



Nuclear Transparency Watch

Prevent and anticipate through transparency and participation

“From case studies of nuclear emergencies with cross-border consequences to the establishment of a roadmap and European guideline for 2021-2030 EP&R developments”

What Civil society (NTW) has learnt from the EP&R European Project?

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Nuclear Transparency Watch

- ❑ **Nuclear Transparency Watch" was established on November 7, 2013** at a founding meeting at the European Parliament in Brussels.
- ❑ **The basis for NTW were:**
 - **A five year process entitled 'AC&N'** (Aarhus Convention and Nuclear) initiated by ANCCLI and with support from DG ENER,
 - **The lessons from Fukushima and the European stress test** process has demonstrated the relevance of the contribution of civil society ,
 - The long-term safety of management and final disposal of radioactive waste also **benefits from public participation and transparency** as is acknowledged in the EU Radioactive Waste and Spent Fuel Management Directive (Council Directive 2011/70/Euratom of 19 July 2011).

NTW implement a **common concern - "safety and transparency in the nuclear sector"** - without prejudice to each other's position on nuclear energy.

Organisational structure of NTW

Members (organisations, qualified experts and MEPs)

Management board with executive committee (bureau)

Working groups

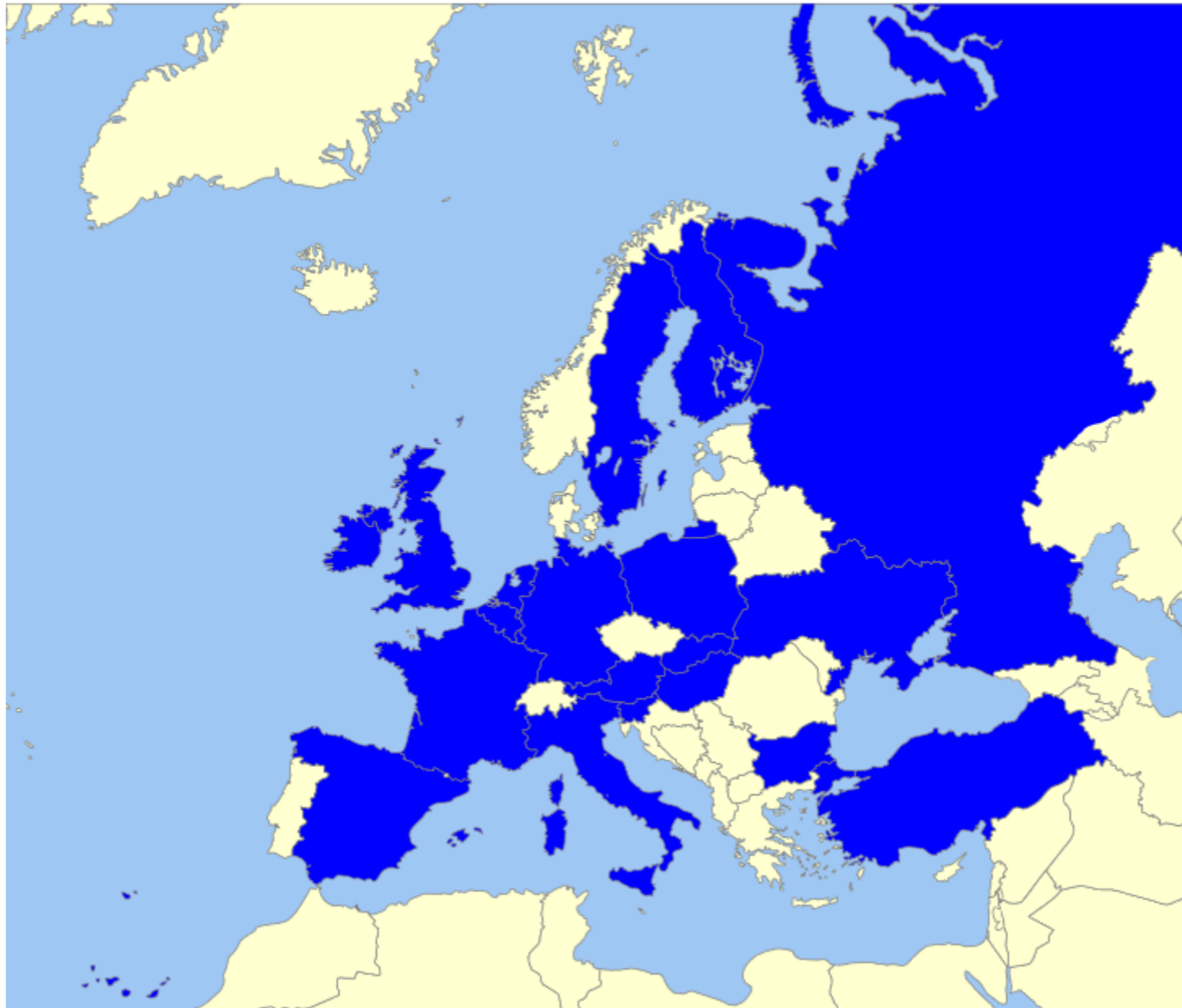
- Emergency Preparedness and Response (EP&R)
 - Report
 - National roundtables
 - Trans boundary roundtables
- Radioactive Waste Management
 - Transparency work (BEPPER project)
 - NTW BEPPER framework and key components on PIP in RWM
 - National roundtables
 - EURAD participation
- Environmental issues
 - Participation in EIA processes
 - Open Radiation
 - Measurements

Work on other issues

- Ageing of Nuclear Plants and Plant Lifetime Extensions (PLEX)
- Decommissioning of nuclear facilities
- Security issue in connection with conflicts (war in Ukraine)
- Aarhus hotline (support for national cases)
- Collaboration with international association and organisations (SITEX.Network, IAEA, OSPART,...)

