Nuclear Regulation Taskforce: One Year On

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To coincide with the first anniversary of the publication of the Report of the Nuclear Regulatory Taskforce and a speech given at the Institute for Government.

1. I am grateful to my fellow NRTF members, Andrew Sherry, Mark Bassett, Mustafa Latif-Aramesh, and Sue Ion and several others for discussions and comments on earlier drafts.

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Summary

The government has not delivered on the Nuclear Regulatory Taskforce's Review with the pace or openness it promised.

The Taskforce found that the cause of high cost and delay was not only regulation. Regulators, government and industry all contribute, and the three interact. Reform must address all three at once.

The Review was published on 24 November 2025 with 47 recommendations. The government accepted them all in principle. Its formal response in March 2026 changed many of them. Statutory deadlines and automatic approvals were removed. Guidance replaced legislation in several areas.

There has been progress. Regulators have done the most. ONR has a new strategy and has cut its safety case guidance by 60%. ONR, the Environment Agency and Natural Resources Wales aim to cut reactor design approval from 3–4 years to 2. AWE expects savings of hundreds of millions of pounds.

Government departments lag. Industry's response is uneven.

There are five concerns:

- The Commission for Nuclear Regulation must decide, not advise.
- The alternative route for the Habitats Regulations is behind schedule.
- The Nuclear Regulatory Implementation Panel met for the first time in late June 2026. It is not independent and its work and membership are not public enough
- The government has published no progress report.

Political leadership is not clear. Neither the current nor the previous Energy Secretary has backed implementation in public. The new Prime Minister has not stated a view.

The prize is large. The decommissioning bill is £150bn to £250bn. Taxpayers invest over £30bn a year in civil and defence nuclear. UK energy prices are among the highest in the world.

This paper asks for three things:

1. Consistent pressure from the Prime Minister on every department.
2. An independent Nuclear Regulatory Implementation Panel that publishes its work.
3. Public scoring of industry progress, and contracts that reward lower cost and improve schedules.

Introduction

Nuclear power is central to several serious challenges in the UK. High energy prices have aggravated a cost of living crisis, have caused deindustrialisation, and are a barrier to growth. Geopolitical risk increases the importance of the nuclear deterrent. We face a decommissioning bill of up to £250bn.

Almost two years ago, the Government identified serious concerns with how regulation drove cost and delay in all three of these critical areas. Delays in planning, cost-overruns, the glacial pace of decommissioning the legacy waste, all contributed to a sense that the UK had lost the ability to do anything efficiently and effectively in the nuclear sector. This was despite the fact that the UK was historically one of the two or three leading nations in the world on nuclear technology.

The Nuclear Regulatory Taskforce (NRTF) was set up with a small group of experts. It quickly concluded the problem was systemic and had as much to do with the behaviour of industry and government as with regulators and regulation.

Specifically, it set out the need to address

- Gold plating, risk aversion and poorly aligned incentives in industry;
- Fragmented and slow decision-making across multiple government departments;
- A system that prioritised process over outcomes;

- A sector in which expertise, experience and culture were in need of significant uplift; and
- A lack of proportionality by regulators and coordination across them.

This could be summarised by better leadership with a stronger focus on outcomes. The Review laid out that the prize was there for the taking.

One year on, what has happened?

The Review was widely welcomed and the Prime Minister committed to implement its recommendations in full. Since then, progress has been slower than promised.[1] The implementation lacks transparency (in contrast to the work of the NRTF) so that it is not possible to understand how far behind the implementation is. Many of the issues that the Review identified as the problems in the sector (e.g., fragmentation, lack of leadership, pace, process over outcomes etc), now seem to permeate the implementation. This creates a problem of accountability.

The structure of this paper is as follows.

First, it describes the process the NRTF went through in detail and sets out what went well and what, with the benefit of hindsight, might be done better. There is no template for undertaking a review of this kind and these thoughts might be helpful in developing one. It would make such reviews more effective. The main reason for including it is that some of these lessons could usefully be taken on in the implementation stage.

Second, it sets out what we learned about the sector in doing the Review, and outlines our thinking behind several of the recommendations, both to explain them more clearly and because some of them risk being misinterpreted.

Finally, it looks at progress since the report was published. There has been real progress in areas like seismic qualification for non-nuclear structures, the ONR reducing the size and number of Technical Assessment Guides, and clarity over regulatory scrutiny for low-risk issues. But implementation is well off track, and this does not seem to worry anyone in government.

This paper has been written in consultation with the other members of the Taskforce, Andrew Sherry, Mark Bassett, Mustafa Latif-Aramesh, and Sue Ion. I am very grateful to them for their support in writing it and the huge amount of effort each of them has personally invested in supporting the implementation of the Review over the past 12 months.

The Review Process

One of the questions I have been asked most frequently over the last year is to describe the process we followed. I thought it useful to summarise that in one place, with some reflections. I hope this might be useful to others planning or carrying out a review like this in the future.

The Review was announced by the government in early February; I was appointed in early April and the other members in May. The final report was issued almost exactly six months after the first meeting of the Review. Annexe 1 sets out the timetable in more detail.

Let me list some of the things that I think worked well.

1. A quick invitation to comment on the scope. We had very little time. My appointment took longer than I expected and the other members were not appointed for another month. So “Summer 2025” was never going to be feasible. I set myself a six-month target. The original deadline was at the end of October. We later extended that to the end of November, which was still six months from the full members coming together. Inviting comments on the scope, and asking people to keep to one

1 See Paragraph 58 onwards of Revisiting the nuclear roadmap by the Energy, Security and Net Zero Committee published on 20th November 2026. Paragraph 58 starts with “Progress since the Government’s acceptance of the Review has been slower than the commitments made to us”

page, meant that we had a dense evidence base for our first meeting. I borrowed this approach from my experience with market studies at the Office of Fair Trading.

