European Union Contract Number: FP6-036413. Deliverable 22

ARGONA Project

Suggested Guidelines for Transparency and Participation in Nuclear Waste Management Programmes

Authors:

Josefin Päiviö Jonsson, Swedish Radiation Protection Authority
Kjell Andersson, Karita Research AB, Sweden
Ricardo Bolado, Joint Research Centre, European Commission
Britt-Marie Drottz Sjöberg, University of Stavanger, Norway
Mark Elam, University of Gothenburg, Sweden
Matti Kojo, University of Tampere, Finland
Gaston Meskens, SCK.CEN, Belgium
Jozef Pritrsky, DECONTA, Slovakia
Phil Richardson, Galson Sciences Ltd, United Kingdom
Linda Soneryd, Stockholm University, Sweden
Lucie Steinerova, RAWRA, Czech Republic
Göran Sundqvist, University of Gothenburg, Sweden
Bronislaw Szerszynski, University of Lancaster, United Kingdom
Clas-Otto Wene, Wenergy AB, Sweden
Hana Vojtechova, Nuclear Research Institute Rez plc, Czech Republic

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ARGONA Project

SUGGESTED GUIDELINES FOR TRANSPARENCY AND PARTICIPATION IN NUCLEAR WASTE MANAGEMENT PROGRAMMES

These proposed guidelines are recommendations that have emerged from the European Union Research Project ARGONA (Arenas for Risk Governance), Contract no.: FP6-036413

The ARGONA project intended to demonstrate how participation and transparency link to the political and legal systems and how new approaches can be implemented in nuclear waste management programmes. Thereby, studies have been done of the institutional and cultural context within which processes of participation and transparency take place in order to understand how the processes can be implemented. The project also included studies of theory in order to build participation and transparency on a firm ground, a number of case studies in Czech Republic, Finland, Sweden and UK, as well as implementation in Czech Republic to make a difference, learn and demonstrate.

The proposed guidelines are thus the result of observations and conclusions made in these efforts, and should not be regarded as an attempt to give a comprehensive set of guidelines for nuclear waste management or even for the implementation of transparency and participation therein. However, it is the hope among the ARGONA participants that they can give relevant thoughts and stimulation to those involved in the nuclear waste management area, especially organizations that have, or may become, responsible for the implementation of processes of transparency and participation, for example implementing organizations, government agencies, regulators as well as regional and local communities. It should be recognized that some of the proposed guidelines may be more relevant for a certain type of bodies (such as an implementer) than for another type (such as a local community) and vice versa. Some of the proposed guidelines are also relevant at a broader societal level and for the European Union bodies. It will be up to the respective reader to judge the relevance for her or his organization.

In application of these proposed guidelines there are several factors, such as legal and institutional frameworks that need to be taken into account, that may make the practical activities, even when resting on the same basic principles, quite different between different countries and between different situations. There is no ideal or prototypical best practice. Instead it may be that 'best practice', or rather 'good practice' is locally defined to a great extent, given that it fits within an overall governance structure.

In addition, different countries are at different stages of their nuclear waste management programmes, which may require different governance approaches. If a country, like Sweden, is in a stage of licensing process or close to it the governance activities essentially aim to

prepare for the regulatory and political decisions to come just within a few years. In other countries, such as France, which have a potential site selected but where the licensing process is longer into the future, local involvement may be intensive to investigate socio-economic consequences of a repository. Yet another situation, as is the case in Finland, is when the key political decisions have been made and an implementer is established in the community excavating the repository site in detail or even constructing the disposal facility.

Many EU countries, however, are in a situation where different radioactive waste management options are being considered and/or are in an early stage of the site selection programme. In these countries, such as Czech Republic, it may be beneficial to proceed step by step and set limited goals. Therefore, at the present stage it is important to ensure a space for open and meaningful dialogue, for exchange of views and for explaining the positions of all stakeholders rather than to try to achieve consensus upon any terms. It should be avoided to go into situations that force stakeholders to lock themselves into firm and opposing positions that later may be difficult to leave. In some countries there is a demand for a long term strategy and guarantees related to management, regardless of Environmental Impact Assessment (EIA) processes. There is a need to make public a) a clear problem solving approach, and b) real commitment by decision-makers or those steering the process.

