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Marktredwitz, 03.03.2018

Subject: Submission to the *new Nuclear National Policy Statement* in the United Kingdom – Public participation procedure under the Espoo Convention and the Aarhus Convention – End of submission period 15 March 2018

Dear Madam, dear Sir,

For the following reasons I submit to the transboundary public participation procedure.

Introduction

The Ministry for Energy and Industry, informed¹² (excerpts):

The overarching National Policy Statement for Energy (EN-1), published in 2011, made clear the Government's view that nuclear power generation is a low-carbon, proven technology which will play an important role as we move to diversify and decarbonise our sources of electricity and increase the resilience of the UK's energy system.

Taken together, EN-1 and the nuclear National Policy Statement (EN-6) provide the framework for development consent decisions on applications for new nuclear power stations expected to deploy by the end of 2025. They set out the need for nuclear power, whilst also providing planning guidance for developers and for the Planning Inspectorate and Secretary of State in their consideration of applications. The sites listed in EN-6 were originally nominated to Government in 2009 and were assessed at a strategic level as potentially suitable for the deployment of new nuclear power stations in England and Wales. These sites are: Hinkley Point C, Wylfa, Sellafield (more commonly known as Moorside), Sizewell, Bradwell, Oldbury, Hartlepool and Heysham.

¹ <http://www.bmub.bund.de/themen/atomenergie-strahlenschutz/nukleare-sicherheit/internationales/uvpsup/beteiligungsmoeglichkeit-in-grossbritannien/>

² <https://www.gov.uk/government/consultations/national-policy-statement-for-new-nuclear-above-1gw-post-2025-siting-criteria-and-process>

EN-6 successfully facilitated the granting of a Development Consent Order for a new nuclear power station at Hinkley Point C in March 2013 and further nuclear projects are planning to make applications for development consent in due course. However, nuclear power stations take a long time to progress from design conception to operation. As such, it is necessary to designate a new nuclear National Policy Statement to facilitate nuclear power stations at sites capable of deployment between 2026-2035.

Government continues to believe that new nuclear power has an important role to play in the UK's future energy mix, alongside other low -carbon energy sources. I am therefore delighted to launch this consultation on the process and criteria for designating potentially suitable sites in a new National Policy Statement for nuclear power projects with over 1GW of single reactor electricity generating capacity deploying between 2026-2035. In doing so we are creating a clear route for future planning decisions to be taken by producing a new National Policy Statement for the deployment of nuclear power in England and Wales.

In this consultation we are actively seeking views and suggestions to enable us to develop the criteria and process to assess which sites should be included in a new National Policy Statement as potentially suitable for the development of nuclear power between 2026-2035.

*Bringing forward a **new Nuclear National Policy Statement** is an important part of the work my Department is doing to facilitate the further deployment of new nuclear power in England and Wales. We look forward to hearing your views and comments on this consultation.*

A. No Zero Option, Missing Alternatives, Wrong Calculations

While the British Government informs the public concerned that it believes that new nuclear power has an important role to play in the UK's future energy mix, alongside other low-carbon energy sources, British NGO's and their experts for renewable energy provide other facts.

The NFLA report on UK National Policy Statement for new nuclear³ argues it is 'not needed' given existing energy efficiency measures and the growing deployment of cheaper renewable energy alternatives are more effective.

*The Nuclear Free Local Authorities (NFLA) published in February 2018 its analysis of the UK Government's proposals to develop a new National Policy Statement (NPS) for the deployment of new nuclear power stations. In its report NFLA notes that changes in the electricity system have seen renewable energy deployment rapidly taking place at the same time as its costs have come down, and at the same time wider energy demand has significantly reduced compared to government projections.⁴ NFLA informed that National Policy Statements (NPS) are intended to establish the case for Nationally Significant Infrastructure Projects, as defined in the Planning Act 2008. The current nuclear NPS (EN-6), published in 2011, lists 8 sites as potentially suitable for the deployment of new nuclear power stations by the end of 2025. These sites are Hinkley Point C, Wylfa, Moorside, Sizewell, Bradwell, Oldbury, Hartlepool and Heysham. As such, it is almost certain that **no** site may be deployed by that date, given that the only possible site in construction at an early stage, Hinkley Point C,*

³ <http://www.nuclearpolicy.info/news/nfla-report-uk-national-policy-statement-new-nuclear-not-needed/>

