STAKEHOLDER ENGAGEMENT PLAN FOR THE EIA REPORT ON A FACILITY FOR TREATMENT AND CONDITIONING OF RADIOACTIVE WASTE WITH HIGH VOLUME REDUCTION FACTOR AT KOZLODUY NPP

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I. Introduction

The present Stakeholders Engagement Plan was developed in support of the environmental impact assessment (EIA) procedure for an Investment Proposal for a Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP. All the activities described below are based on Kozloduy NPP Plc.'s experience as regards corporate communication and communication with regard to previous EIA process, as well as accumulated knowledge on its structure and functions for its relations with important stakeholders.

The intensive communication and the proactive approach towards stakeholder engagement are of great importance for Kozloduy NPP Plc. which bears responsibility for the compliance of the activities with the respective environmental and health norms. Therefore, in order to ensure public support for the Project of the Facility for treatment and conditioning of radioactive waste with high volume reduction factor, a number of activities targeted at engaging each key stakeholder are being prepared.

While the EIA documentation on the Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP Plc. is available for public access, the public is entitled to review all documents and raise questions concerning the EIA Report, Kozloduy NPP Plc. activities and the project for the Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP Plc. These questions shall be obtain competent responses.

II. Project Location and Areas Subject to Impact

The site of the Nuclear power plant is located in the North-western part of Bulgaria, on the right bank of the Danube river, 5 km South-eastwards from the city of Kozloduy, and 3.7 km to the South of the midstream of the river and the boundary with Romania, respectively. All the activities related to the construction of the facility for treatment and conditioning of radioactive waste with high volume reduction factor shall be placed within the existing territory of the nuclear power plant.

According to the instructions provided by the Ministry of the Environment and Water, the designated municipalities to be impacted are the Municipality of Kozloduy and the Municipality of Miziya. Based on the current experience with investment proposals with presumable transboundary impact, it is expected that the Municipality of Becket in Romania shall be designated as an impacted municipality, unless otherwise decided by the the competent authorities.

III. Stakeholders

The key stakeholders that shall be approached (consulted or provided with information about the EIA approval process or be specially addressed) are listed, but are not limited to, below:

Organizations:
1. European Bank for Reconstruction and Development;
2. Bulgarian Nuclear Regulatory Agency;

Ministries and their subordinated administrations:
3. Ministry of Economy and Energy;
4. MEW;
5. Environmental Executive Agency;
6. Regional Inspectorate on Environment and Water - Vratsa;
7. Basin directorate for water management in Danube region - city of Pleven;
8. Ministry of Health; 
9. National Centre for Radiobiology and Radiation Protection;

**Non-governmental organizations and companies:**
10. Bulgarian Atomic Forum (BULATOM); 
11. Bulgarian Nuclear Society; 
12. Women in Nuclear - Bulgaria Association (WIN); 
13. Ecoglasnost National Movement; 
14. Za Zemyata (For the Earth) Environmental Association; 
15. Political Party The Greens; 
16. State Enterprise Radioactive Waste;

**Academic and scientific organizations:**
17. Bulgarian Academy of Science; 
18. Technical University - Sofia;

**Local administration:**
19. Mayor of Kozloduy Municipality; 
20. Municipal Council of Kozloduy Municipality; 
21. Mayors of the village of Harlets, village of Glozhene, village of Butan, 
22. Mayor of Miziya Municipality; 
23. Municipal Council of Miziya Municipality; 
24. Mayor's Proxies in the village of Voyvodovo, village of Saraevo; 
25. District Governor of Vratsa District;

Local population, comprising various age groups.

The range of the target stakeholders shall be continually updated during the process of public communication and the Environmental Impact Assessment. The interested parties shall be invited to participate in the discussion on all topics of concern and during the entire process related to the progress of the Project Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP Plc.

In case the Romanian party raises its desire, the Romanian society located closest to the national border shall be addresses, presumably this will be the population in the Municipality of Becket.

**IV. Providing access to documentation**

**In the Republic of Bulgaria:**

A paper copy of the EIA Report of the Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP Plc., Compatibility Assessment Report and Non-Technical Summary, in Bulgarian language, shall be made available at each of the following places:

1. The building of MEW - Sofia, 67 William Gladstone str.;
2. The building of the Environment and Water Regional Inspectorate - Vratsa, 81 Ekzarh Yossif str.;
3. The building of Kozloduy Municipality - Kozloduy, 13 Hristo Botev str.;
4. The building of Miziya Municipality - Miziya, 25-27 Georgi Dimitrov str., 1st floor Centre for services to the population;
5. House of Culture - Kozloduy, 4 Hristo Botev str.

A paper copy of the Non-Technical Summary and the Stakeholders Engagement Plan, in Bulgarian language, shall be distributed to the mayors or mayor's proxies in the following
settlements within the 10 km zone around Kozloduy NPP site: city of Kozloduy, village of Harlets, village of Glozhene, village of Butan, city of Miziya, village of Voyvodovo, village of Saraevo.