2. Collective decision-making with broad and deep expertise. We were very fortunate with the quality and experience of the people appointed to the Taskforce. The Review touched on regulation of safety, environment, planning and other areas and we had deep expertise on all of these areas, as well as on nuclear physics and engineering, and on both defence and civil. Most important was the deliberative and collegiate nature of our discussions which occurred frequently, and weekly in the later stages. The members brought a wide range of multidisciplinary expertise with a problem-solving independent mindset and passion for change which strengthened our collective deliberations. No one individual could have produced this report. This influenced our thinking about the Commission in Recommendation 2.

3. Site visits. These were hugely important both in understanding the practical experience of people trying to address regulatory challenges and digging more deeply into issues people had written about. People might worry about "capture" in this process. In reality, the opposite is a bigger risk as often we took away lessons from these site visits that might have been the opposite of what was intended.

4. Senior political sponsorship. The Review was strongly driven at the start by the Prime Minister and the Chancellor. This made a huge difference. I wonder if the Prime Minister and No 10 officials underestimate how much a few words or some keen interest (both very cheap) can do. In DESNZ, Lord Hunt, and later Lord Vallance, were hugely supportive (as was Lord Livermore in the Treasury). The political leadership was not consistent. For example, neither the previous nor the current Secretary of State for Energy Security and Net Zero publicly supported the Review while it was happening, or has spoken approvingly of it since. At the official level, the Ministry of Defence was strongly supportive throughout. Within DESNZ, some gave the impression that this Review had been imposed on them and saw it as something to "manage". In the months before completion, DESNZ and MOD officials became strongly supportive at a critical time when the Treasury seemed no longer to favour a radical approach.

5. Consultation. We consulted first on the scope and second on the problems we identified. In addition to the site visits, which were mostly in the first two months, we had structured meetings with individual respondents and groups together. These included industry participants, regulators, government officials, and various advocacy groups.

6. Hearings. We held workshops and other meetings in August after publishing the interim report. These helped refine our views and to explain our thinking to interested parties. They contributed to far more useful responses to the second consultation.

7. Case studies. The gathering and checking of case studies was hugely important for the evidence base, and for public communication of what were complex issues.

8. The team. I should take this opportunity to thank the team, led by Huw Davies (DESNZ) and Andy Newell (MOD). It is a challenge to bring together a disparate group of people to work on an intense project on a tight timescale. They were thrown in at the deep end but in the second half of the project they had come together as a very effective team. It helped that we agreed on the structure of the report very early (June) which made the process of up to 20 people inputting much easier.

9. Narrow focus. We focused tightly on regulation and how to bring down the cost

and avoided getting drawn into the question of whether the UK should build more nuclear power. I think this helped build consensus. For example, speaking earlier this year to RenewableUK, I was able to make the point that many of our examples were drawn23 from renewable energy, and many of our recommendations might also bring down costs there.

10. Engagement on the recommendations. We engaged with government departments and regulators as our recommendations emerged from October with a view to ensuring that they were capable of being implemented. This made it easier for the government to accept the report in full. In the 10 days before publication, there was pressure to dilute or qualify the recommendations (as anticipated). Strong resolve and reasoning by the Taskforce resisted this.

There are some points that, with the benefit of hindsight, might be done differently.

1. There is no standard template for setting up a Taskforce. So the team had to invent this from scratch. In the Review, we frequently note how the lack of standardisation drives up costs. This point applies equally to the process of a review. The Cabinet Office might usefully develop a short guide to setting up a Taskforce. In addition to some of the positive lessons above, it might address practical things like security clearance, access to buildings, meeting rooms, who manages media handling, etc.

2. Environmental regulation was very significant but many of the advocacy bodies in this space were less aware of the Review so we had fewer submissions. In September, we reached out to some of them proactively. While I don't think this affected our recommendations, as we largely shared and reflected their concerns, it did limit the amount of time we had to engage with these organisations prior to publication. Subsequent engagement with some of these organisations was very positive, but would have been better if it could have happened before publication.

3. This was also true of trade unions where earlier engagement would have enabled better understanding of our thinking.
4. Media handling by government communications was poor. A review of this kind is not ideal fodder for a machine charged with daily positive announcements. The initial announcement was botched. There was a huge argument about the press release with the interim report. The actual report went live online 13 hours after the press release. The upside of this was to see public commentary by people on how biased the report was before they could have seen it. This was sorted for the final report, but it should be easier to get right.

5. Our mandate had notable gaps, particularly around nuclear security and the environmental and planning frameworks across devolved administrations. Given how closely security and safety interact in practice, excluding security created operational challenges for our assessment.

6. Implementation. Several months in advance of publication, we suggested to DESNZ that an implementation group be appointed before we finished our work. This idea was rejected. I deal with this in detail below but, looking at other reviews, it might be something to consider adopting as best practice in undertaking reviews of this kind.

Ultimately, we had a good measure of luck with this Review. First, it came on the back of growing concerns about cost escalation and delay due to regulation across swathes of the British economy, from house building and transport to utilities like energy, water, and telecoms. Second, the backdrop of persistently high energy costs kept it relevant. Third, technology has changed energy demand. Whereas previously, industry used more energy than services, services increasingly rely on data storage which is energy intensive. Fourth, there is an exciting, if yet to be proven, renaissance of nuclear innovation. Fifth, the greater risk of

geopolitical conflict highlighted the urgency of the problems in defence. Finally, fiscal pressures made the huge decommissioning bill more salient.

