



MINISTRY OF
AGRICULTURE
Department of Environmental Conservation

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Ms Dorina MOCANU
Director

Directorate for Impact Assessment and Pollution Control
Ministry of Environment, Water and Forests

RO - 040129 BUCHAREST
12, Blvd. Libertatii, Sector 5
Romnaia

E-mail: dorina.mocanu@mmediu.ro; cc: mihaela.macelaru@mmediu.ro

This letter is sent electronically only

Subject: Official Hungarian standpoint on the SEA of the "*National Strategy of Romania on Medium and Long-Term on the Safe Management of Spent Nuclear Fuel and Radioactive Waste*" in a transboundary context

Dear Ms Mocanu,

Thank you for the official letter of 14 Dec, 2020 sent electronically saying that the *National Strategy of Romania on Medium and Long-Term on the Safe Management of Spent Nuclear Fuel and Radioactive Waste* (hereinafter referred to as strategy) is being developed in Romania. Further to your information, this proposal requires a strategic environmental assessment (known as SEA) before its adoption according to the provisions of the *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment* (hereinafter referred to as SEA Directive) as well as of the *Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context* (hereinafter referred to as SEA Protocol). Therefore, your letter was officially considered as a notification on the ongoing strategic environmental assessment according to Article 7 of the SEA directive and to 10 of the SEA Protocol. Romania kindly offered Hungary to analyse the available SEA documentation and to take its position on the possible significant transboundary environmental and health effects on its territory by 30 January, 2021 due to the expected implementation of the strategy.

It is highly appreciated and significantly facilitated the transboundary leg of the SEA procedure that the Romania arranged and kindly provided the translation of the full documentation ensuring an effective public participation and equal opportunities during the SEA procedure. Accordingly, the notification dated on 14 Dec, 2020 was furnished with full version of the draft strategy and Environmental Report translated into English and Hungarian languages as well as the English version of the *UNECE notification form*.

According to the provisions of the Hungarian legislation in force, the available documentation was sent to the authorities responsible for SEA procedure, i.e. to the national environment and nature protection authority (*with regard to environmental protection, and the conservation of nature and*

landscapes), to the national chief medical officer (*with regard to environmental and settlement health*), to the National Chief Directorate of Disaster Management at the Ministry of Interior (*with regard to protection of waters*). In addition, all relevant departments of the Ministry of Agriculture were also involved in the reviewing process.

Electronic format of the available documentation – including the original website announced by Romania – was disseminated for 30 days between 15 December, 2020 and 15 January, 2021 on the website of the Ministry of Agriculture, Hungary (<https://kormany.hu/agrarminiszterium/kornyezetugy>, scroll down menu point No. 4 '*Stratégiai környezeti vizsgálati ügyek*'). Despite of the fact that the relevant NGOs had been directly contacted and they had several opportunities to comment the Environmental Report and the draft strategy according to the SEA regulation, no comments received from that side in the given period.

Based on the expert statements, Hungary accepts the general outcome of the Environmental Report and agrees with its conclusion saying that transboundary environmental and/or health impacts can be controlled on its territory as a result of the implementation of the strategy. Therefore, it does not propose any *significant* amendments to be included in the draft strategy or the Environmental Report.

However, please take it into account that Hungary would like to be informed and officially notified by Romania based on Art 7 of the *Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014* (known as EIA Directive), as well as on Article 3 of the *Convention on environmental impact assessment in a transboundary context done at Espoo (Finland) on 26 February 1991* (Espoo Convention), during the implementation of the strategy *at project level*. Therefore, Romania is kindly asked to send official information when a project falling in the scope of the strategy – *with likely direct or indirect adverse transboundary environmental impacts* – comes to environmental licensing phase. Hungary as a potentially Affected Party would like to take a decision on participating in the environmental licensing procedure of these projects on a case-by-case basis according to the relevant provisions of the Espoo Convention.

Conclusion

Hungary declares that it has no objection against taking measures in finalising and adopting the strategy. By sending this statement, Hungary considers the transboundary leg of the procedure is completed, and kindly asks the relevant authorities to take into account the Hungarian request on notification at project level as explained above in the final statement closing the SEA procedure according to the provisions of Article 8 of the SEA Directive as well as of Article 11 of the SEA Protocol.

This letter should be taken as an official final standpoint of Hungary and is sent only electronically.

Thank you for offering a chance to evaluate the possible environmental and health effects of the above-mentioned strategy. Your co-operation is highly appreciated.

Budapest, “29“ January, 2021

Sincerely yours,


Dr Hunor Orbán

Head of Department

Hungarian focal point to the Espoo Convention