency and mechanisms in place to communicate with this constituency. This does not necessarily mean that they are formally elected community representatives but it does mean that they represent others who are affected by the cement plant. Managing two-way communication with their constituency should be seen as one of the requirements that are agreed by all participants at the outset. These key stakeholders should be seen as the core members of the dialogue. Other stakeholders might be invited to attend due to their expertise or knowledge.

3.7.3 In our experience of working in this context, we have found that where there are participants with very differing views on issues, it can be useful to create a number of guiding documents at the outset of the process. These should be done in collaboration with the stakeholders involved.

Terms of Reference – covering the purpose of the dialogue, its membership, its mode of operation and its timeframe.

Working Agreements or Ground-rules. While terms of reference are about structures and functions, working agreements are much more about behaviour and ways of working, covering such aspects as;

- Confidentiality
- Conduct within the dialogue
- Communication within the dialogue and externally
- Commitment to dialogue
- Process to be followed if the working agreements are not adhered to

3.7.4 Independence and Ownership. A key principle of dialogue is the 'level playing field' whereby the power relationships that come from knowledge, expertise and position are levelled in the sense of enabling those who do not have these things to participate on an equal footing. Who calls the meetings, who sets the agenda, who provides the information and the role that these people, with the perceived power, play in the dialogue process are all important in this. The more influence the stakeholders have over the development of the dialogue process, especially things such as agenda setting the more committed they should become to the process. CEMEX, EA and RBC should participate as 'stakeholders' with a valuable and valued contribution to make. This being the case the question that needs answering is 'who is responsible for organising the dialogue process that enables this type of equality of participation to take place. **Our recommendation would be to employ an independent convenor to organise and facilitate the dialogue process.**

3.7.5 An independent convenor should work on behalf of all the stakeholders and provide the following services;

- Secretariat – ensuring effective logistical and communication arrangements.
- Process design – creating an effective dialogue process.
- Facilitation – providing the expertise to run a process that ensures that the deliberative and collaborative nature of dialogue to be achieved.

This independent convenor needs to be trusted by all stakeholders so we suggest that a procurement process is established that involves stakeholder representatives.

These services need to be paid for which raises issues of independence – does who pays the piper necessarily call the tune? The independent convenor should be asked to demonstrate how they protect and validate their independence.

3.7.6 The Dialogue, as well as having an effective process, must also have a real role, one that is meaningful and proactive. Without this it will soon become just a talking shop, interest will wane and the process will lose value. We suggest that the core of the dialogue process is an approach to Joint Fact-Finding as described in section 3.4.4 whereby stakeholders commission research into areas where there is currently little trust of the information provided. Outside of this core work the dialogue should have other ongoing roles.

We recommend that the Dialogue has the following roles;

- **Sounding Board – early engagement on emerging issues within CEMEX’s operations and/or the local community**
- **Scrutiny – CEMEX current activities and operations**
- **Feedback – to CEMEX, EA, RBC on these activities from the community**
- **Joint Fact-Finding**

4. Concluding Remarks

The ultimate purpose of all engagement is to make things better. There is little purpose in spending time and money on engagement if there is no willingness to listen to its results. All involved must be open to the possibility that existing ideas can be improved and that they will, if necessary, be amended. Those who are being asked for their opinion must be reassured that it will be taken seriously, and that things can be changed. If they do not perceive this, the engagement process will be regarded as a sham and it will be harder to engage them in the future.

Success depends on willingness to collaborate and work together, and there needs to be an acceptance that moving forward may require compromise from all stakeholders. Ultimately choosing to collaborate comes down to the motivation of the individual. Where people do want to engage (from simply asking for responses to questions through to engaging over dialogue), there is always a way to manage their constructive involvement.

