

To

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**Comments on the EIA scoping procedure for the planned Small Modular Reactors with up to 1300 MWe to be sited at Stawy Monowskie in Poland**

The recently started transboundary Environmental Impact Assessment (EIA) procedure for the planned SMR-based new NPP (to comprise up to four 300 MWe units of the yet unlicensed BWRX-300 reactor technology from GE Hitachi) to be sited in Stawy Monowskie, in Southern Poland, is in many ways first of its kind: (1) It is the first NPP based on one of the reactor technologies touted small modular reactor (SMR) for which an EIA procedure has started in Europe, and (2) it is the first SMR planned in Poland.

Therefore, the EIA scoping stage which defines the complete list of topics to be covered by the EIA report is of high importance and is the first phase of the EIA procedure. GDOŚ, the Polish environmental authority, has chosen to limit participation and comments by refusing to open the procedure for the public in Poland. Under the Espoo convention, other countries are bound to abandon their usual good practice and to also keep their public out of the process to treat the Polish and the transboundary public equally.

We demand the following aspects to be included in the scoping:

1. A Strategic Environmental Assessment (SEA) procedure for the overall plan for constructing and operating more than 70 SMR units sited at 20 new NPP sites has to be held and completed first, with state-of-the-art public participation standards fulfilled, before an EIA procedure for any first concrete SMR project in the country starts. A revision of the PEP2040 and PPEJ (combined) must also be conducted, along with a SEA for both updated policy documents.
2. The Polish government should explain why the boiling water of reactor type was chosen after this technology was excluded by the same government (with a decision of the then-climate ministry) from the planned large-scale fleet of the envisioned reactors within the framework of the revision of the PPEJ completed in late-2020.
3. To enable good practice in participation, the EIA reports for any SMR-based NPPs to be submitted by the developers should be translated into English, and into the official languages of the participating countries.

4. A public hearing should be held for the domestic public in Poland; also for the citizens living abroad a transboundary hearing is necessary. If online or hybrid hearings are held, interpretation services at least into English should be offered.
5. The time allowed for comments to be submitted for a public consultation should be sufficient and not fall on public holidays or traditional summer holiday time as was the case with the EIA round held this year for the first planned large-scale NPP in Poland, to be sited in the Pomerania region.
6. Alternative electricity supply options need to be assessed in the EIA report, a CO<sub>2</sub> estimate of the entire nuclear chain based on state-of-the-art climate science is necessary, including uranium mining, enrichment and production of the nuclear fuel.
7. Also realistic time-lines of nuclear project delays have to be taken into account and scenarios included which show how electricity will be supplied when the NPP will not be connected to the grid earlier than in the early 2040ies, the "Plan B".
8. There are no European safety targets for SMR yet. The EIA report should provide proof that the BWRX-300 fulfils the safety objectives for new NPP, including the practical elimination of large and early releases.
9. It is necessary to discuss what kind of emergency planning will be established and what preparations for severe accidents will be undertaken and how the public will be informed and involved in EP&R (Emergency Preparedness and Response).
10. Combined and cumulative effects, including accidents, of nearby facilities have to be taken into account.
11. Security issues and safeguards have to be assessed in the EIA report.
12. Poland does not have any NPPs yet. A new legal framework needs to be implemented. The EIA report must assess what steps are necessary to create an adequate regulatory framework.
13. The operator has no experience with nuclear facilities – the EIA report should explain how the nuclear regulator will ensure oversight over the operator's activity. The operator should provide proof of competence and training. Peer review missions should be planned for support.
14. The EIA report needs to describe not only the expected inventory of radioactive waste, but also the waste management routes of spent fuel and all types of radioactive waste. Poland does not have facilities for nuclear waste management yet – the EIA report needs to discuss all further steps.

We are looking forward receiving information, if and how our recommendations are integrated in the scoping decision.

With best regards