⁴ [NFLA New Nuclear Monitor 52](#) analysing the NPS consultation is attached with this media release and will be placed on the NFLA website

depends very much on considerable financial and technical issues to be overcome in a relatively short period of time. NFLA informed further that the Government argued there remains a real 'need' for new nuclear power stations to be built and producing electricity by 2035. NFLA noted though that when the Government first endorsed Hinkley Point C (HPC) in 2008, it was projecting an increase in electricity consumption of 15% by now, whereas in practice the UK is now consuming 15% less than a decade ago.⁵ **In other words it made a 30% error.** This is despite a 13% increase in GDP over the last decade. HPC is only due to deliver 7% of consumption. So, in fact, there is no "need" for new nuclear power stations before or after 2025. As such, NFLA calls for a statutory review of the 2011 Overarching National Policy Statement for Energy (EN-1) upon which EN- 6 (on new nuclear energy) depends. There has been a consumption revolution over the past decade prompted by vastly improved electricity efficiency in industry, in consumer white and brown goods, and in areas like lighting, where household consumption has dropped from 20.7 TWh in 2007, to 19.3TWh by 2010 and by 2016 this was down to 14.2TWh. This trend is set to continue.⁶ Cost-effective investments in domestic energy efficiency alone between now and 2035 could save around 140 TWh of energy – roughly equivalent to the output of six power stations the size of Hinkley Point C, according to a report by the UK Energy Research Council.⁷ Research by the likes of UBS, Goldman Sachs, Barclays, Bloomberg and Citigroup all expect new solar and renewable technologies to drive rapid change in large scale utility companies that will bring their electricity costs down and deployment up.⁸ As Mike Thompson, the Head of Carbon Budgets at the Committee on Climate Change says: "It is increasingly apparent that renewables do or will offer the lowest cost of electricity over their lifetime of all generating options." They certainly are more cost competitive than new nuclear.⁹ Intermittency issues with renewables could be resolved with the deployment of 'wind to gas' plants and combined cycle gas turbine (CCGT) power stations. This would be achieved more quickly, cheaply, flexibly, and at much lower technical and financial risk than new nuclear baseload power, according to a report by Energy Brainpool for Greenpeace Energy.¹⁰ The likes of district heating systems, hydrogen green gas and larger heat pumps would reduce public and industry demand for heating to be provided from increased electrical sources of energy. NFLA informed that the electricity system has changed radically in the years since the project to build new third generation nuclear in Britain was initiated. NFLA agreed with the views given to the House of Lords by Michael Grubb, Professor of International Energy and Climate Change Policy at University College London, and a former supporter of new nuclear. He said: "times and conditions had substantially changed ... renewables are now clearly

⁵ Letter from Andrew Warren, Chair of the British Energy Efficiency Federation, Guardian 5th July 2017 <https://www.theguardian.com/uk-news/2017/jul/05/nuclear-is-to-wind-as-betamaxis-to-netflix-why-hinkley-point-c-is-a-turkey>

⁶ Comment on the UK Clean Growth Strategy, NFLA Briefing No.169, 14th December 2017 http://www.nuclearpolicy.info/wp/wp-content/uploads/2017/12/A282_NB169_UK_Clean_Growth_Plan.pdf

⁷ J, Timperley, J. *Energy Efficiency Policies could save UK Homes £270 report finds*. Carbon Brief 6th September 2017 <https://www.carbonbrief.org/energy-efficiency-policies-save-uk-homes-270-report-finds>

⁸ Green World 27th August 2014 <https://safeenergy.org/2014/08/27/ubs-its-time-to-join-the-solar-revolution/>

⁹ Mike Thompson, Five reflections on Dieter Helm's Cost of Energy Review, Committee on Climate Change, 31st October 2017 <https://www.theccc.org.uk/2017/10/31/five-reflections-dieter-helms-cost-energy-review/>

¹⁰ Energy Brainpool, Wind power with 'wind-gas' is cheaper and greener than Hinkley Point C nuclear plant Ecologist 17th February 2016, <https://theecologist.org/2016/feb/17/wind-power-windgas-cheaper-and-greener-hinkley-point-c-nuclear-plant>

cheaper. Committing to a 35-year contract (for Hinkley Point C) at that level was economically inappropriate.” He continued: “renewable energy costs ... appear almost to have halved in the past few years ... We now have more than 10 gigawatts of solar, when the cost projections were that we would get 1.5 gigawatts by about this time ... It is now clear that in the electricity sector we will be delivering more renewables than the Government planned for or expected by 2020.”¹¹ NFLA believe therefore that the EN-1 NPS should be re-written and there is no “need” for new nuclear. NFLA English Forum Chair, Councillor David Blackburn said: “The rapid changes in the electricity system in the past decade, as renewables have been deployed and new nuclear has generally stalled and been delayed by technical and economic problems, shows that there is no particular need for new nuclear power stations. Whereas the Government has predicted a large upswing in energy demand there has instead been a rapid fall which has not damaged the economy one jot, indeed has enhanced it. NFLA calls not for a new national policy statement for new nuclear, rather a reappraisal of wider energy use and generation. Renewables have delivered, will continue to deliver and remain the primary answer for future UK energy policy. Government should take on board these changes rather than moving ahead with long-term and expensive support for new nuclear.”

