

Warsaw, 15 July 2014

DOOŚ-tos.442.2.4.2014.dts.3

Ms Christina Bergendorff
Danish Ministry of the Environment
Haraldsgade 53
DK-2100 Copenhagen
Denmark

Re: project of the strategic document establishing the locations for disposing low and intermediate-level radioactive waste.

In reply to the letter dated 3 June 2014 No. NST-103-00055 (received on 6 June 2014) forwarding the scope document for the above-mentioned document project, I hereby present the following information:

This is to inform you that the documentation in question has been laid open to public inspection pursuant to Article 119 (1) of *the Act of 3 October 2008 on making the information on the environment available, environmental protection, social participation in environmental protection and environmental impact assessments* (Journal of Laws of the Republic of Poland (Dz. U.) of 2013, item 1235, as amended), hereinafter referred to as *the Act*, for the following periods:

- the Regional Directorate for Environmental Protection in Gdańsk from 11 July 2014 to 1 August 2014;
- the Regional Directorate for Environmental Protection in Olsztyn from 11 July 2014 to 1 August 2014;
- the Regional Directorate for Environmental Protection in Szczecin from 11 July 2014 to 31 July 2014.

It should be mentioned that public comments will be collected and sent promptly after the expiry of the period for submission thereof.

The documentation provided by the Danish party reveals that the affected party reviewed three possible options for management of the said waste, i.e.:

1. the construction of a disposal site in one of six analysed locations,
2. the storage of waste,
3. the removal of waste outside the country.

The document contains more detailed information on the first option, i.e. the planned construction of a disposal site for low and intermediate-level radioactive waste. The information describes in particular:

- potential locations for the disposal site,
- a design concept for the disposal site (the disposal site situated in shallow ground layers, on the surface and at most 30 meters below ground level;

the disposal site situated in shallow ground layers together with the implementation of boreholes and the disposal site situated in deeper ground layers 30-100 meters below the ground),

- guidelines for constructing the disposal site,
- a general environmental impact assessment of the planned project.

One of the six locations for the disposal site considered in the scope document is the area of Ostermarie-Paradisbakkerne (an area of approx. 15 km²) located to the northwest of Bornholm, about 115 km from the border of Poland (about 80 km from the territorial waters of Poland). There are two habitat areas located nearby (about 70-100 km), *Ostoja na Zatoce Pomorskiej* [Refuge on the Bay of Pomerania] PLH990002 and *Ławica Słupska* [Słupsk Bank] PLC990001.

Taking into account the nature of the investment, which is the construction of a disposal site for low and intermediate-level radioactive waste (mostly solid), it should be assumed that the likelihood of emission of radionuclides in the atmosphere is extremely low. However, should the radioactive substance get into the waters of the Baltic Sea, it should be kept in mind that there is a possibility of movement of waters carrying potential waste from the Baltic Sea towards the North Sea. Furthermore, as revealed in an attachment to the document, the island may be exposed to seismic movements. There is therefore the possibility that the disposal site area could be unsealed and the possibility that radioactive substances could leak into the underground waters through the slots created in the rock material. There may also be risk when transporting the waste by sea.

Having analysed the provided documentation, the opinions of the Polish National Atomic Energy Agency, the Polish Geological Institute – National Research Institute and positions of the regional directorates of environmental protection, as well as on the basis of the assessment of the impact of the planned project document on the territory of the Republic of Poland, **we find it justifiable to undertake the procedure of the cross-border environmental impact assessment of the disposal of low and intermediate-level radioactive waste.**

Therefore, we request that you take into account the following issues regarding the environmental impact forecast for the location of the Bornholm island:

