



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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Regarding information on the proposed activity

“Dismantling and decontamination of equipment from the working areas R1 and R2 of Ignalina Nuclear Power Plant Unit 2 reactor”

Environment State Bureau (hereinafter – the Bureau), acting as a competent authority on environmental impact assessment (hereinafter – EIA) in the Republic Latvia (hereinafter – Latvia), thanks the Ministry of Environment of the Republic of Lithuania (hereinafter – Lithuania) for sending information on the proposed activity *“Dismantling and decontamination of equipment from the working areas R1 and R2 of Ignalina Nuclear Power Plant Unit 2 reactor”* (hereinafter – the Project) in Visaginas Municipality, Lithuania, approximately 8 km from the border of Latvia.

The Project is one of the activities within the large Ignalina Nuclear Power Plant dismantling mega-project. EIA is applied with a continuous step by step approach to smaller subprojects – like the Project.

Latvia has already participated in the transboundary EIA consultations for one of the subprojects of Ignalina Nuclear Power Plant dismantling mega-project – *“Dismantling and decontamination of equipment of Units A-2 and V-2 of Ignalina Nuclear Power Plant”*. During these consultations Latvia has already expressed opinion that one unified EIA should be carried out for the whole large Ignalina Nuclear Power Plant dismantling mega-project. Having assessed information on the Project, the Ministry of Environment and Regional Development of Latvia has once again pointed out to this matter.

The Bureau has received comments and opinions from various stakeholders and herewith forwards to the Ministry of Environment of Lithuania reservations expressed by the Ministry of Environment and Regional Development of Latvia, the Radiation Safety Center of the State Environment Service and the Municipality of Daugavpils county.

The Ministry of Environment and Regional Development of Latvia points out that Lithuania should continue to inform Latvia about all activities related to the decommissioning of the Ignalina Nuclear Power Plant. If significant adverse effects on the territory of Latvia are identified, the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) shall be followed, and Latvia shall be notified. The Ministry points out that,

considering all environmental impact assessments related to the decommissioning of the Ignalina Nuclear Power Plant, one joint EIA should be carried out for all decommissioning works at the Ignalina Nuclear Power Plant.

The Radiation Safety Center of the State Environment Service is of an opinion that EIA documents provide information that allow to assess the Project from a radiation safety perspective. Considering the nature of the Project and EIA documents, the Project is not expected to have transboundary environmental effects. Nevertheless, The Radiation Safety Center of the State Environment Service draws attention to the fact that on page 9 of the summary of EIA report it is said that the Project will be carried out in the period of 6 years (from 2023 to 2028). In its turn, the section on the expected impact on the annual effective dose for the critical group of the population, which is indicated in Table 1 on page 16 of this summary, provides information on the assessment only in the period 2023-2027 (information is not provided for the last year of the Project).

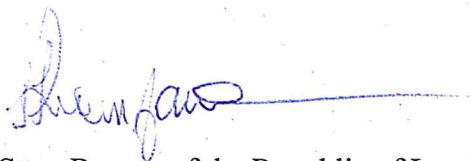
The Municipality of Daugavpils county draws attention to the fact that the territory of Daugavpils municipality and its residential areas are located in the direct potential impact zone of the Ignalina Nuclear Power Plant and the planned decommissioning, decontamination and radioactive waste storage facility. Therefore any activities that are carried out during decommissioning (not only the Project) have the potential to endanger residents of Daugavpils county. The Municipality of Daugavpils county points out that – as all dismantling works are divided into subprojects, there is no overview of the total potential risk. The Municipality of Daugavpils county is of an opinion that so far there is no convincing information that the health and quality of life of the border population will not be affected. After reviewing the potential transboundary impacts of the Project, The Municipality of Daugavpils county concludes that the summary of EIA report provides an assessment that no significant impacts on soil and water are likely. It is also mentioned in the summary of EIA report that the radiological impact on the territories of the neighboring countries will not be increased, but the maximum dose that is possible on the Latvian border in the worst case scenario – in case of an accident – is indicated. The Municipality of Daugavpils county notes that potential risks and the set of measures that should be taken in the event of an accident of a spill into the soil and water – have not been analyzed.

We kindly ask you to take into account the opinions and reservations expressed, improving the assessment and broadening aspects that are assessed.

We are looking forward to our continuous successful cooperation.

Sincerely yours,

Indra Kramzaka
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