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Your ref:  
EN010012-002286  
Our ref:  
NV-05937-20

The Planning Inspectorate UK  
[sizewellc@planninginspectorate.gov.uk](mailto:sizewellc@planninginspectorate.gov.uk)

**Swedish answers to the notification in accordance with Articles 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the project Sizewell C, a new nuclear power station I Suffolk.**

Sweden received a notification from the Planning Inspectorate in the UK to participate in consultation under Article 3 of the Espoo Convention in relation to the nuclear power station project, Sizewell C.

UK has fulfilled their responsibility following from article 3 of the Espoo Convention by providing the Swedish environmental protection agency (EPA) with a notification regarding the project.  
The Swedish EPA has in turn invited Swedish government agencies, organizations and other parties to comment on the projects potential significant effects on Sweden.

**Consultation in Sweden**

The notification and the attached documents were distributed to potentially interested authorities and organizations whom were given between the 16<sup>th</sup> of July and 17<sup>th</sup> of august to comment on whether the project could have significant impact on the environment in Sweden.

The Swedish EPA is the authority responsible for fulfilling the obligations following from, inter alia. Article 3 of the Espoo Convention. However, the Swedish EPA has no responsibility to evaluate the consultations received in the context of the Swedish national consultation procedure with a view to presenting an overall Swedish position. For a comprehensive view of the consultations, we refer to the enclosed statements received.

**Consultations comments received**

A brief summary of the statements is included below, please note that the summary is written on behalf of the Swedish EPA and not the body to which a proposal is referred for consideration:

The Swedish EPA received comments from *The Swedish Radiation Safety Authority, the Swedish NGO office for Nuclear Waste Review (MKG) and Greenpeace Sweden.*

*The Swedish Radiation Safety Authority and MKG* did not provide any comments regarding the potential transboundary effects of the project that might affect Sweden; however they do wish Sweden register as an Interested Party to further follow the project.

*Greenpeace Sweden* commented on the project's potential severe effects on Sweden and other countries in case of an accident if or when the power station is up and running. They have also provided simulations of potential contamination over Sweden if accidents would occur, please see attached. They therefore want Sweden to further take part under the Espoo convention and be given the opportunity to further comment on the environmental impact assessment in accordance to article 4 and 5 of the convention.

Sweden therefor wishes that the upcoming EIA will include worst case scenario and how it might affect Sweden and to continue to take part in the upcoming progress as an effected party and be given the opportunity to comment in the further process of the EIA.

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*As the decision has been made electronically there is no need for signatures.*

For the Swedish Environmental Protection Agency

Karolina Ardesjö-Lundén  
Head of Unit

Richard Kristoffersson  
Point of contact for the Espoo  
Convention

**Attachments**

Comments from Greenpeace Sweden

**Cc**

The Swedish Radiation Safety Authority  
The Ministry of Environment in Sweden, Emma Sjöberg

To: The Planning Inspectorate, UK Secretary of State (ref: EN010012-002286)  
[sizewellc@planninginspectorate.gov.uk](mailto:sizewellc@planninginspectorate.gov.uk)

Copy: Swedish Environmental Protection Agency (ref: NV-05937-20)  
[registrator@naturvardsverket.se](mailto:registrator@naturvardsverket.se)

## Regarding Sizewell C nuclear power station

To Whom it May Concern,

It has come to the knowledge of Greenpeace Sweden that there are plans to construct a new power station in the United Kingdom, the so called Sizewell C Project. As this project falls under the Espoo Convention as well as the Aarhus Convention, Greenpeace Sweden would like to give the following comments.

Greenpeace Sweden insists that the plans of a construction of this nuclear power station is stopped as it may have severe environmental impact on Sweden as well as other countries. To build and operate nuclear facilities without a long term and completely environmentally safe final repository of nuclear waste in place is dangerous and irresponsible. Until the United Kingdom has such a facility in place the construction of Sizewell C nuclear power station should therefore be rejected.

In a letter to all EEA states, dated on July 8, 2020, the UK Secretary of state has assessed that the proposed nuclear project "is not likely" to have significant adverse transboundary effects on Sweden.