The suggested guidelines are followed by more detailed recommendations on how to combine the two basic forms of 'mediation'[1] that have been identified in ARGONA, namely *mediation by demonstration and mediation by dialogue* in Annex 1. Annex 2 gives references for the various sections of the guidelines to more background information in the ARGONA Final Report, the ARGONA Final Summary Report and sub-project reports (ARGONA deliverables). All these reports are available for downloading at the ARGONA web site http://www.argonaproject.eu.

These guidelines concern nuclear waste management, however, this issue represents only one part of society's concerns in complex and controversial matters. The ARGONA participants believe that many of the following suggested guidelines should be of relevance in a much wider context than nuclear waste management[2] only.

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[1] In ARGONA, 'mediation' means building connections and establishing shared knowledge among those implicated in the governance of radioactive waste.

[2] In the following we use 'radioactive waste management (rwm)' in parallel with the somewhat narrower term 'nuclear waste management (nwm)' , as finding solutions for the management other of kinds of radioactive waste are often coordinated with nuclear waste programmes.

1. Rules and regulations

EU Directives, international conventions and national legislation contain certain principles and structures that should always be followed. For example, EIA[3] and Strategic Environmental Assessment[4] (SEA) Directives and national legislation give frameworks for information and participation, but they also provide a rather open framework for what can be done in practice, they can be followed with a higher or lesser degree of ambition. Under this heading some advices for formulating and using such legislative frameworks are given.

1.1   When creative initiatives are being formalized as parts of a legislative framework they can lose in force and formalization can take place at the cost of creativity and content. One can follow the EIA and SEA legal requirements in an administrative way without much of real public participation and without much progress in terms of transparency. There is thus the issue of striking a balance between the force of a legal process, which an implementer cannot escape, and an informal process that can be very effective in providing awareness but for which there are no guarantees – the informal process is essentially dependent on the good will of key actors.

1.2   There is also an issue of balancing the level of detail prescribed in a formal process. A high level of detail can make it less flexible and less able to adapt to new issues and changing contexts. A low level of detail can give too much agenda-setting power to the implementer or other strong actors who may decide to pursue a minimum level of ambition.

1.3   Knowledge about local variations is a key to understanding current processes within the European Union. The diversity may also be an important source for providing additional insights and tools for improved communication processes, although it raises concerns and doubts with respect to attempts to find an ideal or prototypical best practice. It may be that 'best practice' is locally defined to a great extent. It may

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[3] COUNCIL OF THE EUROPEAN UNION (1985): Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment.- Official Journal L 175 , 05/07/1985 P. 0040 – 0048,
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31985L0337:EN:HTML

amended by:

COUNCIL OF THE EUROPEAN UNION (1997): Council Directive 97/11/EC of 3 March 1997 amending Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment.- Official Journal L 073, 14/03/1997 P. 0005 – 0015,
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31997L0011:EN:NOT

[4] COUNCIL OF THE EUROPEAN UNION (2001a): Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.- Official Journal L 197, 21.7.2001, p. 30–37,
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32001L0042:EN:NOT

also be the case that intensified information processes and exchanges of ideas on several societal levels are necessary before similarities across countries become a prevailing feature of European radioactive waste management.

1.4   As participation of environmental NGO: s in projects is considered important, an extra effort has to be made. Financial support is needed to get NGO participation and for example the European Commission could stress the importance of environmental NGO participation in its projects.

1.5   Irrespective of formal requirements, experience tells that creative and good initiatives can be taken for participation and transparency that can 'make a difference' in rwm programmes.

2. How to get started

Those who intend to initiate a process for participation and transparency may be implementing organizations, government agencies, regulators or regional and local communities. In this section some recommendations are given for the early phase of exploration about how a process should be set up and organized, especially what kinds of resources that are available that can give assistance and support.

2.1   ARGONA work, especially the RISCOM Reference Group in the Czech Republic, has shown that you can start to make progress even if the situation seems stuck in stalemate and even if not every interest group is involved from the start.

2.2   Politicians and other relevant decision-makers should be involved in or invited to participation processes to clarify or sort out the framework and the rules for the process, so that questions about mandates and goals for e.g. partnership discussions, veto-rights, etc., are sorted out by the correct party on the correct level within the societal structure at hand.

2.3   There are *many processes and instruments for participation* that have been used in different contexts within and outside the realm of rwm. Unfortunately, however, there is as yet no easily available knowledge base that can be consulted to identify possible approaches and techniques that would be suitable for use in a particular situation. It is thus extra important with an efficient exchange of experiences between various stakeholders in different countries. This can be done by *different kinds of networking* between for example municipalities or NGO: s. For example,

various kinds of collaboration within EU funded research projects such as CiP[5], OBRA[6] and ARGONA have been much appreciated, and can still be encouraged.

