

Activities of NTW

Workshop on Environmental Mapping: Mobilising Trust in Measurements and Engaging Scientific Citizenry

Nadja Zeleznik

nzeleznik@rec.org

21st of March 2017, ICTP, Trieste (Italy)

Nuclear Transparency Watch – Why?

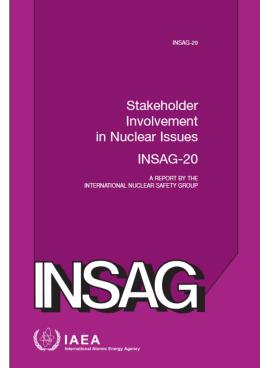
IAEA INSAG-20 (2006)

STAKEHOLDER INVOLVEMENT IN NUCLEAR ISSUES

A report by the International Nuclear Safety Group

Conclusions and recommendations:

"The political, social and economic impacts arising from the use of nuclear energy have generated considerable public concern and debate. Public participation in decisions can promote a greater degree of understanding and can ensure more reasonable appreciation of risks and benefits. It is of utmost importance to provide opportunities for stakeholder involvement and to look for new ways to obtain stakeholder input. [...] The active involvement of stakeholders in nuclear issues can provide a substantial **improvement in safety** and can enhance the general acceptability of the ultimate decisions made."



Nuclear Transparency Watch – Why?

- A five year process entitled 'AC&N' (Aarhus Convention and Nuclear) initiated by ANCCLI and with support from DG ENER and the UNECE "Convention Task Force on Public Participation in Decision-making" was completed in with a round table in March 2013.
- The lessons from Fukushima and the European stress test process has demonstrated the relevance of the contribution of civil society to continuously improve and strengthen the safety of nuclear power installations.
- The long-term safety of management and final disposal of radioactive waste also **benefits from public participation and transparency** as is acknowledged in the EU Radioactive Waste and Spent Fuel Management Directive (Council Directive 2011/70/Euratom of 19 July 2011).

Nuclear Transparency Watch – How?

- Starting in 2012 ANCCLI initiated a process for structuring a European civil society network to enhance public information and participation in the context of nuclear activities.
- A first meeting was held in Paris on 10th of July 2012, where a dozen NGOs from different countries and Members of the European Parliament (MEPs) met in order to investigate the potential, the conditions and means for structuring a European civil society organization.
- An organization called "Nuclear Transparency Watch" was established on November 7, 2013 at a founding meeting at the European Parliament in Brussels.

Nuclear Transparency Watch, NTW

- Nuclear Transparency Watch, NTW is a European network that promotes a citizen watch on nuclear safety and transparency.
- The common denominator is: to impove nuclear and radiation safety!
- Management Board:
 - Nadja Zeleznik, Regional Environmental Center (REC), Slovenia, President of NTW
 - Jean- Claude Delalonde, President of French Federation of Local Commission of Information (ANCCLI), France, Vice-president of NTW
 - Jan Haverkamp, qualified expert, Czech Republic (Greenpeace), Vice-president of NTW
 - Florion Guillaud, ANCCLI, France, treasurer
 - Gilles Heriard-Dubreuil, qualified expert, France, secretary (Mutadis)
 - Jeremy Wates, general Secretary, European Environmental Bureau
 - Jean-Paul Lacote, local elected representative of the city of Steinenstadt and SPD member, Germany
 - Philip Kearney, qualified member, Ireland (ex-Aarhus)
 - Johan Swahn, Director, Swedish NGO office for Nuclear Waste Review, MKG, Sweden

Organisational structure of NTW

Members (organisations, qualified experts and MEPs)

Management board with executive committee (bureau)

Office in Brussels with Head of Operations (Déléguée générale)

Working groups

- Emergency Preparedness and Response (EP&R)

 Report
 - National roundtables
- Radioactive Waste Management
 - Transparency work (BEPPER project)
 - NTW BEPPER framework and key components on PIP in RWM - Report
 - National roundtables
- Tender for transparency report to European Commission
- Assisting organising NGO input into projects developing an RWM strategic research agenda (SITEX II, JOPRAD)

Work on other issues

- Ageing of Nuclear Plants and Plant Lifetime Extensions (PLEX)
- Decommissioning
- Aarhus hotline (support for national cases)

Nuclear Transparency Watch, NTW

- Membership:
 - Today, NTW has 40 members from more than 18 European countries, from both Western and Eastern Europe.
 - Members with a diversity of profiles: public representatives, independent academics and experts, citizens information committees, and NGOs.

