



Vides pārraudzības valsts birojs

*Environment State Bureau of the Republic of Latvia*

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Riga

01.12.2022 No. 5-05/1166/2022

Ref. to: 16.09.2022 No DOOŠ-TSOOŠ.440.8.2015.19

**The General Directorate for Environmental Protection**  
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**Regarding the transboundary environmental impact assessment of planned project consisting of the construction and operation of the first Nuclear Power Plant in Poland, with an electrical power of up to 3750 MWe, in Choczewo or Gniewino and Krokowa municipalities**

The Environment State Bureau (hereinafter – the Bureau), acting as a Point of Contact regarding Notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (hereinafter – the Espoo Convention) of Latvia and as a competent authority on the environmental impact assessment (hereinafter – the EIA) in Latvia, has received the EIA documentation for public participation of the transboundary EIA of planned project consisting of the construction and operation of the first Nuclear Power Plant in Poland, with an electrical power of up to 3750 MWe, in Choczewo or Gniewino and Krokowa municipalities (hereinafter – the Project).

We inform that term for the process of public participation in Latvia was determined from 23rd of September till 20th of November 2022. Information regarding the EIA of the Project and public participation options was published on the Bureau webpage<sup>1</sup> and send to the various stakeholders considering the national procedure of the EIA in the transboundary context. Please be informed that we have received opinions and comments from the Ministry of Transport of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Nature Conservation Agency of the Republic of Latvia, and the State Environmental Service of the Republic of Latvia; there have been no comments from the public.

Please find below comments and opinions expressed by the mentioned stakeholders:

The Ministry of Transport of the Republic of Latvia within its competence agrees with the Environmental Report without further comments or additions.

The Ministry of Health of the Republic of Latvia informs that considering opinion of the Health

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<sup>1</sup> <https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/kodolelektrostacijas-buvnieciba-un-ekspluatacija-polija-choczewo-gniewino-vai-krowas-administrativaja-teritorija>.

Inspectorate there are no comments or objections of the aspects related to the transboundary impact assessment.

The Nature Conservation Agency of the Republic of Latvia (hereinafter – the Agency) concludes that, overall, the EIA Report has been prepared appropriately and carries out a sufficiently high-quality study and evaluation of aspects related to the competence of the Agency. Both provided alternatives of the Project are also acceptable, but the Agency agrees with opinion already provided in the EIA Report that the first alternative of the Project is the preferred one.

Comments from the State Environmental Service of the Republic of Latvia are:

1. Please provide information on how events in Ukraine's nuclear facilities related to the war will be taken into account in the evaluation of the nuclear power plant in Poland, incl. if a nuclear accident occurs not in one, but in two or three reactors.
2. In the section 6.1.1.1 "*MATCH model results*" of the Part 1 "*Introduction*" of the EIA report, the evaluation of Latvia is not mentioned at all. We invite you to supplement the report with an assessment of Latvia (dose rates and estimations of doses from external exposure).
3. Effective doses for adults and children are mentioned in section 6.1.1.2 "*FDMT model results*" (page 32) of the EIA report, Part 1 "*Introduction*", indicating different countries. Latvia is mentioned only in one case - maximum 2-day doses for adults. Please clarify whether, according to the modelling results, it turns out that in other cases the possible doses in Latvia are lower than in countries that are further from the planned sites of the NPP than Latvia. If possible, doses in Latvia are not lower, please clarify section 6.1.1.2 of the EIA report, including information on the assessment to Latvia.
4. Latvia is not mentioned in the information on the thyroid absorbed dose for adults in the section 6.1.1.2 "*FDMT model results*" (page 33) of Part 1 "*Introduction*" of the EIA report, although Latvia is mentioned in the information on the thyroid absorbed doses for children.
5. In the Part 1 "*Introduction*" of the EIA report (page 50) there are tables "*Table V.4-2- 1 Ranges of maximum effective doses for adults from all exposure pathways for neighbouring countries based on results for both sites on the basis of FDMT model results*" and "*Table V.4-2- 2 Ranges of maximum effective doses for children from all exposure pathways for neighbouring countries based on results for both sites on the basis of FDMT model results*". From the name of the tables, it is not clear whether the tables apply to the event of a severe accident. The names of the tables should be clarified.

At the same time, we invite to prepare the possible maximum effective doses in case of a severe accident, taking into account the distance from the nuclear power plant, e.g., 50, 100, 300, 500, 700, 1000 km. Currently, only certain points in specific countries are selected for the assessment.

6. In accordance with the International Atomic Energy Agency publication "*Actions to Protect the Public in an Emergency due to Severe Conditions at a Light Water Reactor*" (2013) there is an ingestion and commodities planning distance (ICPD) of 300 km around the reactor (in the 300 km zone). The EIA report does not include information on the potential amount of radioactive contamination in accidents. The report evaluates possible dose rates and doses for humans (including in the thyroid), but there is no information about possible radioactive contamination Bq/m<sup>2</sup> (ground contamination) at different distances from the NPP in the event of a severe accident.

In addition, we would like to inform, that the Radiation Safety Centre of the State Environmental Service of the Republic of Latvia expressed opinion that there is need to conduct transboundary intergovernmental consultations in the form of an expert meeting, under Article 5 of the Espoo Convention.

The Bureau would like to express willingness to continue commenced cooperation in the field of the environmental impact assessment in the transboundary context.

Regards,

Daiga Avdejanova (signature\*) Director of Environment State Bureau of the Republic of Latvia

*\*Document is sign with secure electronical signature*

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