

Enerģētikas un vides aģentūra

Energy and Environment Agency

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Riga

14.04.2025. Our ref.Nr.2.10/785/2025-N

Ref. to: 03.04.2025. Case number: NV-00544-25 "NPP Ringhals"

Swedish Environmental Protection Agency

e-mail: registrator@naturvardsverket.se

Regarding the environmental impact assessment for nuclear facilities in Varberg municipality, Sweden

The Energy and Environment Agency (hereinafter – the Agency), acting as a Point of Contact regarding Notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (hereinafter – the Espoo Convention) of Latvia and the competent authority on the environmental impact assessment (hereinafter – the EIA) in Latvia, would like to express gratitude to the Swedish Environmental Protection Agency for notification sent regarding plans for nuclear facilities in Varberg municipality, Sweden (hereinafter – the Project) with reference to Article 3 of the Espoo Convention.

The Agency hereby acknowledges the receipt of the notification and prepared documentation¹. Considering the nature and scope of the Project and the possibility of transboundary impacts, we hereby confirm that Latvia intends to take part in the proceedings on the EIA and transboundary consultations of the Project as an affected party.

Please be informed that the Agency published received information regarding the Project on Agency's webpage² on 5 March 2025 and sent information directly to the involved authorities. The Agency received opinions regarding the Project and its potential transboundary impacts within the scope of competence from the Ministry of Climate and Energy of the Republic of Latvia, the Ministry of Foreign Affairs of the Republic of Latvia, the Ministry of Smart Administration and Regional Development of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Ministry of Interior of the Republic of Latvia, the Ministry of Economics of the Republic of Latvia, the State Centre for Defence Logistics and Procurement, the Nature Conservation Agency, the State Environmental Service and the Kurzeme Planning Region. The Agency has not received comments from the public.

¹ Received on 5 March 2025, registration No 2.10/612/2025-S.

²https://www.eva.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/ietekmes-uz-vidi-novertejums-jaunas-atomelektrostacijas-buvniecibai-un-ekspluatacijai-varbergas-varberg-pasvaldibas-teritorija-zviedrija

The Ministry of Health of the Republic of Latvia and the State Environment Service provided more detailed comment concerning the scope for the assessment of the transboundary environment impacts of the Project.

The Ministry of Health of the Republic of Latvia concluded that the document "Background to the Consultation on Transboundary Impacts" includes preliminary analysis that the risk from transboundary consequences of a hypothetical radiological accident has been assessed in comparison with natural background radiation and has been determined which exposure pathways are being assessed for short-term and long-term effects. However, in the opinion of the Ministry of Health a few long-term exposure pathways, which are essential for more complete assessment of the transboundary risk in the event of an accident, have not been included. Long-term risk assessments should also include an assessment of the risk of drinking water contamination since it is currently indicated that the calculations have been made only for the impact from food. As radioactive fallout can affect surface and groundwaters and reservoirs, especially in cases of heavy rain. Regarding long-term risk, the impact of bioaccumulation in the food chain on nutrition also needs to be considered.

The State Environment Service invites responsible authorities from Swedish side to conduct atmospheric dispersion modelling of radioactive release caused by nuclear accident with radius up to 1000 km. Currently, atmospheric dispersion modelling that is done by decision support system JRODOS is at a radius of 800 km (see page 4 in document "Background to the Consultation on Transboundary Impacts"). Atmospheric dispersion modelling with 800 km radius doesn't completely cover all territory of Latvia.

To promote effectiveness of public participation process of the EIA report, the Agency kindly asks to determine reasonable time for organizing participation process (till 60 days), to determine term for the process of public consultation when elaborated EIA report is discussed (we would highly appreciate possibility to determine this term at least 30 days long), and to compile the proposals submitted by the public and stakeholders. Regarding documentation we kindly ask you to prepare the EIA report in English and the summary of the EIA report in Latvian.

Looking forward to a constructive and effective cooperation in the transboundary EIA context.

Enclosure: 2 files (State Environment Service_NPP.pdf, Ministry of Health_NPP.pdf).

Sincerely yours, Director

D.Avdejanova

THIS DOCUMENT IS SIGNED WITH SECURE ELECTRONIC SIGNATURE AND CONTAINS TIME- STAMP

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