

September 20th, 2019

To: Naturvårdsverket (Swedish Environment Agency)
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Dnr NV-05804-19

Comments in the Espoo consultation of the Estonian 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

The Swedish NGO Office for Nuclear Waste Review, MKG, would like to make the following short comments on the Estonian National Action Plan for Radioactive Waste Management.

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.

MKG appreciates that Estonia has made consultation, both national and according to the Espoo Convention, a part of the development of the plans for radiation safety, radon and radioactive waste management. MKG looks forward to the Espoo consultation for the decommissioning of the Paldiski reactor site and for future repositories for radioactive waste.

Best regards,

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