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NV-06662-20

Miljöministeriet Finland
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Answers from Sweden to the consultation in accordance with Articles 4 and 5 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the project plan to extend Loviisa nuclear power plant's lifetime.

Sweden was invited by Finland to participate in the consultation under articles 4 and 5 of the Espoo Convention in relation to the project plan to extend Loviisa nuclear power plant's lifetime.

Finland has fulfilled their responsibility following from the Espoo Convention by providing the Swedish environmental protection agency (SEPA) with an environmental impact assessment (EIA) which the project developer, Fortum Power and Heat Ltd prepared.

SEPA has in turn invited Swedish government agencies, organizations and other parties that expressed their wish to further participate in the environmental assessment to give consultation comments on the EIA documentation.

The consultation carried out by the SEPA have been conducted as follows: The documentation received has been referred to The Swedish Board of Agriculture, The Swedish Radiation Safety Authority, The Sami Parliament Environmentalists for Nuclear (MFK), Miljöorganisationernas kärnavfallsgranskning (NGO) and Folkkampanjen mot Kärnkraft-Kärnvapen (NGO) from the 23rd of September 2021 to 26th of November 2021.

The documents have also been available on the SEPA website.

SEPA is the authority responsible for fulfilling the obligations following from, inter alia. Article 4 (2) and Article 5 of the Espoo Convention. However, the SEPA 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. A summary of the statements is included below, please note that the summary is written on behalf of the SEPA and not the body to which a proposal is referred for consideration:

The Swedish Board of Agriculture notes that the only event that could give rise to consequences on Swedish territory is if a serious reactor accident occurs. The Swedish Board of Agriculture highlights that Fortum should also include more serious reactor accidents in the environmental impact statement and calculate what a large emission in several representative weather situations gives rise to for nuclear fall-out levels. Also, what consequences the fall-out levels may have on agriculture and forestry in Sweden. *For full statement, please see attached.*

The Sami Parliament notes that their earlier comments to the environmental impact assessment have been noted. They further state that they have no assessment of what the best alternative for decommissioning is technically, Alt0 or Alt1, according to the environmental impact statement. To minimize the risks that reindeer husbandry and the Sami natural environment would be damaged by a nuclear accident, it may be better for reindeer husbandry that operations cease in 2027 and 2030 instead of continued operation and decommissioning later. *For full statement, please see attached.*

Environmentalists for Nuclear (MFK) states that with the support of documents referred to in the application, including Environmental Impact Assessment dated September 2021 and therein, from experience and knowledge of reactor operation, both Swedish and international, as well as from academic nuclear physics research, MFK finds that reported environmental impact assessment reliably shows that continued operation of Loviisa 1 and 2, as well as other activities in connection therewith, can take place without potential consequences or environmental impact on Swedish territory. *For full statement, please see attached.*

For the Swedish Environmental Protection Agency

This decision has been made digitally and therefore lacks signatures

Karolina Ardesjö Lundén
Head of Unit

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Point of Contact, Espoo Convention

Attachments, comments from:
The Swedish Board of Agriculture
The Sami Parliament
Environmentalists for Nuclear

cc:
Ministry of the Environment, Emma Sjöberg