



**Statement of the Government of the Netherlands
concerning communication ACCC/C/2014/104**

A. Introduction

1. On 6 May 2014, Stichting Greenpeace Netherlands (Greenpeace) submitted a communication to the Compliance Committee (Committee) under the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Convention), which was forwarded to the Government of the Netherlands (Government) on 3 September 2014.
2. The issue before the Committee is whether Article 6 of the Convention should have been applied in connection with decision-making on the planned extension of the design lifetime of the Borssele nuclear power plant (Borssele NPP).
3. The Government requests for deferment of the consideration of the communication. In the alternative, the Government is of the opinion that Article 6 of the Convention was correctly applied with respect to decision-making on the planned extension of the design lifetime of the Borssele NPP. In order to demonstrate this, the Government will make statements concerning the facts of the case and the implementation of the provisions of the Convention with respect to the decision-making on the planned extension of the design lifetime of the Borssele NPP.

B. Request for deferment

4. The Government notes that, on 19 September 2014, the Implementation Committee under the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) requested the Government to provide clarifications and information regarding the planned extension of the design lifetime of the Borssele NPP. On 24 December 2014, the Implementation Committee, after discussing the information provided by the Government on 21 November 2014,¹ requested the Government to provide additional information.
5. The inquiry under the Espoo Convention aims to determine whether the extension of the design lifetime of the Borssele NPP constitutes an activity within the meaning of the Espoo Convention for which a transboundary environmental impact assessment (EIA) should be carried out.
6. The process of establishing whether the extension of the design lifetime of the Borssele NPP requires the conduct of a transboundary EIA under the Espoo Convention is related to the process of establishing whether the extension of the design lifetime of the Borssele NPP is subject to Article 6, paragraph 2 (e), of the Aarhus Convention.

¹ Appendix 1: clarifications and information regarding the planned extension of the design lifetime of the Borssele nuclear power plant; information provided to the Espoo Implementation Committee on 21 November 2014.

7. Although there are considerable differences between the case of the Borssele NPP and the case of the Bystre deep-water navigation canal construction in Ukraine, the Government would like to make the following observation. The Committee, during its Seventh Meeting,² took “into account the related process of establishing an inquiry commission under the Espoo Convention aimed at determining whether the activity was likely to have a significant transboundary environmental impact” and agreed to “consider the question of compliance with the part of article 6, paragraph 2 (e), relating to environmental impact assessment in a transboundary context in the light of the findings of the inquiry procedure being undertaken under the Espoo Convention”. The Government concludes in the Espoo procedure that the extension of the design lifetime of the Borssele NPP does not constitute an activity within the meaning of the Espoo Convention and is consequently not subject to a transboundary EIA procedure. The inquiry under the Espoo Convention is expected to establish whether or not this conclusion can be upheld. Therefore, the Government requests the Committee to defer its consideration of the decision-making on the planned extension of the design lifetime of the Borssele NPP until such time as the Implementation Committee under the Espoo Convention has reviewed the issue.

C. Background

8. The Borssele NPP is operated by *N.V. Elektriciteits-Produktiemaatschappij Zuid-Nederland* (EPZ). It is a two-loop Siemens/KWU pressurized water reactor (PWR) that has been in commercial operation since 1973. The Borssele NPP has a thermal power of 1365 MW_{th}, a gross capacity of 512 MWe and a net electrical output of about 485 MWe. It generates some 4% of the Netherlands’ electricity demand and is at the moment the only nuclear power plant in operation in the Netherlands.
9. The location of the Borssele NPP is indicated in Figure 1. The plant is located in the Province of *Zeeland* in the southwest part of the Netherlands, in a straight line at 16 km from the border with Belgium. The distance in a straight line to the nearest point in Germany is 183 km.

² Findings and recommendations with regard to compliance by Ukraine with the obligations under the Aarhus Convention in the case of Bystre deep-water navigation canal construction (submission ACCC/S/2004/01 by Romania and communication ACCC/C/2004/03 by Ecopravo-Lviv (Ukraine)), UN Doc. ECE/MP.PP/C.1/2005/2/Add.3.

