

The Statement of the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus

The Ministry of Natural Resources and Environmental Protection of the Republic of Belarus being the body responsible for the fulfillment of the obligations accepted by Belarus under the Convention on Environmental Impact Assessment in a Transboundary Context states that the EIA procedure of the planned NPP construction on the Belarusian territory is being held pursuant to the requirements of the Convention.

While performing coordination procedures with the affected parties on the issue of the planned NPP construction on the Belarusian territory the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus strictly adheres to the provisions of the Convention, recommendations of the Secretariat of the Convention and the Implementation Committee under the Convention.

In accordance with the recommendations of the Secretariat of the Convention and in order to express openness and willingness to cooperate in the field of environmental protection, in July 2008 the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus prepared and circulated via diplomatic channels to all the bordering countries, including the Republic of Lithuania, a letter with the preliminary information on our country's intentions to construct a NPP with an aggregate electric capacity of 2000 MWatt, the first power-generating unit to be put into operation in 2016. The information on the possible location site had not been included.

Taking into account the intention of the Lithuanian Party to participate in the EIA procedure, the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus, in accordance with the provisions of Article 3 of the Convention, requested from the Ministry of Environment of the Republic of Lithuania information on the potentially affected Lithuanian territory which was necessary for the EIA procedure (letters № 14-16/1487-BH of March 24th, 2009 and № 14-16/2198-BH of May 6th, 2009).

The EIA report for the Belarusian NPP was drawn up fully in line with the requirements of the Convention to this document (Annex II of the Convention) and based on the national legislation.

Pursuant to the provisions of Articles 3 and 4 of the Convention the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus has forwarded the following documents: notification of Lithuanian public on the planned activities, and on the implementation of EIA procedures, including public participation and consultations; the preliminary EIA report for the Belarusian NPP – for public hearings (the report contains the analysis of the

three alternative sites for NPP construction). The above mentioned documents have been circulated both in Russian and English.

The selection of the safest site for the NPP construction was based on the research results, including studies carried out on the territory of Belarus before.

For a more careful examination the following sites have been chosen: Krasnopolianskaya and Kukshinovskaya in the Mogilev region, and Ostrovetskaya – in the Grodno region. The EIA report contains data on the three alternative sites.

After the required range of works and procedures have been completed, international experts (Ukraine, Russia, IAEA) were invited to evaluate the results. Taking into account their recommendations, the Ostrovets site was acknowledged a priority. The main criterion for the choice of the Ostrovets site was safety of the NPP planned for construction.

At the Lithuanian Party's request the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus has additionally submitted (letter № 13-16/333-ВН of January 26th, 2010) in the Lithuanian language the summary of the EIA report, information on the possible transboundary impact and the answers to the comments of the Republic of Lithuania concerning the EIA report sent before.

On the basis of the preliminary written agreements reached with the Ministry of Environment of the Republic of Lithuania on the procedure for organizing and conducting public hearings on the Lithuanian territory, and at the invitation of the Lithuanian Party (letter from the Ministry of Environment of the Republic of Lithuania № (10-3)-D8-1443 of February 10th, 2010) Belarusian experts took part in the public hearings organized by the Lithuanian Party in Vilnius on March 2nd, 2010. Following the results of the hearings the official representatives of the Lithuanian Party and other participants of the event signed the Minutes of the event. This fact also demonstrates adherence of Belarus to the procedure set in paragraph 8 of Article 3 and paragraph 2 of Article 4 of the Convention.

It should be noted that the above mentioned Minutes were not been officially sent to the Belarusian Party.

The Ministry of Environment of the Republic of Lithuania has with its letter № (10-3)-D8-4486 of May, 7th 2010 notified Belarus of its official position and the intention to participate in the consultations.

The main argument of the Lithuanian Party against the NPP construction on the Ostrovets site is its close location to the capital of the Republic of Lithuania – Vilnius.

During the hearings in Vilnius and in the answers to the questions addressed to the Belarusian Party we informed the Lithuanian public that the selection of the above mentioned site is based on the engineering survey and research involving several alternative sites. The Ostrovets site has no limiting

factors in contrast to the others. All the materials relating to the selection of a site for the Belarusian NPP have been analyzed by the IAEA expert mission, which evaluated them positively.

By its letter of June 14th, 2010 № 13-16/2799-BH the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus forwarded to the Lithuanian Party answers to the comments on the EIA report, which emerged in the result of public discussions.

In line with the provisions of Article 5 of the Convention and at the suggestion of the Lithuanian Party (letters of the Ministry of Environment of the Republic of Lithuania № (10-3)-D8-4486 of May 7th, 2010 and № (10-3)-D8-4899 of May 18th, 2010) the bilateral Belarusian-Lithuanian consultations concerning the EIA report for the Belarusian NPP were held in Minsk on June 18th, 2010. The Lithuanian delegation was composed of 18 people, representing 6 national authorities, responsible for regulatory, supervisory activities in the area of nuclear energy, as well as representatives of Lithuania's MFA and a Sejm deputy.

During the multihour consultations the Belarusian experts had been giving detailed answers to all the EIA-related questions brought up by the Lithuanian Party, including those, contained in the letter of the Ministry of Environment of the Republic of Lithuania of May 7th, 2010.

