



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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the Republic of Poland's
General Directorate for
Environmental Protection

Mr. Andrzej
SWEDA-LEWANDOWSKI

The Swedish reply to the transboundary consultation of the planned Polish project to construct and operate a Nuclear Power Plant

On September 16th, 2022, the Republic of Poland's General Directorate for Environmental Protection notified the Swedish Environmental Protection Agency [SEPA] about the country's planned project to construct and operate a Nuclear Power Plant [NPP] in *Choczewo*, *Gniewino* or *Krokowa* municipality. The proposed NPP is set to have a total output of 3 750 MWe.

Pursuant to the Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessments in a Transboundary Context [Espoo Convention], a country [originating party] that intends to implement a plan or program likely to have significant transboundary effects on the environment or health of another country [designated party] shall notify the country concerned and, if the designated Party so wishes, enter consultations.

The Swedish Environmental Protection Agency is the responsible authority for submitting and receiving notifications and otherwise fulfilling obligations for environmental impact assessments in a transboundary context [Espoo Convention] in Sweden, according to the Environmental Assessment Regulation (2017:966). The consultation documents have been referred by SEPA to 17 relevant central government agencies, including the County Administrative Boards of *Skåne* and *Kalmar* and environmental organizations. The Swedish consultation period lasted from the 16th of September 2022 until 12th of December 2022.

SEPA hereby acknowledges having received the notification from the Republic of Poland's General Directorate for Environmental Protection and would like to notify that Sweden intends to further participate in the forthcoming process.

Remarks received during the consultation

All statements are enclosed to this letter and should be considered in full.

The NGO *Folkkampanjen mot Kärnkraft-Kärnvapen* [FMKK] rejects the planned Polish project to construct and operate an NPP.

The **County Administrative Board of Kalmar** welcomes the previously requested description on the considerations made to the impacts of climate change. The Board believes that the EIA lacks significant assessments on the marine environment and underlines the importance of choosing solutions and constructions for e.g., the cooling system and the local sewage treatment plant that are robust during a long period of time.

The **County Administrative Board of Skåne** highlights several thematic areas that are to be further developed in the EIA. These include conventional and radioactive waste management, climate change adaptation as well as an evaluation of- and motivation to the project in relation to Directive 2009/28/EC on the promotion of the use of energy from renewable sources.

The **Swedish Association *Environmentalists for Nuclear Power*** [MFK] fully supports the Republic of Poland's plans to establish and operate a NPP to increase the use of carbon free methods to create a stable electrical power grid not only domestically but throughout the whole Baltic region.

The **Swedish Board of Agriculture** [Jordbruksverket] suggest that a serious reactor accident stemming from the proposed Polish NPP is considered by the Board to be the main trigger for any transboundary impact on Sweden. The Swedish Board of Agriculture argues that the EIA should include an assessment on severe reactor accidents with the potential of releasing large quantities of radioactive substances into the surroundings and how that, in turn, could impact the Swedish food production.

The comments made by the **Swedish Food Agency** [Livsmedelsverket] stresses that the potential impact on the supply of food and drinking water in Sweden following a hypothetical meltdown at the proposed Polish NPP, is as great as in the case of a radioactive release from a Swedish NPP. The Swedish Food Agency therefore requests that a thorough investigation, including a risk and impact assessment, are to be conducted by the Republic of Poland.

The **Swedish Radiation Safety Authority** notes the Commission delegated regulation (EU) 2021/2139 which establish technical screening criteria concerning environmentally sustainable economic activities and their potential implication concerning e.g., reactor technology, accident tolerant fuel, plans for waste management including geological final disposal of spent fuel and decommissioning and funding thereof. This regulation enters into force in January 2023. SSM therefor assume that the final choice of technology will ensure that any radiological consequences from the NPP in Sweden will be in the same or less than as presented in the EIA.

The agency also includes detailed comments to several areas of interest in the submitted EIA, that are to be considered in full by the General Directorate for Environmental Protection.

This decision has been made digitally and therefore lacks signatures.

For the Swedish Environmental Protection Agency

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Point of Contact for the Espoo
Convention

Cc

Sandra Jalalian and Astrid Öfverholm at the Swedish Ministry of Environment

Enclosed, statements made in Swedish and English by:

Folkkampanjen mot Kärnkraft-Kärnvapen [FMKK]

the County Administrative Board of Kalmar

the County Administrative Board of Skåne

The Swedish Association *Environmentalists for Nuclear Power* [MFK]

the Swedish Board of Agriculture

the Swedish Food Agency

the Swedish Radiation Safety Authority