Nuclear Transparency Watch – Aims

- **Raising awareness of policy makers and the European society** about the issues of public information and participation for enhancing nuclear safety.
- **Supporting and assisting national and local initiatives** and civil society organizations seeking to promote transparency and public participation in nuclear decision-making.
- **Demonstrate the ability of civil society** to enhance the quality of nuclear decision-making process by initiating or coordinating their actions at the local, national and European level.
- **Bring the voice of civil society** into European decision-making processes concerning nuclear activities and the development of energy policies.
- Assessing comparatively progress in nuclear transparency and public participation in the various European countries.

Organization of the work

NTW

Work on issues

- Emergency Preparedness and Response
- Ageing of NPP and PLEX
- Radioactive Waste Management
- Decommisioning of NPPs and other facilities

- Security

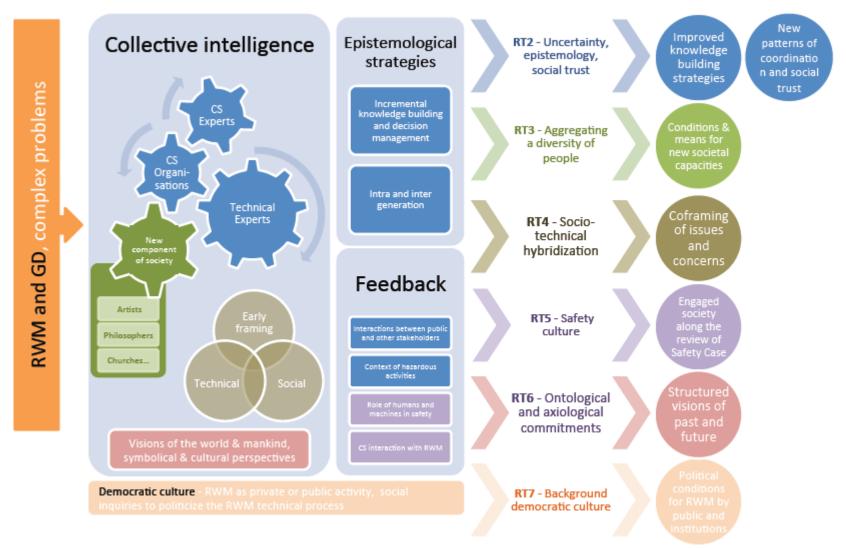
Support for national cases

- Aarhus Hotline -Support in cases of violation (access to information, public participation and access to justice)
- Participation in national debates

Radioactive Waste Management

- Cluster/network on radioactive waste management is under development.
- Work planned on a civil society follow-up of implementation and discussion of criterias for transparency and public participation as required in article 10 of the EU Radioactive Waste and Spent Fuel Management Directive.
- Work planned on **civil society input** into the European research agenda for management and final disposal of radioactive waste and spent nuclear fuel.
- Involvement from CSOs and individuals in the planned research programmes for future (based on work in SITEX II and JOPRAD).

SITEX II topics - Social Science and Citizen Science



NTW events -1

- NTW organized various events on its behalf:
 - conferences in the European Parliament:
 - Event in February 17: adressed major challenges of decommmissioning: waste management, worker and population risks, site rehabilitation and economic reconversion of the concerned territories, dismantling costs, financing and operator liability.
 - Nuclear security (including terrorism, drones, etc.) is an area in which confidentiality is often a hindrance to transparency that must be exceeded in order to allow an effective contribution from civil society.
 - working seminars co-organised with the European Commission:
 - December 2016: EP&R and BSS information to the public: requirements and expectations of civil society;
 - information sessions and numerous partnerships to ensure the presence of civil society at European level.