The Substance: What was the problem?

The rationale for the Review

The government first set out its view of the problem in a No 10 press release of 6 February 2025, "Government rips up rules to fire-up nuclear power". It made five claims:

1. Delay and obstruction: "For too long the country has been mired by delay and obstruction, with a system too happy to label decisions as too difficult."
2. Regulation killed investment: "The industry pioneered in Britain has been suffocated by regulations and this saw investment collapse." It gave a 30,000-page environmental assessment as an example.
3. Cost: "Britain is currently considered one of the world's most expensive countries in which to build nuclear power."
4. Hinkley Point C: "three European regulators reached different assessments on the reactor design, leading to delays and increased costs."
5. Siting: new nuclear was limited to eight sites under "archaic planning rules that haven't been looked at since 2011."

The Prime Minister, Keir Starmer, added: "This country hasn't built a nuclear power station in decades. We've been let down and left behind." He promised "saying no to the blockers who have strangled our chances of cheaper energy, growth and jobs for far too long."

That day the Energy Secretary made a statement in Parliament, but said nothing about a problem. The statement described a sector at the start of a "significant expansion" and called regulation an "enabler". The Taskforce was to "examine how to deliver nuclear faster and cost-effectively".

On 10 April, the government repeated the "most expensive" line. It promised to "call time on a planning system that has held back new nuclear for too long" and to "simplify processes, and reduce duplication".

My interpretation of this was that the government saw the main problem as regulators and regulation.

My view was reinforced by the comments of the Chancellor, Rachel Reeves, on regulators as being an obstacle to growth.[2] Very quickly, I realised that this was not the full picture, and perhaps not even the most important component, of the problem.

A systems not a regulation problem

We went looking for a regulatory problem and found a systems problem that was complex and wide, involving government and industry as well as regulators.

These three problems, regulators, government and industry, interact. For example, if industry lacks a strong cost incentive, then it will have little incentive to push back if regulators demand disproportionately costly solutions. Even worse, it may itself propose costly solutions to avoid the risk and cost of debate. The underlying cause of disproportionality may be very different from what presents on the surface.

The systemic nature of the problem is critical to understanding our recommendations. They need to work as a whole. Partial implementation may create activity without impact. If one individual part is addressed, but another not, then there is a risk that the effort

2. In December 2024, she had written to regulators jointly with the PM and business secretary asking each of them to develop five reforms that would help growth. After a summit with the heads of 17 regulators 16-17 January 2025, her statement included "Tear down regulatory barriers that hold back growth." and "We are not going to be able to grow the economy if the regulators keep doing what they're doing." And on 29th January, in a speech in Oxford, she said Britain is "held back by a complex and unpredictable regulatory system." "I won't apologise for wanting to reform how regulation works in Britain." "There's a lack of predictability in our regulators which is bad for business." In the same period, the government abruptly dismissed the Chair of the Competition and Markets Authority to drive more growth.

in the former is wasted in the latter. There is no point, for example, in regulators becoming more open to debate about optimal solutions if the industry continues to propose over-engineered expensive ones.

Regulators

There were problems with individual regulators being too risk averse or inconsistent. Their leaderships were very open to challenge and change, but we do not underestimate the challenge of delivering on that change. ONR's own culture study found a gap between its stated values, open and fair, and its values in practice: protecting reputation, avoiding risk, following process. ONR leadership recognises this as perhaps the biggest challenge to effective implementation and has responded positively and moved faster than other parts of the system.

Coordination across regulators and regulatory regimes was a big problem. While various attempts had been made to create a "lead regulator", we found only one example where this had worked well and that was in response to an agreed crisis.

We observed that different regulatory rules are sometimes in conflict. This is most evident in contrasting EA and ONR requirements not only in new build but in waste management and decommissioning. Our report highlighted some key examples out of the many case studies we collected.

Government

A large number of problems tracked back to the government itself: key policy fragmented across multiple departments, weak leadership, unclear accountability, and slow pace of delivery. Government legislation and policy set the rules and regulations that regulators impose. So many of the problems that are manifest in regulation on the ground may have their source upstream.

Fragmentation is a huge issue. Multiple government departments owned different parts of the regulatory set-up. The MOD and DESNZ, DEFRA (Environment), MHCLG (planning), MoJ (appeals, Aarhus), DWP (Health and Safety) determined the regulatory environment. DWP was the parent department for ONR, arising from its split from HSE in 2014. Other departments like HMT, CO, DBT (as it then was), DSIT (as it then was) all made decisions that affected the sector. Change requires far more active leadership to coordinate action by all of these.

Government departments seemed not to appreciate the cost of delay and indecision to industry and ultimately consumers and the taxpayer. It is not that individual civil servants could not see this, or were not trying to address it, but rather that the system of decision-making lacked the right incentives and accountability to speed up decision-making. Adding more people to the decision-making group does not necessarily improve the quality of the decision, but it does cause delay and can reduce accountability.

Industry

More surprising was evidence that suggested there were widespread problems inside the industry. These boiled down to the twin issues of economic incentives and culture.

The existence of cost-plus and short-term contracts meant that there was little incentive to challenge expensive solutions to address regulatory requirements. There were too many bespoke solutions (e.g., cranes) when standard ones would have been cheaper and faster, and easier to service and maintain. This was a particular issue in Defence, but many civil projects exhibited outcomes consistent with the same incentives.