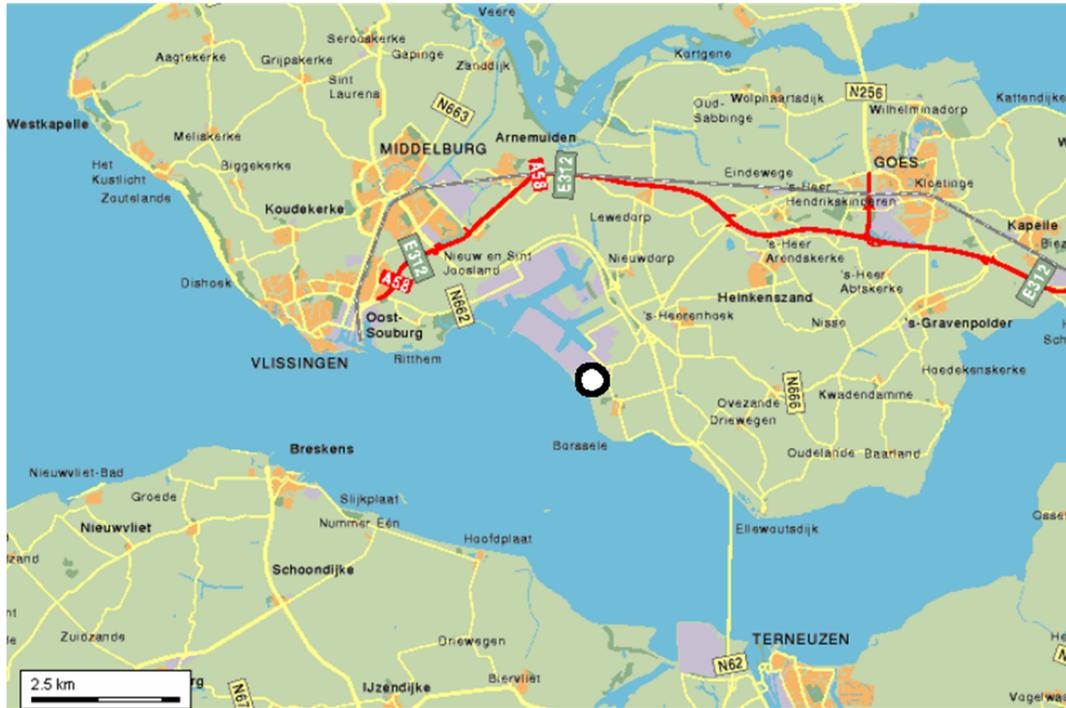


Figure 1: Location Borssele NPP (in circle).

10. The license for construction and operation of the Borssele NPP was issued in 1973 for an *indefinite* period under the Netherlands' Nuclear Energy Act (*Kernenergiewet*). A Safety Report is part of the license. When the relevant design safety analyses were carried out, the Safety Report was based on a design lifetime of 40 years.

11. The ultimate date to shut down the Borssele NPP is 31 December 2033. This shut-down date was the outcome of a political discussion in the Netherlands in the period 1995-2005 on the position of nuclear energy in general and the position and closure of the Borssele NPP in particular. In 2006 the shut-down date was laid down in the Voluntary Agreement (*Convenant Kerncentrale Borssele*) and has been incorporated in Section 15a of the Netherlands' Nuclear Energy Act since the first of July 2010. The Dutch text of the Act is available on the internet (<http://wetten.overheid.nl/BWBR0002402>), an English translation of the relevant Sections can be found in Appendix 2. Compared to the license under the Netherlands' Nuclear Energy Act, which was issued for an indefinite period, this constitutes a restriction of the plant's operating time. Until the ultimate shut-down date, the license holder EPZ is required to operate the Borssele NPP safely.

12. Since 1973, the operating license of the Borssele NPP has been amended several times. Most recently, the license holder EPZ applied for an adaptation of the Safety Report to extend the

original design lifetime from 40 years to 60 years. For this purpose, EPZ was required to demonstrate the safety of the plant for a design lifetime of 60 years. EPZ did not apply for a modification of the duration of the operating license, because the operating license for the Borssele NPP is not limited in time.