B. Decommissioning and Nuclear Waste

Further the INFLA informed that *the Public Accounts Committee report on the botched NDA Magnox contract raised some very serious questions that remain to be answered.* The NFLA informed further that *it welcomes the publication of the Public Accounts Committee (PAC) report on the botched Nuclear Decommissioning Authority (NDA) contract process for cleaning-up Magnox nuclear reactors, which is sharply critical of both the NDA and the UK Government.*¹² *During a two year contract procurement process (2012 – 2014) to decommission 10 Magnox nuclear sites and two nuclear research sites, the NDA awarded a 14-year contract to Cavendish Fluor Partnership (CFP). It was then taken to court by Energy Solutions, part of a consortium that bid for the contract but lost, over what it argued was a flawed process. The High Court ruled that the NDA had wrongly decided the outcome of the procurement process, and the NDA had to settle legal claims with Energy Solutions and Bechtel of nearly £100 million. Parallel to this process, the UK Government, following a NDA recommendation, has also decided to end CFP’s contract nine years early, as it is unable to fulfil all the requirements of the contract. In its analysis of this sorry process, the PAC conclude:*

- *The NDA completely failed in both the procurement and management of the contract to clean up the Magnox nuclear reactor sites—one of the highest value and most important contracts let by Government. Not only did this disrupt an important component of vital nuclear decommissioning work, but it also cost the taxpayer upwards of £122 million.*
- *The NDA ran an overly complex procurement process, resulting in it awarding the contract to the wrong bidder.*
- *The NDA also drastically underestimated the scale of the work needed to decommission the sites at the time it let the contract. The NDA will now have to*

¹¹ House of Lords Select Committee on Economic Affairs, The Economics of UK Energy Policy 18th October 2016 <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/economicaffairs-committee/the-economics-of-uk-energy-policy/oral/42115.pdf>

¹² House of Commons Public Accounts Committee, The NDA’s Magnox contract, 27th February 2018 <https://publications.parliament.uk/pa/cm201719/cmselect/cmpubacc/461/461.pdf>

spend even more effort and use more public money to find a suitable way of managing these sites after the contract comes to an official end in September 2019. • These failures have caused untold reputational damage to the NDA and they raise serious questions about its credibility as a strategic contracting authority. Central government must also share the blame. Not only did HM Treasury and the Business, Energy and Infrastructure Strategy (BEIS) Department approve the NDA's approaches to procurement and contract management, but there are clear failings in BEIS's subsequent challenge and oversight of the NDA, through UK Government Investments. The NFLA informed that it believe the PAC are correct in these highly damaging conclusions, which should not just require major changes in the management and policy processes of the NDA, but require the Government to also review its own failings. There are wider concerns as well. For example, NDA officials altered the scoring under which the bids were evaluated. Whilst the PAC report does not accuse them of corruption, for the NFLA, the justification for doing this – that it was such a complex scoring system (300 criteria that if not met disqualified the bid), that all bids would otherwise have been excluded – suggests the process was ridiculous in the first place. NFLA question whether the senior NDA officials were competent to conduct such an exercise, and it wants to know how improvements are being made for future contract procurement processes. A separate Government initiated inquiry led by Steve Holliday is also expected to report on such matters shortly, and NFLA will be keen to see how it understands the government's failings in oversight of the NDA. NFLA hopes the Holliday review outlines a publicly accessible process that both identifies the failings in government and the measures that need to be taken to ensure a future adequate process is in place when they sign off on contracts. If there are no consequences for government if things go wrong, as in this case, what is the point in them signing such contracts off? NFLA will be writing to Ministers on this point.

As the interim contracting arrangements for managing the Magnox sites ends in September 2019 it also leaves little time for the NDA to be reformed, which has to be a core learning point from this failed procurement process. NFLA also noted a BBC 'File on Four' documentary which found evidence that the same type of 'manipulation' and 'bad practice' had happened with an earlier contract for the Dounreay site. A clear accusation made in the documentary was that the NDA 'managed' the contract for a preferred bidder. NFLA have written previously to the Scottish Government raising these concerns and encouraging it to directly discuss this matter with the UK Government.¹³ It still remains a matter of concern that the PAC report did not address in any detail. All in all, this sorry episode suggests the NDA may not be fit for purpose in managing such complex decommissioning contracts and it should be reformed and even potentially reconstituted. As a perfect example of this, and to the alarm of the NFLA, the PAC report notes: "In March 2017, the NDA's internal audit function reported that there is a possibility that the NDA may have paid its previous contractor for work that was not completed on the sites. The NDA confirmed that it has launched an investigation into whether it may have paid for work that was not undertaken."¹⁴ If the NDA does not know such basic information then questions have to be asked as to its future in its current role. NFLA Scotland Forum Convener, Councillor Feargal Dalton said: "The Public Accounts Committee report on the NDA's contract procurement process is damning in its criticism of both the NDA's procedures and the oversight of them from government. NFLA wants to see action and change as a result of this sorry saga, which has