- technical characteristics of the disposal site;
- expected significant impact of the effects of the project document execution on particular components of the environment, including birds, water organisms and in particular sea mammals, at the project site, and the area of impact thereof;
- the impact of the project document execution on the objectives and objects of protection on the following habitat areas: *Ostoja na Zatoce Pomorskiej* PLH990002 and *Ławica Słupska* PLC990001;
- an assessment of the radioactive threat to living organisms, as well as information on expected long-term changes in radioactivity levels;
- precautions to protect the people and environment against the radioactivity;
- planned measures to secure the disposal site against effects of emergency situations;

- an analysis of the consequences of a breakdown that might occur should the radioactive substances be released from transported or stored waste, and an indication of security measures counteracting the occurrence of emergency situations and preventing the consequences thereof, including the provision of safe transport;
- the range of radioactivity impact in case of disposal leakage;
- the scope and manner of monitoring the disposal.

Furthermore, we request that you answer the following issues:

- please send us the location requirements for radioactive waste disposal applicable in Denmark which will form the basis for assessment of selected locations. In the documents provided, which also contain comments from local communities, there are numerous statements that cause doubts about geological conditions, geomorphology and danger of floods;
- the provided document states that on the planned disposal site, it is also planned that, as well as low and intermediate-level radioactive waste, 233 kg of special waste (radioactive fuel from the research reactor) will be stored. In accordance with the guidelines of the IAEA, only short-lived low and intermediate-level radioactive waste may be disposed of on the disposal sites proposed by the Danish party (pursuant to IAEA Surface Disposal, Near Surface Disposal or Boreholes Disposal). Long-lived and burned nuclear fuel may only be disposed of in Geological Disposals facilities. Therefore, the Polish party requests that you provide explanations regarding this issue;
- in the provided document, the Danish party claims that the disposal project (irrespective of the selected disposal concept) will account for the possibility of waste extraction. According to international practice, radioactive waste disposal sites are constructed in order to leave the waste in a particular place, with no possibility of extracting it. The Polish party requests that you explain whether the planned project is aimed at constructing the disposal site or whether it is aimed at constructing a place to store the waste (i.e. storing the waste in order to re-extract it).

Yours faithfully,

[Stamp: Deputy Director of the Polish Department of Environmental Impact Assessments

Katarzyna Twardowska]

[Signature]

Attachments:

- the opinion of the Polish National Atomic Energy Agency
- the opinion of the Polish Geological Institute
- the opinion of the Regional Directorate for Environmental Protection in Gdańsk
- the opinion of the Regional Directorate for Environmental Protection in Olsztyn
- the opinion of the Regional Directorate for Environmental Protection in Szczecin

Copy to:

- the Regional Directorate for Environmental Protection in Gdańsk, ul. Chmielna 54/57, PL-80-748 Gdańsk
- the Regional Directorate for Environmental Protection in Olsztyn, ul. Dworcowa 60, PL-10-437 Olsztyn
- the Regional Directorate for Environmental Protection in Szczecin, ul. Jagiellońska 32, PL-70-382 Szczecin
- the Polish National Atomic Energy Agency, ul. Krucza 36, PL-00-522 Warsaw
- the Polish Geological Institute – National Research Institute, ul. Rakowiecka 4, PL-00-975 Warsaw



President of the National Atomic Energy
Agency

Janusz Włodarski

P-PAA/134/2990/2014

Warsaw, 4 June 2014

Mr
Piotr Otawski
Deputy Director
of the Department of Environmental
Protection
ul. Wawelska 52/54
00-922 Warsaw

Szanowny Panie Dyrektorze,

In response to your letter no. DOOŚ-tos.442.2.4.2014 dts.3 of 27 June 2014, below I present conclusions from the analysis of the documentation provided by the National Atomic Energy Agency and related to the foregoing letter.

The Danish party envisages three solutions in the process of management of the radioactive waste: building a storage site, storing the waste or disposing of it. The document provided contains information on the planned construction of low and intermediate-level radioactive waste storage sites, in particular, information about:

1. 6 potential locations of the storage sites, selected for more detailed analysis;
2. Design concepts of the storage site;
3. Guidelines for creating the storage site;
4. An environmental impact assessment (the most complex part).

