

**STAKEHOLDER ENGAGEMENT PLAN  
FOR THE EIA  
FOR THE DECOMMISSIONING OF KNPP UNITS 1 TO 4**



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## **I. Introduction**

### **Public Relations Activities in support of the Environmental Impact Assessment (EIA) for the Decommissioning of KNPP Units 1 – 4.**

Herewith we present the Stakeholder Engagement Plan in support of the EIA process and the successful realization of the Decommissioning of the KNPP Units 1-4. All activities are based on previous experience with SE RAW in terms of corporate communication and communication with regard to a previous EIA process, as well as on the accumulated knowledge about its structure and functions and its relations with important stakeholders.

The intensive communication and the proactive approach towards stakeholder engagement are of great importance for SE RAW that are responsible for environmental activities and health security issues. Therefore a number of activities tailored for each specific key stakeholder are considered necessary in order to ensure public support of the Decommissioning of the KNPP Units 1-4 project.

The team of MI Media Group is assisting SE RAW to develop and apply such activities in order to increase public awareness about the EIA that has been prepared; international commitments of the country with regard to the Decommissioning of the KNPP Units 1-4; the character and the schedule of the project and the safety measures, and about the environmental and social responsibility commitments that SE RAW has.

During the EIA Process for the Decommissioning of the KNPP Units 1-4, the public has the right to review all documents and ask questions concerning the EIA Report, the SE RAW activities and about the decommissioning project. These questions must be satisfactorily answered and a Consultation Report will be prepared on the issues raised during the consultation period and the SE Raw responses.

## **II. Project Location and Areas Subject to Impact**

The site of the NPP is situated in the Northwestern part of Bulgaria, on the right bank of river Danube, 5 km in southeast direction of the city of Kozloduy and 3.7 km to the South of the midstream of the river and consequently the boundary of Romania. All decommissioning works for Units 1-4 will be within the existing territory of the NPP.

Based on the experience of the EIA report for the National Disposal Facility for Low and Intermediate Radioactive Waste, situated also on the site of the NPP, we expect that the communities which are subject to impact should be the ones inhabiting Kozloduy municipality and the Mizia Municipality, as well as the Romanian municipality of the city of Beket, unless otherwise determined by the competent authorities.

### III. Stakeholders

The key stakeholders that will be approached (consulted or provided with information about the EIA approval process or be specially addressed) are described herewith, but are not limited to:

- **National government authorities and administration** - MEW and subordinate departments thereof: Executive Environment Agency, Regional Inspectorate of Environment and Waters in Vratsa, Basin Directorate Pleven; Ministry of Health and National Centre of Radiobiology and Radiation Protection; Bulgarian Nuclear Regulatory Agency;
- **Local authorities and administration** – the Chairman of the Kozloduy Municipal Council Mrs. Maya Zaneva; all members of the Kozloduy Municipal Council; the Mayor of Kozloduy Municipality Mr. Rumen Manoev; all members of the Mizia Municipal Council; the Mayor of Mizia Municipality; Governor of the Vratsa District;
- **Local community** – approached in different ways, the groups we define as stakeholders of the Decommissioning of KNPP Units 1-4 project are:
  - Young, actively working men and women, concerned about the environmental impact of the project, and about the impact of the project on the local community;
  - Women who take care of the household, who are especially sensitive on topics, concerning children’s health and environmental protection;
  - Children – in kindergartens and schools, approached in different manner – emotional and educational;
  - Retirees, concerned about the local environment and the impact of the Decommissioning of KNPP Units 1-4 on theirs and their families’ health and lifestyle;
  - Teachers’ community from the local schools – being part of the best educated group of the population and with strong influence over a large part of the overall population.
- **Local opinion leaders and decision makers;**
- **Media** – local, regional and national;
- **Non-governmental organizations with ecological activities** – Za Zemiata (For the Earth) Ecological Association, Bulgarian Bird Protection Society, Association for Wild Nature “Balkans”, Ecoglasnost, Society for Protection of the Nature, Green Balkans Society;
- **Non-governmental organizations focused on energy issues** - Bulgarian Atomic Forum; Bulgarian Nuclear Society; Bulgarian Energy Forum;
- **Bulgarian Academy of Science Institutes** - Institute for Nuclear Research and Nuclear Energy and Geological Institute;
- **Experts, related to the project on national and regional level;**
- **Employees of the SE RAW, part of them being ex-employees of the KNPP;**
- **SE RAW and NPP employees;**
- **Trade Unions’ structures operating in SE RAW;**
- **Romanian society** nearest to the national boarder, expected to be the municipality of Beket;
- **Other organizations and structures related to the issue.**