¹³ NFLA Media Release, November 13th 2018
<http://www.nuclearpolicy.info/news/nfla-scotland-writes-scottish-government-concernsdounreay-decommissioning-contract-redundancies/>

¹⁴ Paragraph 14 in the PAC report.

cost the public over £122 million. This may not just mean a change in personnel at the very top, but a reconsideration of the NDA in its entirety to consider whether it is fit for purpose, and of government in its oversight function. We also urge the PAC and the Holliday inquiry to more forensically consider the similar Dounreay contract procurement process to find out if it was undertaken in a similarly flawed manner. This process puts the NDA under the microscope and it looks wanting. For a body which receives public funding of £3 billion a year that is deeply troubling.”

By learning all this information, the German public concerned understand, that wrong calculations are the base of the new Nuclear National Policy Statement for Energy, therefore no new nuclear power plants are needed, no zero option is provided, alternative concepts for renewables are missing and there`s no nuclear repository in Great Britain. For all these reasons no new nuclear power stations should be planned and the new Nuclear National Policy Statement should be stopped.

Fact is:

- a.) **The documents of the EIA procedure Hinkley Point C, which was done in Germany in 2017, was based on false facts, because the British Government made a 30% error in its calculations of the increase in electricity consumption.** The Department for Business, Energy & Industrial Strategy of the United Kingdom of Great Britain and Northern Ireland (UK) granted a Development Consent Order for the construction of Hinkley Point C in March 2013. In the context of preparing for approval, the relevant British authorities carried out an Environmental Impact Assessment (EIA) only in Somerset in the United Kingdom. A notification according to Article 3 of the Convention on Environmental Impact Assessment in a transboundary context as demanded by the Espoo Convention) wasn't made – it was told, the project will not have any impacts on Germany. Both, the Espoo Implementation Committee and the Aarhus Convention Compliance Committee decided that the first Environmental Impact Assessment procedure done in 2013 needed a transboundary EIA procedure because of the multi-hazardous technology. And indeed these committees asked the United Kingdom to suspend construction, the United Kingdom is ignoring these decisions. This means that approval was granted unlawfully, making the Hinkley Point C nuclear power plant an illegal construction. In addition, the Environmental Impact Assessment done in 2017 in Germany denied the German public concerned its right to the third pillar of the Aarhus Convention – the right of access to justice. By doing so, the British Government once again violated the binding Conventions. Furthermore, since the Brexit has not yet been completed, the current Environmental Impact Assessment procedure violates the so called “Altrip judgment” of the European Court of Justice from 2013.¹⁵ The project owner's legal certainty of construction approval must be investigated. Moreover, the documents presented so far failed to provide a public hearing in Germany. This is mandatory to avoid any discrimination of the German public concerned, because in Somerset several hearings took place¹⁶ during the first Environmental Impact Assessment

¹⁵ <http://www.uvp.de/de/6-aktuelles-a-veranstaltungen/mitteilungen/646-eugh-klagerecht>

¹⁶ Hinkley Point - West Somerset Council <https://www.westsomersetonline.gov.uk/Planning---Building/Planning/Hinkley-Point/Hinkley-Point-Development-Consent-Application>

procedure which only took place in the United Kingdom. The Aarhus Convention art. 3(9) demands public participation "without any discrimination" and the Espoo Convention art. 2(6) demands this in all "possible affected areas". The Aarhus Committee already took this decision in the case of Temelin (ACCC/C/2012/71).¹⁷

This second Environmental Impact Assessment procedure¹⁸ in 2017 was launched only to avoid an infringement procedure after an intervention by the German public through the Espoo Convention Implementation Committee¹⁹, and two complaints sent to the Aarhus Convention Compliance Committee in Geneva (ACCC/C/2013/91²⁰ and ACCC/C/2013/92²¹). Both, the Espoo Convention Implementation Committee and the Aarhus Convention Compliance Committee decided that the Hinkley Point C project must be called a multi-hazardous technology, large-scale impacts on neighbouring countries are indeed possible, and therefore a transboundary EIA was mandatory. The British Government failed until today to provide information to the public concerned in Germany what happened to the submissions^{22 23 24} sent from Germany to the British Government. With this EIA procedure the British Government either violated the rights of the applicant, who already got a granted building permission, or it violated the rights of the public concerned in the neighbour states (Aarhus art 6.4, when all options are open). **Today, the German public concerned learnt, this EIA was based on false facts provided in the National Policy Statement for Energy (EN-1).**

- b.) In 2011 the British Government didn't make sure, that the German public concerned was able to participate on the National Policy Statement for Energy (EN-1) and all possibly following plans and programmes connected to this plan. **The new National Policy Statement for Energy** is the first one on which the German public concerned can participate in a transboundary public participation procedure. The two reasons, why they can do so, are the complaints ACCC/C/2013/91²⁵ and ACCC/C/2013/92²⁶. To avoid an infringement procedure