5. Recommendations Table

1.	<p>Our first recommendation is that the starting point for any potential reorganisation of the arrangements should be to define and agree the purpose and scope of future stakeholder engagement.</p> <p><i>Developing an answer to the question: "What do you want at the end of the process that you have not got now?" will help to define the aims and objectives that you hope to achieve through the engagement process and what outputs you hope to see.</i></p>
2.	<p>We recommend creating a 'map' of the stakeholder programme and making this publicly available so all stakeholders can see where and when they can engage and to what purpose.</p>
3.	<p>We recommend undertaking a mapping exercise in cooperation with stakeholders through some form of dialogue process, which should help create a more robust process and wider ownership.</p>
4.	<p>All Stakeholder Engagement to do with the CEMEX plant forms part of a 'programme' of activity, which is co-ordinated in one place.</p>

5.	CEMEX take responsibility for the stakeholder engagement programme in an up-front and visible way.
6.	The development of a stakeholder communication protocol. This would be a public document that set out what was going to be communicated and how it was to happen.
7.	Stakeholders identified through the interview process that there was a wide range of views around the apparent poor health experienced by people in the vicinity of the plant. We recommend that this issue could be appropriately addressed through a process of Joint Fact-Finding carried out as a key component of the dialogue process set out in section 3.7.
8.	<p>'Dialogue' is the stated purpose of any face-to-face engagement process.</p> <p><i>Those wishing to take part have to sign up to the concept and respect that there will be a range of views and to work cooperatively. In other words it is not a campaigning 'space'.</i></p>
9.	The use of facilitation processes and techniques to create the right environment for 'dialogue'.
10.	Strongly recommend that the Environment Agency re-engages with the process, as their continued absence will devalue the efforts of others.
11.	Strongly recommend that dialogue is a key component of the Stakeholder Engagement Programme.
12.	Employ an independent convenor to organise and facilitate the dialogue process.
13.	<p>The Dialogue has the following roles;</p> <ul style="list-style-type: none"> ➤ Sounding Board – early engagement on emerging issues within CEMEX's operations and/or the local community ➤ Scrutiny – CEMEX current activities and operations ➤ Feedback – to CEMEX, EA, RBC on these activities from the community ➤ Joint Fact-Finding

Appendices

Appendix A. About The Environment Council

Who we are

The Environment Council is a registered charity of nearly 40 years standing. We work to put sustainability at the heart of people's choices, decisions and aspirations. Our goal is to transform conventional decision-making to include best practice engagement in realising the UK's sustainability aims. With our long standing experience of raising awareness, training, and facilitation, and providing a forum for dialogue, we demonstrate what is possible, helping all kinds of organisations make the difficult and complex decisions needed for a sustainable future.

What we offer

The focus of our work falls into three categories:

- Practical design and delivery of engagement processes;
- Learning and Development, delivered through our open course programme, bespoke training courses, and coaching and mentoring;
- Advocacy of best practice engagement, delivered at the right time, in the right way and with the right people.

Practice

We have an enormous depth and breadth of experience in stakeholder and public engagement across a variety of sectors, and working with individuals and organisations from the community, industry, government and NGOs. We work at all levels from very local, community-based projects, to pan-European and international engagement.

As a charity, we are committed to delivering value for our project partners through best practice engagement. We adhere to and advocate our practical Principles of Authentic Engagement (see <http://www.the-environment-council.org.uk/principles-of-stakeholder-engagement.html>) as guidance for genuine and robust engagement. Our strengths lay in our extensive knowledge, experience and skills in designing processes that use a combination of the most appropriate methods at the right time, to achieve well-informed and robust dialogue and engagement. Engagement requires resources from all sides and we feel strongly that it is important that such investments are evaluated and the learnings are used to inform better practice in future. Examples of our work can be found on our website (www.the-environment-council.org.uk).

Learning and Development

As a charity dedicated to seeing engagement done well and for the right reasons we are committed to sharing our knowledge and skills and helping others practice effective engagement. When we work on projects we always seek to share our knowledge and experience and to involve the clients to the level they desire so they can learn and develop from the work.

Advocacy

In advocating best practice engagement we seek to reach out to as wide an audience as possible through the many sets of engagement guidelines that we have produced, from the first generic ones in 1999, to the most recent for the waste sector, published earlier this year. These publications are another opportunity for us to embed engagement and share our knowledge. You can download and find out more about our guidelines at <http://www.the-environment-council.org.uk/guidelines.html>.

