

To: Mr. Stavros Dimas
Member of the European Commission
Commissioner on Environment

Re: Complaint on EIA procedure on Belene NPP in Bulgaria

Dear Mr. Dimas,

In November 2004 the Bulgarian Minister of Environment issued a positive decision on the EIA report of the Belene NPP project. The Minister did so, being well informed about all the problems around the project. The problems were both in quality of the EIA study and procedure on public consultations.

In 2007, the Bulgarian government submitted to the European Commission the papers on Belene NPP in order to receive a Commission's opinion under art. 41-43 of Euratom Treaty.

The Green Policy Institute as well as other NGOs from „NO to Belene NPP!“ coalition believe that the Commission should issue a negative opinion on the Belene NPP on the basis of following:

1. The EIA report does not give the answer of the main question it should give – that the chosen technology is safe for people and environment. The EIA report never observe in depth the technology suggested by Atomstroyexport due to the simple fact that during the EIA procedure there was no chosen technology. The EIA report only gave a preference to one general technology (pressurized water reactors) against other (CANDU), but didn't conclude which one of the 6 PWR technologies is the most safe option for the people and environment. Moreover, in their answers to the NGO comments, the experts who did the EIA clearly stated that „perhaps a new EIA should be done when a concrete reactor design would be chosen“. In spite of this the Bulgarian Government denied such an option in an answer to Green Policy Institute from May 2007.
2. During the public consultations on EIA there were significant violations of people's rights to express their negative opinion and to ask questions. Similar violations appeared in the procedure of EIA in transboundary context (under the Espoo Convention). The examples for such violations you can find in Annex 1 to this letter.
3. There was no sufficient analysis of the seismic risk for the Belene NPP. The seismic risk is very much neglected and undermined in the EIA report, while close analysis of past literature shows that this is one of the most serious issues for the project's site. In case of a serious seismic event (similar or bigger than the one in 1977) there are no guarantees that the proposed reactors and technology would not release radioactivity into the environment. The nearest town of Svishtov is situated only some 12 km away of the project's site. Moreover, there is evidence that the EIA experts did not assess properly the seismic issue, thus contributing to the low quality of the EIA report as a whole:
 - the former head of the Municipal Council of Svishtov, Mr. Zahariev has informed the State Prosecutor in Bulgaria that he EIA experts didn't make any investigations on site and based their conclusions on studies done 10 and more

- years ago;
- there is a document that shows that already in the beginning of the construction of Belene NPP in early 1980s, Soviet experts suggested that the Belene site should be dismissed due to the very bad seismic situation (see Annex 2). The EIA does not comment this fact at all.

Based on the above mentioned information, I call you, Mr. Dimas, to object any proposal for a positive opinion of the EC on Belene NPP.

Let me ensure you, Mr. Dimas, that the Green Policy Institute and other NGOs involved in the monitoring of Belene NPP project as well as concerned citizens are always at the disposal of the Commission for further clarifications.

With best wishes,

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Green Policy Institute

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