

Elisabeth Köstinger  
Federal Minister

Ministry of Sustainability and Tourism

Viennese Platform Nuclear-Free

Forsthausgasse 15/7/11

1200 Vienna

Vienna, 30 April 2018

Dear Ms. Stegmüller!

Dear Ms. Mraz!

Dear Ms. Lorenz!

I answer to your letter from 12 March 2018 concerning the NPP project Belene.

First, I want to thank you for your interest and engagement that is visible in your letter. Like I said before, this is valuable for the work of the Federal Government.

I can tell you that I want to follow the Austrian anti-nuclear-way according to the Government's Programme consequently and with much engagement. This also includes working against newbuilt and replacement of NPPs in Europe, especially in our neighbouring countries, with all political and legal means.

My Ministry is involved from the beginning in the NPP project at the site of Belene.

14 years before, on the 29 April 2004, the Bulgarian Government decided to start finalizing NPP Belene. The environmental assessment report was finished in March 2004.

Austria has analysed since 2004 possible negative impacts by the planned realization of NPP Belene in the meaning of the ESPOO Convention. An official letter was sent by the Austrian Ministry of Environment to the Bulgarian ESPOO contact point in July 2004. The assessment was difficult and took a long time due to the poor quality of the EIA-documents that were provided by the Bulgarian side. Austria therefore reserved its right to participate. At the third Meeting of Parties to the Convention on Nuclear Safety in April 2015, Bulgaria presented a safety concept for the project NPP Belene. This concept included the very ambitious goals for minimizing the effects: No immediate or long-term measures were needed beyond a radius of 800 m around the reactor, and no delayed measures at any time beyond a radius of 3 km. After an Austrian request in September 2005 the State Office "Nuclear Energy and Nuclear Safety" of the Ministry of Energy and Resources confirmed these presented parameter. Austria concluded that with these modern parameters no significant negative impacts on Austria's environment could be expected and refrained from participation in the transboundary EIA.

The catastrophe of Fukushima has confirmed Austria's critical nuclear position. Our sympathy is still with the victims of the catastrophe.

The catastrophe of Fukushima has fuelled some discussions and reflexions in Europe. As a consequence the safety of all nuclear facilities in the European Union was subjected to a “stress-test”, and the Directive for Nuclear Safety was amended to obligatory inclusion the safety goal that accidents with early of large releases of radioactive material in nuclear facilities have to be avoided, and in the case of accident the effects should be minimized. The phrasing in this Directive also shows that severe accidents with significant impacts cannot be excluded completely, not even in new NPPs. The regulation authorities in Europe are aware of this. In a joint document on accident management published at the end of 2014. HERCA (Heads of the European Radiological Protection Competent Authorities) and WENRA (Western European Nuclear Regulators Association) explicitly acknowledged this.

Against this background, the former safety concept of the project Belene has to be questioned. Therefore, first we will ask the Bulgarian side through the ESPOO contact points for clarification of the legal basis, and communicate our request to participate in a possible new EIA procedure.

I ask you kindly to copy this letter also to the other signers of your appeal.

With best regards,

Elisabeth Köstinger