



Giving EIA and ESPOO a Meaning

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Presentation structure

General remarks

- Nuclear projects specifics
 - New NPP
 - PLEX
- Points of the *Background paper* which we consider key for introducing into the ESPOO Convention

General remarks

- **DANGER:** Public + NGO tired of participation without real influence (EIA, Espoo, stakeholder involvement, online consultation by EU Commission on policy)
- EIA/ESPOO needs to be conducted **in time** before a decision is taken and with the real intent to decide on the best option among **all alternatives** – not only EIA on which reactor type, but whether nuclear is the best option for energy supply in a given situation
- EIA should form an integral part of development consent procedure for the project. EIA is concluded by binding decision concerning (at least) the environmental aspects of the project. In some countries, e.g. Czech Republic, even a **negative Final EIA Statement has no influence** on the project.
- **ESPOO Contact point:** NGO consider it inadequate, that their governments decide on whether to notify and involve their own public. E.g. Sweden the Swedish Environmental protection Agency sends out projects to a broad national review, including environmental NGOs.

New NPP

- Affected countries can be further away than for non-nuclear projects (Fukushima impact was measured e.g. Slovakia in sheep milk), so also countries **further away than neighbouring countries** need to be notified – up to them to decide whether they are potentially affected
- SEA before an NPP EIA is launched
- **Severe accidents** are of course to be taken into account during EIA/ESPOO, including mitigation and emergency measures
- After Fukushima we cannot accept probabilistic safety assessments, which exclude certain scenarios based on low probability, but deterministically all scenarios need to be answered



PLEX and power uprate

prolonging NPP operation beyond original life time - power uprate often done at the same time

MOST IMPORTANTLY: Needs to be treated as new-built NPP

- SEA: are there other options?
- Safety etc. needs to fulfill current standards
- Particular risk: Safety margins are reduced
- Is there a solution for nuclear waste?

We demand a clear formulation in the ESPOO Convention that PLEX and power uprate is subject to EIA/ESPOO

FoEE considers the following points of the *Background note* as key:

- 20: EIA without technical specifications does not make sense, e.g EIA Temelin units 34: no reactor type, range of power output between 2000 – 3400 MW
- 25+26: EIA needs to address severe accidents (having usually transboundary impacts)
- 33: after Fukushima accident this should be required, not only considered good practice (..power grid connections, seismic events, exceptional natural phenomena...)