¹⁷ www.unece.org/envenv/pp/compliancecommittee/71tablecz.html

¹⁸ <http://www.bmub.bund.de/themen/atomenergie-strahlenschutz/nukleare-sicherheit/internationales/uvpsup/akw-hinkley-point-c-grossbritannien/>

¹⁹ <http://www.nuclear-transparency-watch.eu/a-la-une/the-espoo-convention-implementation-committee-asks-the-uk-to-suspend-work-on-the-hinkley-point-c-nuclear-power-station-because-of-the-governments-failure-to-consult-with-european-countries.html>

²⁰ www.unece.org/environmental-policy/conventions/public-participation/aarhus-convention/tfwg/envppcc/envppcccom/acccc201391-united-kingdom.html

²¹ www.unece.org/environmental-policy/conventions/public-participation/aarhus-convention/tfwg/envppcc/envppcccom/acccc201392-germany.html

²² <https://blog.greenpeace-energy.de/wissen/atomkraft/uvp/>

²³ <https://gruene-fichtelgebirge.de/akw-hinkley-point-c/>

²⁴ <http://www.umweltinstitut.org/aktuelle-meldungen/meldungen/ueber-21000-einwendungen-gegen-britisches-atom-comeback.html>

²⁵ www.unece.org/environmental-policy/conventions/public-participation/aarhus-convention/tfwg/envppcc/envppcccom/acccc201391-united-kingdom.html

²⁶ www.unece.org/environmental-policy/conventions/public-participation/aarhus-convention/tfwg/envppcc/envppcccom/acccc201392-germany.html

again is the reason for this transboundary public participation procedure. However, today, in 2018, the German public concerned can't participate anymore when all options were open (Aarhus art 6.4). Hinkley Point C got unlawful permission. And Chinese state owned nuclear firms have a commitment from the U.K. government to build the Hualong One at the Bradwell nuclear site in return for a one-third equity stake in the Hinkley Point reactor project now under construction (Twin Areva/EDF 1650 MW EPRs).²⁷ **The new Nuclear National Policy Statement for Energy** must be stopped and must be restarted from the moment where all options were open with a legal public participation procedure open to all members of the public concerned.

- c.) The risk of earthquakes isn't sufficiently clarified in **the new Nuclear National Policy Statement for Energy**. For example the Hinkley Point C nuclear power plant is planned right at the Bristol Channel where the Frankonian Line ends. This geological rupture line starts in Germany, in Upper Palatinate, right at the Continental Deep Drilling Program (KTB).²⁸ Earthquakes can run very quickly along these geological rupture lines. The Franconian line crosses the Rhine Valley and other earthquake zones.
- d.) The emergency preparedness and response plans in the United Kingdom and in the neighbour states aren't sufficient²⁹. **The new Nuclear National Policy Statement for Energy didn't take this into account**. The lack of preparedness in the European neighbour states as well as in the United Kingdom is documented in the **Report of the Nuclear Transparency Watch Working Group on Emergency Preparedness & Response**³⁰ and in the Study of the European Commission. Therefore a new nuclear power plant is irresponsible.
- e.) Additionally, the now published scoping report on **the Appraisal of Sustainability ("AoS")** for a proposed new NPS for nuclear power stations deploying between 2026-2035 is not open for public consultation for the German public at all. Also the "AoS" must be stopped and must be restarted with a legal public participation procedure open to all members of the public concerned.

C. Nuclear Fallout – Source Terms

Radioactive material from Sellafield was found in the Wadden Sea area of Germany and Denmark. The Ministry for Energy and Industry must research the consequences of an INES 6 or INES 7 scale accident of the new planned reactors at Hinkley Point C, Wylfa, Sellafield (Moorside), Sizewell, Bradwell, Oldbury, Hartlepool and Heysham. The risk of such an accident isn't zero according to the builders' specifications. The relevant factor is how much nuclear inventory is inside the containment

²⁷ <http://www.theenergycollective.com/dan-yurman/2427180/czech-cez-try-new-nuclear-tender>

²⁸ https://en.wikipedia.org/wiki/German_Continental_Deep_Drilling_Programme

²⁹ <http://www.nuclear-transparency-watch.eu/category/activities/nuclear-emergency-preparedness-and-response>