The first three issues relating to competences of the National Atomic Energy Agency are at the very early stage of execution. At present, 6 out of 22 original locations have been selected, for which feasibility studies have been completed. The location closest to the Polish border is on Bornholm island.

During the analysis of the documentation provided, despite its highly general character, the following concerns appeared:

a) The Danish party briefly described each of the six locations; furthermore, it also provided the comments made by the community during meetings that were organised for the purpose of social consultations. Due to the fact that this description includes doubtful, to say at least, statements regarding geological conditions, geomorphology, flooding risk etc., the Polish party requests



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to be sent location requirements for radioactive waste storage sites in Denmark, which will form the basis for evaluation of selected locations.

b) The Danish party presented three concepts of storage sites that might be created:

- i. a site situated in the shallow layers of the ground (at a maximum of 30 metres below ground level);
- ii. a site situated in the shallow layers of the ground + boreholes;
- iii. a site situated in deeper ground layers (30-100 metres below ground level).

Irrespective of the final decision as to the kind of waste storage, it is also planned to store the following kinds of waste:

- i. Low and intermediate-level radioactive short and long-lived waste;
- ii. 233 kg of special waste – radioactive fuel from a research reactor.

In accordance with the guidelines of the IAEA, it is only short-lived low and intermediate-level radioactive waste that may be disposed of on the disposal storage sites proposed by the Danish party (pursuant to IAEA Surface Disposal, Near Surface Disposal or Borehole Disposal). Long-lived and spent nuclear fuel may be stored only in Geological Disposals. Therefore, the Polish party requests that this issue be clarified.

c) In the documentation provided, the Danish party stated that the storage site design (irrespective of the final decision regarding the choice of one of the three kinds proposed) will enable excavation of the waste. International practice assumes that radioactive waste storage sites are erected in order to leave the waste in the given site, and not to excavate it. The Polish party requests that it be clarified whether or not the planned investment is aimed at building a disposal storage site or a place for storing waste (i.e. storing the waste for it to be re-excavated).

It should be emphasised that the documents provided take into account natural aspects of the planned investment to a great extent. They do not contain any information that may form the basis for an analysis of emergency procedures plans and preparing prognoses of contamination spread with ARGOS and RODOS decision support systems.

Taking into account the character of the investment, which is the erection of low and intermediate-level radioactive waste (mostly solid) storage sites, it should be assumed that the likelihood of emission of radionuclides into the atmosphere is extremely low. Should the radioactive substances get into the Baltic Sea, it should be borne in mind that this is a sea of positive water balance, which makes the water masses move in the direction from the Baltic Sea into the North Sea. The only concern from the point of view of seawater relates to the location in the Regional Municipality of Bornholm, which, due to its proximity to Polish territorial waters (about 80 km), might potentially have an impact on the country radiological situation in the event of an accident involving contamination of seawater.



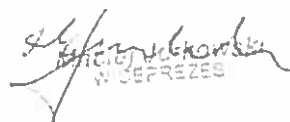
The distance between the Kingdom of Denmark and the Republic of Poland completely mitigates the possibility of the impact of other proposed locations on Poland.

By reasons of the foregoing, it should be recognised that the impact of potential accidents in the planned facility in most of the locations considered (excluding the location in the Regional Municipality of Bornholm) on the territory of the Republic of Poland is negligibly low.