Skills and culture were a huge barrier to progress. We found risk aversion, and a focus on process over outcomes, to be endemic.

There are signs that cultural issues are being recognised, particularly through the ONR Together strategy and the new Nuclear Industry CEO Forum. But culture does not

change because we create another strategy or forum. Risk aversion, proceduralism, and shortages of the right skills and experience remain embedded across the system. The test is whether leadership commitments now change everyday decisions; whether people are trained, empowered and supported to exercise proportionate judgement, challenge unnecessary complexity, and prioritise real safety over paper safety. Experience shows us that it is possible to be compliant and still unsafe. For the nuclear sector, this is simply not acceptable.

Other Insights

1. Copying international regulations was not a panacea, but more could be done to benefit from regulatory solutions in other relevant jurisdictions.
2. Export controls were a less visible but important part of the regulatory architecture about which we received many concerns.
3. Substantial expenditure did not always produce proportionate environmental benefit.
4. Risk aversion was built into the rules. Targets ratchet down. Our "gross disproportion" test makes the UK an international outlier. The system punishes failure but cannot reward success.
5. Safety cases were so long and complex that they likely had the opposite effect to that intended. Simplification is intended to strengthen safety by making the key claims, evidence and risks clearer, not to lower standards.
6. Decommissioning suffered from the same problems. At Winfrith, proportionate regulation would save £45m and remove about 10,000 HGV movements. Across Nuclear Restoration Services sites, the saving is about £6bn. Biodiversity Net Gain creates a liability of around £10bn for the NDA.
7. We were deeply concerned at the slow progress of decommissioning old submarines and the way that commercial contracts were structured by the MOD.
8. There are many fine consulting firms in the supply chain but often the government outsourced important tasks to consultants that should properly have been done in-house.
9. The fifty-year saga of building a deep geological repository for nuclear waste, although outside of our scope, exemplified many of the most serious systemic problems.

Finally on a positive historical note, many people pointed out how innovative and world-leading the UK had been in atomic energy. The best example of this is Winfrith. In 1957 the UK Atomic Energy Authority began building a research site on Winfrith Heath in Dorset. Its first reactor was running by the end of 1959. Winfrith went on to host nine reactors, most of them testing new ideas. Dragon, built with eleven other European countries, was the world's first experimental high-temperature gas-cooled reactor: 20 megawatts, cooled by helium, with an outlet temperature of 750°C. Its ceramic-coated fuel particles are the same basic idea behind several of today's small modular reactor designs. The Steam Generating Heavy Water Reactor took four years to build and fed up to 100 megawatts into the grid from 1967 to 1990. At its peak in 1966, 2,350 people worked there. That reactor closed 36 years ago. Dismantling its core has still not started. Britain once built and operated reactors faster than it can now dismantle them.

Some Recommendations

The recommendations in the report speak for themselves. Many of them had more underlying thought and consideration within the Taskforce than was published. Looking back on the last year, it seems useful to expand on or explain our thinking in a few areas.

Recommendation 1: Strategic Steer

If a shark approaches a shoal of fish, they all move in the same direction without meetings and conference calls. The idea of the strategic steer from the Prime Minister was to try to induce this type of shoaling response across the civil service, regulators, industry and the supply chain. This type of change management

is a huge challenge, but easier if everybody is seen to do it. It needs leadership, direction and nowhere that people can hide. All three are currently a concern.

Recommendation 2: The Commission for Nuclear Regulation

The idea of a decisive Commission was a key recommendation designed to address multiple problems. Its placement as Recommendation 2 reflects the importance with which we view it. We saw it as the glue that holds various other parts of the jigsaw together. Our reasoning went far deeper than was published in the report.

We saw the Commission as a solution to multiple problems.

First, it would help overcome the problems of multiple regulators by creating one place for the final decision, across safety, environment and planning. A single decision-maker would help cut repeated safety cases, environmental assessments and planning applications. A lead regulator model would not achieve this.

Second, a system of open hearings and collective decision-making is likely to produce decisions that are both more robust legally and more accepted by stakeholders. The aim is to do things well and once.

Third, it helps address the ratchet towards ever higher standards that are not proportionate. Its process can enable greater challenge of gold-plated solutions by regulators and businesses.

Fourth, it follows international precedent. Our closest partners on nuclear technology, namely the US, France, Japan, Canada and South Korea, all have commission structures. Finland has also created a one-stop shop for permits.

We proposed a staggered approach to this. The Taskforce members think that getting this right is more important than getting it done quickly so if there were to be some slippage, it would be better on timing than substance.

In order to give proper effect to our recommendation and the thinking behind it, we still believe the following.

1. The Commission must decide, not merely advise. This is a fundamental requirement. If regulators can simply disregard its conclusion, the underlying problem remains and the Commission becomes an additional layer of process.

2. It must have sufficient concurrent statutory powers. The Commission needs authority spanning nuclear safety, security, safeguards, environmental regulation and planning where necessary to resolve a case. Better coordination cannot by itself overcome conflicts arising from different statutory vires.

3. It must focus on exceptional cases, not routine regulation. The ONR, the environmental regulators and planning authorities should retain their expertise, responsibilities and normal decision-making. The Commission should address substantial, novel, contentious or deadlocked matters. It should simplify the system rather than become another regulator within it.

4. Decisions must reflect independent, expert, collective judgement. The proposed small Commission model deliberately combines senior regulatory leadership with independent commissioners. The Chief Nuclear Inspector provides connection with the regulatory system; independent members provide challenge and protect the Commission from simply reproducing existing institutional positions.

