REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

MINISTER

54-00-12

16 ***April 2013***

Subject: *Consultation regarding the EIA for construction of new units of the Paks NPP, Hungary*

Dear Dr. Sándor,

I would like to refer to your letter dated 8 February 2013, by which you have informed us about the beginning of the process of prior consultation regarding the EIA for construction of new units of the Paks NPP.

Pursuant to the regulations of the Convention on EIA in a Transboundary Context and Directive 2011/92/EU, the Ministry of Environment and Water of the Republic of Bulgaria provided the public and the specialized agencies with access to your notification in compliance with Article 3 of the Convention on EIA in a Trasboundary Context and the documentation for the scope of the EIA for at least 21 days. Taking into account the received opinions on the basis of the reviewed documentation, the conclusion is that the introduction of new generation nuclear units cannot be expected to lead to a significantly increased risk of severe accident compared to the preset risk for Paks NPP site. Therefore we consider that the provided scope of assessment, which is in compliance with all relevant international regulations, does not imply the necessity of additional information at this stage of the EIA procedure, except the envisaged in the assessment, including for the purpose of emergency planning and emergency response in case of transboundary pollution.

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Based on the above, I would like to inform you that the Republic of Bulgaria does not intend to take part at this stage of the EIA procedure for the construction of new units of the Paks NPP.

On the other hand, we consider that the early stage of the procedure and the related gaps are the reason for the assessments to be based mainly on trade documentation of manufacturers of reactors and equipment. As a result, there are no clear measures for prevention and mitigation of the impacts taking into account the transboundary nature of the Danube River which is of high importance for Bulgaria in different aspects such as transportation, recreation and tourism, extraction of inert materials, fishing, irrigation and also in case of high water levels for the zones of protection of the waters of the islands and lowlands, drinking water supply from groundwater in the lowlands and other factors concerning the operation of the future nuclear units which are important for the Danube water quality status, mostly in case of accidents. In this regard, the impact of any possible beyond design basis accidents should be considered, taking into account the conclusion that under certain weather conditions radioactive pollution can reach the western parts of Bulgaria within 30-40 hours.

Therefore, we expect the EIA for the new nuclear units for Paks NPP to include an analysis of their impact on the territory of Bulgaria in case of possible beyond design basis accidents. In case of an established possible high negative transboundary impact of the investment proposal at any next stage of the procedure, concerning the territory of Bulgaria, we would like to duly receive the relevant additional documentation for consideration and a new decision for a possible participation of the Republic of Bulgaria in the EIA procedure in Hungary.

Given the above mentioned, if Bulgaria does not confirm its participation as an affected party in case of occurrence of the specified circumstances at any of the next stages of the procedure, we express our desire to be promptly informed upon completion of the EIA procedure on Hungarian territory and we would like to receive your final decision on the construction of new nuclear units for the NPP in Paks.

I take the opportunity to express my highest consideration and willingness for a fruitful future cooperation.

Yours sincerely,

Julian Popov

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