Our advocacy work does not stop with these publications. We proactively seek to shape policy through responses to Government consultations, we sit on cross-sector bodies as engagement specialists and in pioneering engagement in sectors that will benefit from this way of working. All of these are ways of embedding our expertise in engagement and ensuring it is done well across a range of sectors.

Appendix B. Interview Questions

Questions for stakeholders Stakeholder Engagement over CEMEX Rugby Cement Plant (RCP)

You were recently contacted by The Environment Council over the plans for stakeholder engagement around the Rugby Cement Plant – thank you for agreeing to speak to us.

Please feel comfortable in speaking your mind – we will not judge anything you say, we are independent professional facilitators and are here to make sure your views are represented for the duration of our involvement with this issue.

Just to clarify what we mean by ‘stakeholder engagement’. Stakeholders we define to be anyone who has an interest or a ‘stake’ in an issue – someone who might be impacted by it or someone who can affect a key decision, for example. The engagement of these stakeholders can take many forms. Interviews, such as we are conducting now, are just one of many methods that can be used to engage stakeholders. In this case we have chosen to use interviews because we wanted to allow each stakeholder we speak to the space to speak their mind and have this recorded by us, an independent charity who believe in the integrity of effective stakeholder engagement.

You are at liberty to not answer questions if you are not comfortable in doing so and anything you say will be anonymous and confidential (your views may be used in our recommendations but they will not be attributable to you).

The feedback we receive will feed into the recommendations we (The Environment Council) are going to make to Rugby Borough Council, The Environment Agency and CEMEX as they consider the future of stakeholder engagement around the Rugby Cement Plant

The questionnaire should take about 20 - 30 minutes.

Do you have any questions or points of clarification you would like to ask before we begin?

The Questions

NB: questions are intended as a guide to conversation that allow the interviewee space to offer their opinion on the subject matter

Profile

1. Which district of Rugby do you live in?
2. Do you have specific areas of interest in the plant? What are they?
3. Have you been involved with the Rugby Cement Plant before?
4. If so in what capacity?
5. Are you involved in other community-based activity?

Information

1. What information is of interest to you about the Rugby Cement Plant?
2. Do you currently have access to this information?

3. Do you think information provision needs improving and if so, how?

People

1. Who do you think is ultimately responsible for managing stakeholder engagement around the RCP?
2. Who is currently engaged over the Rugby Cement Plant?
3. Do you think these people are effectively engaged/communicated with?
4. If not why not and if so, what is effective about this communication?
5. Do the people currently engaged over the Rugby Cement Plant represent your views?
6. Do you think that everyone who needs to be involved in engagement around the Rugby Cement Plant is so?
7. If not, then who or which groups are missing?

Communication

1. What existing opportunities are there for communication about the Rugby Cement Plant?
2. Do you think these are utilised effectively?
3. Do you think there is currently effective communication over the Rugby Cement Plant?
4. What other routes of communication do you think could be effective?
5. What are the key things that you want to communicate regarding the Rugby Cement Plant and who do you want to communicate them to?

Vision

1. What would you like to see happen in the future regarding stakeholder engagement over the Rugby Cement Plant?
2. Are there any barriers to this happening and if so what are they?

Other

1. Is there anything you would like to add?

Close.

Thank you for your time and feedback. The next stages are as follows; Once we have conducted all the interviews, we will collect the information into a report and based on this information be making recommendations to CEMEX, The Environment Agency and Rugby Borough Council as to the possible future options for stakeholder engagement around the Rugby Cement Plant. We will present the final report and recommendations to the funders at the end of April. We understand from the funders that they will then share the findings with the community forum and the wider stakeholder community, seeking comment and feedback before reaching their final conclusions.

Appendix C. The Environment Council's Principles of Authentic Engagement

Inclusiveness: encourage the participation of all stakeholders who have an interest in or who would be affected by a specific decision, including 'hard to reach' groups, such as young people, minorities, and socially mobile professionals.

Transparency, openness and clarity: ensure stakeholders are given all the information they need, tell them where information is lacking or things are uncertain, indicate clearly what they can or cannot influence by responding, and provide an indication of next steps.