5. Proportionality and challenge must be central to its culture. The Commission is intended to address the regulatory "ratchet", where additional requirements can accumulate and caution is institutionally easier than proportional judgement. Dutyholders and regulators should be able to test competing evidence openly without legitimate challenge being interpreted as

a weakening of commitment to nuclear safety.

6. Decisions should create useful precedent. Significant decisions should normally be published with concise reasons explaining the evidence, judgement and proportionality of the outcome. This allows one difficult decision to clarify expectations across the sector, rather than the same arguments being repeated project by project.

We considered that the Commission should be a very light structure and report into the Cabinet Office. Given the decision to move ONR to DESNZ (see below), we feel more strongly that the Commission should be completely independent of both MOD and DESNZ.

We did not feel strongly about other factors such as the precise number of commissioners, its physical location, titles, secretariat arrangements and detailed procedures.

What does success look like? If a critical nuclear initiative hits a stalemate owing to conflicting stances by separate oversight bodies, could a compact, highly specialised, and genuinely autonomous panel consider the opposing arguments, deliver an authoritative and balanced ruling to resolve the impasse, publish its rationale, and enable both industry and regulators to proceed efficiently?

If yes, the reform meets the original intent. If not, implementation has missed the central purpose of the Commission. The bottom line is the UK does not need another coordinating committee, or a think tank giving advisory views after the fact. It needs a credible mechanism for making difficult cross-regulatory decisions when the existing system cannot. That is the dimension of the original Commission concept that should not be compromised.

If the decision not to implement Recommendation 2 is taken because of parliamentary time, we think it is more important to get this right than to hurry the legislation and get it wrong. That would be process trumping outcomes (again).

Recommendation 12: Alternative Pathway for Habitats Regulation

We found very compelling the evidence we received regarding nature depletion in the UK over many decades, as we state in the Report. Examples like the fact that the salmon in the Severn system are a genetically distinct population that cannot be replaced if they become extinct were particularly compelling. It is difficult to estimate how much the UK spends annually on nature conservation and restoration but a figure of £1.5bn does not seem out of line.

It was jarring that we were spending £700m on one project but not properly addressing the problem. It was even more jarring that the process enabled this to happen without enough question or debate. For example, no consideration was given to whether spending a fraction of that money on avoiding agricultural run-off and addressing other sources of harm to the fish might have been far more effective. The process did not allow an efficient allocation of resources. We said that replacing one process with another "will not achieve a radical reset" and that the money should go to nature, not to surveys, assessments and disputes.

One reading of Recommendation 12 is that we should prioritise the protection of habitats, but do so in the most effective way. This would channel more money towards genuine conservation efforts which are arguably under-resourced and do so in a way that brings down the cost of infrastructure.

We understood that this proposal was radical. Part of our thinking was that the very small size of the nuclear estate (2,500 hectares or about 0.01% of UK land) created an opportunity for policy experimentation. Any policy change of this type is likely to result in learning: it might be a huge improvement or it might not work as intended. Trialling it on a small part of the estate seemed like a very proportionate and useful way of learning whether we could improve environmental outcomes. At a minimum, this should be done immediately with the defence nuclear estate.

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There is clear backsliding on our environmental measures beyond Recommendation 12. Recommendation 28 sought to allow environmentally better solutions without fresh planning permission. Less than 12 months later, DESNZ has repeatedly declined to implement it, expressly removing our model provision "even if the change is potentially positive". The Department for Transport has, to its credit, included that wording in planning permissions.

We were mindful of international obligations during the Review. The Review pointed out that under the Trade and Cooperation Agreement, the UK cannot lower overall environmental protection, including the Habitats Directive, in a way that affects trade or investment with the EU. That does not stop innovation, as the European case studies we cited show. Worryingly it appears that this is being interpreted narrowly to mean that the UK's environmental law is "frozen" at where it stood at the end of 2020, when the transition period ended. Those views were rightly dismissed, with assistance from the Attorney General and No. 10 at the time. But the argument is re-emerging. It seems that a far more useful interpretation would be that the UK does not lower environmental protection any more than another member state could. I, along with Mustafa and Ben Southwood, have since drafted a paper, due for publication shortly, showing the sheer amount of variation in European environmental regulations. That paper was primarily for a European audience, but it supports the argument that the excessively narrow interpretation should not be followed.

ONR Reporting Line

A good party game during the Review was to ask people what government department the ONR reported into. Most people, even Whitehall experts, took several guesses before they hit on DWP. This made sense given that the ONR was split out of the Health and Safety Executive which sits in DWP.

The Review received many submissions arguing that this reporting line was a problem. Against this, the need for independence may suggest the regulator should not report into a "parent" department such as DESNZ or MOD. The Taskforce considered this at length (see paragraphs 182–184). Many were opposed to DESNZ being the parent department for the reason just outlined. Other countries have their regulator report into the office of the prime minister but the UK system is not set up in that way. Neither the Cabinet Office nor the Treasury seemed willing to take responsibility. So the Taskforce decided not to make a recommendation.

The ONR's reporting line was moved from DWP to DESNZ in June 2026 with little in the way of public announcement or reasoning, and without informing the NRTF members. Members of the NRTF regretted not having made a formal recommendation.

Ministerial Decisions

This is relevant to several of our recommendations including 17 (environmental permits), 27 & 31 (planning), and 46 (sites). Our thinking was that many decisions should rest with ministers rather than regulators. This preserves democratic accountability and resolves political trade-offs. In nuclear, examples range from parts of the policy framework, such as the semi-urban population density criteria, to planning approval for large projects.