The scope of the target stakeholders will be continually updated during the process of public communication and the Environmental Impact Assessment. The interested parties will be invited to participate in the discussion process on all topics of concern and during the entire process of the

progress of the Decommissioning of KNPP Units 1-4 project. A detailed list of stakeholders is provided on <http://dprao.bg>

#### **IV. Documents to be released**

The following documents will be disclosed for stakeholder comment:

- EIA Report on Decommissioning of KNPP Units 1- 4 (Bulgarian and English)
- Non-Technical Summary (Bulgarian and English)
- Stakeholder Engagement Plan (Bulgarian and English)

Documents which are subject to public release under these requirements are:

- EIA Report on Decommissioning of KNPP Units 1-4, in Bulgarian:  
located physically, in paper, in the town hall of Kozloduy Municipality (13, Hristo Botev St, Kozloduy) and the town hall of Mizia Municipality (25-27, Georgy Dimitrov St., Mizia, 3330) and State Enterprise Radioactive Waste Headquarters (Sofia 1797, 52A “G.M.Dimitrov Blvd., fl.6) and SE RAW Information Center in Kozloduy;
- Notification for Public Disclosure of the EIA Report in one local newspaper – “Kozloduy dnes” and in a national newspaper - “Novinar daily” as per the requirements of the Bulgarian legislation regarding EIA. The Notification will be uploaded also on the SE RAW homepage.
- A publicly available written statement on the stakeholder concerns (proposals, recommendations, opinions, objections) expressed during the public hearing/hearings will be submitted to MEW and municipality authority(s), where the public hearings were held. The statement will be uploaded also on the SE RAW home page.
- Non-Technical Summary of the EIA Report on Decommissioning of KNPP Units 1-4, in English
  - located physically, in paper, in the buildings of the Municipalities of Beket and/or other Romanian settlement (to be defined by the Romanian Ministry of Environment and Forests) ;
  - uploaded on the home page of SE RAW - [www.dprao.bg](http://www.dprao.bg);
- Chapter 11.5 - Transboundary Aspects of the Investment proposal, in English located physically, in paper, in the buildings of the Municipalities of Beket and/or other Romanian settlement (to be defined by the Romanian Ministry of Environment and Forests) ;
- Notification in English for Public Disclosure of the EIA Report available for the Public in a local Romanian newspaper. The Notification will be provided in English to the Romanian authorities; the English version will be uploaded on the SE RAW homepage.
- Written statement in English on the public concerns (proposals, recommendations, opinions, objections) expressed during the public hearing/hearings will be submitted to the Ministry of Environment and Forests and municipality authority(s), where the public hearings will be held, providing access to the public to them. The statement will be uploaded also on the SE RAW home page.
- Announcement of the MEW decision on EIA to the public, in Bulgarian and English in local newspaper and on the SE RAW homepage.

- Sixty days after the disclosure of the EIA, NTS and SEP a Stakeholder Report summarizing all stakeholders' comments and SE RAW responses will be prepared and issued to the respective stakeholders.
- The Investor written statement resulting of the Public consultation will be posted on the SE RAW homepage and hard copies provided to the concerned Municipalities and the Ministry of Environment and Waters.

**In addition, to the legally required documents, MI Media Group plans to undertake the following public consultations activities:**