2.4　　When setting up a dialogue process it will be beneficial to make use of different kinds of resources that are available to help guiding the process in the intended direction to achieve the goals. In this context existing *EU Directives, international conventions and national legislation* should be seen as resources. For example, in a situation where the rwm programme is not yet in a stage which requires EIA consultations, basic EIA principles, such as early involvement and investigating the 'zero alternative' (the option of not implementing the proposed solution), can still be followed. The Aarhus convention[7] is a resource for e.g. communities and NGO: s that can be referred to when requiring access to information and participation.

2.5　　Yet another type of resource in starting a dialogue process is the *mediators* of such processes. Rather than simply wishing to educate the public about environmental dangers, the mediators are committed to involving publics and assisting them to recognize their own stakes in environmental problems. Mediators thus, do not only assist in defining the context of public policies. They may also be crucial for how concerned parties or publics are constituted, and what role they are assumed to play in discussions over policy. Successful mediators define new arenas of risk governance, they draw people and things closer together, intensify interactions between them, and allow productive new combinations and alignments of people and things to emerge. A stakeholder wishing to start a dialogue process should, however, be aware that also mediators are actors on the market of mediation, and therefore the stakeholder should make him/herself aware of different approaches and define his/her own purpose with the mediation in order to be able to choose the best approach.

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[5] **CiP** (**C**ommunity Waste Management **i**n **P**ractice), a research action part-funded under the 6th Framework Programme of the European Commission with the aim to make actual progress in nwm which includes participation from stakeholders in five European counties.

[6] **OBRA** (European **Ob**servatory for long-term governance on **ra**dioactive waste management), a coordination action under the 6th Framework Programme of the European Commission that included a feasibility study for a European Observatory for long-term governance on radioactive waste management.

[7] UNITED NATIONS ECONOMIC COMMISSION FOR EUROPE (1998): Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. Aarhus, Denmark, 25 June 1998, http://www.unece.org/env/pp/documents/cep43e.pdf

3. Basic approaches

Before starting up a process of participation and transparency, it is critical to be aware of the overall aims and objectives. This is probably of great importance for the choice between the basic approaches that exist. This section gives some guidance for this key to a successful process. Different types of process leaders (e.g. an implementing agency or a local community) may have different points of departure and therefore they may prefer one approach before another one. It should be remarked that these proposed guidelines don't have the ambition to be overall covering but rather they bring up approaches that either have been directly addressed in ARGONA or otherwise have become a subject for consideration in the project.

3.1   One basic approach to participation is *the partnership model* where the stakeholders, including typically the implementer of a rwm programme and local authorities make a formal agreement to jointly develop solutions for disposal and siting. This model was developed and first applied in Belgium.

3.2   In order to enhance the awareness of the issues, it is recommended to organize *transparency arenas using the RISCOM model*[8]. This can be done either as a deliberative process of its own or as formal regular intermediate checkups within the framework of a larger deliberative process. Compared to other deliberative processes, transparency arenas have the specific purpose to increase awareness by creating clarity in complex issues, not primarily for consensus building. In this way they can support representative democratic decision making as well being a dialogue process for all stakeholders. This approach has been developed in Sweden and was applied in the Czech Republic within the ARGONA project.

3.3   The partnership and transparency models shall not be seen purely as alternative ways of action but as approaches that could be combined, for example transparency exercises could be arranged under the umbrella of a partnership, as intermediate events. In addition, there are many instruments for public participation (focus groups, consensus conferences, science shops etc) available for use within the broader framework of a deliberative process.