Emergency Preparedness and Response (EP&R) Working Group (EP&R WG)

- EP&R working group was established with the creation of NTW in November 2013
- The aim of EP&R WG is:
 - to carry out an evaluation of the existing European and national EP&R provisions from the civil society point of view, identifying key challenges,
 - to inform public on the findings and
 - to provide guidance for further activities of the interested public.
- **10 European countries**: Belgium, Bulgaria, Czech Republic, France, Germany, Ireland, Luxembourg, Ukraine, Sweden and Slovenia involving 21 participants from 15 organisations.

• The results:

- Report of NTW on Emergency Preparedness & Response work (200 pages),
- Position paper of NTW on Emergency Preparedness & Response situation in Europe (15 pages).

Presentation of the EP&R report

After one-year investigation of off-site EP&R, the reports has been presented on April 15 2015 at the European Parliament in the presence of MEPs and representatives of the European Commission and Public institutions.



Information collection and analyses of EP&R

International seminars

with expert institutions and international associations,

Desk work

to review the national provisions and international requirements,

Interviews and questionnaires

with representatives of responsible institutions and local populations,

° The investigations performed by the EU institutions

(i.e. the "Review of current off-site nuclear emergency preparedness and response arrangements in EU member states and neighbouring countries" study),

 The organisation of transboundary roundtables involving the participation of responsible institutions and civil society.

Main results of EP&R WG -1

• Seminars:

- Current EP&R is in practice at best a bureaucratic list of good intentions since plans are not realistic.
- Citizens are insufficiently informed and involved.
- Exercise scenarios are not realistic.
- Plans need to integrate the feedback of Fukushima in order to be realistic.
- National arrangements are too different: in methods, algorithms, models, appreciations of uncertainties, intervention levels and definitions, etc.
- Differences are leading toward inconsistencies along borders what leads to distrust in the decisions of the authorities that amplify the seriousness of an eventual crisis situation.
- Not prepared for challenge: in a major nuclear emergency situation in a country, multiple sources of information, presumably conflicting, will develop even in the short term. How to communicate?
- Address post-emergency issues based on the experiences gained from the Fukushima accident.
- EU level authorities initiate the improvements but the work is extremely slow.

Main results of EP&R WG -2

• Desk top and interviews/1:

- Many different approaches in EU on Emergency Planning Zones, Sheltering, Iodine Prophylaxis, Evacuation, Restrictions to Food and Drinks, Information Provision, Termination of Emergency, Trans-boundary Issues,
- Almost no real involvement and public participation of civil society organisations in planning – prevailing top-down approach,
- Almost no cross- border cooperation in place with some exceptions, but public is not involved,
- No special sheltering sites are envisaged, possible problems with food supply (48 h) and conditions in houses (ventilation),
- Low percentage of people in emergency zones (20-50 %) has iodine tablets with theme,
- Very different levels for evacuations (from 30 mSv to 350 mSv),
- Evacuation is a challenge (how, in which direction, availability of info, multiple sources of info), but not realistically addressed in drills,

Main results of EP&R WG -3

• Desk top and interviews/2:

- Decontamination seen as not problematic, but no real proves (the number of people in millions, how to do it, contaminated material management, standards, ...)
- Possibilities for multiple relocation still present, the duration of relocation is underestimated (as learned from Fukushima accident),
- Possible capacities for food and drinks monitoring are not sufficient in case of large contamination,
- Communication strategies are to passive and there is a lack of public discussions on the issues,
- Language barriers for information distribution and dissemination (within the authorities and journalists to the citizens),
- Trust to the information sources is a challenge all over Europe more needs to be done.

