



Kilcatherine, Eyeries, County Cork  
<http://www.friendsoftheirishenvironment.org>

*Phil Hogan, TD,  
Minister for the Environment,  
Customs House,  
Dublin 1  
15 March 2013*

Re: **Transboundary consultation on UK Hinkley C Nuclear power plant**

Dear Phil;

I hope you are well and your work meets the expectations you outlined to me at the outset of your tenure. I am taking up your invitation to contact you on a matter of great concern to ourselves and the Irish public.

**We have recently learnt that the proposed new nuclear power plant at Hinkley C in Somerset has not been subject to trans-boundary assessment as the 'likely impacts determined through a thorough EIA do not extend beyond the county of Somerset and the Severn Estuary', according to the Environmental Impact Assessment.**

We understand from informal conversations with the Radiological Protection Institute that Ireland was not formally notified under the trans boundary requirements of the Espoo Convention or otherwise; we assume this is because the UK authorities contend there are no trans boundary impacts.

That such is not the case is a matter of simple reason.

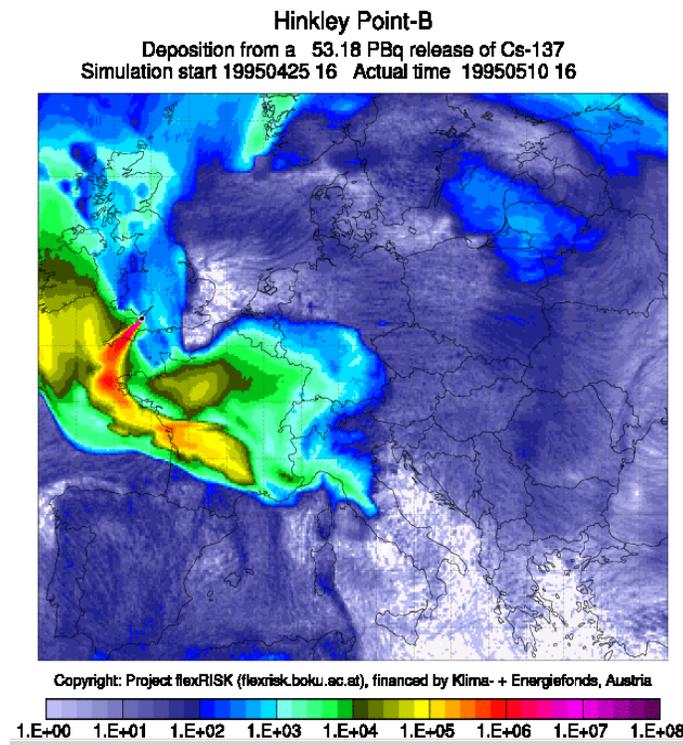
**Under certain meteorological conditions a nuclear release from Hinkley Point could cause widespread contamination in Ireland. Such releases are not impossible. A conservative worst case release scenario should have been included in the EIA because of its relevance for impacts at greater distances.**

These concerns are highlighted because costs associated with new safety features (in part caused by the Fukushima Daiichi nuclear disaster) have led to an increase in the output of the plant by an unprecedented higher burn-up of fuels and for the use of MOX, increasing the potential of danger in comparison with the latest Generation II plants.

There is a manifest risk of a nuclear release and certainly, it cannot be proven beyond doubt that a large release cannot occur. In that context the EIA must consider the consequences of such a release and what preparations should be considered for such an event.

If contamination of ground (and air) beyond certain thresholds can be expected, a set of agricultural intervention measures is triggered, including earlier harvesting, closing of greenhouses and covering of plants, putting livestock in stables etc. Preparation of these measures relies on an accurate assessment of the potential impacts of worst case scenarios.

Scenarios of nuclear releases and their contamination impacts have been developed and explored by the FlexRisk project<sup>1</sup>. This analysis demonstrates the potential for severe impacts on Ireland. Below is one of the contamination scenarios based on meteorological conditions.



This example results in deposition in the south of Ireland higher than 10 000 Bq/m<sup>2</sup> (Depositions higher than ca. 650 Bq/m<sup>2</sup> trigger radiological protection measures.)

The Austrian Federal Environmental Agency has made an Expert Statement<sup>2</sup> on the risks to Austria they have identified from this new nuclear power plant, referring to the analysis in the FlexRisk project as well as detailing other concerns.

1 <http://flexrisk.boku.ac.at/en/index.html>

2 <http://www.umweltbundesamt.at/fileadmin/site/publikationen/REP0413.pdf>

Manifestly, under certain meteorological conditions, the risk to Ireland would be much higher than the risk to Austria.

As you are aware, the Espoo Convention on Environmental Impact Assessment in a Transboundary Context provides that any neighbouring country may submit the question of whether a project may have transboundary impacts to an inquiry commission which will advise on the likelihood of significant adverse transboundary impact.

In the circumstances which are that confirmation of the UK development consent is due on 19 March, 2013, we would urge you to make a formal request under this convention without delay.

Kind regards,

Tony

Tony Lowes,  
Director, Friends of the Irish Environment