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**Strategic environmental assessment to the update of the concept of radioactive waste and spent nuclear fuel management**

Comment on the Environmental Report

Your e-mail of 21 June 2017

Our reference: RS III 2 - 18042 CZE

Bonn, 16 August 2017

Dear Ms Šamšulová, dear Mr Hejhal,

First of all I would like to thank you for consulting the Federal Republic of Germany in the transboundary strategic environmental assessment (SEA) to the update of the concept of radioactive waste and spent nuclear fuel management as well as for granting the request for an extension of the deadline. As we agreed, we asked the German public to send comments directly to the contacts that you provided.

We sent you the Federal Environment Ministry's statement on the scoping phase of the strategic environmental assessment by letter of 23 November 2015. Unfortunately, I became aware that these comments, due to imprecise translation, were not always rendered accurately in the German version of the environmental report. For this reason I have attached a copy of said statement for your information. Some terms have not been defined clearly in the recently presented German version of the environmental report, either. This may also result from translation problems.



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Following the participation of German public authorities in the strategic environmental assessment, I would like to comment as follows on the documents you provided:

Germany welcomes the fact that the Czech Republic is updating its concept of radioactive waste and spent nuclear fuel management and adapting it to the changes in expected waste volumes and updated international regulations. We are also very pleased about the strategic environmental assessment and the transboundary participation that are being carried out on updating this concept.

From Germany's point of view, it is important that the implementation of the updated concept will not have any negative impacts on German territory. The documents presented, however, do not provide sufficient proof. One aspect is that the environmental data available for a strategic environmental assessment of a plan are generally not as detailed as they would be for an environmental impact assessment. I would therefore request that transboundary participation is carried out in the context of upcoming environmental impact assessments for measures to implement the concept where these measures might affect German territory.

In addition to the environmental impacts of regular operations, I believe it necessary to also consider the impacts of potential incidents/accidents in the context of both the SEA and upcoming EIAs. As I stressed in my comments of 23 November 2015, it is important to lay out potential environmental impacts, including exposure to radiation in a comprehensive manner so that the process is transparent and easy to understand for the public. This applies



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in particular to the site selection for a deep geological repository but also to the changes planned for the disposal facilities Richard and Bratrstvi for low and intermediate level waste.

It should be pointed out if environmental impacts of certain facilities were already presented in previous EIAs and also where environmental impacts are expected to differ due to the changes in the concept.

With a view to disposing of spent nuclear fuel and high level radioactive waste, I support the deep geological repository favoured in the concept as well as the site selection procedure for such a disposal facility.

It is understandable that the environmental report can only make general assessments regarding the environmental impacts that can be expected as no specific site has been chosen yet to establish a disposal facility. As soon as more specific data is available on the project, further confirmation is necessary that such a disposal facility is not expected to have any transboundary impacts. I would therefore like to ask you to keep in close touch with the German authorities, provide the relevant information and facilitate German participation during the upcoming phases of the site selection process.

Your concept does not rule out the joint storage of low, intermediate and high level waste in future. In my opinion, it would be important to make sure already during the planning phase that additional emplacement of low and intermediate level waste does not impact on the achievable safety level of disposal of high level waste.



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Finally, I would like to assure you that Germany appreciates very much the close and trusting cooperation on the topic of nuclear waste disposal between neighbours and at international level. It is obvious that the Czech authorities consider guidance by international recommendations and cooperation in renowned international institutions an essential element of ensuring responsible disposal. I am looking forward to continuing this close exchange between our authorities.

I will provide a courtesy translation of this letter in English as soon as possible.

Yours sincerely,  
for the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety

Robert Harbers

#### **Attachments**

- 1) Statement on scoping of 17 December 2015 (German/English)