



Stakeholder engagement in decommissioning - perspectives, needs, challenges Republic of Bulgaria

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Access to information

- Bulgarian legislation guarantees public access to information at the earliest possible stage of any project relating to nuclear energy, RAW and SNF management (infrastructure, decommissioning, RAW processing, disposal, and storage facilities and SNF storage facilities).
- This is carried out through a process of mandatory public consultations, part of the EIA procedure stipulated in the Environment Protection Act and the Regulation on the conditions and procedure for Environmental Impact Assessments.
- The participation of all stakeholders is provided through the mandatory publication of proposed investments in the media and issuing open invitations to public consultations.

Challenges – EIA approval

EIA reports approval process – appeals may delay the projects significantly

Decommissioning EIAR:

- MEW Decision issued on 31 October 2013;
- The NGO *Coalition for a Sustainable Development* appeal was rejected by a decision of the 3-member Supreme Administrative Court (SAC);
- On 24 July 2015 the five members' SAC took Decision (No. 9030) to reject the appeal against the Positive EIA Decision and the Decision of the three members' SAC.
This decision is final and cannot be appealed.

Plasma Melting Facility EIAR:

- MEW Decision issued on 27 February 2014;
- On 3rd June 2015 the appeal was rejected by a Decision of the 3-members' SAC;
- On 22nd June 2015 the SAC registered an appeal (No. 9589) of the Coalition for Sustainable Development against the 3 members' SAC decision;
- On 24 September 2015 the first 5 members' SAC sitting was held – Final judgment is to be determined.

National Disposal Facility EIAR:

- MEW decision appealed by NGO. Decision of the SAC passed for the plaintiff; EIA process returned to MEW and resumed starting from the Scope and Content of EIA Report.
- February 2015 – positive quality assessment by MEW
- New public hearings – April 2015; EIA report, Non-technical Summary, report on degree of impact on protected zones submitted to Romanian Ministry of Environment and Forestry beginning in March. The answer from the Romania on the details for the Public Hearing meeting in Romania territory is pending



Possible solutions

NGOs very active in appealing all nuclear related projects: decommissioning, new build, National Disposal Facility, lifetime extension of existing units, research reactor reconstruction. Procedure in the SAC is prolonged and causes delays and cost overruns in the implementation of the projects.

- Public communication strategy on place from the beginning to ensure the public support for the projects;
- Independent assessment of the EIA report before submittal to the MEW;
- Training of judges on the EIA aspects and requirements.



THANK YOU FOR YOUR ATTENTION!

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