



Our ref: PL 2/4/5/12B

Your ref: EIA/IC/CI/5 – Hinkley Point C NPP

Mr Romas Svedas
Chair, Implementation Committee,
Convention on Environmental Impact Assessment in a Transboundary Context and its
Protocol on Strategic Environmental Assessment,
Palais des Nations,
CH-1211 Geneva 10,
Switzerland.

30 April 2018

Hinkley Point C Nuclear Power Plant: Transboundary Environmental Public Consultation

Dear Mr Svedas,

I refer to your letter of 28 March 2018 requesting certain information arising from the Implementation Committee's engagement with the United Kingdom in relation to potential transboundary impacts of Hinkley Point C Nuclear Power Plant. Replies to your specific questions are set out below.

- a) *Information on the results of the consultations with the United Kingdom since March 2017 with regard to the activity;*

While Ireland is a non-nuclear State, it recognises the sovereign right of individual States to determine their own energy mix, including whether to develop nuclear power. It is Ireland's expectation that, where a State chooses to develop or extend a nuclear power industry, this will be done in line with the highest international standards in respect of nuclear safety and environmental protection.



Hinkley Point C is just over 240km from the east coast of Ireland and the opportunity for the Irish public to comment on the potential environmental impacts of the project is welcome and valuable, having regard to the level of public interest in the UK's new build nuclear programme.

Ireland's public consultation on the HPC Nuclear Power Plant ran from 20 February 2018 to 17 April 2018, with submissions or observations being made to the local planning authority concerned. An extended consultation period, well beyond the minimum 30 day period prescribed in EU legislation, was set in order to maximize the opportunity for public participation. Further to the expiry of the consultation period, the local planning authorities are currently in the process of sending to this Department copies of submissions and observations received through the consultation process, prior to forwarding them to the relevant UK authorities for consideration. The statistics currently available to the Department in relation to the public consultation are as follows:

| Submissions made by: | No. of submissions |
|--|---------------------------|
| Individual members of the public | 14 |
| Groups | 7 |
| Elected public representatives | 8 |
| Prescribed bodies prescribed for consultation in relation to planning applications | 2 |
| Planning authorities | 2 |
| State bodies other than prescribed bodies and planning authorities | 2 |

The Parliamentary Committee on Housing and Planning also proposes to make a submission by 11 May 2018 which will also be forwarded to the UK authorities.



- b) *Whether the Government of Ireland considered that the activity at Hinkley Point C was likely to cause a significant adverse transboundary impact on the territory of Ireland;*

The 2013 study¹ conducted by the Radiological Protection Institute of Ireland (RPII) on the possible radiological impacts of the United Kingdom's new build programme, including Hinkley Point C, concluded that the routine operation of the proposed new nuclear power plants, including Hinkley Point C, should have no measurable radiological impact on Ireland or the Irish marine environment. However, the study also identified a number of severe accident scenarios that could potentially have significant radiological impacts for Ireland. While the likelihood of occurrence of such accidents may be low, if they were to occur they could, as indicated, result in a significant transboundary impact on Ireland.

- c) *The position of the Government of Ireland regarding the application of the Convention, including on:*
- i. *whether the discussion with the United Kingdom in reaching the agreement on whether there was likely to be a significant adverse Transboundary impact will be continued in accordance with article 3 paragraph 7, and whether in absence of such agreement the matter will be submitted to the inquiry commission in accordance with the provisions of appendix IV of the Convention, or;*
 - ii. *whether, after consultations with the United Kingdom, the application of the Convention was no longer considered necessary.*

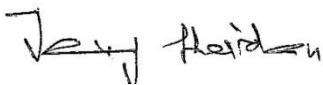
¹ [“Assessment of the potential radiological impacts on Ireland of the UK’s proposed nuclear power plants”](#)



Ireland and the United Kingdom cooperate closely on radiological matters, including through a biannual meeting of the United Kingdom-Ireland contact group. The UK nuclear new build programme is a standing item on the agenda for these discussions, which are very valuable for Ireland's understanding of developments in this area. This ongoing engagement is extremely important to Ireland in order to ensure that the Irish people and environment are protected from the possible harmful effects of radiation. In view of this regular engagement and in light of the afore-mentioned RPII Report, it is not considered necessary to continue to apply the Convention to Ireland's contacts with the United Kingdom concerning the Hinkley Point C project. However discussions are ongoing with the UK authorities with a view to ensuring that Ireland will be subject to advance notification of any future UK proposals to construct new nuclear plants and that any necessary transboundary consultations are conducted at the earliest stage of the process and before the commencement of construction of any such nuclear plants.

I trust that this letter will assist the Espoo Implementation Committee in its deliberations at its next meeting on 28-30 May 2018, at which it is proposed that Ireland will be represented.

Yours sincerely,



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