

Working Group on Environmental Impact Assessment and Strategic Environmental Assessment (Espoo Convention), 10th meeting, 1 December 2021

General statement by Christiana Mauro on behalf of Nuclear Transparency Watch concerning the Espoo Work Plan for the identification of synergies and possible cooperation activities in marine regions

### **Promoting the practical application of the Convention and Protocol beyond the UNECE region**

In response to the Working Group's commitments we welcome the initiative to reinforce the legal framework for protection of the marine environment from pollution. The importance of transparency in the consultation process and in the application of regional agreements in the achievement of this aim will benefit all parties.

We endorse in particular the initiation of collaboration with the Secretariat of the London Convention and the London Protocol, and encourage their inclusion in the scope of the framework of the Work Plan. According to the Convention and its Protocol all Parties must take effective measures to prevent pollution of the marine environment caused by dumping at sea.

The London Convention (London Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter) is one of the first international agreements promoting the effective control of all sources of marine pollution, and has been in force since 1975 with 87 Parties;<sup>1</sup> 2022 will mark the 50<sup>th</sup> anniversary of this Convention. The London Protocol, with 53 Parties, was designed to modernize the Convention and entered into force in 2006.<sup>2</sup>

### **Limitations to the London Convention and London Protocol's effective application**

Despite widespread criticism and continued efforts to convince Japan to consider better, and viable, alternatives<sup>3</sup>, the Japanese government is planning for the discharge into the Pacific Ocean of radioactive contaminated water from the Fukushima Daiichi Nuclear Power Plant, and construction of a subsea bed pipeline for this purpose is expected to begin early in 2022. Greenpeace and others have argued that international consultations have been insufficient and that the consequences of this plan would be "long-lasting and irreversible".<sup>4</sup>

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<sup>1</sup> [www.imo.org/en/OurWork/Environment/Pages/London-Convention-Protocol.aspx](http://www.imo.org/en/OurWork/Environment/Pages/London-Convention-Protocol.aspx)

<sup>2</sup> [www.cdn.imo.org/localresources/en/OurWork/Environment/Documents/PROTOCOLAmended2006.pdf](http://www.cdn.imo.org/localresources/en/OurWork/Environment/Documents/PROTOCOLAmended2006.pdf)

<sup>3</sup> Greenpeace Germany, "Stemming the tide 2020: The reality of the Fukushima radioactive water crisis", October 2020, see [https://www.greenpeace.org/static/planet4-japan-stateless/2020/10/5e303093-greenpeace\\_stemmingthetide2020\\_fukushima\\_radioactive\\_water\\_crisis\\_en\\_final.pdf](https://www.greenpeace.org/static/planet4-japan-stateless/2020/10/5e303093-greenpeace_stemmingthetide2020_fukushima_radioactive_water_crisis_en_final.pdf)

<sup>4</sup> Greenpeace International, Matters Related to the Management of Radioactive Wastes: Concerns regarding plans for further treatment and disposal of liquid radioactive wastes (contaminated water) from the Fukushima Daiichi Nuclear Power Plant, Japan, and proposal for an expert technical workshop to explore alternatives to discharge, 20 August, 2021, Para 3, [www.greenpeace.org/static/planet4-japan-stateless/2021/10/fde7468c-lc-43\\_11.pdf](http://www.greenpeace.org/static/planet4-japan-stateless/2021/10/fde7468c-lc-43_11.pdf)

In October, 2021, at the 43<sup>rd</sup> Consultative Meeting of Contracting Parties to the London Convention and 16<sup>th</sup> Meeting of Contracting Parties to the London Protocol, hosted by the UN's International Maritime Organization, Greenpeace proposed the establishment of an expert working group to explore alternatives to Japan's nuclear waste management plan.<sup>5</sup> While many states supported the proposal to review solutions less damaging to the marine environment, Japan, the US and the UK blocked the proposed technical expert working group review.<sup>6</sup>

Addressing the problem of pollution and loss of biodiversity in the oceans has become an important environmental challenge; there is still a general lack of transparency and accountability in decision-making steps that lead to marine pollution, biodiversity loss and permanent damage to marine environments. Increased cooperation between Espoo and marine regions conventions may be an important step in developing the strengths and addressing the weaknesses of regional legal instruments.

While guidance from impact assessment communities could help to integrate best-available-technology approaches into decision-making, the international community will need to step up actions to combat the disproportionate affects stemming from economic considerations of a handful of actors determining the future health of international marine ecosystems.

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<sup>5</sup> *Ibid*; for further information, contact Shaun Burnie, Senior Nuclear Specialist with Greenpeace East Asia at [sburnie@greenpeace.org](mailto:sburnie@greenpeace.org) or Dr David Santillo at [dsantillo@greenpeace.org](mailto:dsantillo@greenpeace.org)

<sup>6</sup> Greenpeace International, IMO Convention Greenpeace press release, "Japan blocks proposal for international scientific assessment of alternatives to Pacific Ocean discharge of Fukushima radioactive water", 11 November, 2021, see [www.greenpeace.org/japan/nature/press-release/2021/11/02/53596](http://www.greenpeace.org/japan/nature/press-release/2021/11/02/53596)