The electronic version of the EIA Report, the Compatibility Assessment Report, the Non-Technical Summary and the document herein - in Bulgarian and in English language, shall be published also on Kozloduy NPP web site: http://www.kznpp.org/. Free internet access is available in the computer halls in the community centres of the settlements in the Municipalities of Kozloduy and Miziya.

The electronic version of the Compatibility Assessment Report is accessible on the web site of the Ministry of the Environment and Water, on the following link: http://www.moew.government.bg/.

In the Republic of Romania:

In case the Romanian party states its desire, a hard copy of the Non-Technical Summary of the EIA Report on the Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP and Chapter 11.5 - Transboundary aspects of the investment proposal, in English language, shall be made available in the buildings of the Municipality of Becket and/or other Romanian settlements (these shall be determined by the Romanian Ministry of Environment and Forests).

V. Informing

1. Notification

Notification for Public Disclosure of the EIA Report shall be submitted for publishing in the local news - Miziya and Kozloduy dnes, one regional newspaper - Konkurent, and in a national newspaper - 24 chasa, in compliance with the requirements of the Bulgarian legislation as regards EIA. The notification shall also be broadcast through the ELTO radio and in the NPP News broadcast of the internal radio information system at Kozloduy NPP site. A notification shall be uploaded also on Kozloduy NPP Plc. web site http://www.kznpp.org/.

In case the Romanian party wish to take part, a notification in a local newspaper shall be published, to publicly disclose the EIA Report. The notification shall be submitted to the Romanian authorities in English language; the English version shall be uploaded on Kozloduy NPP Plc. web site http://www.kznpp.org/.

2. Leaflets

Two leaflets shall be prepared; they shall be targeted at the wide public. One of the leaflets shall contain brief general information on Kozloduy NPP; on the units in operation and the shutdown units; on the long-term economic package provided by the European Commission, including the nuclear energy sector, designed to overcome the consequences of the early closure of the first four units, and related to that, also on Project 5b Construction of a Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP site, as well as on the EIA Report for the project.

The second leaflet shall provide technical information on the Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP site.

The leaflets shall be distributed at the locations where the public discussions are to be held. The leaflets shall be available in Bulgarian and in English language, and, if necessary, in Romanian language.

3. Posters

Posters with information on meetings organized by Kozloduy NPP shall be placed in the
Municipalities' buildings, in the House of Culture in Kozloduy, and also at public places in the settlements within the 10 km zone around Kozloduy NPP site. At the beginning of the period for disclosing the information, the posters shall be placed at places with ensured public access in the respective settlements within the 10 km zone of Kozloduy NPP.

VI. Consultation

1. Planned dates and venues of the public meetings.

Kozloduy NPP Plc. foresees to carry out public discussions on the following dates:

- 26.09.2013 at 10.30 h in the Municipal Club in Miziya;

In case a public discussion is to be held in Romania, it shall be organized in the settlements determined by the local authorities, on the dates officially agreed and included in the programme. A Romanian speaking interpreter, with good knowledge of the language and experienced in the topic shall be provided to facilitate the communication.

2. Documenting during the public discussions

Any questions and comments raised during the public meetings shall be put in writing and they shall be addressed during the meetings, if that is possible. Questions that cannot be provided with an answer during a specific meeting shall be submitted to the competent specialists from Kozloduy NPP Plc. for response.

Questions and statements on the investment proposal can be addressed also in writing to Mrs. Galya Nikolova - Head of the Quality Division, e-mail: GKNikolova@npp.bg, or written down in the Books for Statements, located in room 104 in the building of Kozloduy Municipality, in the building of Miziya Municipality, and in the House of Culture – Kozloduy (locations where access is provided to the EIA Report and the attachments therein).

Within 10 days after the meeting is held, the respective village halls and municipalities, as well as the competent authority shall be provided with a written statement by the Employer on the proposals, recommendations, opinions and objections resulting from the public discussion. Also, this statement should be presented in the House of Culture - Kozloduy.

The written statement shall be translated in English language and shall be uploaded on the web site of Kozloduy NPP Plc.

VII. Grievance mechanism

All complaints concerning the EIA procedure for Investment Proposal for a Facility for treatment and conditioning of radioactive waste with high volume reduction factor at Kozloduy NPP shall be addressed to Mrs. Galya Nikolova, Head of the Quality Division, e-mail: GKNikolova@npp.bg, or in writing, in the House of Culture - Kozloduy.

A Grievance form shall be provided to those who wish to submit a question, a comment or a complaint. The Grievance form shall be published on Kozloduy NPP Plc. web site http://www.kznpp.org/, as well as in room 104 in the building of Kozloduy Municipality, in the building of Miziya Municipality, and in the House of Culture – Kozloduy (locations where access is provided to the EIA Report and the attachments therein).