



To the Points of Contact for the Espoo  
Convention in Sweden, Finland and Latvia

Our ref 18 November 2019 No 7-12/19/4171- 10

Regarding the strategic environmental assessment of the  
National Radiation Safety Development Plan 2018–2027,  
the National Radon Action Plan and the National Action  
Plan for Radioactive Waste Management

In a letter dated July 31, 2019, Estonia notified, in accordance with article 10 of the Protocol on Strategic Environmental Assessment (SEA) to the Convention on Environmental Impact Assessment in a Transboundary Context, its neighbouring countries concerning the SEA of the National Radiation Safety Development Plan 2018-2027, the National Radon Action Plan and the National Action Plan for Radioactive Waste Management. The notification contained the summary of the SEA report, including the description of the aforementioned plans.

The objective of the National Radiation Safety Development Plan is the management of radiation protection during 2018-2027 to ensure an optimal radiation safety, and the effectiveness and development of radiation protection in Estonia. Two action plans form the annexes to the National Radiation Safety Development Plan: the National Radon Action Plan and the National Action Plan for Radioactive Waste Management.

Responses were received from Denmark, Finland, Latvia, Lithuania, Poland and Sweden. Finland and Sweden indicated its wish to participate in the transboundary SEA procedure of the plans. Denmark and Lithuania indicated that they do not wish to participate in the procedure. Also Poland does not wish to participate, however, interest was expressed in receiving relevant information. Latvia does not wish to participate, however, Latvia wants to be informed if the final storage site for decommissioning of the nuclear site in Paldiski is changed to a site that is closer to the common border.

With this information letter answers are provided to the comments made by the countries. Also the subsequent stages related to the adoption of the plans are briefly described.

The Swedish Radiation Safety Authority informed that Sweden intends to take part in the up-coming transboundary SEA procedure concerning the specific plans and actions for the decommissioning of the Paldiski site and the plans for constructing a final disposal for radioactive waste. The Swedish NGO Office for Nuclear Waste Review (MKG) pointed out that the planned Estonian repository for radioactive waste should according to best available technology (BAT) be placed as deep as possible in a favourable geohydrologic site. A repository containing short-lived radioactive waste should be placed at a depth of more than 100 m. A repository containing long-lived intermediate-level waste should be placed at a depth of more than 400-500 m.

Regarding the comments made by Sweden, the Ministry of the Environment of Estonia would like to state the following. The detailed recommendations for the disposal site as described in the Swedish comments will be taken into account in the subsequent local government designated spatial plan and in its SEA process. No new corresponding terms are included in the SEA report of the plans in question as the plans are of general nature.

The Ministry of Economic Affairs and Employment of Finland considers it important for Estonia to assess the required permanent repository using conservative estimates of the amount of waste to be disposed of and, on the other hand, to consider being open to international cooperation in order to reduce the amount of radioactive waste. The adverse transboundary impacts of the planned activities are to be highly unlikely, as Estonia mainly disposes of low-level and intermediate-level waste. The Ministry of Foreign Affairs of Finland emphasises the importance of adhering to international commitments in the preparation and implementation of the National Radiation Safety Development Plan.

Regarding the comments made by Finland, the Ministry of the Environment of Estonia agrees that it is important to assess the required permanent repository using conservative estimates of the amount of waste to be disposed of and to consider being open to international cooperation in order to reduce the amount of radioactive waste.

Regarding the comment made by Latvia, the Ministry of the Environment of Estonia confirms that Latvia will be informed if the final storage site for decommissioning of the nuclear site in Paldiski is changed to a site that is closer to the common border.

The National Radiation Safety Development Plan, the National Action Plan for Radioactive Waste Management and the National Radon Action Plan are planned to be adopted in the beginning of 2020. Sweden, Finland, Latvia and Poland will be informed about the adoption of the plans.

In terms of the following activities in the subject field, please be informed that the Government of the Republic of Estonia has taken the decision to establish a final storage site for radioactive waste in Estonia by 2040. In order to establish this, it is necessary to initiate the local government designated spatial plan procedure together with SEA.

The establishment of the final storage site for radioactive waste and the decommissioning of the Paldiski reactor sections could potentially have adverse transboundary impacts. Respectively, this is further assessed in more detail in the SEA of the local government designated spatial plan and in the environmental impact assessment of decommissioning the reactor sections of the Paldiski nuclear site. Both assessments shall be carried out as transboundary procedures.

Considering the information described above, if you happen to have further questions regarding the SEA and the adoption of the plans in question, please send them by November 27, 2019.

Sincerely Yours,



Kaupo Heinma  
Point of Contact for the Espoo Convention

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