A nuclear power station is an "ultra-hazardous" activity according to the Aarhus Convention Compliance Committee (findings concerning Hinkley Point C - ACCC/C/2013/90) and therefore environmental impacts are deemed to be possible also beyond borders.

The distance between Chernobyl nuclear power plant and for example the city of Gävle in mid Sweden which suffered severely (and still do) from the contamination following the 1986 nuclear disaster is around 1300 km. As a comparison the distance between Sizewell and the city of Malmö (third largest city in Sweden, located in the south close to Copenhagen) is some 500 km shorter, around 800 km in total. Furthermore Malmö is situated in a usual wind direction from the UK east coast.

Following pages contain a simulation of possible contamination over Sweden from a severe nuclear accident at Sizewell (used source term of 118.9 PBq Cs-137). The simulation is made through the Austrian flexRISK project (<http://flexrisk.boku.ac.at/>) with weather conditions for a number of days in 1995.

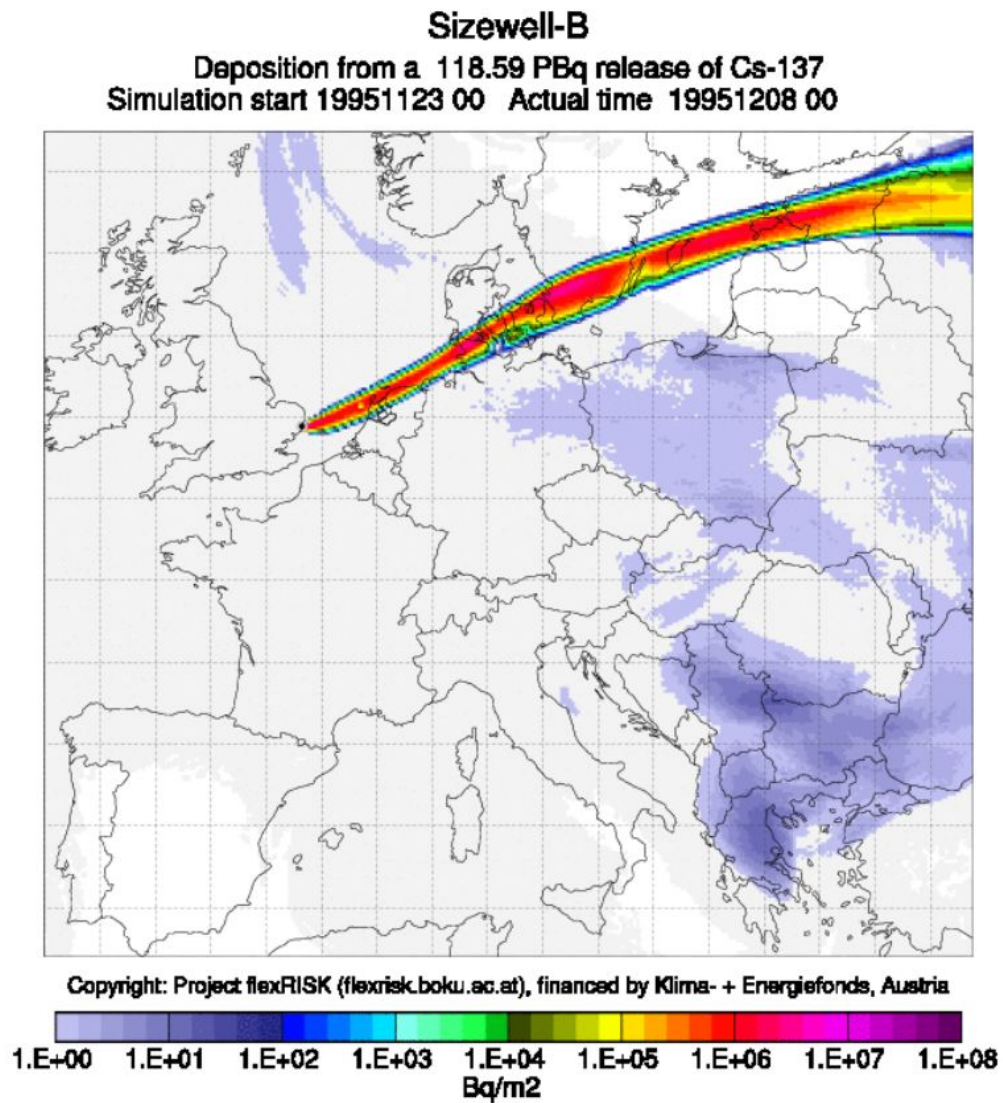
If the Sizewell C Project despite this still proceeds we presume that the Best Available Technology (BAT) is used throughout the whole project.