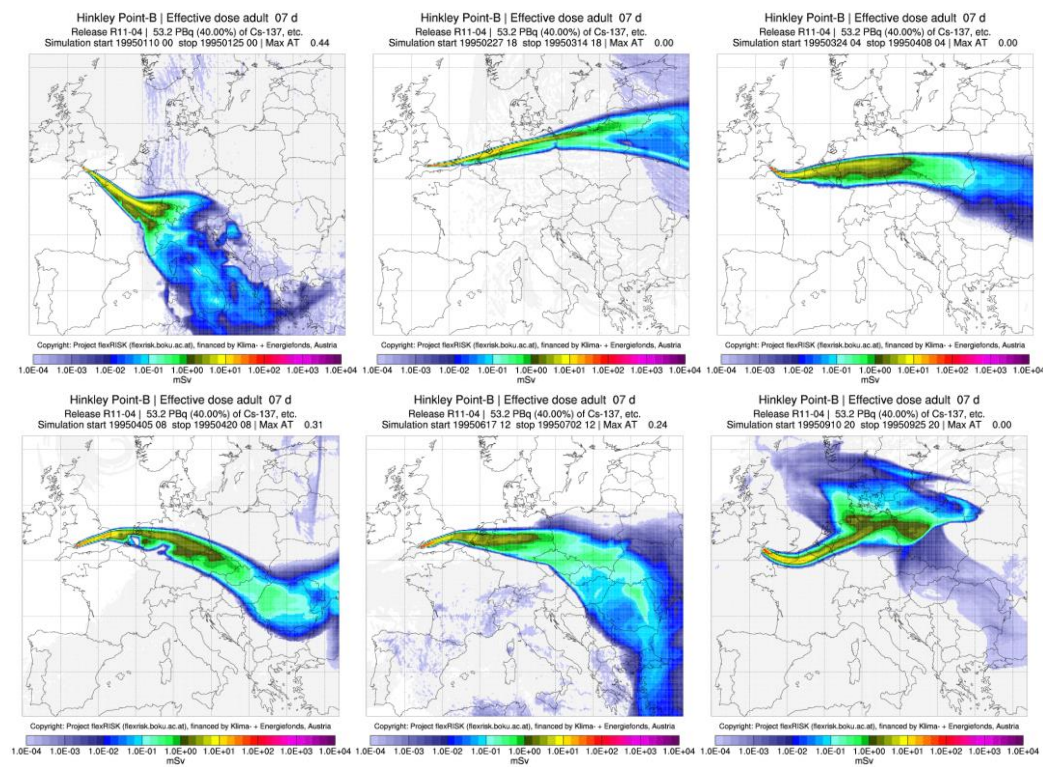
³⁰ [Report of NTW Working Group on Emergency Preparedness & Response \(180 pages\)](#)

and, in the worst case, can leak into the environment. Greenpeace provided a flexRISK project for a Generation III+ reactor in Poland. Starting on page 20 there is a graphical overview of all 86 cases.³¹

The Institute for Safety and Risk Studies at the BOKU University of Vienna provides on the flexRISK website³² a lot of source terms concerning Germany from the existing reactors of Hinkley Point C, Wylfa, Sizewell, Oldbury, Hartlepool and Heysham. **These source terms³³ make clear, each new planned nuclear reactor unit in Great Britain can contaminate any place in Germany by air and the coast by the water path.**³⁴

- **The new Nuclear National Policy Statement for Energy must provide source terms for this multi-hazardous technology for INES 6 and INES 7 accidents under realistic weather conditions from January to Dezember.**

Hinkley Point C, there are more such source terms concerning Germany at the flexRISK website.