13. In the past, the design of nuclear power plants was generally based on a design lifetime of 30 or 40 years. The design lifetime is used particularly in the design of a number of components which are not easily replaceable, such as the reactor vessel and the reactor building. These components were designed so as to be certain to last for the design lifetime foreseen based on a particular load during operation. Given overdesign and conservative analyses, it is likely that large, less easily replaceable components will substantially outlast those 30 or 40 years, but this does need to be demonstrated. Operators of nuclear power plants have, what is referred to as, an 'ageing management program' to monitor and deal with physical ageing phenomena in materials of items that are important to safety. This program thus ensures that components that are important to safety are in adequate condition at all times.
14. A change in the operation of the Borssele NPP in 1994 in connection with the implementation of a number of safety-enhancement measures resulting from a 10-yearly safety review prompted the Netherlands' competent authority to require EPZ to apply for a revision of the license. In the Netherlands, a revision license is considered a comprehensive license that does not only cover the proposed modification of an installation, but the operation of the installation as a whole. The revision licensing procedure for the Borssele NPP was carried out in 1994. All previous licensing decisions issued under the Netherlands' Nuclear Energy Act to operate the Borssele NPP, including all conditions attached to these licensing decisions, were consolidated in a single license. The revision license was issued by decision of 2 August 1994 and was re-issued by decision of 26 May 1999. As part of the procedure for the revision of the license, EPZ has submitted a revised Safety Report as well as a comprehensive EIA report.
15. In addition to the EIA report from 1994, EPZ has submitted in 1996, 2004 and 2011 EIA reports on the Borssele NPP in connection with license applications for, successively, the increase of the nuclear fuel enrichment grade to 4%, the increase of the nuclear fuel enrichment grade to 4.4%, and the fuel diversification for, among other things, the use of mixed oxide fuel (MOX). The extension of the design lifetime of the Borssele NPP was not considered in the context of these EIA procedures. However, the 2011 EIA report on MOX takes into account the fact that this fuel will be used until the end of 2033 (the ultimate date to shut down the Borssele NPP).

16. In the view of the Netherlands' competent authority, the proposed modifications of the Borssele NPP for which an EIA was conducted by EPZ in the past, had only possible significant adverse transboundary environmental impact in the neighbouring country Belgium. That is also the reason why in all these procedures the Netherlands' competent authority has actively involved Belgian authorities and administrative bodies.

17. With respect to all EIAs in connection with a license application for the Borssele NPP, the Netherlands' competent authority has notified the Belgian authorities of the proposed activities by providing all information throughout the EIA procedures, as well as during licensing procedures, on possible significant adverse transboundary impacts in Belgium. Also, with respect to the EIA and licensing procedures for the fuel diversification at the Borssele NPP, the public in Belgium was provided information on possible adverse environmental impacts of the proposed activity at the same time and in the same way as the public in the Netherlands. Therefore, the public in Belgium had the opportunity to directly participate in the EIA procedure, as well as in the licensing procedure, on the same footing as the public in the Netherlands. The public notifications on the opportunity to participate in the EIA procedure, as well as in the licensing procedure, were published in Belgium and the public in Belgium was therefore in a position to express its views.

18. As for Germany, bilateral consultations are held on an annual basis with the authorities of Niedersachsen and Nordrhein-Westfalen as well as with the *Bundesministerium für Umwelt, Naturschutz, Bau und Reaktorsicherheit*. These consultations are known as the '*Niederländisch-Deutsche Kommission für grenznahe kerntechnische Einrichtungen*' (NDKK). In the NDKK, the competent German authorities are informed about all developments in the Netherlands in the field of nuclear energy, including anticipated and pending licensing procedures, including those with regard to the Borssele NPP. The relevant agreements in the context of the NDKK have been complied with in all EIA procedures, as well as in the procedure for the extension of the design lifetime.

