

Public Consultation Plan for Strategic Environmental Assessment of the Northern Dimension Environmental Partnership Nuclear Window**PUBLIC CONSULTATION PLAN FOR STRATEGIC ENVIRONMENTAL ASSESSMENT
NORTHERN DIMENSION ENVIRONMENTAL PARTNERSHIP (NUCLEAR WINDOW)****1 INTRODUCTION****1.1 Background**

Although the extent to which public input can determine the options and outcome of the SEA is inevitably constrained in the context of the current project, because of its relationship with the SMP which is already being progressed, NNC – as the lead contractor - remains committed to stakeholder involvement in the SEA process as a matter of principle and because it recognises the practical benefits for all parties.

This Public Consultation and Disclosure Plan (PCDP) sets out the process by which Rosatom and the project team will provide information to stakeholders and the wider public on the strategic environmental assessment (SEA) being undertaken to determine the appropriate strategies to address the legacy environmental problems resulting from operations and decommissioning of the nuclear powered submarines in Murmansk and Archangelsk regions. The SEA complements the Strategic Master Plan (SMP) and will be carried out in accordance with EBRD Environmental Policy and Procedures and the requirements of the EU SEA Directive.

1.2 Scope

The PCDP provides for early and meaningful engagement with stakeholders during SEA scoping and for sharing information and consulting during the SEA implementation phase with key stakeholders who may be affected by or interested in the project. It is consistent with the EBRD's requirements as set out in its guidelines for PCDP preparation¹ and covers:

- Local requirements for consultation and disclosure
- Identification of key stakeholder groups
- The strategy and timetable for sharing information and consultation
- Resources and responsibilities for implementing the PCDP activities
- Reporting and documentation of PCDP activities
- A proposed comment and complaint mechanism

¹ EBRD Consultation and Disclosure Requirements - Guidance for Preparation of a Public Consultation and Disclosure Plan. EBRD July 2003.

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1.3 Relationship with SMP Activities

The SMP programme and its associated public consultation and disclosure programme have been running for some time. The SEA project team recognise that it will be important to look for opportunities to make use of communication routes and information already available through mechanisms established under the SMP programme, where it is practicable to do so. The focus of the SEA team's discussions with stakeholders will naturally be the SEA programme but, as requested by the EBRD, stakeholders will also be asked during Scoping in particular about their needs and suggestions for effective on-going information and involvement through the SEA and SMP implementation phases. SMP experts will be present during public consultation meetings.

1.4 Resources and Responsibilities

NNC is responsible for the development of the PCDP and all aspects of its implementation.

The Local PCD Coordinators (Valery Mararitsa and Irina Esipova) report to the International PCD Coordinator, and will be responsible for managing the Russian elements of the PCD programme, including:

- Developing and maintaining the stakeholder register
- Disseminating information to, and providing a local contact point for, Russian stakeholders
- The organisation and reporting of all PCD events in Russia
- The collation and translation of all comments received from Russian stakeholders and made at public and other meetings within Russia
- Managing the provision of information and documents on the Internet

The International PCD Coordinator (Mark Gerchikov) reports to the Project Manager (Mark Dutton), and will be responsible for managing the remaining elements of the PCD programme and for the integration of international and local programmes. He will be supported by a PCD specialist.

The PCD coordinators will also be the initial contact point for any stakeholders who have a complaint about the process. Stakeholders may also contact the project manager directly if necessary. Their contact details will be included in relevant documentation. Information on the EBRD Independent Recourse Mechanism is available on the Bank's website².

² www.ebrd.com/about/irm/index.htm

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In Russia 'Public Hearings' ('Obshestvenniye slushaniya') are stipulated in two separate regulations:

1. Environmental Impact Assessment (OVOS) Regulation from 18th July 1994, No 222.

The organisation responsible for implementing a project is responsible for conducting local public hearings in accordance with item 4 of the regulation. Hearings are conducted at the Federal level if 'positive and negative impacts are of national character'.

Such hearings are normally implemented in a formal manner and involve project initiators providing an overview of the environmental assessment followed by a question and answer session with the audience. In addition representatives of the public are given an opportunity to submit their views in writing.

2. Ecological Expertise Law

'State Ecological Expertise' is an independent peer review of the Environmental Impact Assessment. At this stage Local Authorities and organisations involved in conducting State Ecological Expertise can initiate public consultations on the project. The practical implementation of 'public consultations' may include separate meetings with individual stakeholders, 'round tables' and referendums.

In summary, Russian regulations stipulate 'public hearing' requirements at the project stage rather than during strategy definition. The objective of SEA and Phase 1 SMP projects is to determine the overall strategy for addressing nuclear problems in North West Russia. The projects identified at subsequent stages are therefore likely to require Public Hearings in accordance with the above Russian Laws, but no such hearings are anticipated as part of the SEA process.