But ministerial decisions often involve duplicate processes, especially repeated consultation. These add delay and cost for taxpayers and weaken investor confidence. They also create a risk that narrow interests use procedural delay to override the wider public interest.
In the report, we said that ministers should "put in place binding mechanisms that will make it possible to take brave decisions and not kick the can down the road."

In a side letter to the Prime Minister, we expanded on this and suggested strict deadlines for these decisions, with automatic approval if no decision is made by the deadline, and a ban on further consultation where thorough consultation has already taken place.

The Prime Minister replied on 29 December that these thoughts were "extremely valued" and would be considered alongside implementation.

We sought to clarify this for nuclear. Recent remarks by the Cabinet Secretary and senior ministers suggest that wider debate has now begun; I return to it in the conclusion.

Process over outcome

The UK approach to regulation seems to assume that (a) if the process is right, then the right outcome will follow, and (b) more process must be a good thing. Both deserve to be challenged.

This was a consistent theme in our report but especially for recommendations 5 (reset safety cases), 12 (Habitats), 13 (proportionate Environmental Impact Assessments), and 14 (Modular Low-Carbon Acceleration Zones).

What we saw on safety cases suggests the reverse of both (a) and (b) may hold. Excessive complexity and risk reduction at all costs can weaken safety, obscuring the key safety claims and diverting attention and resources from material risks. Experience bears this out: the Margam rail tragedy (2019), the sinking of the tug Biter on the Clyde (2023) and the near-failure of Toddbrook Reservoir at Whaley Bridge (2019) all show that compliance does not guarantee safety. Compliance is not wrong, but it is insufficient. Expert judgement must be rewarded, especially when it challenges and simplifies safety methods. Safety assurance must be proportionate to the risk: document volume is not evidence of rigour. This requires the cultural change described earlier: leaders who listen and act, and a workforce encouraged to question and raise concerns.

Recommendation 45: Letter from Chancellor to Industry

The government can directly change its own behaviour and the regulatory environment but has fewer levers to influence how industry behaves. As this is a systems problem, action on all three is needed. We were troubled by the lack of levers to deal with gold plating and inefficiency in the companies. Existing commercial arrangements and risk distribution frequently incentivise over-engineering and excess complexity instead of delivering cost-effective outcomes.

One important lever the government has comes from its role in funding investment, underwriting risk, and contracting with business. In all of these areas, it should consider moving away from cost-plus contracting and other structures that create incentives to drive up cost. This will not happen overnight but it is surprising that so little consideration is given to commercial incentives in spending taxpayer money. Our recommendations on better use of incentive contracts and a single "super duty holder" in the MOD were set out privately to the Secretary of State for Defence.

In addition, we wanted the government to ask the key companies in the industry and supply chain to set out how they were going to drive behaviour change and cost reduction within their businesses so as to have a bigger coordinated effect across the entire sector.

This was the genesis of asking the Chancellor to write to regulators and operators on gold-plating, risk appetite, culture and contracts, with six months to reply. Rachel Reeves sent that letter in March 2026.

Recommendation 47: Implementation

We were acutely aware of the risk that a review of this kind is not implemented. We took several measures to address this risk, particularly around the engagement with many parties prior to publication to ensure that implementation was feasible.

We did not consider that sufficient. Several months before publication, we suggested that an implementation group be established before publication. This would have (a) provided continuity; (b) enabled implementation at pace; and (c) sent a clear signal about commitment to implementation.

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Our model for this was Sir Charles Haddon-Cave's 2009 Review into the Nimrod accident. This found over-complex safety cases, weak regulation, a poor culture and under-investment. He established an implementation group before his report was finalised and his implementation team succeeded. Sadly its lessons were not transferred to the nuclear sector.

We thought an independent Nuclear Regulatory Implementation Panel could perform an additional useful function, namely to oversee any adjustment to the recommendations. In paragraph 580, we stated "We acknowledge that when reviewing the recommendations in detail and in considering implementation, the government will conclude that some recommended outcomes could be better achieved by alternative means, or that delivery timescales must necessarily be adjusted. We therefore recommend that Taskforce members remain engaged as part of the Implementation Panel to review progress and support delivery".

We also suggested that it report to the Prime Minister as well as the Energy and Defence Secretaries. It was to produce a plan within three months and review progress every six months. We warned that the enthusiasm that greets publication may not turn into persistent motivation and momentum. This was all designed to address the concern that we summarised in the covering letter to the Prime Minister where I wrote "You will be told you need time to consider, consult and dilute. I encourage you to resist."

The Response to the Recommendations and progress on implementation

The report was well received on publication on 24 November. The media fastened on one example, the fish protection measures at Hinkley Point C.

On 26 November, the Chancellor welcomed the report in her Budget speech. She called it "an ambitious plan to cut the red tape that has tied our nuclear industry in knots for decades" and promised that "within three months we will set out our plan for delivering his recommendations." The government said it accepted the principle of all the recommendations.

A week after publication, on 1 December, the Prime Minister gave a speech on growth in London. He confirmed the government was "accepting the Fingleton recommendations" and asked the Business Secretary "to apply these lessons across the entire industrial strategy." The government response to the report came on 13 March 2026, a little over three months later. It committed to progressing all 47 recommendations.

- 21 were adopted essentially as set out.
- Two were rejected on substantive grounds.
- Eleven were substituted with alternative approaches.
- 11 were reduced in scope or deferred.
- On two specific points, ministers indicated an intention to go beyond our proposals.