Yours sincerely,



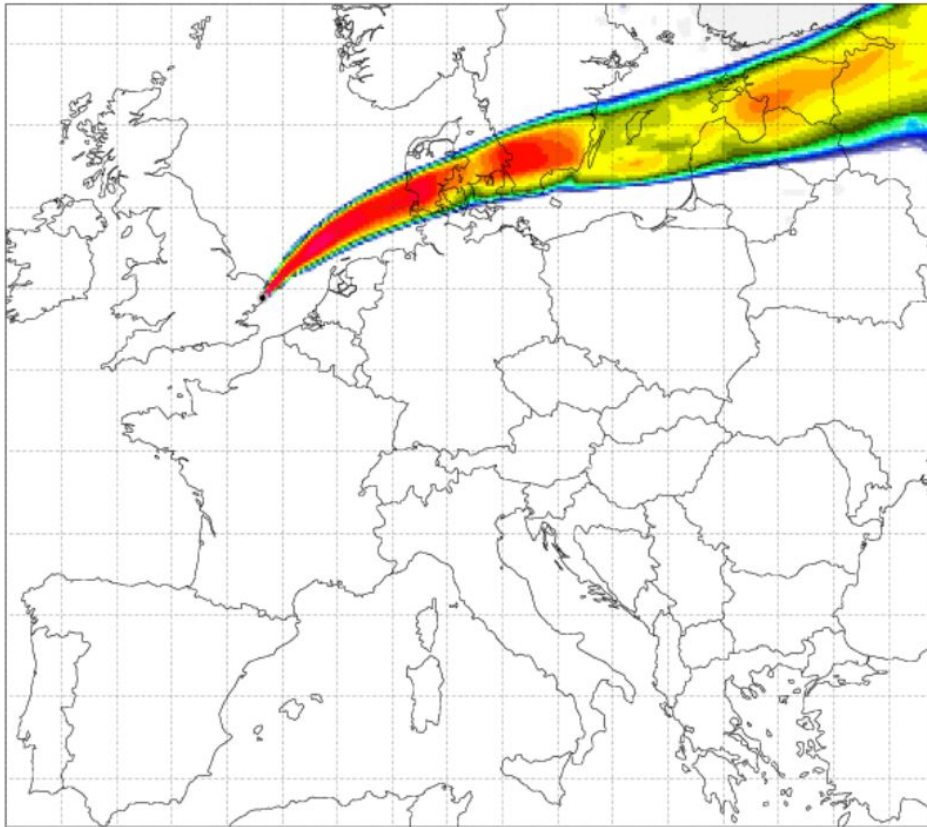
Rolf Lindahl, Climate and Energy Campaigner, Greenpeace Sweden

flexRISK worst results for Estonia and Sweden

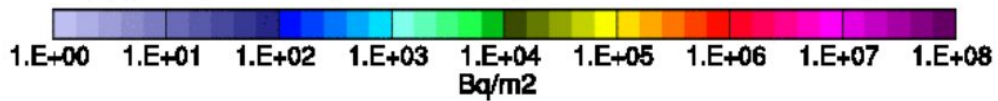


## Sizewell-B

Deposition from a 118.59 PBq release of Cs-137  
Simulation start 19950203 09 Actual time 19950218 09