19. In addition, at the request of the German authorities, the Netherlands' competent authority has sent all relevant information in relation to the licensing procedure for fuel diversification of the Borssele NPP, including the draft decision and the notification.

20. The table below shows schematically in what way the Belgian and German governments as well as the public were notified of the different licensing procedures for the Borssele NPP. MOD 1994 stands for 'MODification Project' (the 1st large modification project); POS 1996 for 'Project *Optimalisatie Splijtstof*' (the use of 4.0% enriched fuel); POS2 2004 for 'Project *Optimalisatie Splijtstof 2*' (the use of 4.4% enriched fuel); MOX 2013 for 'Mixed OXide fuel' (fuel diversification, including the use of MOX); LTO 2013 for 'Long Term Operation' (extension of the design lifetime of the Borssele NPP). In addition, an overview can be found in Appendix 3 showing how and when the Belgian and German governments as well as the public in the Netherlands, Belgium and Germany were involved in the different licensing procedures.

		The Netherlands	Belgium		Germany		
Licenses NPP Borssele		Public participation	Notified	Public participation	Notified	NDKK	Public participation
1	Borssele MOD 1994	x	x			x	
2	Borssele POS 1996	x	x			x	
3	Borssele POS2 2004	x	x			x	
4	Borssele MOX 2011	x	x	x	x	x	By German authorities
5	Borssele LTO 2013	x	x			x	

The Netherlands

21. In all licensing procedures for the Borssele NPP, the draft-license was notified in newspapers in the Netherlands and on the internet. During the six-week period prescribed by law, everybody had the opportunity to express views on the draft-license and the application. When an EIA was part of the licensing procedure, it was also possible for the public to express its views on the EIA report.

Belgium

22. The draft-licenses and notifications were also sent to the relevant Belgian administrative bodies specified in the draft-licenses. Apart from the draft-license, notice was also given in Belgian newspapers of the publication of the license application and the EIA report for fuel diversification. This means that the Belgian public had the opportunity to directly participate in this licensing procedure and take notice of the results of the EIA.

Germany

23. The German authorities were notified in all instances of a licensing procedure for the Borssele NPP through the aforementioned bilateral consultations in the NDKK. This was also the case in the licensing procedure for the fuel diversification (MOX 2011) for the Borssele NPP. The German authorities on their own initiative actively notified the German public that the draft-license, the license application and the EIA report were published. The German public had thus the opportunity to participate in the licensing procedure and directly express its views during a

period of six weeks on the same footing as the public in the Netherlands. Out of a total of 123 views that were expressed during this period, seven views were made by German environmental organizations and individuals. Five of these were accompanied by signature lists, signed by 73 people. In the license, the Netherlands' competent authority addressed all the expressed views, including the German views. The Dutch and German members of the public who gave their view on the draft-license were individually informed by a letter of the Netherlands' competent authority and also received a copy of the final license decision and of the notification.

24. The way in which public participation has taken place in the case of LTO 2013 is explained in more detail in Section D.2 of this Statement.

10-yearly periodic safety review

25. In addition to the submission of four EIAs, EPZ has conducted safety evaluations of the Borssele NPP in 1993, 2003 and 2013 (in progress). These 10-yearly safety reviews are intended to assess the actual physical condition of the installation, and to review the design and operation of the installation in the light of state-of-the-art science and technology with respect to nuclear safety and radiation protection. Following each periodic safety review, safety-enhancement measures were identified and, following the issuance of the required license, implemented.
26. The Netherlands' competent authority is currently in the process of evaluating the 10-year safety review of 2013 (10EVA13) with respect to the Borssele NPP. This review has not yet been finalized. By the end of March 2015, EPZ must send the conceptual improvement plan to the Netherlands' competent authority. On the basis of this plan, it will be decided which measures have to be implemented by EPZ. If these measures include measures for which an amendment of the license is needed, a procedure according to Division 3.4 of the General Administrative Law Act (*Algemene wet bestuursrecht*) (GALA), including public participation and possibly an EIA, shall be followed (see Section D below).