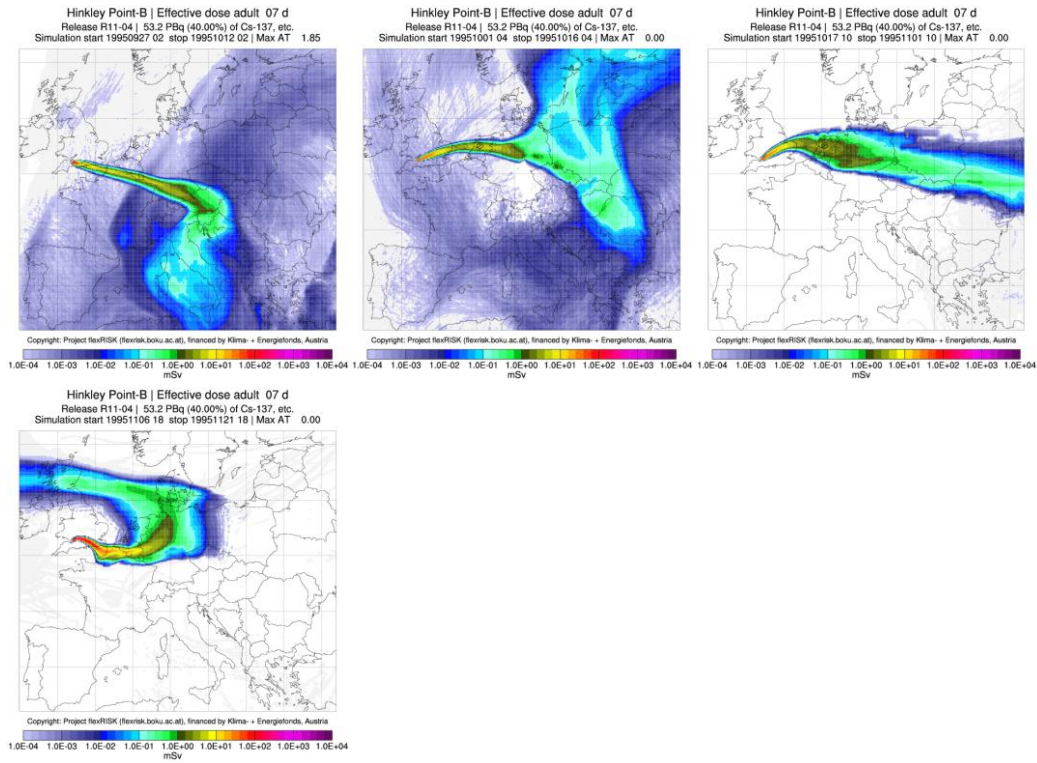


³¹ https://www.greenpeace.de/sites/www.greenpeace.de/files/publications/20140304-flexrisk_report_pl.pdf

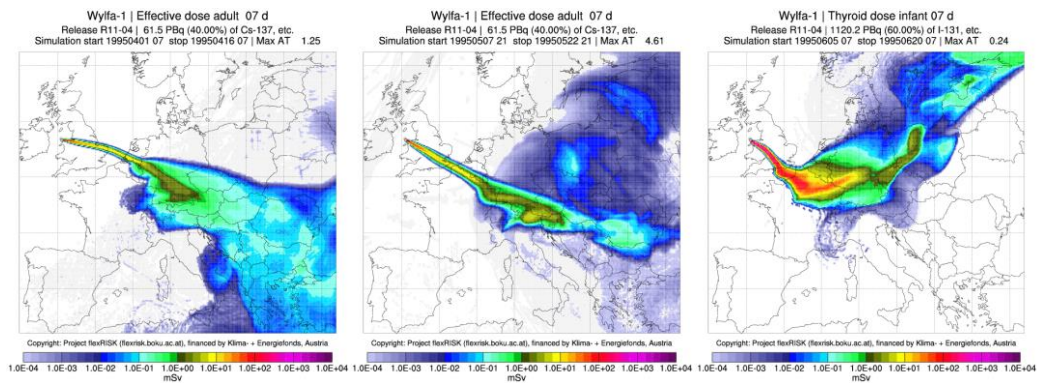
³² <http://flexrisk.boku.ac.at/en/evaluation.phtml#form>

³³ <http://flexrisk.boku.ac.at/en/evaluation.phtml#form>

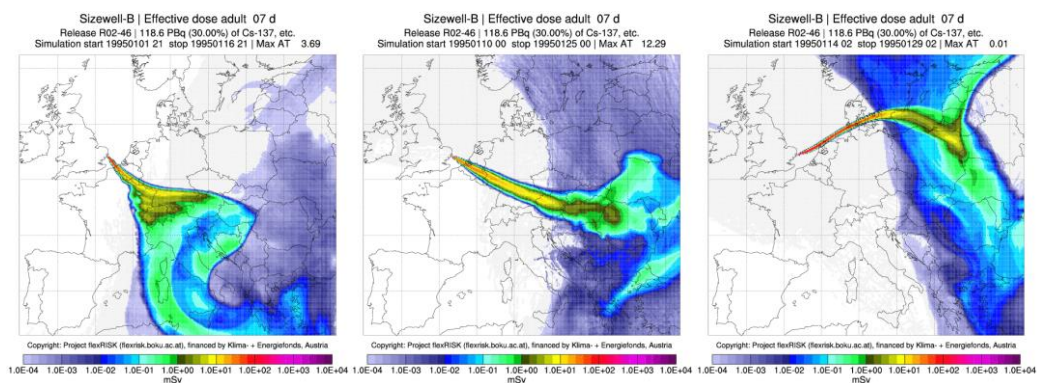
³⁴ <http://flexrisk.boku.ac.at/de/index.html>

