



LIETUVOS RESPUBLIKOS APLINKOS MINISTERIJA
THE MINISTRY OF ENVIRONMENT OF THE REPUBLIC OF LITHUANIA

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Implementation Committee
Convention on Environmental Impact
Assessment in a Transboundary Context
Office S.319, Palais des Nations, CH - 1211
Geneva 10
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Dear Implementation Committee Members,

Lithuania highly supports the work done by the Implementation Committee and appreciates the efforts and time spent analysing the documents and information related to the Ostrovets nuclear power plant (hereinafter – Ostrovets NPP) case under consideration by the Implementation Committee of the Espoo Convention since 2011.

We fully support the Committee's determination to engage external expertise to obtain opinion and responses to the Committee's questions with regard to the transboundary environmental impact assessment (hereinafter – EIA), safety issues and especially the site evaluation and selection for the Belarus NPP. We highly value the central role of the International Atomic Energy Agency (hereinafter – IAEA) in setting international standards of nuclear safety and security and consider its input with regard to the international legal framework related to the development of nuclear energy projects in further analysis of the Ostrovets NPP case as very important.

However, it is important to note that since the IAEA was not provided with all the information the Implementation Committee has received from Lithuania and Belarus with regard to the Ostrovets NPP since 2011, the answers to the mentioned questions cannot be comprehensive. Moreover, it should be stressed that within the framework of the United Nations, it is the Espoo Convention and its bodies that have the competence and mandate to assess the substance and procedure of the transboundary EIA and it is the Implementation Committee that has detailed information regarding the Ostrovets NPP case.

We would like to reiterate Lithuanian viewpoint that the most effective way to get comprehensive assessment of how relevant international standards were applied in the development of the Ostrovets NPP project is **to establish an international expert body** as it was proposed in draft decision VII/2. Lithuania guarantees its organisational and financial contribution for this purpose.

It is of utmost importance to carry out transparent, objective and comprehensive analysis of the information and documents related to the Ostrovets NPP project provided to the Committee by Lithuania and Belarus in line with the spirit and letter of the Espoo Convention in order to ensure

that no compromises are made at the expense of environmental protection, human health and nuclear safety.

Lithuania appreciates the Committee's opinion that the site selection remained the key issue and the IAEA SEED mission did not fully answer the question on the matter. Lithuania supports the Committee's questions in relation to the follow-up by Belarus with decision VI/2 regarding the Ostrovets NPP (EIA/IC/S/4) presented in the Annex I of the Report of the Implementation Committee on its fortieth session. The questions raised by the Committee regarding the site, evaluation of population density in assessing radiological impacts of major accidents and in preparation of emergency measures, assessment of radiological impacts on rivers and ground waters in case of major accidents, radioactive waste and spent fuel management are of utmost importance in order to ensure that significant adverse transboundary impacts on the environment, including human health and safety, have to be properly assessed and taken into account in the decision making procedure.

However, with regard to question No. 4, we would like to note that the IAEA SEED mission that was carried out in Belarus in January 2017, was incomplete and did not cover modules 2 and 3 that deal with geological, seismological and other aspects, in particular, population density, possibility to implement emergency response measures that are related to site selection and evaluation. For comprehensive assessment of the scope of the IAEA SEED mission, please, refer to the letter of the Lithuanian Ministry of Environment of 31 August 2017, No. (10-3)-D8-5952.

In our opinion, the review of compliance of the Ostrovets site selection documentation with international rules, requirements and recommendations should cover collection and analysis of data, analysis of impacts, mitigation of impacts and environmental monitoring programmes. Also, it is important to evaluate, if international requirements regarding site selection, assessment and exclusion criteria (for example, **effects of external events occurring in the region of the particular site (natural or human induced), seismic hazard assessment (deterministic and probabilistic assessment), population density and possibility to implement emergency response measures**) were applied in the selection of the Ostrovets site and other sites, which were also examined. Therefore, we kindly advice to **distinctly mention these factors** as they are of significant relevance in site selection process in order to ensure that the selected site would not cause unacceptable risks to population and environment throughout the lifetime of the NPP.

We hope that suggested clarifications would be useful for further analysis of the Ostrovets NPP case. Also, we would like to reiterate our readiness to continue the close cooperation with the bodies of the Espoo Convention.

Yours sincerely,

Vice-Minister
Martynas Norbutas