D. Implementation of the provisions of the Convention with respect to the activity

D.1 Implementation of the provisions of the Convention with respect to nuclear reactors by the Netherlands in general

27. For the licensing of a nuclear reactor in the Netherlands, a special law applies, the Nuclear Energy Act (NEA).³ According to Section 17, of this Act, Division 3.4 GALA and Division 13.2 of the Environmental Management Act (*Wet milieubeheer*) apply to the preparation of a decision on the request for a license.

³ Appendix 2: English translation of relevant Sections of the Nuclear Energy Act.

28. The provisions of Article 6 of the Convention are implemented in Division 3.4 GALA. Specific environmental laws refer to this Division of the GALA for the procedural requirements for decision-making, as in the case of the NEA.
29. Division 3.4 GALA sets out the uniform public preparatory procedure. It contains general provisions on public participation in decision-making, which have to be taken into account when the application of this Division is legally required. A translation of this Division of the GALA with a more elaborate description of the procedure is attached.⁴
30. The main steps to be taken under the uniform public preparatory procedure are presented below.

Informing the public early in the decision-making

31. The competent authority lays down the draft decision for examination together with the relevant documents which are necessary to assess the draft (section 3.11 GALA). This includes the application for a license. Before these documents are deposited for examination, the competent authority publishes a notice of the draft decision in one or more daily or weekly newspapers or local papers that are delivered at home free of charge or in another suitable manner (Section 3.12, subsection 1, GALA).
32. Section 3.12 GALA contains more requirements on the timely public notice of the draft decision, requirements on the content of the notice, and provisions on the relevant information that is available for the public. For instance, if the decision is made by an authority forming part of the central government, the notification will have to be published in the Government Gazette (*Staatscourant*).
33. The competent authority has to add any new relevant documents and information to the documents deposited for examination (Section 3.14, subsection 1, GALA).

Providing for early public participation

34. The procedure for public participation that allows the public to submit views (in writing or orally) is implemented in Sections 3.15 to 3.17 GALA. According to Section 17 NEA, Division 13.2 of the Environmental Management Act applies.⁵ This means that *members of the public* may express their views on a draft decision on the basis of the NEA to the competent authority either in writing or orally. This is laid down in Section 13.3 of Division 13.2 of the Environmental Management Act.
35. The time limit for expressing views for members of the public is six weeks, unless a longer period is specified by law. The term for putting forward views starts on the day that the draft decision is made available for examination (Section 3.16 GALA).

⁴ Appendix 4: English translation of Division 3.4 of the General Administrative Law Act.

⁵ Appendix 5: English translation of Divisions 13.1 and 13.2 of the Environmental Management Act.

Informing the public when the decision is taken

36. Sections 3.43 and 3.44 GALA contain provisions on the public notice of the decision. The persons who stated their views during the preparation of the decision shall be informed in writing when the decision is notified to the applicant, or as soon as possible thereafter (Section 3.43 GALA). According to Section 3.44 GALA, a copy of the decision will be sent to those who have expressed views on the draft decision.
37. Section 3.46 GALA requires that a decision shall be based on sound reasons and Section 3.47 GALA requires that these reasons are made public together with the decision.

Conclusion

38. The Government concludes that the public participation requirements of Article 6 of the Convention with respect to nuclear reactors are adequately implemented in Dutch law, especially in Division 3.4 GALA in conjunction with Division 13.2 of the Environmental Management Act and Section 17 NEA.
39. Divisions 3.4 GALA and 13.2 of the Environmental Management Act guarantee public participation in decision-making; provides requirements for notifying the public concerned on the decision-making; establishes timeframes for public participation procedures within a decision-making process; regulates that public participation takes place early in the decision-making process; encourages exchange of information between the applicant and the public; requires competent authorities to provide the public access to all information, including environmental information, relevant for decision-making; and prescribes procedures for public participation.

