



Uddannelses- og
Forskningsministeriet

Naturstyrelsen
Haraldsgade 53
2100 København Ø

Att.: Thilde Flindt
thini@nst.dk

Kommentarer ved høring over svensk atomaffaldsdepot efter FNs Espoo-konvention

Styrelsen for Videregående Uddannelser har fået overdraget besvarelsen af Naturstyrelsens henvendelse af 12. februar 2016 til Uddannelses- og Forskningsministeriet om kommentarer ved høring over det påtænkte slutdepot for brugt kernekraftbrændsel i Sverige.

Styrelsen for Videregående Uddannelser har taget til efterretning, at der fra dansk side ikke vil ske deltagelse i miljøvurderingen af det svenske slutdepot for brugt kernekraftbrændsel i Forsmark, Östhammars Kommun.

Styrelsen for Videregående Uddannelser har deltaget i et konsultationsmøde i Sverige den 21.-22. marts 2016 arrangeret af Naturvårdsverket, herunder en besigtigelse af lokaliteten for slutdepotet i Forsmark. Der er den 5. april 2016 modtaget referat og materiale fra konsultationsmødet den 21. marts 2016. Styrelsen for Videregående Uddannelser anser referatet for at være en korrekt gengivelse af forløbet af konsultationsmødet.

Styrelsen for Videregående Uddannelser har ikke yderligere kommentarer til sagen.

Med venlig hilsen

Kristoffer Brix Bertelsen
Chefkonsulent

12. april 2016

Styrelsen for Videregående
Uddannelser
Direktionssekretariatet

Bredgade 43
1260 København K
Tel. 7231 7800
Fax 7231 7801
Mail uds@uds.dk
Web www.ufm.dk

CVR-nr. 3404 2012

Sagsbehandler
Kristoffer Brix Bertelsen
Tel. 7231 8876
Mail kbbs@uds.dk

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NOAH Friends of the Earth Denmark
Nørrebrogade 39, 1. tv.
2200 Copenhagen N
Tel.: +45 35 36 12 12
E-mail: noah@noah.dk / nh_hooge@yahoo.dk
Homepage: <http://noah.dk/>

SustainableEnergy
Klosterport 4E, 1.sal
8000 Aarhus C
Tel.: +45 86 76 04 44
E-mail: pedersen@ve.dk
Homepage: www.ve.dk

Copenhagen, 15 April 2016

SWEDISH ENVIRONMENTAL PROTECTION AGENCY
Valhallavägan 195
SE-106 48 Stockholm
Att: Åsa Wisén
E-mail: asa.wisen@swedishepa.se

Case number: NV-07138-15

These are the comments submitted by NOAH Friends of the Earth Denmark and RenewableEnergy pursuant to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) and EU directive 2011/92/EU regarding the assessment of the transboundary environmental impacts of a final repository for spent nuclear fuel at Forsmark in Östhammar municipality in Sweden:

Firstly, NOAH and RenewableEnergy strongly disagree with the Danish authorities' decision not to participate in the environmental impact assessment procedures.

Secondly, NOAH and RenewableEnergy share the views of the Swedish Society for Nature Conservation, SSNC, and the Swedish NGO Office for Nuclear Waste Review, MKG, and recommend that the application of a final disposal for spent nuclear fuel by the Swedish Nuclear Fuel and Waste Management Company, SKB, should be further elaborated. At several occasions, SSNC and MKG have stated that they lack answers to critical questions, such as the long term-safety of the barrier system and the account of alternative methods of disposal - deep borehole disposal in particular.

Furthermore, they have raised concerns about the methods used when procuring evidence in support of claims for long-term safety, the suitability of the chosen site of Forsmark, as well as the risk of deliberate intrusion. Also, the two organisations are critical of the fact SKB refuses to publish

material and completions concerning the long term-safety of the disposal methods, which means that significant issues, such as the process of copper corrosion, will not be thoroughly reviewed¹.

Thus, NOAH and RenewableEnergy draw the following conclusions: On the basis of the application's current content and taking into consideration the doubts that have been raised by SSNC and MKG regarding the lack of documentation on crucial safety issues, a license to SKB to build a final repository for spent fuel at Forsmark should not be granted. Furthermore, it appears that there is a large risk that neither the copper barriers, nor the clay will keep the radioactive waste isolated from the environment as long as necessary. Concerns have been raised that the site location at Forsmark is not suitable for the disposal method chosen by SKB. E.g. the bedrock is vulnerable to impacts of future ice ages. Considering that in some scenarios seepage from the final repository could occur as early as a few hundred years from now, negative transboundary impacts on public health and the environment cannot be ruled out in the future – a crucial argument for rejecting the current application.

best regards,

Niels Henrik Hooge and Palle Bendsen

NOAH Friends of the Earth Denmark's Uranium Group

Hans Pedersen

RenewableEnergy

¹ More specifically, SSNC and MKG have raised doubt in regard to the application's lack of documentation with respect to the following: Knowledge concerning the function of the man-made barriers of copper and clay, accounting for alternative methods, description of the so-called 'zero alternative', i.e. what is to be done if the license application is rejected, knowledge of the risks of permafrost and earthquakes during an ice age, the basis for determining the suitability of Forsmark as a site, the basis for determining the potential benefits of an inland location and the basis for determining the risk of deliberate intrusion, cf. e.g. MKG press release, 29 January 2016:

<http://www.mkg.se/pressinformation-om-kungorelsen-av-slutforvarsansokan>

For a more comprehensive description of the issues in question, see *Draft report from the Swedish NGO Office for Nuclear Waste Review (MKG) with requests for supplementary information on the licence application for a repository for spent fuel at Forsmark*: http://www.mkg.se/uploads/Draft_of_report-MKG_and_SSNC_statements_to_the_Environmental_Court_and_SSM_in_June_2012_and_October_2013-August_2015.pdf