

Item 7 (c) Agenda of the 8th session of the Meeting of the Parties, July 4, 2024

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Ecoforum would like to highlight one additional priority for the agenda of the next MOP: this is the topic of **nuclear safety and security in conflict zones**.

While the public enjoys the right to consent to nuclear power plant construction and modification under Art 6(1)(a), the reality is that the majority of existing plants in the world are so old that they have never even undergone an initial environmental impact assessment (EIA).

Many of the Parties – including France and Ukraine, most of whose facilities never underwent EIAs – deny that the extended operation of an infrastructure designed to operate for a maximum of 30 years necessitates public participation or EIAs<sup>1</sup>. And the few facilities around the globe that have undergone EIAs were not assessed for impacts of war.

We wish to stress that “nowhere in the world is the threat of an attack by invading military forces against a nuclear power reactor included in the design basis against which a plant must defend to be licensed for operation”<sup>2</sup>. The operation of nuclear power stations under these conditions poses a threat that is serious, specific and immanent.<sup>3</sup>

Since nuclear power plants were not constructed to withstand acts of major shelling or bombing the populations and environments in their area are extremely vulnerable.

We would also like to bring your kind attention to a report published on 2 July by the Bellona Environmental Foundation which examines Russia's preparations for the restart of the Zaporizhzhia Nuclear Power Plant and its associated risks.<sup>4</sup>

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<sup>1</sup> When the Ukrainian NGO Ecoclub launched the Rive NPP reactor case with the Espoo Implementation Committee in 2011 a final decision had already been taken

[www.unece.org/DAM/env/documents/2019/ece/IC/Ukraine\\_S1/42\\_ece.mp.eia.ic.2018.4e\\_Advance\\_copy.pdf](http://www.unece.org/DAM/env/documents/2019/ece/IC/Ukraine_S1/42_ece.mp.eia.ic.2018.4e_Advance_copy.pdf)

<sup>2</sup> [www.carnegieendowment.org/2022/04/27/civil-nuclear-energy-risks-from-russia-s-invasion-of-ukraine-pub-87064](http://www.carnegieendowment.org/2022/04/27/civil-nuclear-energy-risks-from-russia-s-invasion-of-ukraine-pub-87064)

<sup>3</sup> An impact resilience framework adapted to 21st c threats, Working Group on EIA and SEA, 12th meeting, 15 June, 2023, [www.unece.org/environment/documents/2023/07/presentations/item-9-nuclear-transparency-watch-npp-risk-assessments](http://www.unece.org/environment/documents/2023/07/presentations/item-9-nuclear-transparency-watch-npp-risk-assessments)

<sup>4</sup> [www.bellona.org/publication/the-potential-restart-of-the-zaporizhzhia-nuclear-power-plant-analysis-of-technical-and-political-aspects](http://www.bellona.org/publication/the-potential-restart-of-the-zaporizhzhia-nuclear-power-plant-analysis-of-technical-and-political-aspects)