



Warsaw, April, 2008

MINISTER OF THE ENVIRONMENT

Maciej Nowicki

Sign.: DOOS- 082/ 2660/08/AO

**Ministry of the Environment
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In reply to notification received under Article 3 paragraph 1 of the Espoo Convention as regards the project planned to construct new nuclear plant in the national territory of Finland (letter dated 5 February 2008, sign.: YM1/5521/2008), I have the pleasure to deliver Poland's position, as follows.

The said notification was received on 12 February 2008 by the Ministry of the Environment of the Republic of Poland. The notification was accompanied by the following preliminary documentation concerning the project planned:

- „Environmental Impact Assessment Procedure, International Consultations”,
- „Environmental Impact Assessment Program for a Nuclear Power Plant”.

According to Article 66, paragraph, 1 subparagraph 1) of the Act of 27 April 2001 on Environmental Protection Law (Official Journal of 2008, No. 25, Item 150), the Minister of the Environment forwarded the documentation received to the Voivodes (i.e. Governors) who are territorially competent in the scope of the area potentially affected by a transboundary impact from the project in question. Those are the Governors of the West Pomerania, Pomerania, Warmia and Masuria, and Podlasie Voivodships (i.e. Provinces). The aim thereof was to secure public participation procedure and define the scope of environmental impact documentation from the project planned (i.e. scoping). Having the aforementioned in mind, may I deliver the following statement under Article 3 paragraph 1 of the Espoo Convention.

Within the impact zone of the nuclear plant planned, in 1000 km radius distance, the northern territories of the Republic of Poland would be affected, in the case when the plant is situated in two locations, i.e. near the localities of Kristinestad and Ruotsinpyhtää. In the case of the two other locations of the project planned (i.e. Karsikkoniemi and the Laitakari Island in the Gulf of Bothnia, at the Municipality of Simo, or Cap Hanhikivi in the West Coast of Finland, at the Municipality of Pyhäjoki), the 1000 km radius impact zone would not affect the national territory of the Republic of Poland.

In spite of such a considerable distance between the site of the project planned and the territory of the Republic of Poland, the effects of contaminated air masses inflowing from the location of the nuclear plant have to be considered in case of its potential accident. Given the fact that in the area of Northern Poland quite intensive air masses inflow from the Barents Sea and Eastern Scandinavian areas is noted in a multi-year scale, hence also from above the areas considered the possible locations of the nuclear plant planned, in case of its accident, there would be a likelihood of contamination of the Polish Baltic Coast and the northern part of the Republic of Poland.

In relation to the above, may I inform you kindly that the Polish Party hereby expresses its interest in participating in the environmental impact procedure in a transboundary context.

Please, note the statement presented below, as regards the scope of the environmental impact documentation which has to determine:

- The anticipated environmental impacts from the alternatives analysed, including also those for the case of the occurrence of a serious reactor breakdown, as well as any possible transboundary impact;
The said analyses have to take into account the forecasts of the impacts from any project alternatives proposed that would affect both the natural habitats and the plant and animal species, for which the Natura 2000 site is designated;
- The methods to prevent the project planned against any likelihood of accident, and to reduce any effect thereof;
- The likelihood of contamination of the atmospheric air and the duration of relocation of contaminated air masses towards the national territory of the Republic of Poland and to the area of the Polish Exclusive Economic Zone of the Baltic Sea, in case a reactor breakdown occurs;
- The propagation methods for radioactive substances in the environment, particularly, in relation to the national territory of the Republic of Poland,

- The likelihood of contamination of marine environment and the methods possible to prevent this environment against contamination by radioactive substances originating from fuels or wastes, also in case of accident;
- Waste management methods, including the waste from used nuclear fuel;
- Description of the methods to prevent any possible terrorist attacks;
- Description of the principles for carrying out the monitoring of the project planned.

At the same time, may I emphasise the need to detail a precise location of the project planned. In opinion of the Polish party, and with regard to atmospheric circulation and the relevant distances, areas most distant from the territory of the Republic of Poland, including the Cap Karsikkoniemi and Laitakari Island in the Gulf of Bothnia, at the Municipality of Simo, or Cap Hanhikivi in the West Coast of Finland, at the Municipality of Pyhajoki, would be considered optimal locations for the project planned.