

## **Statement on the SEA procedure for the nuclear waste management programme of the Slovak Republic**

November 22, 2024

Clearly, nuclear waste management programmes as well as programme reviews are subject of a Strategic Environmental Assessment (SEA), also in a transboundary context. Therefore, the signatories welcome this transboundary SEA for the update of the Slovak nuclear waste management programme.

### **Transparency and public participation**

At the hearing in Bratislava in October 2024 it became obvious that communities were not informed that they were chosen as a site for a final repository. Participation has to start at the earliest possible time and not only when decisions have already been made. It is not enough that the national waste management programme emphasises that the selected final repository needs to be accepted by the public. An appropriate participation procedure according to good practice examples has to be designed and conducted to ensure participation of the public will be effective.

### **Costs and financing**

The costs for nuclear waste management need to cover all activities including final repositories for all types of wastes. The SEA report offers estimation for costs, but no plan on how these costs can be covered. No information was provided on the amount of fund which have been collected in the National Nuclear Funds as of now and of a prognosis for future accumulation. The issue of where additional funds will be drawn if the fund will prove insufficient needs to be solved. If the available budget needed to develop and construct a final repository for spent fuel will not be available, this might result in long-term interim storage and carrying increased risk or having to find additional funds, e.g. from EU funds.

### **Alternatives:**

The planned start of operation of the final repository for spent fuel and high radioactive waste (HLW) in 2065 is a very short timeframe compared to the planning in other EU countries; it is most likely that a final repository will not be operable until then. Therefore, and also due to the unclear financing situation, long-term interim storage is a realistic option. The environmental consequences of this option should have been assessed in the SEA, the SEA needs to specify the design life of all interim storage facilities and canisters, and how safety and security of those will be ensured over decades.

The Slovak Republic is interested in an international repository solution. Until now, no country has stepped forward to offer hosting a shared repository; on the contrary – most countries hoping for a shared repository option, among them the Slovak Republic, have bans on the import of radioactive waste in place which leaves the realisation of a shared solution even more unrealistic. Therefore, this is no serious alternative but only a way to postpone deciding on a national repository. On top, Slovakia is not even a member of the ERDO association, which also sows doubt on the seriousness of this option. Each option should undergo an environmental assessment in a SEA, also the shared repository option; this was not done. This applies also for the option of reprocessing which the Slovak programme has not excluded.

## **Safety and security of a final and interim repositories**

No country has an operable final repository for spent fuel and HLW. It cannot be guaranteed with today's knowledge that the waste will be kept safe from the environment for a million years. Therefore, retrieval and recovery scenarios and options of the nuclear waste from a repository should be researched and implemented.

Experiences in operating low and intermediate radioactive waste (LILW) repositories such as Asse in Germany show that retrieval and recovery can become necessary. If retrieval and recovery have not been anticipated and included in the repository design, this will lead to enormous difficulties and burdens for future generations.

The wet interim storage at the Bohunice site is not state-of-the-art and goes hand in hand with a higher emission risk in case of accident. Spent fuel should be relocated as fast as possible to dry interim storage facilities.

Terror attacks on interim storages can lead to transboundary impacts. The interim storages should be secured against all types of external attacks, and the SEA should provide information on this.

Before lifetime extensions of NPP or newbuild are decided, it is necessary to ensure that the capacities in interim and final disposals for all types of radioactive waste suffice and that the financing of all nuclear waste management activities is ensured.

We are looking forward to receiving information on how our recommendations are taken up in the SEA decision.

With best regards,