Independence: using a neutral convener and independent facilitators, especially in highly polarised situations, can help to build the confidence of stakeholders. It is difficult for a sponsoring organisation, whether local authority or private company, to facilitate an independent process, and the attempt to do so may in itself arouse suspicions about the integrity of the process.

Resourcing: good engagement processes need both time and money. Running out of either is frustrating for all. Furthermore, it can actively undermine everything previously achieved. Spell out the resource implications at the outset and be wary of starting what cannot be properly completed.

Commitment: show respect for both stakeholders and taxpayers by giving engagement the appropriate priority and resources, and demonstrating that it is a genuine attempt to understand and incorporate other opinions even when they conflict with the existing point of view.

Accessibility: provide different ways for people to be engaged and ensure people are not excluded through barriers of language, culture or opportunity.

Accountability: as soon as possible after the end of engagement processes respond to participants with an unambiguous account of how and why their contributions have - or have not - influenced the outcome, and ensure there are routes for follow-up including reporting on final decisions, strategies and/or implementation plans.

Responsiveness: there is little purpose in spending time and money on engagement if there is no willingness to listen to its results. Those doing the engaging must be open to the idea that their existing ideas can be improved (or are wrong), and that they will, if necessary, be amended. Those being engaged must perceive that their voice will be taken seriously, and that things can be changed. If they do not perceive this, the engagement process will be regarded as a sham, and it will be harder to involve them the next time their views are needed.

Willingness to learn: all engagement should encourage everyone to learn from each other, and this means a style of process that is as interactive and as incremental as possible to build increasing layers of mutual understanding, respect and relationship.

Productivity: the ultimate purpose of all engagement is to make something better. How an engagement process will do this needs to be set out to encourage stakeholder participation and assure them that neither their time nor the sponsor's money is being wasted.

Appendix D. The Environment Council's Independence Statement

We believe the best environmental choices will be made if we can guarantee the integrity of the decision-making process. Our independence is a vital asset. The Environment Council acts as honest broker and consensus-builder in finding long-term solutions to environmental issues. Being impartial and trustworthy enables us to work effectively with all different sectors of society.

Appendix E. Joint Fact-Finding

The Difficulty of Creating Scientific Consensus

The history of science, from Copernicus to the recent experiences with GM (genetic modification), is littered with debate and controversy. A genuine scientific consensus may be very slow in appearing, as the issue of climate change illustrates. It needs the input of many practitioners within a single field and often across many, and may not be built in timescales needed by decision-makers and society to address the issue.

The problem is that few people recognise that even the simplest fact- or science-based is based on assumptions. If people dislike what a particular study says then they may commission their own using different assumptions. This of course leads to conflicts in evidence and even the contracting out of the dispute to teams of experts in opposing camps, so heightening the adversarial nature of the debate and polarisation. So rather than trying to develop a scientific consensus - a consensus amongst scientists - The Environment Council believes it is preferable to build a consensus amongst key stakeholders on the direction, assumptions and methods of scientific research.

Stakeholders are the people or organisations who have a stake in a situation or a decision. Many stakeholders are increasingly sophisticated and able to access a variety of information sources, and even to commission their own research. Excluding them from the process of commissioning scientific advice can often only fuel controversy at a later stage. A large amount of money, both public and private, is spent on scientific research and attention must be paid to spending it effectively.

Joint Fact-Finding

Science can be a useful tool in controversial public issues only if the key stakeholders have the opportunity to discuss the direction, assumptions and methods of scientific research. Tried and tested dialogue management techniques can be used to establish a consensus on the way to undertake scientific research. Joint Fact-Finding helps stakeholders effectively agree or at least define the assumptions behind future studies. The parties might even agree who does studies or reviews of research and even who funds the work. This means any discussion of the results is focussed on the substantive issues rather than criticisms of methodology and probity.

If stakeholders are not involved, the outcomes of the research will be questioned on many fronts. Were the concerns for the stakeholders addressed? Did the stakeholders buy into the methodology, so that they agree to use the research as a basis for discussion, even if the outcomes are not what they would like to see? Apparent contradictions in scientific evidence will create a great deal of uncertainty both amongst decision-makers and wider society, but in many instances it is avoidable.