Main results of the EP&R WG -4

- Trans-boundary EP&R Round Tables more then 200 people:
 - EP&R of NPP Cattenom; Remich , Luxembourg, May 17 2014
 - EP&R of **NPP Temelin**; Hlobuka nad Vltavom, Czech Rep, September 27 2014
 - EP&R of NPP Krško; Brežice, Slovenia, October 20, 2014
 - EP&R of NPP Kozloduy, Sofia, Bulgaria, January 19 2015
 - EP&R in Ukraine, Kyiv, Ukraine, January 26 2015
- Objectives:
 - To bring together key stakeholders to discuss state of the art of national and trans-boundary provisions, practices and challenges of EP&R,
 - To trigger the multi-stakeholders process of critical discussion in an open, fearless, critical and toward improvement of the situation oriented manner,
 - To encourage concerned citizens, citizen's initiatives and NGOs in respective countries and provide them basic information, also on lessons learned from Fukushima and on-going EU activities in the field,
 - To support the cross border cooperation on trans-boundary EP&R issues between citizens and authorities.

Main results from the EP&R WG -4

Main findings from the RTs:

- Inadequate response/ignorance of the operators and authorities and lack of participation of local inhabitants and municipalities in case of RT Catternom and Temlin.
- **2. Good collaboration with official institutions** in RT Krško although low level of information about the provision in Slovenia and even lower in Croatia has been observed.
- 3. EP&R plans are based on rationality of a planned top down administrative actions that does not match with the chaotic reality.
- 4. Information strategies and capacities seems to be the weakest point of EP&R activities and are often based on message that sever nuclear accident is impossible to happen.
- 5. There is **question of reality of scenarios** upon which the responses are based, **limited exercises**.
- 6. Trans boundary EP&R provisions are few and hampered by inadequate procedures and/or languages skills of responsible personnel.

Main findings in EP&R WG -5/1

- Evaluation of national EP&R provisions
 - EP provisions remains outdated, inadequate and not real in many cases
 - Evacuation (large scale) not possible in many cases
 - Lack of efficient radiation monitoring devices
 - Lack of local authorities (and local population) awareness and training
 - Inadequate medical support
- Assessment of Plans, including involvement of Citizens
 - Lessons of Emergency exercises & drills are limitedly taken into account
 - Sub-optimal management of response: lack of radiological expertise among first responders, late transfer of data or lack of it, operational rooms for command,...
 - Poor maintenance of Emergency plans
 - No independent review or evaluation of plans
 - CS not involved in planning
- Emergency information
 - Lack of communication between different concerned administration in some cases.
 - No use of new media for information dissemination (social media as info sources)
 - Communication and notification lines for responsible are not entirely working

Main findings in EP&R WG -5/2

- Trans-boundary dimension of nuclear accidents
 - EP&R is dealt at national level, with little trans-boundary cooperation
 - Heterogeneity of existing EP&R provisions is a real threat
 - Difficulty to bring together all the players across boarders in order to discuss EP&R
- Post-accident consequences
 - Nuclear accidents have (very) Long Term complex consequences that need to be addressed
 - Post-accident situations necessitates complex recovery processes involving the population
 - Only addressed by very few countries today (like France), with minor scenario difficulties of local implementation, especially in case of trans boundary situation
 - Need for clarification of food standards and their harmonisation
- On-site emergency management
 - Questions on the availability of human resources
 - Protection of workers which was evident during Fukushima accident
 - Availability of technical tools

Main findings in EP&R WG -5/3

- Nuclear liability
 - Abyssal gaps between accident costs and existing insurance provisions
 - Need for investigations on actual costs of accidents based on recent Fukushima experience (compensation)
 - Public liability replaces private liability?

Self-evaluation of regulators - is this reality?

