Need and quality of EIAs for nuclear life-time extension decisions

- **The need** for an Environmental Impact Assessment (EIA) for decisions concerning life-time extension of nuclear power plants
  
  Borssele ACCC/C/2014/104 ([ECE/MP.PP/C.1/2019/3](#)):  
  ➔ no doubt about impacts\(^1\)  
  ➔ early when all options including zero option are open  
  ➔ environment  
  Espoo Implementation Committee and ad-hoc Working Group  
  ➔ every decision should be informed by an EIA that covers the period relevant to that decision  
  European Court of Justice  
  ➔ Advocat Géneral opinion (CURIA [case C-411/17](#))

- Inclusion of transboundary public
  
  ➔ Aarhus: ultra-hazardous activity ([ACCC/C/2012/71](#), par. 74)\(^2\)  
  ➔ Espoo: significant transboundary impacts cannot be excluded ([ECE/MP.EIA/IC/2014/2](#))\(^3\)

- Need for an **EIA to make EIA informed decisions**
  
  ➔ no operational decisions that are not informed by EIA input and public participation on environmental issues

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1. The ACCC “considers it inconceivable that the operation of a nuclear power plant could be extended from 40 years to 60 years without the potential for significant environmental effects.”

2. “The Committee is convinced that in the case of decision-making on ultrahazardous activities like an NPP, being activities invariably of wide public concern, particular attention must be taken at the stage of identifying the public concerned and selecting the means of notification in order to ensure that all those who potentially could be concerned in the decision-making, including the public concerned outside its territory, have a reasonable chance to learn about the proposed activities and their possibilities to participate.”

3. “The Committee noted that the listed activity under item 2 of the appendix did not specifically refer to the construction or the extension of lifetime or update of a nuclear reactor, but, rather, identified a nuclear reactor as such as an activity, among other activities in the list that, if it was likely to cause significant adverse transboundary impact would then require the application of the Convention. Therefore, a significant adverse transboundary impact is likely to be caused not only by the construction and first operation of a nuclear reactor, but also from the continued operation beyond the originally authorized lifetime of a nuclear reactor.”
• Need for **full project impact** assessment:
  ➔ including production and management of waste,
  ➔ production of fuel,
  ➔ changes in environment (habitation, nature, economic activity),
  ➔ impacts of beyond design accidents (ACCC: high hazard).

• **EIA as crucial basis for justification**
  ➔ Given the high cost, high hazards, complexity and lack of speed in development of waste management (and waste managers increasingly pleading for a break on production), and the increased availability of good alternatives → justification needs to pass a high hurdle.
  ➔ Need for high quality and comprehensive information and public participation for that.