D.2 Implementation of the provisions of the Convention with respect to the proposed activity

Proposed activity (Article 6, paragraph 1 (a))

40. Under the Convention, nuclear power plants, such as the Borssele NPP, are activities covered by Article 6, paragraph 1, and Annex I, paragraph 1, of the Convention, for which public participation must be provided in licensing procedures. The provisions of Article 6 should also be applied with respect to decisions on a change to or an extension of a nuclear power plant following Annex I, paragraph 22.
41. The Government notes that, for operating the Borssele NPP, EPZ has a license under the NEA since 1973. The license is valid for an indefinite period. At the time of the original design and construction of the Borssele NPP, it was assumed that it would have a design lifetime of 40 years, i.e. until 2014. This design lifetime was also taken as a starting point for the design of the Borssele NPP in several safety-related analyses and records of evidence in the Safety Report. The Safety Report is part of the license.

42. In order to make use of the license under the NEA after 2013, EPZ had to demonstrate that the continuation of operation for a longer period was still possible within the applicable technical preconditions. In the license application for the extension of the design lifetime, dated 12 September 2012, EPZ provided this evidence. As a result of this evidence for extending the design lifetime to 31 December 2033, an amendment to the Safety Report and a change to the license under the NEA were required. EPZ requested this change in its license application. EPZ's request formalized the necessary amendments to the Safety Report associated with the license. There was no request to change or to extend the installation of the Borssele NPP. Moreover, there was no request to extend the operating time, because the initial license for the Borssele NPP was valid for an indefinite period and had not expired. Therefore, the extension of the design lifetime of the Borssele NPP is not an activity listed in Annex I of the Convention and does not constitute a proposed activity within the meaning of Article 6, paragraph 1(a), of the Convention.

Activity which may have a significant effect on the environment (Article 6, paragraph 1 (b))

43. The extension of the design lifetime of the Borssele NPP does not concern the issue whether the exploitation of the Borssele NPP can be extended to the end of 2033. The extension of the design lifetime only concerns the adaptation of the Safety Report.

44. The amendments in the Safety Report do not concern any change to or extension of the operation of the Borssele NPP and, consequently, do not have more or less favorable environmental impacts than those considered in previous licenses for the Borssele NPP. Therefore, the extension of the design lifetime of the Borssele NPP does not constitute a proposed activity within the meaning of Article 6, paragraph 1(b), of the Convention.

Reconsidering or updating the operating conditions for an activity (Article 6, paragraph 10)

45. As set out in paragraphs 40-44 above, the extension of the design lifetime of the Borssele NPP did not involve any physical change to or extension of the operation of the Borssele NPP; nor was it considered to have a potential significant effect on the environment. In view of the case of the Mochovce nuclear power plant in Slovakia,⁶ the adaptation of the Safety Report necessary for the extension of the design lifetime might be considered to involve a reconsideration and update of the operating conditions of the Borssele NPP. The implementation of the Convention may benefit from further guidance by the Committee on the exact meaning of the term 'operating conditions'. Should the Committee conclude that the term includes the adaptation of the Safety Report in the case of the Borssele NPP, the Government considers that, in

⁶ Findings and recommendations with regard to communication ACCC/C/2009/41 concerning compliance by Slovakia (adopted by the Compliance Committee on 17 December 2010), UN Doc. ECE/MP.PP/2011/11/Add.3.

accordance with Article 6, paragraph 10, of the Convention, it applied the provisions of Article 6, paragraphs 2 to 9, "mutatis mutandis, and where appropriate".

License procedure (Article 6, paragraphs 2-9)

