



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

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Dear Mr. Zaharia, Chair of Implementation Committee to the Espoo Convention,

I am writing you this letter in order to express appreciation for the work done by the bodies of the UNECE Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), especially the Implementation Committee, in promoting practical implementation and improving application of the requirements of the Espoo Convention. The Committee has played an important role in drawing the attention of the international community to the nuclear and environmental safety problems that accompany the Belarus nuclear power plant project in Ostrovets.

In 2014, sixth Meeting of Parties of the Espoo Convention (MOP6) stated that Belarus was developing the Ostrovets NPP project in non-compliance with the Espoo Convention and recommended to take certain steps in order to comply with the Convention. Lithuania expected that these recommendations would be a strong impulse for Belarus to review the development of the Ostrovets NPP project; however, Belarus ignores the recommendations, only nominally fulfils the procedural requirements and pays no attention to the substance of actions and documents. MOP6 on 2-5 June 2014, recommended Belarus to invite the International Atomic Energy Agency's (IAEA) Site and External Events Design (SEED) mission for the evaluation of the site selection criteria; however, the SEED mission hosted by Belarus in January 2017 was not tasked to assess site related issues. Lithuania reiterates its position that the transboundary environmental impact assessment (EIA) for the Ostrovets NPP is still pending, as Lithuanian questions related to the Ostrovets NPP nuclear and environmental safety have not been answered and the procedural steps in line with the Espoo Convention have not been fulfilled.

Lithuania fully supports the proposal of the Committee of the Espoo Convention to Lithuania and Belarus to co-establish an expert body modelled after the *Inquiry Commission* set in Appendix IV of the Espoo Convention that would support the analysis of the transboundary EIA procedures and substance of the Ostrovets NPP project in order to assess Belarus compliance with the Espoo Convention.

Lithuania has, on a number of occasions, drawn the attention of the Committee to several issues of great concern, relating to the implementation of the Ostrovets NPP project: Belarus *de facto* selected the site for the construction of the NPP in Ostrovets district before the commencement of the transboundary EIA; Belarus has assessed the population density around the Ostrovets NPP only in the territory of Belarus, but no assessment of population density in Lithuania was made; Belarus did not take into account that distance from Vilnius to the Ostrovets NPP is only 40 km; no assessment of radiological impacts on Lithuanian public and transboundary waters in case of a major accident and

other environmental risks was made; there is a deficit of transparency and a lack of willingness from Belarus to cooperate in implementing the Espoo Convention.

Lithuania is also greatly concerned about the recurrent incidents at the construction site. Only in 2016, there were at least six incidents and two of them included the reactor vessel – one of the most important safety components of a NPP. It is even more worrisome that the information about the incidents came through the media, but not from the Belarus authorities. The most serious incident occurred on 10 July 2016, when the 330-ton reactor vessel fell down from the height of 4 meters. As the damage done to the reactor vessel could lead to the deterioration of its characteristics, Lithuania demanded that Belarus replace the reactor vessel. On 26 December 2016, the replacement reactor vessel, intended for the first unit of the Ostrovets NPP, was also damaged: on the way from Russia to Belarus, it hit the pole of the railway power supply line. Lithuania requested Belarus to investigate thoroughly all the incidents and to inform Lithuania and the relevant international organisations about the findings and conclusions; however, information on the investigations had not been received. The recurrent incidents at the Ostrovets NPP demonstrate serious deficiencies in the construction process and systematic problems of safety culture. Furthermore, the incidents indicate the insufficient capabilities of the operating organization and the regulatory authority to control the safety of the process and to ensure that the Ostrovets NPP is constructed in accordance with the approved design documentation and international standards.

Lithuania repeatedly demands Belarus: 1) to co-establish an international commission of experts, as proposed by the Committee of the Espoo Convention for an in-depth analysis of the Ostrovets NPP case; 2) to accomplish the International Atomic Energy Agency's (IAEA) Site and External Events Design Review Service (SEED) immediately in its full scope, with a view to evaluate the site selection criteria and studies for the NPP, as well as its development and operation, as it was recommended by the MOP6; and 3) to undertake a comprehensive risk and safety assessment (stress tests), as it was agreed between Belarus and the European Commission on 23<sup>rd</sup> June 2011, with participation of the European Union and Lithuanian experts.

Since Belarus has made no progress in implementing the recommendations of MOP6, Lithuania asks the Committee to consider the suspension of the construction works of the Ostrovets NPP. International experts should be engaged for the project review, with special attention to be paid to site research and selection issues and transboundary EIA process in line with the international standards.

I would like to renew my full support to the work done by the Committee in order to enhance the implementation of the Espoo Convention and especially for the consideration of the Ostrovets NPP case. Lithuania confirms its readiness to continue the close cooperation with the bodies of the Espoo Convention. This information was shared with other Committee members.

Yours sincerely,



Vice-Minister  
Martynas Norbutas