



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

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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 11 February 2011 No. 13-16/816-BH providing to us so called final EIA report for the Belarusian NPP document, we are sending Lithuanian position and questions regarding this document.

We are concerned, that despite the absence of fulfilled procedures required by Espoo Convention (properly prepared EIA report, organisation of requested public hearings and consultations) it seems that the site for construction of the planned NPP has already been chosen, the digging and other preparatory works have started and it is declared that the final EIA report has been submitted to the affected parties. We would like to draw your attention, that this is already a violation of Espoo convention procedures. We are confident that on 11 February 2011 the provided document can't be considered as the final EIA report, because the officially submitted Lithuanian requests to provide clear answers and essential additional information and fulfil other obligations under Espoo Convention are in general ignored by Belarusian authorities.

Furthermore, the submitted document itself raises doubts. It is stated that the EIA report was prepared in accordance with data of 6 July 2010, however, more recent information related to Lithuania such as the letter of the Ministry of Environment of the Republic of Lithuania dated 9 July 2010 is mentioned, in addition there is no any indication that there was any response to the request re-convene public hearings in Lithuania and bilateral consultations. It should also be noted that due to the poor quality of the document itself and its poor English translation, it was impossible to clearly understand and evaluate the presented text: the terminology used in the text doesn't correspond to internationally accepted one (used in the documents of International Atomic Energy Agency (IAEA), in the IAEA Glossary (IAEA Glossary, 2007) or in other international legislation); there are a lot of unexplained abbreviations; the resolution of presented illustrations is very low.

The provided document is not corresponding with the IAEA and Espoo requirements nor by the content and scope, neither by the quality of the analysis. Therefore, taking into the quality of the document, it can't be considered as the final EIA report.

Having analysed the submitted EIA report for the proposed nuclear power plant in Belarus, with regret we conclude that the questions raised by Lithuania in the letter of the Ministry of Environment of the Republic of Lithuania dated 7 May 2010, which were repeatedly expressed during the bilateral meeting held in Minsk on 18 June 2010 haven't been answered. Further analysis of the only and already selected site in Astravec is unqualified and missing basic information. EIA report still lacks important information on site selection criteria; there are no explanations why such important factors as the population density and vicinity to the most densely-populated part of the territory of the Republic of Lithuania that includes the capital city Vilnius have been ignored.

The report also fails to provide equal and thorough assessment of the alternatives, as it is focuses exclusively on the Astravets site, which is not in conformity with the provisions of the Espoo Convention requiring a comparison of no-action, location and technological alternatives. Moreover, there are no answers to the questions regarding the assessment of selected sites in accordance with IAEA Safety Requirements "Site Evaluation for Nuclear Installations". The report hasn't been supplemented with any additional geological, seismological and seismo-tectonic data, although such information is necessary for proper comparison of the location alternatives.

Issues related to the long-term safety, such as planning of decommissioning, radioactive waste and spent nuclear fuel management and final disposal are not properly addressed in the report. Safety substantiation concerning the possible crash of a heavy aircraft is not presented, although the assessment of such terror event is a very important issue when planning to construct the nuclear power plant close to the border of Lithuania and its capital, where the population currently exceeds 500 000 residents and the distance to the planned NPP is less than 50 km. The modelling assumptions used for assessment of radiological impact in the event of a design and severe accident are imprecise and unjustified. Also it is still unclear how the assessment of the radiological impact on the population of Lithuania under normal operational conditions was carried out. The report lacks an assessment of exposure of the population to radiation under normal operational conditions and in case of accident for other two sites analysed in the report. Moreover, the provided information about the early warning of other states and communication in the case of accidents as well as the exchange of radiological monitoring data is insufficient.

Another important issue, which is not thoroughly addressed in the EIA report, is the possible impact on the ecosystem and hydrological regime of the river Neris by the exploitation of NPP in Astravec site. There are no conclusions about a negative impact of change of hydrological regime, thermal, wastewater pollution on the sensitive Neris river ecosystem and no information is provided on the concrete envisaged measures to mitigate possible adverse effects on the ecosystem of the river caused by different types of pollution.

Taking into account the presented arguments, we urge the Republic of Belarus to submit comprehensive and well-grounded answers to all the questions raised by Lithuania regarding the EIA for the Belarusian nuclear power plant project, to organize public hearings in Lithuania and the Lithuanian-Belarusian bilateral consultations in accordance to Espoo convention. Lithuania is of the same position as it has been stated in Ministry's letters of 7 May 2010 and 9 July 2010 - we object the construction of nuclear power plant in Astravec site.

We have to state, that we haven't noticed any Belarussian attempt to consider Lithuania's position and requests in preparing the EIA report. As Lithuania is to be the most affected party in the project of Belarussian NPP, we request once again to respect our position.

We believe that the Republic of Belarus shall be in compliance with all international regulations regarding environmental requirements, nuclear safety and radiation protection, specifically with Espoo Convention and Convention on Nuclear Safety (provisions provisions of Article 14 and 17 of the Convention on Nuclear safety require a detailed evaluation of a proposed nuclear installation on individuals, society and the environment before the construction of a nuclear installation) therefore, we once again call to perform a comprehensive analysis of other suitable sites for the construction of NPP (alternate sites) as it is required by the Espoo Convention.

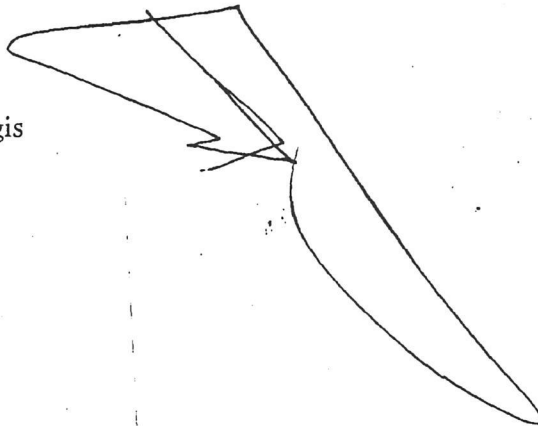
We would like to note, that EIA report will not be considered as final and EIA procedure will not be considered completed, unless these requirements are fulfilled.

We would like to draw your attention to the fact that according to the provisions of Espoo Convention final decisions regarding the site selection for construction of the Belarusian NPP shall be taken and any construction works shall be started only after the evaluation of the outcome of EIA including the comments of the affected Parties and the outcome of consultations under Espoo Convention with the affected Parties. It should be noted that the Party of origin shall provide to the affected Party the final decision on the proposed activity along with the reasons and considerations on which it was based.

Please find enclosed comments of Lithuanian authorities on the latest version of EIA report, which haven't been answered yet, 6 pages.

Yours sincerely,

Dr. Aleksandras Spruogis
Vice-Minister

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long, sweeping tail that extends downwards and to the right.

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