



Bundesministerium für Umwelt, Naturschutz, Bau und Reaktorsicherheit, RS III 2, Postfach 12 06 29, 53048 Bonn

Ministerstvo životního prostředí  
Vršovická 1442/65  
Praha 10, 100 10  
Czech Republic

TEL +49 22899 305-2951

FAX +49 22899 305-3225

Joerg.Reckers@bmub.bund.de

www.bmub.bund.de

e-mail only

**Strategic environmental assessment to update the concept of radioactive waste and spent nuclear fuel**

Statement on scoping

Your letter of 23 November 2015

Our reference: RS III 2 - 18042 CZE

Bonn, 17.12.2015

Dear Mr Hejhal,

The Czech Ministry of the Environment announced the beginning of the scoping phase of the strategic environmental assessment to update the *concept of radioactive waste and spent nuclear fuel* to the Federal Republic of Germany and has given us the opportunity to submit comments regarding content and extent of the scope at working level. I welcome this opportunity so early in the process and would like to thank you, especially for the German translation of the summary. Unfortunately, I have not been able to study the documents that were provided in Czech.

I would like to comment on two issues:

From the documents I gather that the environmental assessment covers anticipated new or reconstructed existing near-surface repository for radioactive waste, anticipated new storage facilities and deep geological repository. As a general rule, the strategic environmental assessment should cover all



Page 2

relevant content of the *concept for treating radioactive waste and irradiated fuel elements*. If this requirement is fulfilled with the three areas listed, it would be helpful to expressly state this fact. If this is not the case, the scope should be extended accordingly.

The documents should also specify the environmental impacts that will be studied in the assessment. A strategic environmental assessment especially needs to consider potential radiological impacts, including transboundary ones.

In your letter you state that so far no transboundary impacts have been identified. However, it is pointed out in the summary that at this point it is not possible to assess the impacts the concept may have beyond the borders of the Czech Republic, but that the probability of impacts is low.

In Germany's view, the handling of radioactive waste and irradiated fuel elements is a particularly sensitive process that needs to be very transparent and easy to understand for the public.

I would therefore appreciate it if you could clearly lay out in your strategic environmental assessment whether potentially significant transboundary impacts can be expected, especially regarding the planned activities at the final repositories Richard and Bratrstvi and the site selection for a final repository for high level radioactive waste.

I would like to ask you to plan and implement the Czech concept in such a way that no adverse impacts affect German territory, that it complies with



Page 3

all international requirements and that the process will be carried out in a transparent and understandable way.

As representative of the competent federal ministry I hereby notify you that the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety will participate in this process in the Czech Republic.

I would be delighted if we could continue the exchange on the progress of drawing up and implementing the updated *Czech concept for treating radioactive waste and irradiated fuel elements* in future and keep up the good neighbourly cooperation.

Sincerely yours

For the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety

Reckers