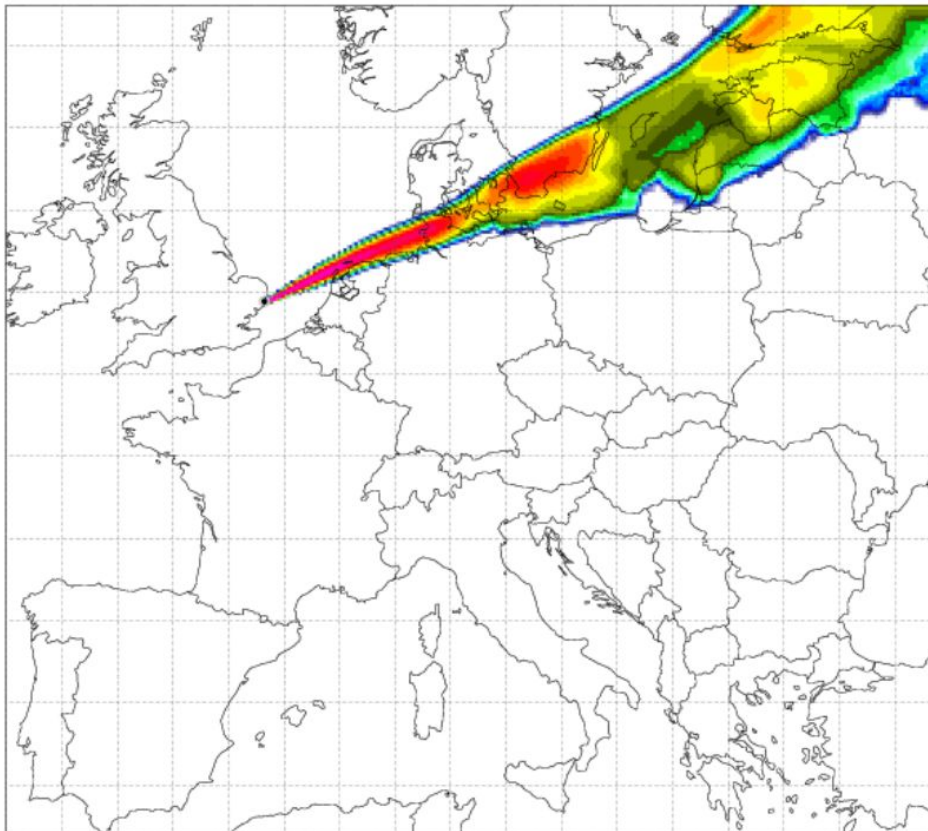
Copyright: Project flexRISK (flexrisk.boku.ac.at), financed by Klima- + Energiefonds, Austria





## Sizewell-B

Deposition from a 118.59 PBq release of Cs-137  
Simulation start 19950215 14 Actual time 19950302 14