## **V. Consultation**

### **1. Materials and location of materials:**

- **Monthly Bulletin** dedicated to the Decommissioning of KNPP Units 1-4 project – information about the Bulgarian project, expert positions and interviews, international experience, best practices in the field, etc. The Bulletin will be distributed to the following recipients: Kozloduy Municipality; Members of the Kozloduy Municipal Council; Kozloduy Community Center; Informational Center of SE RAW in Kozloduy; Office Protocol of SE RAW; Mayor of the city of Mizia, Members of the Mizia Municipal Council. The Bulletin will be available during the whole legally determined EIA process.
- **Leaflets** – two types of leaflets are prepared. One is dedicated to the general activities of SE RAW and is designed for general public; another one is dedicated to the Decommissioning of KNPP Units 1-4 project, designed for general public. The issued leaflets will be distributed to the following recipients: Kozloduy Municipality; Members of the Kozloduy Municipal Council; Kozloduy Community Center; Informational Center of SE RAW in Kozloduy; Office Protocol of SE RAW; Mayor of the city of Mizia; Members of the Mizia Municipal Council. The Leaflets will be available also in Romanian.
- **Posters** – posters, informing about meetings, events, discussions and other initiatives, organized by SE RAW will be put in the Municipality buildings, on boards, in the Information Center of SE RAW in Kozloduy, in the Office Protocol of SE RAW, public places in the villages of the municipalities. Posters will be available prior to each event.
- **Press releases** about key events connected to public discussions and important activities of SE RAW in general and in connection to Decommissioning of KNPP Units 1-4 project will be issued on occasion.
- **3D model** of a KNPP unit will be exhibited in the Information Center of SE RAW in Kozloduy and will be available during all meetings and public hearings in order to visualize the decommissioning processes.
- In order to inform the Romanian public, some of the **information materials** will be published also **in Romanian language** (leaflets, presentations established by SE RAW and by EWN for Public meetings) and press releases will be sent also to Romanian media. The EIA Report will be submitted to the competent Romanian authorities. If media interest is expressed in terms of questions, requests for interviews, etc. they will be timely met with the appropriate information and assistance.

## 2. Public meetings planned

**An overall program will be kept up to date on the SE RAW website with the dates and times of the stakeholder meetings.**

- **Public meetings with local communities** are planned for the city of Kozloduy, the city of Mizia and in Romania. Dates and places of the meetings will be announced in advance through local authorities (Mayors, secretariats), through printed materials and through local media (Kozloduy Dnes weekly, Kozloduy-bg.info, and Vizh TV channel), as well as through the home page of SE RAW – [www.dprao.bg](http://www.dprao.bg).
- **All questions and comments** made during the public meetings are going to be taken down and addressed personally during the meeting, if possible. Questions that cannot be addressed during the meeting are to be collected and provided to competent specialists of SE RAW to provide a response. Answers to the questions are to be provided in the Information Center of SE RAW in Kozloduy within two weeks. The Stakeholder Report will summarise stakeholder concerns and provide responses. All questions might be addressed in written form to the e-mail address of the Information Center of SE RAW and to [info@dprao.bg](mailto:info@dprao.bg) – the mail is going to be published in the leaflets provided by the enterprise, and it is already available on the homepage of the company.
- **All changes proposed by the local communities** and approved by the management of SE RAW complying with the national legislation will be announced during the public meetings, in the Monthly Bulletin and in the Stakeholder report.
- **Public hearing** will be organized in the settlements defined by the Romanian authorities on the dates officially agreed and included in the program. A Romanian interpreter with good knowledge of the language and experience in the topic will be secured in order to facilitate the communication. Information materials in Romanian language (leaflets, presentations established by SERAW and by EWN for Public meetings, stand-alone banners with basic information) will be available in the venue/s of the public hearings.

## VI. On-going information

During the whole period prior to the Public Hearing of the EIA report and after that event, public information concerning the Decommissioning of KNPP Units 1-4 project will be provided. All important information concerning the EIA report, the Decommissioning of KNPP Units 1-4 project and the activities of SE RAW will be published on the home page of the enterprise. Press releases will be issued to national and regional media and also published on the home page of SE RAW.

The local newspaper Kozloduy dnes will open a column with Q&A regarding the Decommissioning of KNPP Units 1-4 Project. Most frequently asked questions will be answered by experts from the SE RAW and third parties – environmental, nuclear, medical and other specialists.

## **VII. Grievance mechanism**

All suggestions, complaints and objections concerning the Decommissioning of KNPP Units 1-4 project should be addressed to SE RAW in written form to the following e-mail: [info@dprao.bg](mailto:info@dprao.bg). They may be personally presented in written form in the Information Center of SE RAW in Kozloduy and/or in the Office Protocol of SE RAW. A Grievance Form will be provided for those who want to submit a question, comment or complain. The Grievance Form will be available on SE RAW homepage, as well as in the SE RAW Information Center and SE RAW Headquarters.

All incoming written suggestions, complaints and objections should be transferred to the competent experts of SE RAW. Answers and statements should be given within 2 weeks time. They should be provided via e-mail to the recipient or in written form in the Information Center of SE RAW in Kozloduy or in the Office Protocol of the enterprise after being approved by the management of SE RAW.