

PUBLIC PARTICIPATION IN PLEX DISCUSSIONS: ECOCLUB EXPERIENCE

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Ukrainian Nuclear Industry

- 15 units in operation
 - 12 units to be decommissioned before 2020
- Almost 50% of electricity
- Uranium mines
 - around 30% of the domestic consumption
- No facilities to manage with radioactive wastes and spent nuclear fuel
- About 0.02 €/kWh for selling 'nuclear' electricity into the grid

Espoo Convention

The Convention on Environmental Impact Assessment in a Transboundary Context:

- Environmental impact assessment of certain activities at an early stage of planning
- Notification and consult on all major projects under consideration that are likely to have a significant adverse environmental impact across boundaries

Ukrainian NPP: extending lifetime

- Affected countries has never been notified
- No EIA
- No real public participation
- Nuclear regulator took the decision in 2010 (Rivne 1,2) and in 2013 (South-Ukrainian 1)

Rivne NPP: complaint (1)

Complaint submitted on 20 April 2011 by Ecoclub :

- Not applying Espoo Convention to PLEX of the 1st and 2nd reactors at Rivne NPP
- Ukraine continues to be in violation by not applying it to the decision-making related to PLEX of other nuclear reactors
- Not ensuring EIA prior to authorizing extension of the lifetime
- No public participation
- No notification of affected countries

Complaint was developed with legal support by the Resource and Analysis Center "Society and Environment" and the European ECO-Forum

Rivne NPP: complaint (2)

At its 25th session, the Implementation Committee had concluded:

- Ukraine had not applied the Convention in relation to the planned extension
- Extension of the lifetime of an NPP, even in absence of any works, was to be considered as a major change to an activity

Rivne NPP: complaint (3)

The Implementation Committee's questions to Ukraine (briefly):

- Had the extension been subject to a transboundary EIA procedure?
- Had that report covering environmental impacts been submitted to the Ukrainian public for comments?
- Which Parties could potentially be affected?
- Would the Government implement the full transboundary EIA procedure?

CSOs' activities in the country

- Informational tours around NPPs
 - Hundreds of complaints of the local people to the Ministry of Nature Protection concerning PLEX
- Different type of policy activities to highlight the Espoo requirements to PLEX
 - Public Council
 - Public hearings
- NGO's analytical publications on different aspects of PLEX
 - NECU: "the planned number of cycles of "cooldowns" has already been exceeded that will lead to the formation of cracks... Further usage of the reactor vessel, which cannot be replaced ...may result in a serious accident with the emissions of radioactive substances".

Do the EU based institutions support PLEX in Ukraine?

- EBRD and Euratom allocated €600 million loans for so called safety upgrades
- Due to the low tariff it is difficult to expect the implementation of all measures for life time extension without the loans
- EURATOM's loan conditions are that Ukraine complies with the Espoo and Aarhus
- Bankwatch/NECU have been drawing the attention to the connection between safety upgrade programme and PLEX
 - No any interconnections on EBRD documents
 - No information available to public on EURATOM

Current positions on PLEX&Espoo

- Ministry of the Environmental Protection
 - Responsible body for the Espoo without proper rights
 - Officially announced the necessity to perform the Espoo requirements
 - Governmental working group was created
 - Weak on defending its position
- State Nuclear Inspectorate (regulator)
 - Decision maker
 - Officially recognized the problems with Espoo
- Ministry of Energy and Coal Industry and operator state there is no need to meet the Espoo requirements

Further steps

- Participation on the development of regulation on the application of the Espoo Convention to nuclear energy-related activities
- The final decision in the case of life time extension under the Espoo is expected in June this year
- The draft law to adapt the national legislations to the Espoo requirements is in the Parliament
 - Need to be revised to make sure that the public will be involved on early stage
- We have for find the honest ways to compare PLEX with energy efficiency and RES
 - Strategic Environmental Assessment?

Conclusions

- CSOs get more influence using the Espoo
- Good way to influence governments
- PLEX gets publicity using the Espoo
- Espoo requirements give a possibility to claim the fulfilment of the nature protection and public participation procedures on PLEX

THANK YOU!

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