Taking into account all of the foregoing circumstances, it should be stated that due to the potential localisation of the radioactive waste storage site on Bornholm island, which is located in close proximity to the Polish borders, **it is recognised that the participation of the Republic of Poland in the cross-border procedure of the environmental impact assessment is necessary.**

Maciej Jurkowski, Vice-President

President of the National Atomic Energy
Agency



MACIEJ JURKOWSKI
VICEPRESIDENT



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National Geological Institute

National Research Institute

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National
Geological Service

National
Hydrogeological
Service

Warsaw, 7 July 2014

GP/...../2014

Ms

Katarzyna Twardowska

**Deputy Director of the
Department of Environmental
Impact Assessments**

**General Directorate
of the Department of Environmental
Protection**

Re: *Notification on the proposed draft of the strategic document establishing the location for disposing low and intermediate-level radioactive waste in Denmark*

In response to the letter ref. no. DOOS-tos.442.2.4.2014.dts.2 dated 17 June 2014, this is to inform you that, having read the documentation provided, the specialists of the National Geological Institute – National Research Institute have found the following facts:

- The document refers to elements required by separate EU legislation for this kind of facilities (Directive 70/2011/EURATOM);
- The document briefly describes the kinds of waste, which to a great extent are comparable to the Polish inventory of radioactive waste, i.e. institutional waste, medical waste;
- The document presents three concepts for the storage site;
- It also refers to the results of the social consultation conducted, without indicating to what extent they are decisive for the selection of location, but they clearly indicate concerns of the local communities;
- The study presented contains clear geological review criteria for selecting the perspective areas

for storage site location and the results of the review — six locations selected and a sophisticated description of geological conditions of each of them. The locations ~~are~~ characterised by various different kinds of rocks. Elements and factors requiring detailed examinations for each of them have been emphasised;

- From among the areas considered, the closest to the borders of the Republic of Poland is the location within the gneiss rocks on Bornholm island.

Taking into account that this is an early stage of the programme and the Danish document and prior experience of the specialists from the Polish Geological Institute - Polish Research Institute in Polish projects relating to disposing of low and intermediate-level radioactive waste (relating both to the operation of the storage site in Różan and searching for a location for a new surface storage site), at this stage there is no direct substantiated necessity for the Republic of Poland to participate in the cross-border procedure. However, we propose a declaration of our willingness to receive further information and documentation pertaining to the actions undertaken.

Safe Infrastructure and
Environment PROGRAMME
MANAGER

Dr Edyta Majer



**REGIONAL DIRECTOR FOR
ENVIRONMENTAL
PROTECTION
IN SZCZECIN**

04/07/2014

2805

Szczecin, 3 July 2014

WONS-OŚ.442.6.2014.AT:

Mr Michal Kielsznia
General Director For Environmental Protection
ul. Wawelska 52/54
00-922 Warsaw

Pursuant to Article 119 (2) of the Act of 3 October 2008 on making information on the environment available to the public, environmental protection, social participation in environmental protection and environmental impact assessments (Journal of Laws of the Republic of Poland [Dz. U. of 2013, Item 1235, as amended), I am submitting a proposed position of the Regional Director for Environmental Protection in Szczecin regarding the draft of the strategic document establishing the location for a low and intermediate-level radioactive waste storage site made by the Danish party.

On 27 June 2014 with the letter ref. no.: DOOŚ-tos.442.2.4.2014.dts.1, the General Director for Environmental Protection forwarded to the Regional Director for Environmental Protection in Szczecin, as the body responsible for the area of possible cross-border impact, the scoping document entitled: "A request regarding a plan for creating the final storage site for Danish low and intermediate-level radioactive waste in the respective scope" (project, June 2014) sent by the Danish party.

The analysis of the document reveals that the project in question includes a plan to designate areas appropriate for localisation of the final waste storage site, which would be able to accept radioactive waste from Denmark for many years, including the waste from the research activity from Riso, from the healthcare sector and from industry. Six potential locations for the waste storage site have been specified. Due to the fact that those locations are situated at a significant distance from the Polish borders, the attention should be drawn mainly to: the area of Ostermarie-Paradisbakkeme (area: approx. 15 square kilometres) situated in the north-western part of Bornholm. This area borders the Baltic Sea in the north and is situated on the peripheries of two Natura 2000 areas. It is situated at the level of 65-80 m.a.s.l.

