



Ympäristöministeriö
Miljöministeriet
Ministry of the Environment

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The Ministry of the Environment of Estonia
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Finland's response to Estonia's notification concerning the strategic environmental assessment of the National Radiation Safety Development Plan 2018 - 2027, the National Radon Action Plan and the National Action Plan for Radioactive Waste Management

On July 31, Finland received a notification from the Estonian environmental authorities concerning the strategic environmental assessment of the National Radiation Safety Development Plan 2018 - 2027, the National Radon Action Plan and the National Action Plan for Radioactive Waste Management in accordance with Article 10 of the Protocol on Strategic Environmental Assessment to the UN/ECE Convention on Environmental Impact Assessment in a Transboundary Context. According to Finland's Act on the Assessment of the Effects of Certain Plans and Programmes, the Ministry of the Environment is the competent authority for the Protocol on Strategic Environmental Assessment and is therefore in the position to coordinate Finland's reply.

The Ministry of the Environment would like to inform Estonia that Finland does wish to participate in the environmental assessment of Estonia's National Radiation Safety Development Plan, the National Radon Action Plan and the National Action Plan for Radioactive Waste Management.

In their notification, the Estonian environmental authorities requested comments and opinions on the National Radiation Safety Development Plan, the National Radon Action Plan and the National Action Plan for Radioactive Waste Management, as well as their environmental impact assessment.

The Ministry of the Environment has requested comments and opinions from the Ministry of Social Affairs and Health, the Ministry of Economic Affairs and Employment of Finland, the Ministry for Foreign Affairs of Finland, Greenpeace Finland, the Finnish Association for Nature Conservation, WWF Finland, the Radiation and Nuclear Safety Authority, the Finnish Environment Institute and the Centres for Economic Development, Transport and the Environment of Uusimaa and Southwest Finland. The material Estonia has sent has been available for comments and opinions on the lausuntopalvelu.fi website. Information about the material has also been communicated to the public in the form of an announcement in the Official Journal, and the material has been available at the Registry of the Ministry of the Environment and on the Ministry's website. During the public comment period from 30 August to 30 September 2019, there was an opportunity for the public and the authorities to comment on the material.

The Ministry of the Environment has received statements from the Ministry of Economic Affairs and Employment of Finland and the Ministry for Foreign Affairs of Finland; no comments from public were received. The statements received are enclosed in their entirety so that they can be

taken into due account in accordance with Article 11 of the Protocol on Strategic Environmental Assessment.

Based on the comments received and reflecting its own views, the Ministry of the Environment considers it important that Estonia is drawing up the National Radiation Safety Development Plan, the National Radon Action Plan and the National Action Plan for Radioactive Waste Management. The Ministry of the Environment points out that Estonia's summary of the environmental report concerning the measures in relation to Paldiski states that the likelihood of possible transboundary environmental impacts will be more thoroughly assessed in further planning. The Ministry of Environment considers this important.

Summary of the statements

The statement from the **Ministry of Economic Affairs and Employment** primarily addresses the National Action Plan for Radioactive Waste Management and its environmental impact assessment. The Ministry considers it important that Estonia has drawn up the National Radiation Safety Development Plan, the National Radon Action Plan and the National Action Plan for Radioactive Waste Management, and has assessed their environmental impacts. The Ministry sees that Estonia is making significant progress in the management of radioactive waste and that one centralised facility for the disposal of radioactive waste is likely to be sufficient for the disposal of radioactive waste in Estonia.

The direct environmental impacts of the National Action Plan for Radioactive Waste Management are mainly related to the establishment of a repository. The repository would serve as a centralised solution for the disposal of existing and future radioactive waste. The Ministry of Economic Affairs and Employment considers it important for Estonia to assess the required permanent repository using conservative estimates of the amount of waste to be disposed of and, on the other hand, to consider being open to international cooperation in order to reduce the amount of radioactive waste.

Estonia estimates that the construction of a repository for radioactive waste and the dismantling of the Paldiski reactors may have transboundary impacts. The likelihood of such impacts will be further assessed later in the design of layout for the special repository, and in the environmental impact assessment of decommissioning the reactors. The Ministry of Economic Affairs and Employment considers the adverse transboundary impacts to be highly unlikely, as Estonia mainly disposes of low-level and intermediate-level waste.

In its statement, the **Ministry for Foreign Affairs** states that the environmental assessment of the Estonian National Radiation Safety Development Plan will be governed by the Protocol on Strategic Environmental Assessment appended to the UN Economic Commission for Europe Convention on Environmental Impact Assessment in a Transboundary Context. The Ministry for Foreign Affairs emphasises the importance of adhering to international commitments in the preparation and implementation of the National Radiation Safety Development Plan.

Permanent Secretary


Hannele Pokka

A handwritten signature in blue ink, appearing to read 'Essi Römpötti', with a stylized flourish at the end.

Essi Römpötti

Specialist

Enclosures

Statements received

For information (without enclosures)

The Ministry for Foreign Affairs of Finland