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[8]For a description of the RISCOM Model, see e.g. Andersson, K., Westerlind, W., Atherton, E., Besnus, F., Chataîgnier, S. Engström, S., Espejo, E., Hicks, T., Hedberg, B., Hunt, J., Laciok, A., Leskinen, A,. Lilja, Ch., O'Donoghue, M., Pierlot, S., Wene, C-O., Vira, J. & Yearsley, R (2004). Transparency and Public Participation in Radioactive Waste Management. RISCOM II Final report, European Union Contract Number FIKW-CT-2000-00045. SKI Report 2004:08, Stockholm, Sweden

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SUMMARY OF CONCEPTS

A *transparency arena* is a *safe space* for creating clarity with dialogue and stretching using the principles of the **RISCOM Model**

In a transparency arena stakeholders share and increase their mutual awareness about the issues being addressed. The main events are hearings with *stretching*, where stakeholder arguments are challenged from different angles to clarify claims to truth, validity and authenticity as defined by the RISCOM Model. This is a tailored hearing format to gain transparency. It should be noted that the stretching is for all stakeholders, not just the implementer or a regulator. Everyone who is advocating an argument, also against the suggested way forward, should be prepared to have his arguments being stretched for the sake of clarity. The actual hearings may be combined with other kinds of dialogue formats including group-work activities. A *reference group* is established by a formal agreement with stakeholder participation (e.g. industry, academia, authorities, NGO: s), which decides on context and aim of the transparency arena including the hearings. The participation of major stakeholders is important from the initial phase to ensure fairness of the entire process.

3.4   The ARGONA project analysed how *the three arenas of transparency, deliberation and representative democracy* relate to each other. A deliberative governance process can include formal transparency arenas as a way to make regular intermediate checkups of factual and value-laden issues as well as actors' intentions and interests. In that sense, transparency arenas should not be seen as activities that physically happen outside of deliberation, but as formal phases of a deliberative governance process itself. Actors can be 'stretched' to reveal their intentions and interests at any moment in a political discourse but organising transparency should go together with *enabling reflexivity* in the sense of becoming aware of the potentials and limits of own knowledge and roles. It is the aim of the stretching function in the RISCOM model to give signals to the one being stretched that make him/her more adaptable to the surrounding environment and trends for the future (which makes him/her more viable).

3.5   Based on the analysis made in ARGONA it is also recommended that formally organised transparency arenas should become a universal norm that should inspire and steer the practical political organisation of governance, also in the framework of representative democracy.

3.6   Two basic forms of mediation have been identified and analysed in ARGONA: m*ediation by demonstration* and *mediation by dialogue.* The first is about showing 'hard facts', while the other is about involving citizens in activities where no final

answer (truth) exists. Both forms of mediation are understood as indispensable in radioactive waste management. As each one has its own part to play neither one should be automatically privileged over the other one in any policy process. Annex 1 gives further guidance on how they should be used.

3.7 Participation processes should involve discussions about the form and structure as much as contents and principles. It is necessary to allow for a time consuming process as there is a continuous need for feed-back processes and overview.

4. Trust is basic

Having selected the basic approach for a process of participation and transparency, there are a number of considerations to take into account during the process. In the following some recommendations that have been pin-pointed during the ARGONA project are given.

4.1 For any governance process, for any deliberative or transparency arena to be legitimate, it needs to have a certain degree of trust among those affected, those participating and citizens at large. If a stakeholder does not trust the organization of a particular deliberative or transparency setting he/she will not take part and immediately it will lose legitimacy. Trust is difficult to define and therefore it is difficult to know what would be the necessary conditions for trust building, however, ARGONA research suggested three conditions: (1) better knowledge generation, (2) real justification, and (3) process thinking.

4.2 The aim of *better knowledge generation* can be described as a joint act of gaining insight into complexity. In short, better knowledge generation is done through interactive practices and settings that foster reflexivity and organize transparency. While deliberation builds on the act of better knowledge generation, it should be inspired and steered by the principle of justification. *Real justification* means that there is a real chance for stakeholders to influence the process. *Process thinking* implies at the same time looking back and looking forward. Governance needs a consciousness of history in the sense of a joint understanding of 'why things went the way they went', in order not only to learn from the past, but also to critically assess shared but differentiated responsibilities. Looking forward can mean a degree of adaptability of implementation of a decision process in the social and physical reality including reversibility of decisions.

5. The need for a 'safe space'

5.1   Often there is need for a 'safe space' for discussions in the meaning of a process, or an arena, where different stakeholders can move forward together to increase their understanding of the issues and also of their respective views without being committed to find common solutions, which may cause certain stakeholders to feel like hostages for a certain purpose. A transparency arena using the RISCOM model provides such a safe space as the participating stakeholders together form events, such as hearings, on the basis of agreed principles. Other dialogue processes can be formed as safe spaces as well. This can be the case e.g. for series of meetings arranged for municipal representatives from different countries to meet, exchange experiences and interact. This has been the case for the COWAM[9] series of projects and in the CARL project[10].