The area of the Ostermarie-Paradisbakkeme will be located in the north, about 70 km from the Polish Natura 2000 areas, i.e. the Zatoka Pomorska PLB990003 special bird protection area and the Ostoja na Zatoce Pomorskiej PLH990002 site of community importance.

Storing radioactive materials underground is at present the most common way of disposing of radioactive waste. However, burying waste that will remain radioactive for many years is not equivalent to storing it safely and isolating it from the environment. One of the most likely mechanisms of environment contamination arising from waste being stored in geological formations is contamination of unconfined groundwater. The documentation also focuses on issues of the Bornholm ground formation, including concerns regarding the possibility of an earthquake, and as a consequence, a possibility of a leak

through cracks in the rock. There are also concerns as to the risk connected with the transport of waste, especially via sea.

Given the above, the Regional Director for Environmental Protection in Szczecin found it justifiable to undertake an environmental impact assessment of the strategic draft document in question in the cross-border context.

A complete environmental impact assessment should be conducted for the planned investment, which will enable determination of the direct and indirect effects of the investment on people and the environment in the cross-border context, including the Baltic Sea sensitive ecosystem, including:

- presentation of the bird migrant routes, taking into account the species protected in the PLB990003 "Zatoka Pomorska" bird refuge and the analysis of the investment impact in that scope;
- presentation of the impact of the planned investment on the cohesion and integrity of the European Ecological Network Natura 2000 and in the objectives and subject of protection of designated Natura 2000 sites located within the investment impact zone;
- presentation of the expected significant impact of the project on particular components of the environment, including: birds, water organisms and, in particular, sea mammals, at the site of investment and its impact zone;
- an analysis of the radiological situation, an evaluation of the radiation threat to living organisms and expected long-term changes in radioactivity;
- specification of measures for protection of people and the environment against the radiation;
- an analysis of consequences of an accident that might occur should the radioactive substances from transported or stored waste be released, and indicating security measures counteracting the occurrence of emergency situations and preventing the consequences thereof, including the provision of transport safety.

Therefore, the Regional Director for Environmental Protection in Szczecin, acting pursuant to Article 119 (1) of the Act, informed the public that the documentation provided by the Danish party may be reviewed and that comments or requests regarding the draft of the strategic document in question may be made. As soon as the procedure has been completed, the results of social consultations will be forwarded to the General Directorate for Environmental Protection.



[signature] 3 JULY 2014

Gdańsk, 07/07/2014

**General Directorate for Environmental Protection
Department of Environmental Impact Assessments,
ul. Wawelska 52/54
00-922 Warsaw**

Re:

Letter ref. no.: DOOŚ-tos.442.2.4.2014.dts.1 of 26 June 2014 regarding the participation in the cross-border procedure of the proposed draft of the strategic document establishing the location for disposing of radioactive waste in Denmark

The Regional Director for Environmental Protection in Gdańsk finds it justifiable to join the procedure regarding the cross-border impact of the low and intermediate level radioactive waste storage site. One of the locations considered in the scoping document is Bornholm island, situated about 115 km from the Polish border. As specified in the appendix to the document, the island may be at risk of seismic movements, which may compromise the integrity of the storage site. There may also be a risk relating to transport of the waste by sea.

In this situation this authority is of the opinion that the following should be taken into account in the impact assessment for the Bornholm location:

- technical characteristic features of the waste storage site (overground/underground),
- protecting the site against emergency situations,
- the scope and manner of monitoring the waste storage site,
- the range of radioactivity impact in case of a leakage of waste,
- the consequences of the waste leaking into sea water (e.g. in case of a disaster at sea).

