

Concerning Decision IX/4i on compliance by Czechia  
Greenpeace, Jan Haverkamp

1. We want to notice once more that the Guidance on the Applicability of the Convention to the Lifetime Extension of Nuclear Power Plants cannot be “used in a retroactive way”. This Guidance does not consist of new rules, but a clarification of existing rules and was developed by this esteemed body to help the IC implement the Convention. That is exactly how the IC has used the Guidance.
2. We support the findings from the Implementation Committee that the Czech Republic has prolonged the operation of D1-4 in non-compliance with the Convention and its argumentation.
3. Although we are not happy with the fact that there are no direct consequences for the current operation of D1-4, we note that between 2025 and 2027 the next Periodic Safety Review has to take place. This will need public participation on environmental issues under the Aarhus Convention. Our advice is to do that in the form of an EIA under Espoo, so that the situation that D1-4 currently operates without a relevant EIA is remedied – and so that constructive input is provided to be taken into account in decisions if and under which conditions further operation can take place.