46. As stated above, a specific law applies for the use of nuclear energy, the NEA. Based on Section 17 NEA, Division 3.4 GALA applies to the preparation of the decision on a request for a license for a nuclear reactor.
47. In the draft decision, the requested extension of the design lifetime of the Borssele NPP to 31 December 2033 was approved under certain conditions. In accordance with Article 6, paragraph 2, of the Convention and Section 3.12 GALA, the public was notified of the draft decision on 24 October 2012. The notification states the opportunities for examination of the draft decision and public participation in the decision-making process. The draft decision and the notification were also sent to several administrative bodies involved in the Netherlands and Belgium, as indicated on page 13 of the decision in Appendix 6.⁷
48. In accordance with Section 3.12, subsections 1 and 2, GALA, the notification was published in the Government Gazette⁸, in the Dutch newspapers *De Volkskrant* and *De Provinciale Zeeuwse Courant*, and in several local papers that were delivered at home free of charge.
49. In accordance with Section 3.11 GALA, the draft decision, the application and all other relevant documents were physically available for examination in the municipality of *Borssele* and the Ministry of Economic Affairs in The Hague. In addition, the draft decision, the application and all relevant documents were published and available for download on the website of the Government.⁹
50. Since the extension of the design lifetime of the Borssele NPP did not involve a change or extension of activities under the Convention, it has not been subject to a national or transboundary EIA procedure. With respect to Article 6, paragraph 2 (e), the Government notes that the Convention does not require an EIA to be carried out. The Convention does not stipulate that an EIA must be a mandatory part of public participation procedures nor does it regulate the situations where an EIA is required.¹⁰
51. In accordance with Article 6, paragraphs 3-7, of the Convention and Sections 3.15 and 3.16 GALA, during six weeks (from 25 October 2012 up to and including 5 December 2012), the public was able to express its views (in writing, by telephone and by email) on the draft decision and the application. In addition, a hearing was organized in the municipality of *Heinkenszand* on 7 November 2012, providing the opportunity to ask questions and to express views. This hearing was announced in the notification of 24 October 2012. Moreover, there

⁷ Appendix 6: English translation of the decision on the LTO license.

⁸ Staatscourant 2012, no. 21707, 24 October 2012.

⁹ <http://www.rijksoverheid.nl/onderwerpen/kernenergie/documenten-en-publicaties/vergunningen/2012/10/24/inspraak-verlenging-bedrijfsduur-kerncentrale-borssele.html>.

¹⁰ Findings and recommendations with regard to Communication ACCC/C/2008/24 concerning compliance by Spain, UN Doc. ECE/MP.PP/C.1/2009/8/Add. 1.

was a special telephone number made available to pose questions on procedural and substantive matters. In total, 638 views were received within the prescribed time limit for public consultation. Out of these 638 views, more than half came from German members of the public and some from (local) governmental and political German organizations (see Annex C of the decision in Appendix 7). A total of 54 unique views was identified.

52. The public consultation as set out above was not limited to the issue of technical nuclear safety. It also included issues relating to the potential impact on the environment. In accordance with Divisions 3.4 GALA and 13.2 of the Environmental Management Act anyone could have submitted an opinion on the preliminary decision to extend the design lifetime of the Borssele NPP. In the preliminary decision (which also elaborates on aspects such as safety, ALARA, and radiation protection) and other relevant documents with respect to the extension of the design lifetime, the changes to the Safety Report are clearly set out. Models and calculations are used to explain the consequences of extending the design lifetime and to indicate that the extension of the design lifetime would not have any environmental impacts.
53. In chapter 6 of the decision in Appendix 6, the Netherlands' competent authority took due account of the views and addressed them in accordance with Article 6, paragraph 8, of the Convention. The views resulted in the adaptation of the decision with the reasoning of the license being clarified on a number of points. However, the decision itself and the license conditions were not adapted.
54. Similarly, for the procedure for the draft decision and in accordance with Article 6, paragraph 9, of the Convention and Section 3.43 GALA, the appended decision was made public on 20 March 2013. In addition, those who had expressed their views on the draft decision were separately informed by a letter of the Netherlands' competent authority and received a copy both of the decision and the notification (Section 3.44, subsection 1, GALA).
55. In accordance with Section 3.45 GALA, the notification of the decision¹¹ contained information on the possibility of appeal to the Council of State (*Raad van State*), which is the highest administrative court in the Netherlands. During six weeks from 22 March 2013, all stakeholders who had previously expressed their views on the draft decision were entitled to appeal to this independent Court.

Conclusion

56. On the basis of the considerations above, the Government concludes that all requirements for public participation under Article 6 of the Convention have been complied with in the licensing procedure for the extension of the design lifetime of the Borssele NPP.

¹¹ Appendix 8: English translation of the notification.