Regional Director for
Environmental Protection
in Gdańsk Hanna Dzikowska
Hanna Dzikowska

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REGIONAL DIRECTORATE FOR ENVIRONMENTAL
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Olsztyn, 9 July 2014

WOŚ.442.1.2014.MH.1

**Mr Michal
Kielsznia General
Director for
Environmental
Protection**

In response to your letter dated 3 July 2014, ref. no. DOOS-tos.442.2.4.2014.dts.2, having analysed the scoping document regarding the location of the low and intermediate level radioactive waste disposal storage site, I am writing to inform you that, due to the nature and the scale of the investment in question, there is very little likelihood that this investment will have any impact on the Warmińsko-Mazurskie Region, at either the construction or operation stages.

Due to the foregoing, the Regional Director for Environmental Protection in Olsztyn does not find it justifiable to participate in the cross-border procedure for the proposed draft document in question.

REGIONAL DIRECTOR FOR
ENVIRONMENTAL
PROTECTION

in Olsztyn

Stanisław Dąbrowski

Western
Pomerania

WOŚ.III.7030.32014.GS

1.07.2014

6645 MP

Grzegorz Kubiak

Szczecin, 30 July 2014

Re: WONS-OŚ.442.12.2014.AT.4

Mr Grzegorz Kubiak
Regional Director for
Environmental Protection in
Szczecin

In response to the request of 3 July 2014 to provide assessment and conclusions regarding the project entitled "Plan for creating the final storage site for Danish low and intermediate-level radioactive waste in the respective scope – project, June 2014", the material provided was analysed as required by the scoping procedure. The analysis of the documentation was based on the Commission guidelines regarding the Environmental Impact Assessment ("EIA") "Scoping June 2001" and the Polish legislation: Resolution of the Council of Ministers of 3 December 2002 on radioactive waste and spent nuclear fuel (Journal of Laws of the Republic of Poland [Dz. U.] No. 230 Item. 1925 of 2002). Authors' guidelines were also taken into account: according to the information included in "Appendix - specifying the scope" subsection 1.2. Stages of the environmental impact assessment. The authors indicate the following objective for the first stage:

Consultations should help determine the information and expertise necessary for conducting the EIA. This stage was called "specifying the scope".

By reasons of the foregoing, our opinion is focused mostly on identification of issues that should be evaluated while conducting the EIA that have not been indicated in the document provided, and evaluating their importance for selected locations.

1. The information on the geological features of the six potential sites should be completed with detailed examination of the substrate characteristic features, including the evaluation of permeability and percolation for particular locations.
2. The qualitative and quantitative characteristics of identified waste designated for treatment implies a range of decisions and actions that have not been specified, presumably due to the lack of such characteristics, or they have not been further detailed in the draft document provided (the kind of building, processing procedure and preparations for transport, protection before the final storage etc.) or have been described very precisely (expected climate changes until 2100 – will this period suffice? – in the Polish legislation, it is 500 years for monitoring the storage of low-level radioactive waste; in France, it is a 300-year period); therefore, it is recommended that the EIA documentation be completed with:
 - a. the qualitative and quantitative characteristics of the waste,
 - b. the waste processing method before it is transported and finally stored.
3. The guidelines for creating the final storage site (Chapter 3) should be extended with data on the potential impact, likelihood of the impact, geographical range, scale and comprehensiveness, period of impact. Methods should be indicated that will be used to forecast the scale of the impact on environment.
4. A checklist of undertakings and preventive actions, monitoring and rescue activities on each stage of waste management should be provided.
5. The safety analysis should also take into account the risks of earthquakes, vibrations caused by railway transport, the presence of a road, the presence of other facilities at risk, an aeroplane disaster, explosions or an intrusion.

Urząd Marszałkowski Województwa Zachodniopomorskiego [Marshal's Office for Zachodniopomorskie Region]
Department of Environmental Protection

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6. Because the storage site that you propose will have some surplus storage space, it should be protected against unauthorised use by interested parties other than those which are involved at present. Therefore, the expansion of the scope of receipt of radioactive waste and storage of waste with a radioactivity level that exceeds the level defined now should be excluded.

