



MINISTRY OF ENVIRONMENT,
WATERS AND FORESTS

Министерство на околната среда и водите

Вх. № 0800-1

София 04.11.2016 г.

Cabinet of the Minister

Reg.No 7511 / CPP / 03.11.2016

Subject: EIA procedure on the investment proposal for construction of National disposal facility for low and intermediate radioactive waste initiated by State enterprise "Radioactive Waste" -

Dear Ms. Vassileva,

In relation to the Bulgarian project "Construction of National disposal facility for low and intermediate radioactive waste initiated by State enterprise "Radioactive Waste" - we inform you as follows:

Romanian Party is convinced that the Bulgarian Party understands the sensitivity of such project whose location is near the border with Romania.

Within the procedure for environmental impact assessment in a transboundary context, the public from Romania has expressed his opinion against the project implementation near the Romanian-Bulgarian border. This highlights once again the importance of ensuring by the Bulgarian Party that the project does not compromise the human health and the environment and compliance of this commitment by the Bulgarian Party is a major concern for Romania.

In order to ensure a proper implementation of the project and activity storage, in order to avoid an transboundary impact and considering that the Bulgarian Party has not taken into consideration all the Romanian's requirements in the EIA Decision no. 21-9 / 2011 and has not provided concrete answers on radiation monitoring in the radius of 30 km on Romanian territory, throughout of the environmental impact assessment process, in according with the provision of Article 6 of the Espoo

Ms. IVELINA VESSELINOVA VASSILEVA
Minister
Ministry of Environment and Water,
Republic of Bulgaria



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Convention, we insist that the Bulgarian Party to include in the final decision the following conditions:

- a. We kindly request the Bulgarian Party that Romanian authorities (MEWF/ NEPA / EPA Dolj) to be informed periodically (hourly / daily / weekly / monthly / etc. depending on the frequency that the sampling is carried out) on monitored indicators (measuring indicators and their values) and immediately in case of detection of high levels of radioactivity on all environmental factors, in all stages of Implementation of the deposit (construction, operation, closure, post-closure, etc.), considering that, according to information provided in the EIA procedure, the Bulgarian Party:
 - wastewater, radioactive generated through seepage and drainage from deposit will be collected in special tanks, treated in the atomic power plant from Kozloduy and subsequently stored in the storage, feasible solution only for the period of operation of the two facilities.
 - The EIA documentation completed include insufficient data on the monitoring of surface water and /or groundwater, and in the present, within the monitoring programs of transnational Monitoring Network (TNMN) of the International Commission for the Protection on the Danube River (ICPDR), the radioactivity is no monitored.
 - The importance of activities from the nuclear field undertaken in the Kozloduy site (Bulgaria carrying out in parallel several projects), whose impact individually and cumulatively raised concerns to the Romanian population in the area of influence, both by point of view of human health and the environment.
- b. Compliance with the requirements of Directive 2011/70 / Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste.
- c. Take all necessary measures and providing recommendations to protect Romanian population in the zone of influence at the early stages of an



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accident, under the same conditions in which they are carried out by the operator NDF for the local Bulgarian population for any accident that may occur on Kozloduy site.

In accordance with art. 7 of the Espoo Convention, the Romanian Party reiterates the necessity of a post-project analysis which includes the following elements:

- results of the monitoring process on compliance with the Habitats Directive and the Birds Directive because at the Romanian border are designated Natura 2000 sites and other protected areas.
- results of radioactivity monitoring of surface and groundwater waters in the area of influence of the landfill.
- inventory of the waste deposited, together with their monitoring results.

Elaboration of a specific plan for emergencies situations that include:

- Creating a line of direct communication between the Bulgarian and local / central Romania authorities in order to inform in real time on the situation of Radiana site and evolution of the situation in case of an event.
- A procedure for special notification by the authorities from Romania for emergencies situations;
- Initiating of some exercises between the emergency authorities of the two countries, in order to test the response time of the communication line in case of accident.
- emergency plan, including mandatory measures in case of events like rainfall, earthquake, plane crash, terrorist attack etc.

Elaboration of an impact assessment study on human health for the inhabitants of Romania in the influence area of 30 km, in normal operating conditions of the deposit, and for each type of emergency situation, taking into account the continuous operation of the objective and cumulated impact with the other objectives of the Kozloduy site.

The study should be developed during the development stages project and submitted to the Romanian authorities for making available to citizens / public from Romania.



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Considering the fact that the public from Romania does not agree with the implementation of the project due to its location near the border with Romania, authorities from Romania must ensure that dispose of clear information on the Radiana site, for a correct information of the population from Romania. In this respect the Bulgarian Party must demonstrate that the deposit operation complies and therefore the potential impact on human health and the environment, including in the area of influence of the project on the Romania territory will be below the level required by the regulatory authority in the nuclear field from Bulgaria.

Romania still expresses his desire to conclude a bilateral agreement between Romania and Bulgaria for post project monitoring of the environmental effects on human health of all projects from the Kozloduy NPP site, which will include their area of influence on the Romania territory.

Please accept, Ms Minister, the assurance of my highest consideration and esteem.

Yours sincerely,

9 MINISTER

Cristiana PAȘCA PALMER

A handwritten signature in black ink, appearing to read "Cristiana", with a stylized flourish below it.