Table 5-1: Benchmarking for countries with NPP

	BE	BG	CZ	FI	FR	DE	HU	NL	RO	SK	SI	ES
Requirement (IAEA GS-R-2)												
General requirements												
1. Basic responsibilities												
Functional requirements												
2. Establishing emergency management and operations												
3. Identifying, notifying and activating												
4. Taking urgent protective action												
5. Providing information and issuing instructions and warnings to the public												
6. Protecting emergency workers												
7. Assessing the initial phase												
8. Managing the medical response												
9. Keeping the public informed												
10. Taking agricultural countermeasures, countermeasures against ingestion and longer term protective actions												
11.Mitigating the non-radiological consequences of the emergency and the response												
12.Conducting recovery operations												
Requirements for infrastructure												
13. Authority												
14.Organization												
15.Coordination of emergency response												
16.Plans and procedures												
17.Logistical support and facilities												
18.Training drills and exercises [Questions 7.1, 7.2]												
19.Quality assurance programme [Questions 6.3, 7.1, 7.2, section 11]												
EU Requirements (Basic Safety Standards Directive, Public Information Directive, Regulations on food intervention levels)												
BSS Directive (96/29/Euratom)												
Article 50. Intervention preparation												
Article 50. Intervention preparation Article 51. Implementation of intervention												
Article 52. Emergency occupational exposure												
Article 53. Intervention in cases of lasting exposure												
Public Information Directive (89/618/Euratom)												
Article 5. Prior information												
Article 6. Information in the event of an emergency												
Article 7. Information of persons who might be involved in the organization of emergency assistance												
Article 8. Information procedures												
Regulation laying down maximum permitted levels of radioactive contamination of foodstuffs (Council Regulations												
3954/87 and 2218/89 and Commission Regulation 944/89)												

Main recommendations from EP&R report -6

- **Need for detailed CSO evaluation** of EP&R provisions in each country
- Need for CSO and public engagement in planning and management at local, national and trans-boundary levels
- Harmonise emergency provisions (emergency zoning on evacuation, sheltering, iodine distribution)
- Need for developing a legal framework involving CSOs at each level of preparation and decision in the spirit of the Aarhus Convention
- Develop a EU wide policy on EP&R EC should take the lead (like for updating of nuclear safety after Stress Tests)
- Need for appropriate resources for CSO and local communities to be involved
- Need for quality control procedures (QA/QC) including feed-back of new events, exercises & drills (learning process)
- **Reconsider evacuation process** in the case of large urban area
- Integrate rescue and radiation experts in civil protection staff
- Train medical staff
- Finance research activities in this area
- Develop Medium Long Term post-accident policies
- Create a CS-EP cooperation to investigate liabilities for NPPs accident

Possible follow-up of NTW WG: 2017 and on

- Systematic investigation of EP&R provisions at different national and transboundary levels based on modified approach used for the EP&R report.
- Influence of improvements made in new legal EU framework (BSS, Safety directive, Food standards) requirements would be analysed.

Round tables:

- Aarhus Convention & Nuclear round tables linking EU associations (HERCA, WENRA, ENSREG), EUP, EC and NTW,
- Cross border RT on trans-boundary cooperation/harmonisation,
- Nationally with all relevant stakeholders Interactions between regulators, civil protection authorities, local municipalities, operators, NGOs, civil society and other interested organisations and citizens.
- Possible cooperation in EU research projects (H2020/Euratom) and with established associations.

NTW future actions

- Coordination of events in different institutions of EU and of international importance – all topics interested for members;
- Participation in the EU conferences and meetings (ENEF, ENSREG,) – presentation of views from civil society;
- Participation in research activities future Joint Programmes (like Radiation Protection, Radioactive Waste Management,) and development of harmonized approaches for performance of investigation from Civil Society views;
- Development of tools for improvement of communication information dissemination and supporting the discussion;
- Involvement of new initiatives from public to be addressed at the EU level.



Contact

- Website : <u>http://www.nuclear-transparency-watch</u>
- Newsletter via e-mail
- Follow us on Facebook and Twitter (@NTWeurope)

Contact point:

Marie-Alix Verhoeven

ma.verhoeven@nuclear-transparency-watch.eu





Thank you for your attention!