6. Early public involvement

6.1   Early public involvement brings big benefits. First it is a matter of fairness as it makes possible for all stakeholders to influence the process and to contribute with their perspectives at a stage when they still can be incorporated. Secondly, it provides not only an early warning system for potential conflict situations but also a chance to solve problems early. Thirdly it can prevent, or at least decrease the likelihood of, narrow early framing which later shows up to be insufficient. In that way early involvement provides perspectives that could make the entire process more effective saving financial resources and time.

7. The safety analysis

7.1   Communication of the safety analysis results is necessary, but not only the implementer's results. Controversies with regulators and environmental NGO: s can in this case be used to explain uncertainties. Stakeholder input, e.g. on relevant

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[9] The **CiP** (**C**ommunity Waste Management **in P**ractice) project is the third one in a series of projects, called COWAM, devoted to the creation of a European network on radioactive waste governance

[10] CARL (2004-2007) - a research project, coordinated by University of Antwerp, addressing stakeholder involvement conducted by an independent, self-supporting consortium of organizations from countries that have experience with stakeholder involvement in radioactive waste management.

scenarios, can be valuable for the conduct of the safety analysis, however it is important to maintain the integrity and ethos of the technical expertise involved.

8. No progress without resources

8.1   Many of the good examples of public participation have been developed and used entirely without new laws or conventions. However, the possibility to form new initiatives is dependent on resources. The access to and regulations around resources is vital for the outcome of the processes of participation and transparency.

9. The relation between research and implementation

9.1   Bridging the gap between research and implementation is a key issue for progress not only for rwm but much more in general. One particular characteristic of governance research in rwm, however, is that research initiatives have directly initiated participative processes with great impact. On the other hand, much knowledge has been gained which now needs to be implemented and rwm programmes need to move forward without waiting for much more of basic research.

9.2   In ARGONA, *stretching* of research projects was tested in an *End Users Conference.* This was found very useful, although many wished it had been more provocative, exhaustive and stringent. For similar activities in the future, one should focus on a few, deep questions and the researchers should have time to prepare themselves for the questions beforehand. Also, detailed stretching of research projects could be suitable to have among researchers, but with free access for others to attend.

10. Local compensation

10.1   Local perception of safety is very important. Safety should be discussed and demonstrated clearly before initiating any negotiation for compensation.

10.2   A community perspective is recommended in order to identify and address local needs and interests. At the very least the local public should be informed from the very early phases onwards.

10.3   A broad political mandate is recommended in the early phase of the negotiations to provide cross-party confidence and consistency. Multiparty negotiations are needed, as is clarity about the role of all stakeholders.

10.4 Cooperation of all candidate host communities for a repository is recommended in order to avoid competition and secrecy.

11. Other practical recommendations

11.1 Impartial and independent professional mediators should facilitate communication among interested parties during the discussion. This applies especially to the discussions on contentious issues such as selection of an appropriate nuclear waste management alternative or deep repository siting. It can often be beneficial to involve well-known persons in the function as moderator, for example well-known media personalities.

11.2 It is essential to encourage participation of representatives of state institutions such as Ministry of Environment and Ministry of Industry and Trade, and also representatives of government parties. This is one of the most important prerequisites for discussion to be relevant and meaningful for the practical application of conclusions.

11.3 Media participation in events such as seminars, science shops or public hearings should also be encouraged. It can draw attention to the issues about nuclear waste management and ensure greater interest and participation of the general public, the responsible state organizations and, last but not least, NGO: s.

11.4 It can be beneficial to the process development, both for practical work and research, to include 'foreign experts' in related fields to obtain broader perspectives and to allow for other kinds of experience. The aim would be, not to review the processes or developments only from within a country, but to systematically involve experience, views and comparisons with similar situations in other countries.

Annex 1

Mediation by Demonstration and Dialogue

Two basic forms of mediation of radioactive waste management were identified and analysed in ARGONA: mediation by demonstration and mediation by dialogue. The former coincides firstly with showing and visualizing radioactive waste management issues and solutions for public inspection and recognition. The latter, on the other hand, corresponds firstly with the establishment of different styles of public discussion, deliberation and inquiry for elaborating further on policy issues and solutions. Both forms of mediation provide the basis for the collection of significant bodies of public evidence and testimony which can be used to continuously inform and guide decision-making processes.

