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Comments on the Fortum Corporation's Environmental Impact Assessment (EIA) for the Loviisa 3 Nuclear Reactor in Finland

These comments are submitted in accordance to the Espoo Convention (<http://www.unece.org/env/eia/eia.htm>) at the request of the Swedish Environmental Protection Agency (<http://www.naturvardsverket.se/>) on 22 April 2008 (registry number 121-5350-07). At that time the deadline for submissions was set as 16 June 2008. Considering the large amount and technical nature of the information covered by the EIA, the six weeks allowed for comment is inadequate. None-the-less a number of questions arise and thus further consultation with Fortum Corporation is required. The Swedish Environmental Protection Agency has specified the time for possible additional consultations as between 25 June and 11 July 2008. It is requested however that these consultations take place in the fall of 2008 at the earliest to provide more time for preparation and discussion with government officials. The impending summer holiday season for government officials means that many people are unavailable.

The following issues are among those need to be further addressed or that are not addressed at all in the EIS:

- a description of the intended end-use energy consumption for the energy produced together with possible alternative sources for these end-uses, including conservation, efficiency improvements and supply sources;
- a list of isotopes expected to be released to the air and water and their amounts and distribution over time, including maps showing the estimated downwind and downstream plumes;
- a cost analysis addressing the problem of cost over-runs normally experienced by the nuclear industry;
- a broad life-cycle analysis including the entire fuel chain from uranium exploration to spent fuel management and reactor decommissioning, including total CO₂ emissions throughout all phases;
- a detailed description of transport modes and routes, including maps, and accident scenarios for both fresh and spent fuel;
- implications of international spent fuel waste management scenarios, e.g. a central European storage facility, and the current review process in Sweden;

Two additional minor though important comments follow.

It is requested that Fortum Corporation date their documents. Neither the printed copy received nor the digital versions available from the Finnish Ministry of Employment and Economy's website (<http://www.tem.fi/?l=en&s=1915>) are dated.

It is also requested that Fortum Corporation explain the organizational structure, if there is one, of the list of references included in the EIS. The lack of alphabetical order makes it difficult to quickly find references.

Miles Goldstick,
Information Secretary.