2nd March 2017

Mr. Giles Scott
Head of Energy Infrastructure Planning and Coal Liabilities
Department of Business, Energy & Industrial Strategy
3 Whitehall Place
London
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Your Ref: EN0100001-006398

United Nations Economic Commission for Europe
Meetings of the Parties to the Convention on Environmental Impact Assessment in a Transboundary Context
Findings and recommendations further to an Implementation Committee initiative concerning the United Kingdom of Great Britain and Northern Ireland (EIA/IC/CI/5)

Dear Mr. Scott,

I refer to your letter of 21 December 2016 inviting an opinion on whether Ireland would consider notification under the Espoo convention at the current stage of the development at Hinkley Point C would be useful.

It is our opinion that such notification would be useful and the basis for this opinion is outlined below.

United Kingdom new build study

In 2013 Ireland published a study on the possible radiological impacts of the United Kingdom’s new build programme including Hinkley Point C – “Assessment of the potential radiological impacts on Ireland of the UK’s proposed nuclear power plants”. This study concluded that the routine operation of the proposed new nuclear power plants (including Hinkley Point C) will have no measurable
radiological impact on Ireland of the Irish Marine environment. However, the study also identified a number of severe accident scenarios that could cause significant radiological impacts to Ireland. While the likelihood of occurrence of such accidents may be low, if they were to occur they could result in a significant transboundary impact on Ireland. Thus, the Espoo Implementation committee’s finding that “the characteristics of the activity and its location warrant the conclusion that a significant adverse transboundary impact cannot be excluded” is consistent with the above study.

UK-Ireland relationship

While Ireland is a non-nuclear State it recognises the right of States to determine their own energy mix, including whether to develop nuclear power. It is our expectation that, where a state chooses to develop a nuclear power industry, this will be done in line with the highest international standards in respect of safety and environmental protection. As our nearest neighbouring State we naturally take a particular interest in nuclear matters in the United Kingdom.

Hinkley Point is just over 240km from the east coast of Ireland and given the nature of the project it attracts significant interest among the Irish public and particularly environmental NGOs. Having the opportunity to formally comment on the UK’s new build programme is extremely valuable in allaying public concerns in relation to the programme.

Ireland and the United Kingdom cooperate closely on radiological matters including through a biannual meeting of the United Kingdom-Ireland contact group involving your Department. The UK new build programme is a standing item on the agenda for these discussions which are very valuable for our understanding of this area. This ongoing engagement is extremely important to Ireland to ensure that the Irish people and environment are protected from the possible harmful effects of radiation.

I look forward to continuing to work productively with your Department on radiological matters of mutual concern.

Yours sincerely,

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c.c. Dr. Killian Smith, Environmental Protection Agency

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