Principles and Guidelines of Mediation

1. Both mediation by demonstration and mediation by dialogue should be understood as indispensable in the formation of arenas of risk governance in radioactive waste management.

2. As the two basic forms of mediation each one has its own part to play in advancing radioactive waste management solutions, neither one should be automatically privileged over the other one in any policy process.

3. Both mediation by demonstration and mediation by dialogue can be expected to generate large bodies of public evidence and testimony which can be used to help inform and guide decision-making processes. Historically, evidence deriving from mediation by demonstration has been accorded greater prominence in the radioactive waste management field than evidence deriving from mediation by dialogue. For this reason, new ways of effectively combining evidence and testimony deriving from both forms of mediation should be explored in policy processes in the future.

4. Because mediation by demonstration builds upon a clear division between those who demonstrate and those who are being asked to see and evaluate what is being shown, mediation by dialogue should be conceived and constructed as an opportunity to unsettle and destabilize these established roles.

5. Because mediation by dialogue serves to erase the divide between 'demonstrators' and the 'inspectors/observers' of radioactive waste management problems and solutions, mediation by demonstration should be conceived as implying the organization of 'show trials' attempting to publicly reaffirm the legitimacy of the division of management powers they support.

6. Neither mediation by demonstration, nor mediation by dialogue, should be thought of as predominantly technical or political activities. Both should be recognized and appreciated as contributing to the creation of public arenas where technology and

politics can be brought into close and continuous contact with each other in the pursuit of exemplary radioactive waste management solutions.

7. Combining mediation by demonstration with mediation by dialogue allows for greater public recognition to be granted to the 'hidden' roles that both play in each other. The two basic forms of mediation always impinge on each other, and recognizing this opens the way for a significant expansion of the dialogue element in demonstration, as well as a broader evaluation of the demonstration woven into dialogue.

8. Mediation by demonstration and mediation by dialogue should not be understood as alternative ways of seeking to advance radioactive waste management solutions, so much as interdependent ways. They serve to sustain and enlarge the relevance of each other. In combination they can help to strengthen the political legitimacy and technical integrity of radioactive waste management solutions.

9. The links between two forms of mediation can be intricate. On one hand, pursued in apparent isolation from each other, they may unnecessarily complicate the communication about radioactive waste management. On the other hand, they can be organized by different bodies having different roles in a radioactive waste management programme, such as an implementer, a regulatory body or a local organization. In such a case, it may be better to clarify the different aims of the two processes.

Annex 2

References to ARGONA reports

This Annex is intended as a source of reference for those who want to have more background information to certain sections of in the suggested guidelines. References are given for the various sections of the guidelines to more background information in the ARGONA Final Report, the ARGONA Final Summary Report and sub-project reports (ARGONA deliverables). All these reports are available for downloading at the ARGONA web site http://www.argonaproject.eu.

1. Rules and regulations

ARGONA Final Report and ARGONA Final Summary Report - Chapter 4

ARGONA Deliverable 2

2. How to get started

ARGONA Final Report and ARGONA Final Summary Report - Chapters 3, 4, 9

ARGONA Deliverables 2, 14, 15

3. Basic approaches

ARGONA Final Report and ARGONA Final Summary Report - Chapters 3, 7, 9

ARGONA Deliverables 13, 15, 20

4. Trust is basic

ARGONA Final Report and ARGONA Final Summary Report - Chapter 8

ARGONA Deliverable 13

5. The need for a "safe space"

ARGONA Final Report and ARGONA Final Summary Report - Chapter 3

ARGONA Deliverable 14

6. Early public involvement

ARGONA Final Report and ARGONA Final Summary Report - Chapter 4, 7, 9

ARGONA Deliverable 2

7. The safety analysis

ARGONA Final Report and ARGONA Final Summary Report - Chapter 6

ARGONA Deliverables 8, 17

8. No progress without resources

ARGONA Final Report and ARGONA Final Summary Report - Chapters 7, 11

ARGONA Deliverables 2, 20

9. The relation between research and implementation

ARGONA Final Report and ARGONA Final Summary Report - Chapter 11

ARGONA Deliverable 26

10. Local compensation

ARGONA Final Report and ARGONA Final Summary Report - Chapter 10

ARGONA Deliverable 16b

11. Other practical recommendations

ARGONA Final Report and ARGONA Final Summary Report - Chapter 3

ARGONA Deliverables 14, 21