Looking across these adjustments, two themes emerge. First, firm statutory deadlines or automatic approvals were generally stripped out. Second, changes in primary legislation were replaced with non-binding regulatory guidance.

What has gone well

It is clear that there has been progress. Regulators have done the most. Government departments appear to lag them. It is very difficult to assess progress within industry but reports suggest that the response is patchy and not as consistent as one would like. Examples of progress include:

- The announcement of legislation in the King's Speech in May.
- The establishment of the Nuclear Regulatory Implementation Panel in June.
- The ONR has published a new strategy, ONR Together, which commits to "proportionate, enabling regulation". It has set up a Lead (now termed Single) Nuclear Regulator Group and an Industry CEO Forum, revised its safety-case guidance, published new guidance on using relevant good practice

in regulatory judgement, and started a process review. It backs the Commission and charging reform. Its Chair and CEO have driven stronger industry responses to the report. Its programme to reduce the number and the size of Technical Assessment Guides has reduced guidance on safety cases from two documents to one with a 60% reduction in word count. The ONR has also spoken publicly about the challenge of culture change.

- The EA has set up a Nuclear Transformation Programme and put all its nuclear work under one leadership.
- The ONR, the EA and Natural Resources Wales say they aim to cut reactor design approval from 3–4 years to about 2.
- Some nuclear sites are reclassifying structures and buildings so they do not need full seismic qualification. This should bring significant time and cost savings.
- The ONR and the Defence Nuclear Safety Regulator are aligning guidance and procedures ahead of their merger.
- Digital safety cases are being actively used in new projects.
- Rolls-Royce has redesigned the structure and content of its safety cases to simplify the claims and be proportionate in the evidence required, which should reduce the size and complexity of the next-generation reactor plant nuclear safety case.
- BAE Systems is working with Natural England to address requirements in a way that protects the necessary environmental outcomes while mitigating schedule risk to the build programmes.
- Babcock is using the reactor plant's inherent safety in conjunction with proportionate physical upgrades to the 15 Dock facility to enable docking around 3–5 months earlier than would previously have been the case.
- AWE has proposed a revised approach to facility categorisation which will enable some activities currently operated under a nuclear licensing regime to be more appropriately managed under the radiological regime. This will reduce costs in the order of hundreds of millions of pounds for capital projects, and tens of millions of pounds a year in through-life costs for operations and decommissioning.
- The Defence Nuclear Establishment is looking at how AI can be used with pilots being explored in the area of digital safety cases.

There has been much international interest in the report, with the UK seen as leading on regulatory reform in this space. Some other countries are undertaking similar reviews. This is particularly important for innovation and new technologies such as maritime (propulsion and floating power generation) nuclear.

This progress (and there will be more examples) is great but not enough. There remain substantial areas of concern where progress is slow or limited or where recommendations risk being ignored.

Areas of concern

First, there are reports that the Commission will be an advisory body only. Not only is that contrary to our recommendation, it may actually make things worse. We do not need more process and must resist the desire seen in UK regulation to think more process is the answer.

Second, the Government should avoid general dilution and delay of important environmental recommendations. In relation to Recommendation 12, the government stated: "We agree that developers of nuclear projects should have an alternative way to comply with the Habitats Regulations."

- It changed that for civil nuclear, saying it would use Environmental Delivery Plans under the Nature Restoration Fund. It says a developer can then make "a single payment that discharges relevant obligations, as envisaged by the Taskforce". This appears to be behind schedule.

- For defence, it supported a stronger, bespoke "alternative pathway for Habitats Regulations Compliance". More detailed plans were promised "in the Summer". Not only is this behind schedule, but there

are reports that DEFRA does not wish to implement it. If this is true, it is a good example of why implementation needs strong leadership from No 10, especially as it risks delaying the nuclear deterrent.

Third, the most serious concern relates to the process of implementation. Recommendation 11 is now proposed through guidance, Recommendation 19 on national landscapes is being resisted by Defra, and Recommendation 28 is being undermined by DESNZ planning decisions. Variations were anticipated by para 580 but the process for addressing them was not what we recommended.

The Nuclear Regulatory Implementation Panel was not appointed until the end of June, over six months after our report was published. This meant that there was no independent oversight over the government response in March. The Taskforce members were not consulted.

DESNZ could have published the membership, the terms of reference, milestones, decisions, and six-monthly progress assessments, but has not done so. The only public indication was that the ONR announced it was attending the first meeting on 30 June. Lord Vallance referred to it in Parliament a few weeks later.

We called for an independent chair reporting to the Prime Minister. What we got is a panel chaired by DESNZ (one of the departments it oversees), described in its own terms of reference as advisory, and with members not published. Its terms of reference became public only through a freedom of information request.

There is scant public information on progress. The Nuclear Regulatory Implementation Panel has not reported. The Centre for British Progress usefully published a tracker of the recommendations and it suggests that two are completed, 29 are on track and 16 are off track.

In effect, the government has chosen to mark its own homework, and to do so in private, the opposite of what the Taskforce recommended. So it is not just lack of progress, but lack of evidence on progress, that is at issue. It is possible that insufficient resources have been allocated to implementation, but again, we have little insight into this.
The lack of transparency is something that we should have anticipated and formulated into a recommendation. It makes it very difficult to hold the government to account on implementation if there is little publicly available information. I regret that we were not stronger and clearer on this.