We once again underline, that according to the materials and conclusions of the EIA for the Belarusian NPP there is no significant adverse impact on the territory of Lithuania in the result of the construction and operation of the NPP. The Lithuanian Party has neither in letters nor during consultations provided any prove of possible adverse impact of the Belarusian NPP on the Lithuanian territory.

Based on the results of the consultations the Belarusian Party prepared and signed the Minutes, which were forwarded to the Lithuanian Party (letter № 13-16/4464-BH of September 9th, 2010). Thus the Republic of Belarus has followed the requirements of Article 5 of the Convention.

The final EIA report, completed and updated in consideration of the comments and proposals from the Lithuanian Party and other affected parties, has undergone the procedure of State Ecological Expertise of the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus (expert report № 28 of July 13th, 2010) and was submitted to the Lithuanian Party on February 17th, 2011.

In spite of the fact, that the Belarusian Party has conducted the EIA procedures for the Belarusian NPP under the Convention, the Lithuanian Party claims that the Republic of Belarus does not comply with the international norms.

At present the final decision is being prepared in accordance with Article 6 of the Convention and the national legislation of the Republic of Belarus.

During the activities carried out by the Republic of Belarus in the framework of the EIA compliance procedures, some affected parties expressed their interest to participate in the procedure of the post-project analysis. This procedure is provided for in Article 7 and Annex V to the Convention. The Republic of Belarus is also interested in this procedure and will start its practical implementation at the stage of elaborating the NPP project documentation.

Answers to the comments of the Lithuanian Party concerning the final EIA report for the Belarusian NPP (annex to the letter of the Ministry of Environment of the Republic of Lithuania of March 18th, 2011 № (10-3)-D8-2613) will be forwarded later.

As far as the issue of compliance with the provisions of the Convention is concerned, it is necessary to underline, that the Lithuanian Party has decided to construct Visaginsky NPP at the distance of 2,3 km from the state border of the Republic of Belarus in spite of repeated objections of the Belarusian Party expressed both in letters to the Lithuanian contact authority under the Espoo Convention and during bilateral meetings.

Till present the Republic of Belarus has not received answers and explanations on the following issues, concerning the planned construction of dangerous nuclear facilities on the Ignalina NPP site:

- Justification for the Visaginsky NPP location in such proximity of the state border that part of Belarusian territory is affected by the sanitary protection zone of the enterprise, in which economic activities are limited;

- Significant changes in temperature regime of lake Drisviaty (Drukshai), which is the cooling water-reservoir for the Ignalina NPP, have not been taken into consideration. These changes have led to alterations in the ichthyofauna in the lake on the whole, including the part of it, situated on the territory of Belarus. The data should be considered in comparison with the background index in the water body before the Ignalina NPP had been put into operation, and not of the time when the EIA of the Visaginsky NPP was carried out.

This water body accumulates contamination not only in water, but also in vegetation, fish and, to the most extent, – in bottom sediments, which can later on become a source of secondary pollution of the environment. As this natural object is common for Belarus and Lithuania, it is necessary to evaluate the lake system contamination dynamics in order to undertake preventive measures to eliminate technogenic burden on the lake;

- Elaboration of the suggestions to conduct a post-project analysis in accordance with Article 7 of the Convention. Till present the Belarusian Party has not received for consideration any monitoring program for any of the facilities planned for construction or being constructed on the Ignalina NPP site;

- No information has been submitted to the Belarusian Party on the aggregate impact on the Belarusian environment (including specially protected

natural territories – National park “Braslav lakes”) of all the facilities listed below and connected with decommissioning of the Ignalina NPP, and the planned construction of the Visaginsky NPP on the same site:

1. Solid waste management and storage complex, which includes complexes for the treatment and storage of liquid and solid long- and short-lived radioactive waste;

2. New interim storage facilities for spent nuclear fuel;

3. Landfill facility for short-lived very low level waste;

4. Near-surface repository for low- and intermediate-level radioactive waste;

5. Storage of bitumen-impregnated radioactive waste, which is planned to be turned into a repository;

6. Installation for the transformation of liquid nuclear waste into solid nuclear waste;

7. Dry storage facility for the spent nuclear fuel;

8. Decommissioning of two Ignalina NPP units;

9. Planned construction of the new Visaginsky NPP with the estimated aggregate capacity of 3400 MWatt.

As it was noted in the EIA report for the Solid waste management and storage complex, accidents at the facilities of the Complex can have the most severe consequences. Unfortunately, Lithuanian engineering companies have not evaluated the mutual impact of the accidents on the facilities, situated in the proximity of the Solid waste management and storage complex including the impact of the Complex on the New interim storage facilities for spent nuclear fuel and vice versa. Possibly, the results of such evaluation may show insecurity of these facilities' disposition in the immediate proximity of each other.

Taking into account the fact that construction works have been started on a number of the above mentioned radiation-dangerous objects without having settled the issues raised by the Republic of Belarus, we call on the Lithuanian Party to comply with the commitments under the Convention on the above listed unresolved issues, and ask that reasoned answers and explanations are given to us in the near future.