



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

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Ministry of Natural Resources and Environmental
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**REGARDING LITHUANIAN POSITION ON ENVIRONMENTAL IMPACT ASSESSMENT
DOCUMENTATION FOR THE CONSTRUCTION OF THE NUCLEAR POWER PLANT IN
THE REPUBLIC OF BELARUS**

Dear Mr. Vitalij Kulik,

In response to your letter of 22 April 2011 No. 13-15/2180-BH providing to us answers to the comments raised by Lithuanian authorities and the Institute of Physics of Centre for Physical Sciences and Technology regarding the environmental impact assessment report for the Belarusian NPP document, we are sending Lithuanian position and questions regarding the submitted document.

To begin with, we would like to inform you that Lithuania having concerns about the compliance of the Republic of Belarus with its obligations under the Convention with respect to the construction of the nuclear power plant in the territory of Belarus has made an official submission to the Espoo Convention Secretariat and the Implementation Committee and requested: 1) to call Belarusian side fully comply with the requirements of Espoo Convention and restart EIA process (properly prepare EIA report, organise proper public hearings and consultations); 2) to invite Belarusian side to suspend all construction process until EIA process is fully finished and 3) to revise the decisions regarding site selection for Belarusian NPP, as Astravets site is only 50 kilometres from the centre of Lithuanian capital city Vilnius and such factor has to be regarded as insurmountable difficulty for the implementation of the emergency planning measures. We hope that investigation of this case not only will solve our disputes, but also will promote the proper implementation of the Convention in the future.

Lithuania had to take such step as the Republic of Belarus hasn't showed any attempts to consider our position and fulfil our repeatedly expressed requests regarding proper application of Espoo Convention requirements for this project.

Having analysed the submitted information, we would like to note that the provided answers haven't convinced us to reconsider our position. As Lithuania is to be the most affected party in

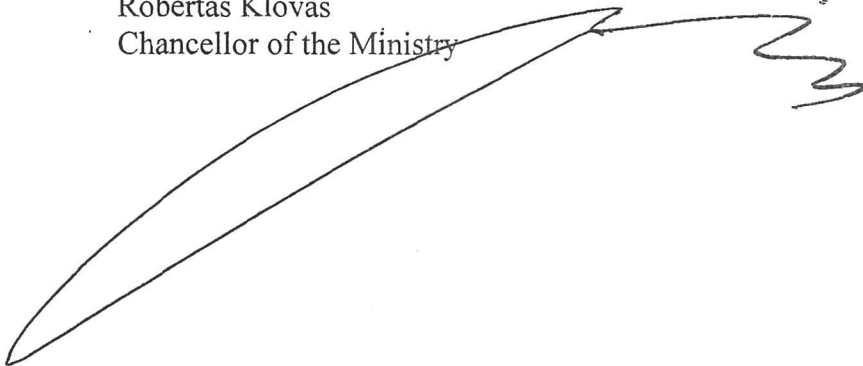
the project of Belarusian NPP our objection to the construction of nuclear power plant in Astravec site should be respected.

Moreover, we are of the opinion that the site selection, which is one the crucial tasks of EIA, hasn't been done properly, as we still haven't received clear information on criteria and the results of research works, which determined the prioritization of the Astravec site. The answers and EIA report fails to provide equal and thorough assessment of the alternatives. It should be noted that the assessment of radiological impact during normal operation and in the case of accidents is one of the most important criterion for site selection. The question how the radiological impact on the population of Lithuania during normal operation was assessed remains unanswered. The conclusions regarding absence of impact on the ecosystem and hydrological regime of the river Neris by the exploitation of NPP in Astravec site are not grounded. Not all the presumptions made for design base and severe accidents are reasoned. Issues related to the long-term safety, such as NPP decommissioning and its financing, radioactive waste and spent nuclear fuel management and final disposal are still not properly covered. A lot of other issues such as early warning of other states and communication in the case of accidents as well as the exchange of radiological monitoring data should be settled before proceeding with the project implementation.

Please find enclosed comments of Lithuanian authorities and the Institute of Physics.

Yours sincerely,

Robertas Klovas
Chancellor of the Ministry

A large, stylized handwritten signature in black ink, starting with a long, sweeping curve from the left and ending with a jagged, wavy tail on the right.

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