Membership

Currently 23 countries and 56 members



NTW participation in project

- **NTW was invited to participate in the project *Implementation of Nuclear and Radiological Emergency Preparedness and Response Requirements in EU Member States and Neighbouring Countries*, coordinated by NucAcvise.r**
- **NTW decision was to invite the members if they wish to be observers in the activities.**
- **NTW saw the events as opportunity for civil society to express their position but also to engage.**
- **For this project NTW formed observers' teams for all cases: FR – Spanish member, LUX – Luxemburg m., SWISS – Swiss/French m., HU – Hungarian m., SLO – Slovenian m., BU – Bulgarian m., RO – Romanian m., FIN – Finish m., Sweden – Nederland m.**
- **NTW decided not to fil in the questionnaire as the NTW members do not participate in the development or implementation of EP&R.**
- **NTW (member from ANCCLI) presented the results of Civil Society evaluation of EP&R (from 2015) <https://www.nuclear-transparency-watch.eu/wp-content/uploads/2015/04/NTW-Report.pdf> at the first project event (Nov 2021)**

Main findings in investigations performed by NTW

- **Evaluation of national EP&R provisions**
 - EP provisions remains outdated, inadequate, delusional
 - Evacuation (large scale) not possible in many cases
 - Lack of efficient radiation monitoring devices
 - Lack of local authorities (and local population) awareness and training
- **Assessment of Plans, including involvement of Citizens**
 - Lessons of Emergency exercises & drills are limitedly taken into account
 - Lack of radiological expertise among first responders, late transfer of data or lack of it, operational rooms for command,...
 - Poor maintenance of Emergency plans
 - No independent review or evaluation of plans
 - CS not involved in planning
- **Emergency information**
 - Total lack of communication between different concerned administration
 - No use of new media for information dissemination
 - Communication and notification lines for responsible are not entirely working.

Main findings in investigations performed by NTW

- Trans-boundary dimension of nuclear accidents
 - EP&R is dealt at national level, with little trans-boundary cooperation
 - Difficulty to bring together all the players across borders in order to discuss EP&R
- Post-accident consequences
 - Nuclear accidents have (very) Long Term complex consequences that need to be addressed
 - Post-accident situations necessitates complex recovery processes involving the population
 - Only addressed by very few countries today (like France), with minor scenario – difficulties of local implementation, especially in case of trans boundary situation
 - Need for clarification of food standards and their harmonisation
- On-site emergency management
 - Questions on the availability of human resources
 - Protection of workers which was evident during Fukushima accident
 - Availability of technical tools

NTW observers and questions for CSO - Comments

- The questions showed that the observers has no role in the cases
- The role of CSO is not well undersand
- From the involved CSO organisations: ANCCLI is member of NTW (so basically they would be involved 2x), GMF is composed by association of municipalities and associations of municipalities with nuclear facilities across European countries. Many mayors are very involved in EP&R and have responisility at the local level.

Questionnaire – filled in Aug 2022 – main issues -1

- What are the main findings raised from the reviews and analyses you conducted related with EP&R?

That, in general, EP&R arrangements are severely inadequate – They are virtually never based on worst case scenarios and built upon too low source-terms concerning severe accidents. There is a lot of unclarity about issues like measures in agriculture, economy, prophylaxis intake, evacuation plans, but also long-term arrangements. There is a general lack of transparency and public participation in development of EP&R measures.

- When was the last exercise you attended?

We conduct our own (international) emergency exercises within the organisation. The last one was in 2018. The next one had to be cancelled due to COVID.

We have tried to participate (constructively!) in exercises on national and international level, but were refused. Recent examples include Belgium (Tihange) and the IAEA (CONVEX-3, 2021, based in the UAE).

When we wanted to observe passively (after refusal to participate) in an existing exercise on our own initiative, the exercise was cancelled (!)

Questionnaire – filled in Aug 2022 – main issues -2

- Could you provide the main findings of performed exercises?

One important finding in our last own nuclear emergency exercise was that people on the ground had problems finding adequate information in the public domain and confused shielding and prophylaxis arrangements for protection against nuclear attacks and protection against nuclear accidents.

Another is that Greenpeace is in general well prepared for nuclear emergencies – probably better than others, incl. many authorities, because we also include higher potential source terms in our calculations. This includes situation assessment and monitoring, necessary instrumentation, duty of care for staff, internal organisation, preparedness for outward communication.

- In your opinion, what are the elements of the current EP&R arrangements which can be improved in practice and why? Given just some:

Developing understanding of the public and civil society and their roles in EP&R

Understanding and overcoming the fear for transparency

Structural inclusion of civil society in the set-up and planning of EP&R

Developing EP&R not only for incidents up to INES 5, but also for INES 7 and using realistic worst case source terms for that

Harmonisation towards best available practice, including strongest used norms

Questionnaire – filled in Aug 2022 – main issues -3

- Do you think that EP&R exercise scenarios are realistic enough today and why?

In general, official EP&R exercise scenarios:

- Use of too low source terms
- Lack of inclusion of civil society (citizen who would be impacted)
- Lack of transparency about set-up and evaluation
- Too much focus on top-down communication, too little taking into account the dynamics of horizontal communication within society (incl. social media)
- What does lead to distrust population in the decisions of the authorities and amplify the seriousness of a national crisis situation? Of a cross-border crisis? Do you have practical proposals to face it?

The provision of insufficient information, information in expert language, denial of justified concerns, insufficient preparation for worst case scenarios (e.g. Fukushima!), lack of transparency (e.g. the Ru-106 incident)

Practical proposals? Of course we have – that is not something for a questionnaire, but for a more explicit and broader discourse.