

# GENERAL ENVIRONMENTAL POLICY

Department V



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Ms. Seija RANTAKALLIO  
Ministry of the Environment  
Point of Contact of the Espoo Convention  
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Vienna, 26.03.2008

Your Reference/Your File Number  
Your letter dtd.

Our File Number

Official-in-charge/Ext.

BMLFUW-  
UW.1.4.2/0031-V/1/2008

Dr. Platzer-Schneider / 2115  
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Dear Ms Seija Rantakallio,

Please find enclosed an expert statement regarding the scoping phase of the ongoing EIA procedure for the NPP Fennovoima Oy. We would highly appreciate if these comments would be forwarded to the applicant.

We have to underline, that the information currently available does not allow for a proper assessment whether or not the project *"is likely to cause a significant adverse transboundary impact on Austria's environment"*. Consequently, we have to reserve our right to participate in the Environment Impact Assessment procedure as provided for in the Espoo Convention and the EIA Directive.

Apart from providing us with the EIA report you could assist our assessment by informing us on legal requirements applicable to this project providing clear evidence that no project will be licensed which is capable of causing significant adverse transboundary impacts (considering effects of design basis and beyond design basis accidents), e.g. by effectively excluding

- emergency protection action or long term action beyond 800 meter from the reactor, and
- delayed action at any time beyond 3 km from the reactor.



If the Finnish authorities could confirm to the Austrian authorities in writing that these objectives will be met, either by an irrevocable decision of the owner/operator, supported by convincing technical evidence pertaining to the type reactor selected, or – preferably – in compliance with a condition encoded in legally binding requirements or set by the Finnish Nuclear Regulatory Authority in a legally binding way, Austria in return could consider not to be affected by significant adverse transboundary impacts on Austria's environment.

Please let us know in due course, if Finland is able to provide such evidence.

With kind regards

On behalf of the Minister:  
Dr Ursula Platzner-Schneider

Enclosure

Electronically signed.