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3 TRANSBOUNDARY CONSULTATION

Russia has not ratified the UNECE Convention on EIA in a Transboundary Context which places a requirement on the Government of the host nation to inform Governments of the countries which may be affected by the project.

Notwithstanding the above, the principles and requirements of the Espoo convention will be followed and the governments of potentially affected states will be notified by the project team of the commencement of Scoping and the main consultation phase at the same time as other national and international stakeholders and invited to participate.

The objective will be to provide participants in other countries with broadly equivalent information and ability to comment. Information dissemination and comment routes will therefore not discriminate unreasonably between Russian and international participants. It will not however be practical to provide translation into languages other than English and Russian and comments can only be accepted in these languages. The project team will be supportive where authorities in other countries chose to initiate consultations on this issue, but will not be responsible for any costs incurred and cannot commit to providing experts for public meetings etc.

4 THE STAKEHOLDERS

4.1 Stakeholder Groups

NNC will treat as stakeholders in the SEA application process those national and local authorities, constituencies, organised groups or individuals that have a direct or indirect interest in the outcome. This may be, for example, because they:

- Have relevant responsibilities
- Are potentially affected
- Have a view on what the outcome ought to be
- Are representative in some way of a wider constituency

Certain organisations have been identified as 'key' stakeholders because of their role in the SEA, SMP or wider implementation process or because of their previous involvement in this area. Past experience suggests that these will be the ones with the greatest interest and provision has been made in advance within the programme for more detailed involvement.

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National and international NGOs are expected to play a role and some have already been included on the provisional stakeholder register. However, in this project it will be particularly important to reach the potentially affected public and their local representatives.

It is anticipated that the Governments of Finland and Norway are the most likely to express an interest, though other donor nations and the EBRD will also be included as stakeholders.

Notwithstanding the above, in line with its objective of inclusivity, NNC will try to respond constructively to other individuals or organisations seeking additional information or wishing to make their views known outside of the programmed activities.

4.2 Stakeholder Register

The register is a contact database compiled during preliminary studies and from existing databases, updated as the project proceeds with the details of other stakeholders who express an interest. Invitations to register will be a feature of all relevant briefing and information material. The database will also be used to keep individuals and organisations up to date with developments and notify them of new documents added to the website.

The register will include, amongst others:

- Russian industry, shipyards and contractors
- The SMP project team
- Regulators and local authorities
- Local communities
- NGOs
- International stakeholders and donor countries

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5 PCDP OVERVIEW

The PCDP comprises 6 main activities:

Activity	Duration	Target start date
Preliminary engagement		Complete
Scoping notification & scoping consultation	30 days	Complete
Announcement of consultation and Issue of draft SEA		May 2005
Release of the draft SEA and consultation thereon	120 days	May-August 2005
Analysis of comments and reporting		August 2005
Release of final SEA		September 2005

The preliminary, relatively informal, engagement phase develops relationships with key stakeholders and ensures that the PCDP process broadly meets their requirements. The consultation infrastructure is put in place and the process of identifying interested and potentially affected parties started. Links will be set up to the EBRD website, which will in due course include SEA information, documents for download and links to further information.

Scoping is a formal process and seeks to actively involve stakeholders in the definition of the SEA scope and subsequent PCDP activities. The project team will circulate a draft SEA scope and PCDP for comment and meet key stakeholders.

During the 120 day consultation phase, stakeholders that may wish to comment and/or be informed about the project have access to the Draft SEA and may submit comments. Public meetings will be held during this phase. Comments will be addressed within the SEA and the final SEA report released.

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6 SCOPING

Scoping will last 30 days. A preliminary register of stakeholders will be compiled, including contact points for potentially affected states as defined by the Espoo convention. Stakeholders on the register will then be notified of the project, informed of the scoping arrangements and provided with a Scoping Information Pack before its commencement.

6.1 Scoping Information Pack

The Scoping Information Pack will be prepared in English and Russian, and will comprise:

- An overview of the SEA project, including an outline programme and key dates
- A description of key strategies considered within the Strategic Master Plan (submarine, surface ship dismantling, infrastructure improvements, decommissioning of radwaste and spent fuel facilities)
- The PCDP, including proposed public meeting arrangements
- References to background documentation
- Instructions for making comments on the draft SEA scope and PCDP
- Details of Russian and international contact points

6.2 Scoping Meetings

A programme of scoping meetings was held in Murmansk, Severodvinsk and Moscow between 22 and 26 November 2004 (see separate Scoping Report). The objectives of these meetings was to:

- Inform stakeholders of the project and relationship between the SMP and SEA
- Solicit comments on key strategies considered within Strategic Master Plan and PCDP generally
- Discuss with stakeholders the means by which they will be involved through the SEA process
- Explore stakeholder and public priorities and issues of concern
- Work towards a consensus on environmental assessment criteria
- Identify additional stakeholders

Notes will be made of the main points arising, but it is not the intention to prepare detailed transcripts.