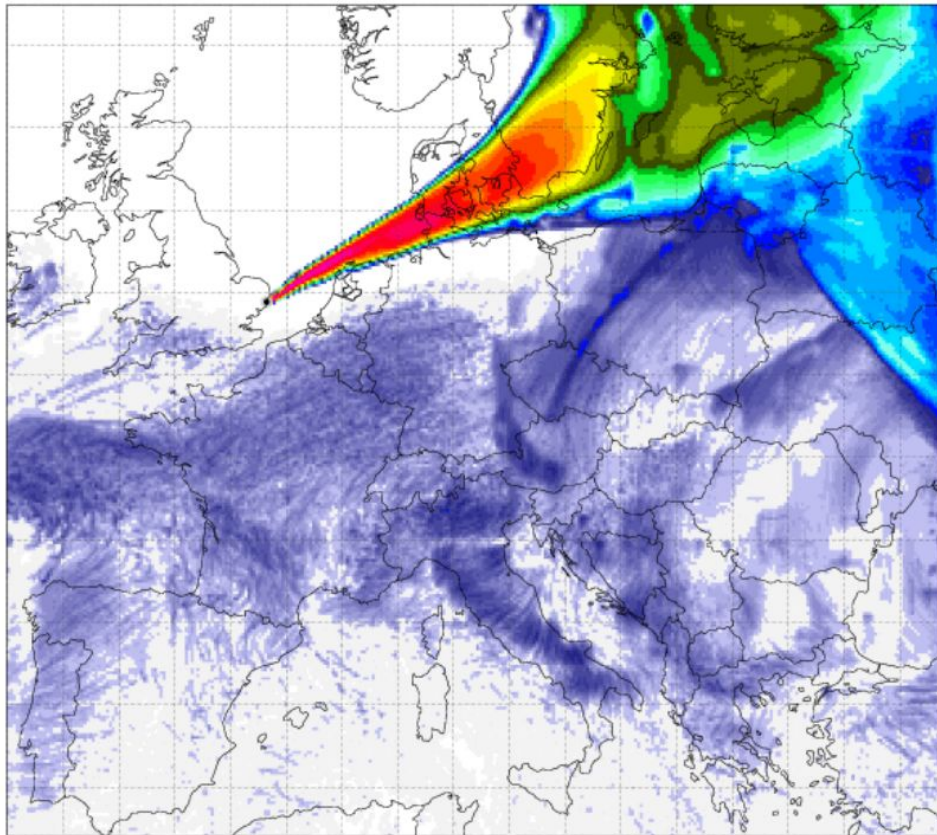


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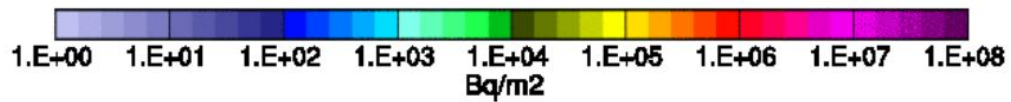


## Sizewell-B

Deposition from a 118.59 PBq release of Cs-137  
Simulation start 19950617 12 Actual time 19950702 12

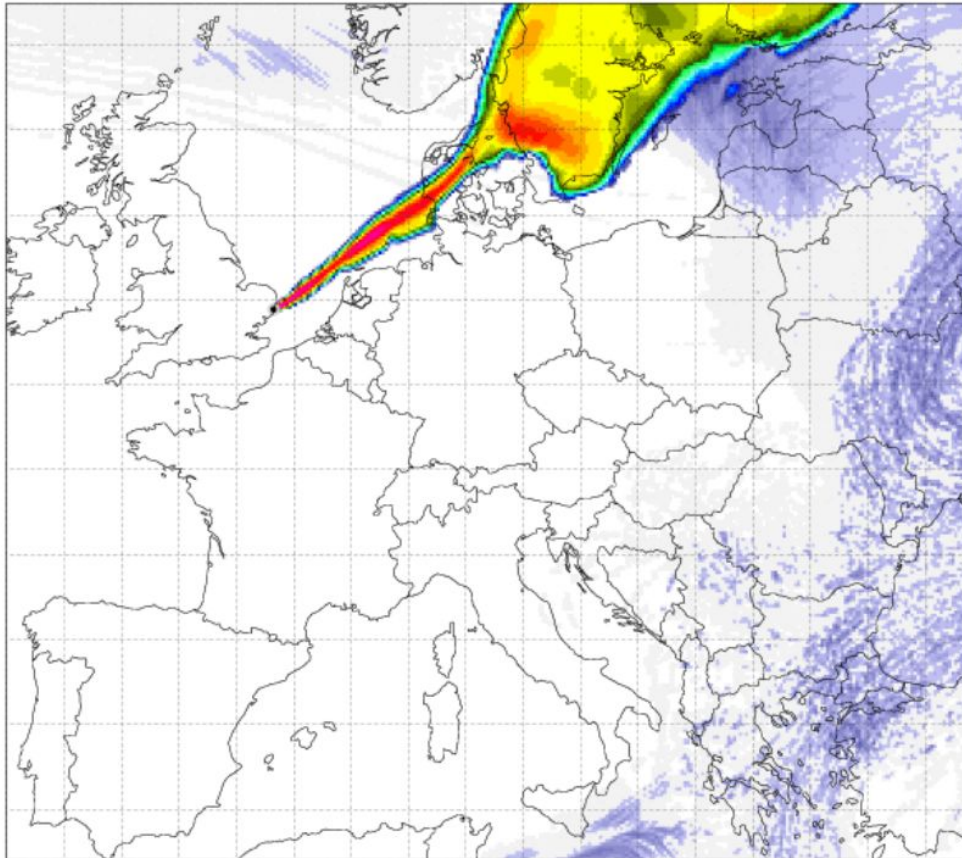


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## Sizewell-B

Deposition from a 118.59 PBq release of Cs-137  
Simulation start 19951005 05 Actual time 19951020 05



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