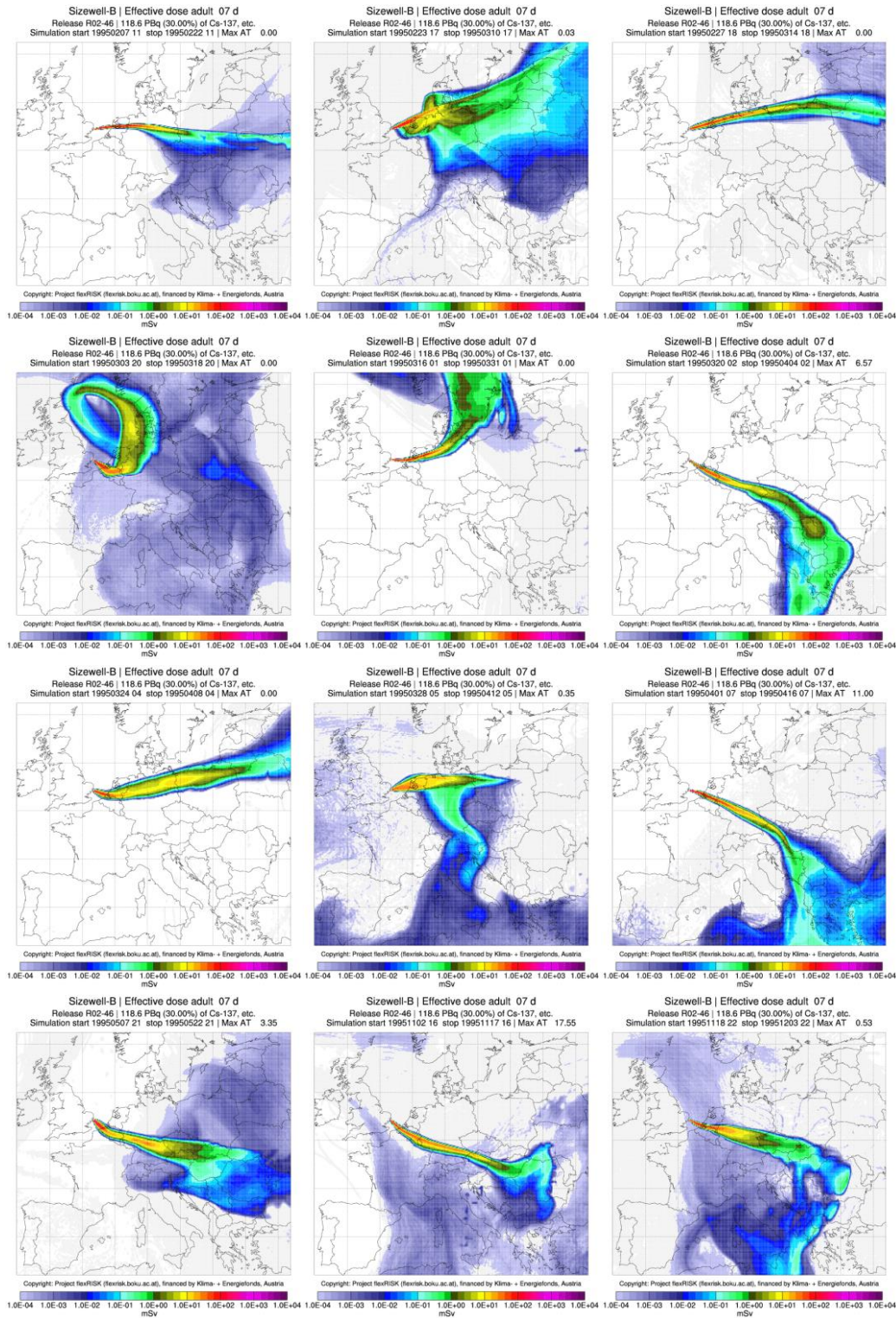


Wylfa, there are more such source terms concerning Germany at the flexRISK website.



Sizewell, there are more such source terms concerning Germany at the flexRISK website.





D. Conclusions

Bearing in mind the facts provided under A, B and C the new Nuclear National Policy Statement for Energy and the “AoS” must be stopped. Both must be restarted with:

1. A legal public participation procedure, open to individuals and all members of the public concerned, from the beginning, when all options are open.

2. Correct legal conditions in the context of the international laws, the Espoo Convention and Aarhus Convention.
3. Zero option and a renewable energy plan as an alternative plan.
4. Correct calculations on nuclear energy, including the Uranium life cycle “from cradle to grave”.
5. Correct earthquake studies for all sites.
6. Source terms for INES 6 and INES 7 accidents of this multi-hazardous technology under realistic weather conditions from January to Dezember.
7. Adequate nuclear emergency preparedness and response plans, together with the neighbour states, including iodine pills for all possible affected areas (see No. 6).
8. Operator liability for all possible damages in Great Britain and neighbour states.

E. Additionally

All provided documents are in English language. According to the Espoo Convention art. 2.6 (and shall ensure that the opportunity provided to the public of the affected Party is equivalent to that provided to the public of the Party of origin) and to the Aarhus Convention³⁵ art. 3.9 (without discrimination as to citizenship, nationality or domicile) these documents should be provided in German to make sure that every person of the public concerned is able to participate without discrimination and without encountering any language barrier.³⁶

Please confirm receipt and please be so kind and make sure, that the German public concerned will find the final report of **the new Nuclear National Policy Statement for Energy** where their submissions are rated on the BMUB website.

Kind regards,

Brigitte Artmann

³⁵ www.unece.org/env/pp/treatytext.html

³⁶ https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-15&chapter=4&clang=en#EndDec