The formal meetings will be supplemented by less formal 'open houses' in the evening.

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6.3 Reporting

At the end of the Scoping phase, a consultation summary will be prepared and circulated – where contact details are available - to those who participated, along with an updated SEA scope. The draft SEA report will also summarise the outcome of any previous consultation, including Scoping.

7 MAIN CONSULTATION PHASE

7.1 Announcement of Consultation

An announcement letter will be sent to registered stakeholders, including contact points for potentially affected states, announcing the commencement of the SEA consultation and inviting their participation. The announcement will be no later than two weeks before the commencement of the main consultation period.

An updated overview of the SEA project, including an outline programme with key dates and the PCDDP (which also includes information on the project and EBRD complaints procedures) will be attached. Instructions will be provided for obtaining and making comments on the draft SEA and details will be given of Russian and international contact points.

A series of press releases will be sent to the editors of potentially interested media in Moscow, Murmansk and Severodvinsk announcing the SEA project and associated public consultations. Copies will also be sent to the editors of NGO and other on-line newsletters. If it proves necessary, press releases will be supplemented by paid advertisements.

Additional stakeholders will continue to be added to the register as they are identified or identify themselves.

7.2 Consultation Documents

The Draft SEA will be made publicly available for inspection and comment for a period of 120 days and there will be a minimum of 120 days between the release of the draft SEA and consideration of the final version by the EBRD Board of Directors.

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The Consultation Information Pack (CIP) will be prepared in English and Russian. It will include the draft SEA, plus a copy of the announcement letter and its supporting and contact information. Hard copies will also be available for the 120 days duration of the main consultation phase in suitable locations, including Murmansk, Severodvinsk and Moscow. The details will be confirmed following discussions with key stakeholders, but will include the EBRD in London plus EBRD Regional Offices in Russia and other potentially affected states and the offices of the relevant local authorities. Copies will also be sent to mayors of the main villages within the potentially affected area.

Copies of the CIP will also be sent free of charge in electronic form to all the stakeholders on the register and anyone else requesting one. Hard copy versions will be sent on request, but payment may be requested to cover the cost.

7.3 Public Meetings

Public consultation meetings will be held to review the draft SEA report in Murmansk, Severodvinsk and Moscow. The meetings will be open, but if more people wish to participate than can be accommodated priority will be given to stakeholders who have informed the project sponsor of their intention to attend. Details of venue etc. will be confirmed at least two weeks in advance, when the extent of public interest in each area has become clearer.

The detailed arrangements will be confirmed following discussions with stakeholders during Scoping, but it is likely that each meeting will start with a presentation by the project sponsor summarising the programme and the main conclusions of the draft SEA, and identifying issues on which stakeholder input is particularly needed. The usual plenary question and answer session will be followed, if it seems appropriate, by an 'experts fair' where participants can talk informally to the various specialists present. Each meeting is expected to last for no more than 4 hours. Each meeting will be chaired or moderated by two experts: NNC's Project Manager or his representative and an independent local expert.

Notes will be made of the main points arising, but it is not the intention to prepare detailed transcripts.

The formal meetings will be supplemented by informal opportunities to meet the team during the evening.

7.4 Use of the Web Site

It is important that members of the public have the opportunity to provide comments and/or request additional information online. The CIP will therefore be available for download via the internet and stakeholders will be able to comment via email. The intent is that an updated list of Q&As will also be available online.

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8 ANALYSIS AND REPORTING

The analysis of comments and updating of the draft SEA in the light of comments received will start towards the end of the consultation period. Comments will be accepted in Russian or English by post, fax or email. Comments will be translated as necessary, collated with points made at the public meetings, and a summary prepared.

Relevant experts will review the comments and collate the responses into a 'Q&A'. This Q&A will be used as the basis for responses to those who submitted individual comments and made available to the EBRD.

9 RELEASE OF THE FINAL SEA REPORT

The SEA will be updated as necessary in the light of comments received and the section covering the results of consultation will be extended to summarise the results from the full set of PCDP activities. Copies of the final SEA will be placed in the same locations as the draft SEA for public inspection and electronic copies will be made available on request.

10 ABBREVIATIONS

CIP	Consultation Information Pack
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
NGO	Non-Governmental Organisation
PCD(P)	Public Consultation and Disclosure (Plan)
Q&A	Question and Answer
SEA	Strategic Environmental Assessment
SEA	Strategic Master Plan