With reference to the presented concept of the planned investment, it should be stated that a common feature of all planned locations is their shoreline location, very close to seawater.

Therefore, the two locations considered – on Bornholm and in Rødbyhavn on Lolland island – should be verified in detail.

In addition to the risks indicated in the material, the Bornholm location presents other threats:

- archaeological research on the Polish area revealed the occurrence of a tsunami, which hit the South Baltic shore in the Middle Ages. That proves that earthquakes in this area do happen. An analysis of available works reveals that the area that is at greatest risk of this kind might be Bornholm, where the substrate of the island was found to be moving, which poses a threat of a leak through cracks in the rock;
- a risk of seismic phenomena, according to the Polish Geological Institute [PIG], "The scope of the current tectogenic elevation of Scandinavia is marked in the southern direction up to the line of Kaliningrad - Smolzhino - Łeba, covering also Bornholm and northern Denmark, i.e. places where earthquakes have occurred in the last 100 years";
- the presence of vertical and horizontal faults (which may disqualify the location in its entirety); - this is the location farthest from Risø in the open sea, which generates a special transport-related risk.

It should be emphasised that the island has special unique qualities that make it highly attractive for tourists. Due to the size of Bornholm, the localisation of the storage site, irrespective of its definitive location, will decrease the (environmental, tourist and economic) potential of the whole island.

Localisation on Lolland island – Rødbyhavn

The ground configuration and proximity to the sea shore is of significant concern here. Taking into account global warming, the tendency of the sea level to rise, the cumulation of flooding on land due to a high wave, which in extreme cases may be ten metres high, there are real concerns as to the safety of the installation in the planned location. Storing radioactive materials in Rødbyhavn, which is at risk of depression, should be avoided. The close proximity of the planned tunnel with Germany should also be taken into account. A stream of vehicles/trains passing may cause constant vibrations in the area – this hypothesis should be verified – which might have an impact on the planned storage location.

URZĄD MARSZAŁKOWSKI WOJEWÓDZTWA ZACHODNIOPOMORSKIEGO
[Signature]
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Urząd Marszałkowski Województwa Zachodniopomorskiego [Marshal's Office for Zachodniopomorskie Region]
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WONS
04.08.2014
ZACHODNIOPOMORSKI URZĄD WOJEWÓDZKI
w Szczecinie

Szczecin, dnia 31 lipca 2014 roku

IR-1.0221.11.4.2014.MP

Pan

Grzegorz Kubiak

Regionalny Dyrektor
Ochrony Środowiska
w Szczecinie

Re: Proposed draft of the strategic document establishing the location for a low and intermediate-level radioactive waste storage site provided by the Danish party (ref. no. WONS-OŚ.442.12.2014.AT.6)

With reference to the information provided in the proposed draft of the strategic document establishing the location for a low and intermediate-level radioactive waste storage site, out of the six possible locations proposed, attention should be drawn to the location in Østermarie-Paradisbakkerne in the north-western part of Bornholm.

In comparison with the other locations, this area borders the Baltic Sea and is located closest to Poland. Due to the large scale of investment (all Danish waste, waste from the nuclear research conducted at the National Laboratory for Sustainable Energy in Risø, from the healthcare sector, research institutes and industry), it is necessary for the documentation to include information about how the hazardous waste will be transported and indicate the routes of transport.

Road and sea transport of hazardous waste always raises numerous public concerns about the safety and the risk of disasters.

Undoubtedly, locating the radioactive waste storage site for the purposes of the whole of Denmark as far as possible from the Polish borders would be a beneficial solution.

z up. WOJEWODY ZACHODNIOPOMORSKIEGO

mgr inż. Barbara Wójcik
DYREKTOR
Wydziału Infrastruktury i Rolnictwa

P.O. Box 10w5658fe 1/skrytka

Zachodniopomorski Urząd Wojewódzki w Szczecinie [Office of the
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