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Vice-Chair of the Implementation
Committee under the Convention on
Environmental Impact Assessment in
a Transboundary Context

Ms. Maria do Carmo Figueira

Dear Ms. Maria do Carmo Figueira,

Having thoroughly analyzed the Committee's request to Belarus of January 10, 2018 regarding site selection process for the Belarusian NPP, we would like to provide the following observations and clarifications.

The Espoo Convention does not obliges its Parties to describe locational alternatives for a proposed activity in all cases without exception, but only where it is appropriate. Moreover, the convention does not oblige to describe the site selection process. Nevertheless, the EIA report for the Belarusian NPP provides a summary of the site selection process and a description of reasonable locational alternatives for the Belarusian NPP (please refer to pages 46-59 in the original document in Russian; pages 44-56 in its English version).

We would like to clarify that 74 areas¹ (each of about 500 km², not to be confused with sites², which land area is up to 5 km²) throughout the entire Belarusian territory were identified in 1990s when Belarus considered possibilities of embarking on nuclear power programme.

During site selection for NPP construction the archive documents were reviewed: primarily desk review of the available natural and geographical, geological, seismic, tectonic, hydrological, ecological, etc. conditions was carried out. As a result of this review, 71 areas out of 74 were excluded. Thus, three remaining areas were recommended for further in-depth investigations – Bykhov and Shklov-Gorki areas in Mogilev region as well as Ostrovets area in Grodno region.

The primary criterion for the site selection process was safety.

Following in-depth surveys and studies in these areas three alternative sites were identified for the Belarusian NPP location – Krasnaya Polyana and Kukshinovo in Mogilev region as well as the Ostrovets site in Grodno region.

¹ The territory within the region considered for the location of the nuclear power plant, which allows placing several NPP sites, for which the landscape-geographical and situational conditions are close in their characteristics.

² The territory of up to 5 km² within the protected perimeter, where the main and auxiliary buildings and facilities of the nuclear power plant are situated.

No prohibiting factors (the site is not to be taken under consideration should these factors are in place) for the NPP construction were detected at these sites.

However, at the Krasnaya Polyana and Kukshinovo sites carbonates were found at a depth of about 45 m (may cause underwashing and karst processes) identified as an **unfavorable factor** (parameters or characteristics of the territory that, although not fully meet the requirements of location, but there are technical solutions that can meet these requirements) demanding costly engineering solutions in order to ensure safety of the future NPP.

These circumstances were taken into account and the Ostrovets site was identified as a priority site for the NPP construction, while the Krasnaya Polyana and Kukshinovo sites were considered as reserve ones.

A comprehensive EIA was carried out for the planned NPP. All three alternative sites were thoroughly and equally described, compared with regulatory requirements in the EIA report for the Belarusian NPP.

In line with the Espoo Convention Belarus furnished all the Parties, which indicated their desire to participate in the EIA procedure for the Belarusian NPP (Austria, Latvia, Lithuania, Poland and Ukraine), with the EIA report and in 2009-2013 carried out consultations on the basis of the EIA report both with their public and governments.

Separate consultations on the site selection are not required by the Espoo Convention.

In the course of the transboundary EIA procedure neither participating countries nor public presented any evidence of the possible significant adverse environmental impact as a result of the NPP construction at the Ostrovets site.

After the completion of the transboundary EIA procedure for the Belarusian NPP, the Decree of the President of the Republic of Belarus of 2 November 2013 authorized the construction of the Belarusian NPP and approved the Ostrovets site in Grodno region for these purposes.,

In conclusion, let me express the hope that the above clarifications will be helpful to the Committee to further consider Belarusian NPP case in a non-discriminatory and unbiased manner and reassure that we remain at the Committee's disposal for any further clarification it may need.

First Deputy Minister,
National Coordinator of the Republic
Belarus on the Espoo Convention



Iya Malkina