Traditional approaches to risk assessment find it difficult to incorporate ethical or value-laden points of view into their analyses. Where ethical considerations are likely to be taken into account in a policy decision, these should be brought into discussions on the formulation of scientific advice. This can help inform scientists of the wider considerations of society, and will also lessen any conflict between science and ethics in the future.

The impartiality of evidence is sometimes called into question. Stakeholder engagement at an early stage would be able to address this issue. Any

stakeholder who might be likely to question the impartiality of the scientists, or the validity of their methodology, would be able to raise those concerns before scientific research was carried out. This approach means that instead of avoiding or documenting potential conflicts of interest, it is possible to gain positive approval on the way forward. Joint Fact-Finding also provides an important foundation for agreeing contingency plans in case key assumptions turn out to be wrong (e.g. as a result of research by scientists outside the process turning up new information which should be taken into account).

The presentation of uncertain or conflicting conclusions to scientific study is extremely difficult. The Environment Council's experience shows that these difficulties should be addressed before, rather than after, the evidence is gathered. The uncertainties and differing conclusions are not the result of failings within the scientific community or policy makers, but are inherent in the nature of such complex questions. Joint Fact-Finding will help address those uncertainties that are of greatest importance to stakeholders, and reduce the likelihood of stakeholders gathering conflicting evidence. Stakeholders would communicate with their own constituencies and allow for greater acceptance of results. Potential presentational difficulties could be raised at an early stage and stakeholders themselves asked to address them. This approach will also give stakeholders a far better understanding of the process of scientific advice so that when results are put forward, most presentational and communication difficulties will already have been addressed.

Conclusions

Joint Fact-Finding means a managed dialogue process to give key stakeholders the opportunity to discuss the direction, assumptions and methods of scientific research. This approach will address the issue of mistrust, questioning and rejection of scientific evidence, and the likelihood of stakeholders compiling their own, contradictory evidence. By recognising the issues at an early stage, scientific evidence can be made to be acceptable, recognised and used as a shared basis for decision-making by all stakeholders. The fear of such an approach may be that it will lead to unnecessary conflict and argument. Our experience in a wide number of cases is that such conflict, if it is not addressed at such an early stage, inevitably emerges later on in the decision making process and is much more difficult to resolve.

Example of Joint Fact-Finding

Jointly agreed Sampling and Monitoring (JASM)

Investigations into whether there is any detectable radiological residue at key sites/routes used by trains carrying spent nuclear fuel.

The Environment Council previously convened a dialogue, which resolved the conflict that arose when BNFL announced its intention to use Cricklewood sidings in North London as a marshalling site for trains carrying used nuclear fuel. During this dialogue interest was expressed as to whether any contamination was left behind by the used fuel transport flasks. A small group of stakeholders undertook to examine as objectively as possible whether any contamination from the transport of used fuel was present at typical operational sites and feed any findings back to the BNFL National Dialogue. Stakeholders represented BNFL, local and national NGOs and the local authority.

Recognising that in areas of environmental concern the objectivity of data is often questioned when the work has been conducted on behalf of one stakeholder only, it was decided that a new approach was needed to obtain objective data with a widely accepted provenance. The Jointly Agreed Sampling and Monitoring working group was set up and convened by The Environment Council to discuss 'the characteristics of a possible jointly-agreed monitoring and sampling

programme, and thereby start the process of developing mutual trust and respect.'

The Group agreed to appoint a technically qualified organisation to undertake a programme of scientific work and to carry out a monitoring programme on certain parts of the rail network used for the transport of used nuclear fuel. The Group jointly agreed: the methodology to be used by the contractor; who the contractor should be (through a tender and interview process) the location of the control sites; how the findings would be presented; and interpretation of the results. All this was done in advance of the work being carried out.

The final report, 'Radioactivity monitoring at Brent Yard railway sidings, Willesden' was produced by Stanger Science and Environment in October 2001.

All Group members were satisfied that Stanger's work accurately recorded the level of contamination that existed on the site at the time of sampling. The Group and The Environment Council believe that this approach, of a diverse group of stakeholders, jointly agreeing a scope of work, its methodology and the selection of the organisation to carry out the work, represents a significant step forward in addressing contentious environmental subjects.