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The Ministry of the Environment
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Swedish answers to the notification in accordance with Articles 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the wind farm lifetime extension of Loviisa Powerplant.

Sweden received a notification from the Ministry of the Environment in Finland to participate in consultation under Article 3 of the Espoo Convention in relation to the planned lifetime extension of the nuclear powerplant Loviisa.

Finland has fulfilled their responsibility following from article 3 of the Espoo Convention by providing the Swedish environmental protection agency (EPA) with a notification regarding the project.

The Swedish EPA has in turn invited Swedish government agencies, organizations, the public and other parties to give consultation comments on the EIA program.

Consultation in Sweden

The notification and the attached documents have been circulated for consideration to Swedish central government agencies, county administrative boards, municipalities, organizations and the public during the period from 2nd of September to the 28th of October. The documents have also been available on the Swedish EPA website www.naturvardsverket.se/Esbo

The Swedish EPA is the authority responsible for fulfilling the obligations following from, inter alia, Article 3 of the Espoo Convention. However, the Swedish EPA has no responsibility to evaluate the consultations received in the context of the Swedish national consultation procedure with a view to presenting an overall Swedish position. For a comprehensive view of the consultations, we refer to the enclosed statements received.

Consultations comments received

A brief summary of the statements is included below, please note that the summary is written on behalf of the Swedish EPA and not the body to which a proposal is referred for consideration:

Försvarets forskningsinstitut (FOI), Sveriges meteorologiska och hydrologiska institut (SMHI), Myndigheten för samhällsskydd och beredskap, Länsstyrelsen i Uppsala, Havs och Vattenmyndigheten (HaV), Länsstyrelsen I Stockholm, replied that they had no further comments.

Jordbruksverket express the need for further participation in the upcoming process. Their comments regard potential risks due to potential accidents and highlights the need to assess the risks connected to releases of radioactive substances and the effects on agriculture, animal husbandry, fishing etc. *For full statements, please see attachment.*

Strålsäkerhetsmyndigheten (SSM) express the need for further participation in the upcoming EIA process. SSM acknowledge that the EIA-program is ambitious and that the program is well supported through science. However, in case of a severe accident, impact on ground cover in Sweden cannot be ruled out. Potential emissions should be reduced through the use of best available technique (BAT). *For full statements, please see attachment.*

Sametinget considers that the developer should in its EIA consider the reindeer husbandry area in Sweden and describe what the company should do to mitigate the damage, for the Sami culture with reindeer husbandry and other Sami industries, in the event of an accident. *For full statements, please see attachment.*

Miljövänner för kärnkraft (MFK) recognizes the high safety culture shown in Finland, MFK believes that there is no need for Sweden's participation in the environmental impact assessment. *For full statements, please see attachment.*

Miljöorganisationernas kärnavfallsgranskning (MKG) sees the risk that Sweden may subject to the threat of considerable environmental impact if the lifetime extension takes place and express the opinion that Sweden should take part in the continued consultation process. The main reason for this opinion is that as a nuclear reactor ages there is an increasing risk for a major nuclear accident. *For full statements, please see attachment.*

Folkkampanjen mot Kärnkraft-Kärnvapen (FMKK) comments on the old age of the Loviisa powerplant and potential risks connected to that. FMKK considers the 0 alternative to be the only realistic and responsible alternative. *For full statements, please see attachment.*

The Swedish EPA also received several appendices from the public which is also enclosed to this letter, please see attached.

The Swedish Environmental Protection Agency's concluding opinion

Based on the comments received, Sweden hereby express the wish to participate further in the upcoming EIA process.

As the decision has been made electronically there is no need for signatures.

For the Swedish Environmental Protection Agency

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Head of Unit

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Point of contact for the Espoo
Convention

Attachments

Comments from Jordbruksverket
Comments from FOI
Comments from SMHI
Comments from länsstyrelsen Uppsala
Comments from länsstyrelsen Stockholm
Comments from miljövänner för kärnkraft
Comments from HaV
Comments from MSB
Comments from SSM
Comments from MKG
Comments from FMKK
Comments from Sametinget
Comments from the public

Cc

The Ministry of the Environment in Finland, Seija Rantakallio
The Ministry of Environment in Sweden, Emma Sjöberg