Declining to implement a recommendation, or amending it, would not be a problem, especially if that is transparent and well reasoned so that it can be assessed. It means that delay can be observed. When the work is not visible, meaningful accountability becomes impossible. Implementation should adopt the openness, evidence, and external engagement used during the Review.

Finally, little is known about the industry response to the Chancellor's letter. It should be possible for the government to publish the bulk of the responses it received with its own independent scoring of whether it is sufficient. It is also not clear how far down the supply chain the Chancellor's letter has gone. We were clear that the problem was deeper than the top-line delivery bodies. Without clear public accountability, companies will not have the incentive, one might even say burning platform, to deliver the necessary change.
The fundamental issue with business comes down to incentives, contracts, risk allocation and a culture of risk aversion. The government should demonstrate publicly that it is acting on improving all of these.

Conclusion

The NRTF Review enjoyed unusually broad political support for its recommendations. Successful implementation is a simple test of the capacity of the system to deliver on what senior politicians have requested. The first year shows how difficult the state finds it to sustain reform after an initial political commitment. Why is that?

First, political leadership needs to be robust

and continuous. The Review pointed out that government departments have their own priorities and that coordinated action will only happen if the Prime Minister and No 10 maintain strong pressure on implementation.

The strong statement of the Prime Minister in December was very useful. The current Chancellor has also been clear. Prime Minister Burnham has not yet stated what he thinks. Neither the current nor previous Secretary of State for Energy Security and Net Zero has said publicly that they want to see implementation. This raises the concern that the top-down leadership has been lost or delayed, and this gives departments a reason to focus on other things. Strong and visible ownership by the Energy and Defence Secretaries would signal that implementation remains a government priority.

Second, the implementation approach adopted by DESNZ is deficient. DESNZ declined to set up the Nuclear Regulatory Implementation Panel ahead of the publication of the Review as we had suggested. It set it up later than agreed; and it did not appoint an independent chair. This combines with a complete lack of transparency which makes it difficult if not impossible to measure progress.

This approach runs directly contrary to the open, transparent and engaged approach adopted by the NRTF. It reduces accountability. It is impossible to tell if DESNZ is more behind with its own recommendations than other departments, and we should be able to observe this.

It risks alienating and confusing stakeholders. It weakens implementation. Companies might wish to write contracts based on the assumption that a particular recommendation will be implemented, but cannot do so. Third, there may be lessons around project management. If full and fast implementation is desired, then having a high level of continuity from the civil service team that does a review into implementation and putting appropriate resources into it is crucial.

The centre of government now appears to share much of our diagnosis.

In September, the Chancellor, John Healey, the First Secretary of State, Louise Haigh, and the Attorney General wrote to all ministers on "The Simplification and Agency of Government". They called consultation culture "an industry of dither and delay", said there is no general duty to consult, and told ministers they may act on a tenable legal argument even where the legal risk is high. That is close to what we proposed in paragraph 593 and in our side letter to the Prime Minister. It resonates because a year ago, some of our recommendations were attempted to be held back on legal advice, only for that to be overruled by more informed consideration.

Earlier this month, the Cabinet Secretary, Antonia Romeo, accepted the criticism that the civil service is "tame and risk-averse". She said these "behaviours are a function of the system", so "we need to change the system". She also said that trust is "earned primarily through consistent delivery". I agree with both.

The letter speaks to ministers and the Romeo speech to civil servants. Neither reaches the regulators or the industry. The deadlines and defaults removed in March have not been restored. And implementation of our report is neither independent nor transparent. Nuclear is therefore a good test of whether these words become action. If the state cannot deliver reforms that command such broad support, in a sector where delay costs billions, it is hard to see where it will.

There is still time to make a difference. The second year must be one in which institutional activity becomes a measurable change in cost, pace and outcome. Here are some suggestions:

1. Strong, clear and consistent pressure from the Prime Minister down to drive implementation and ensure all government departments are prioritising their areas and

putting outcomes over process.[3] Reiterating or even republishing the steer under Andy Burnham's name would assist;

2. Make the Nuclear Regulatory Implementation Panel independent, make its work and views fully transparent, and clarify accountability;

3. Provide more clarity on industry progress both to ensure consistency and encourage laggards, and apply pressure via public scoring of progress and aligning financial incentives and contracts with the public interest.

The prize is huge. The decommissioning bill is estimated to stand at £150bn to £250bn. UK energy prices are among the highest in the world. UK taxpayers invest over £30bn a year in civil and defence nuclear. Removing the excess costs and delay in the current system is worth the effort.

3. In this regard, the reported comments of Louise Haigh at the CBI conference on November 23 2026 that "We will deliver the Fingleton reforms as committed to. In full." are very welcome.

Annexe 1: Timeline

Date	Event
6 February	Written statement in Parliament stating that the Prime Minister commissions an independent taskforce on civil and defence nuclear regulation, due to report in "summer 2025"
11 February	John Fingleton was approached to undertake the Review.
10 April	The Review was launched.
23 April	Terms of reference and invitation to comment published.
9 May	Andrew Sherry, Mark Bassett, Sue Ion, Mustafa Latif-Aramesh were announced as members.
19 May	The call for evidence ended.
22 May	First meeting of the Members.
11 August	Interim report and further invitation to comment published.
8 September	Deadline for comments on Interim report.
24 November	Publication.

From April to September, we conducted site visits.

In August and September, we had workshops and meetings with people and organisations who made submissions. We timed these to ensure that responses to the Interim report could address our questions.

In October and November, we met with regulators and government departments to discuss draft recommendations and ensure they were capable of being implemented.