

# Transparency from the point of view of civil society

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issues to address from transparency side:

- preventing NIMBY blockage of action;
- preventing only inclusion of “nuclear communities” in attempts to speed up action;
- quality over speed, though our generation should take responsibility!
- Full, early and ongoing transparency about risks, and finances and economic consequences;
- involvement of the public in early stages:
  - inclusion of decommissioning plans and all related uncertainties in construction plans for new nuclear projects – No guarantee for early financial security of decommissioning should be a game-stopper!
  - the need for national nuclear phase-out plans;
  - the need for acknowledgement of wider spread potential impacts (transports, location(s) of temporary and final repositories, malevolent attacks) and inclusion of relevant public;
  - early and ongoing public participation in decommissioning project development;
  - rigorous and independent assessment of costs and regular updates – public participation in such assessments;
- involvement of the public in an early stage in finding alternative social and economic development for regions affected by nuclear phase-out and decommissioning.
- Commission: adhere under Euratom also to Aarhus! (e.g. art. 41/44)

issues of content:

- Clear EU guidance to member states to address the finance gap on the basis of polluter pays principle; PINC: 123 Billion gap is under-estimate – see Borssele 500 MEUR;
- Clarity for citizens about maximum life-time of reactors based on speedy phase-out, original technical life-time, rigorous risk-reduction based assessment of problems, flaws and risk relevant issues, including safety culture and emergency preparedness;
- Reduction of abuse of ALARA (abuse of economic, complexity, organisational arguments) – move to Best Available Technology (BAT) and Best Regulatory Practice (BRP);
  - Especially: abuse of lack of decommissioning funds for life-time extension decisions. Unacceptable! This was coming. Build-up of decomm funds should have been on the basis of risk (i.e. already available when first fuel is loaded) or in worst case on the basis of initial technical life-time. Any delay is culpable behaviour of operators and involved authorities; Case: Netherlands – no sufficient funding, now loss in operation.
  - Deference or direct decommissioning? See Doodewaard in the Netherlands: better is fast guarantee on decomm funds and direct decommissioning;
  - Discounting cannot be an argument – economic gambling is too weak a basis for something as important as nuclear decommissioning and waste.
- URGENT: Santa Maria de Garoña, Almaraz, Doel 1,2, Tihange 1, Mühlheim, Beznau, Borssele, Oskarshamn, Ringhals, Loovisa, Olkiluoto 1,2, Ignalina, Bohunice A1 and V1, Kozloduy 1-4, Hinkley Point A,B, Heysham. HEADS UP: French fleet – 21 reactors >35 yrs, UK fleet, first VVER440/213s (SK, HU, CZ). Not letting Germany off the hook: The current compromise needs more transparency and public participation.