

NORTHERN DIMENSION ENVIRONMENTAL PARTNERSHIP NUCLEAR WINDOW STRATEGIC ENVIRONMENTAL ASSESSMENT

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1 CONTEXT

The development of a Strategic Master Plan is the initial task under the Nuclear Window of the NDEP. This task is already being undertaken.

The Assembly of Contributors decided to complement the development of the SMP with a Strategic Environmental Assessment (SEA), for which the Terms of Reference have been prepared. The SEA is expected to provide the environmental dimension to the technical SMP and contribute to the overall decision making process.

2 ENVIRONMENTAL DUE DILIGENCE

- **To carry out a Strategic Environmental Assessment (SEA) of the entire programme**
- **To carry out specific Environmental Impact Assessments (EIAs) of individual components if required**
- **To carry out extensive public information and consultation during SEA**

The environmental due diligence includes the SEA and specific EIA related to individual projects. It also includes an extensive **public information and consultation** during the SEA.

The term **SEA** is used to describe the process of evaluating the environmental consequences of a proposed plan or programme that might significantly affect the environment, before it is approved. The SEA addresses the whole programme at its initial design stage ; it is undertaken much earlier in the decision-making process than the more specific, project focused **Environmental Impact Assessments (EIAs)**.

The SEA should be based on the requirements and guidance provided in the respective EU SEA Directive (Directive 2001/42/EC); it should also meet international best practice in SEA and EIA development.

3 STRATEGIC ENVIRONMENTAL ASSESSMENT (EU SEA DIRECTIVE)

‘The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes ...which are likely to have significant effects on the environment.’

The environmental requirements of donor countries are mostly comparable and often identical (e.g. for EU member and accession countries, based on EU Directives). Compliance with EU

requirements and other applicable international standards is also at the heart of the Bank's environmental compliance requirements. It was agreed by the donor countries that the project be structured and carried out in compliance with EBRD's Environmental and Public Disclosure Policies (2003 revisions).

4 SEA APPROACH

- **High level strategic assessment of potential impacts of the proposed project (SEA Report)**
- **Consultation with the authorities and the public**
- **Transboundary consultations**

The SEA is complementing Phase 1 of the SMP. It will identify the key environmental, health and safety and social issues associated with the Nuclear Window of the NDEP. The SEA will help identify and shape the priority tasks for urgent implementation which will be identified under phase 1 of the SMP. It will identify potential concerns, risks and opportunities that may be associated with proposed project/tasks and that need to be built into their specific terms of reference.

'Environment', by EBRD definition, includes worker health and safety, public health and safety, and relevant social issues (such as community impacts, involuntary resettlement etc.).

The SEA process comprises a high level strategic assessment of potential impacts of the project, consultation with the authorities and the public, as well as trans-boundary consultation.

5 REGULATORY BACKGROUND

The SEA will take account of

- **National regulatory requirements**
- **Relevant international regulatory requirements (e.g. EURATOM)**
- **International Good Practice**

The Bank's activities are governed, among others, by its Environmental and Public Information Policies. The *EBRD's* Environmental Policy states that for cooperation funds, *specific donor requirements relating to environmental issues take precedence. To the extent that donor requirements do not address a particular environmental issue in their own environmental policy, the Environmental Policy will apply.*

EBRD's Environmental Policy also states that in addition to EIAs on specific projects, *the EBRD may also carry out Strategic Environmental Assessments (SEAs) on the likely environmental consequences of proposed plans or programmes which might significantly affect the environment.*

The SEA will take account of the Russian regulatory requirements, the relevant international regulations, as well as international best practice. The public consultation process will need to

take account of international requirements (e.g. the Convention on EIA in the trans-boundary Context - Espoo Convention).

The Assembly of Contributors has approved the application of the Bank's Environmental Policy.

6 SEA OBJECTIVES

- **To provide the environmental dimension to the SMP**
- **To be a key part of the environmental due diligence of the NDEP**
- **To be a key part of public disclosure and consultation process**
- **To provide input to the due diligence of specific projects under the SMP**

The SEA is closely linked to the SMP. Its key objectives are

- To provide the **environmental dimension to the SMP** and thus contribute to the overall decision making process which will shape the nuclear window of the NDEP.
- To be a key part of the EBRD's **environmental due diligence** of the NDEP as required under the Bank's Environmental Policy.
- To be a key part of **public disclosure and consultation** process as required under the Bank's Public Information Policy.
- To provide information which will assist the Contributors to the NDEP Support Fund and the Russian Authorities in their assessment and **due diligence of individual projects** (should this be required).

7 SCOPE OF WORK

The scope of the SEA process comprises 3 inter-related tasks leading to deliver 3 key outputs:

1. Preparation of an **SEA Report**
2. **Public information and consultation** associated with the development of an SEA.
3. **Assistance to the development of the SMP** by providing pertinent and actionable environmental information.

8 PREPARATION OF SEA REPORT

- **Identify all relevant regulatory and other applicable standards**
- **Identify and review existing information**
- **Identify and assess environmental and health and safety impacts of the project**
- **Prepare a draft SEA Report fit for public disclosure**

The Consultant will:

1. Take account of the definitions, requirements, outputs etc. as defined in EU Directive 2001/42/EC (*Directive on the Assessment of the Effects of Certain Plans and Programmes*)

on the Environment); take account of relevant national and international standards and guidelines (e.g. EU, Euratom etc.); take account of international experience in comparable SEAs and international best practice in EIA, SEA and public information and consultation.

2. Review the existing environmental and public and occupational health and safety information relevant to the project.
3. Carry out a strategic assessment of the environmental impacts of the nuclear window of the NDEP which complements (and contributes to) the SMP.
4. Prepare an SEA Report in draft form (for comment) and in final form (after consideration of comments and inputs arising from the public disclosure and consultation plus comments from the Bank and the SMP consultants).

9 PUBLIC INFORMATION AND CONSULTATION

- **Develop a public information and consultation plan**
- **Identify all relevant national and international stakeholders**
- **Carry out scoping**
- **Arrange and hold public meetings**
- **Develop a dedicated website**
- **Provide a summary consultation report**

A Public Consultation and Disclosure Plan will be needed at the initial stage of the SEA to define stakeholders who are affected or interested in the programme. The SEA will be discussed at a conceptual stage with stakeholders, and the SEA report will be available for public review and comment for 4 months. A website for programme information is envisaged.

The trans-boundary consultation will be undertaken in line with the principles of the Espoo Convention. Those countries wishing to be included in the consultation process as the NDEP Nuclear Window programme progresses will be included as Stakeholders in the Public Consultation and Disclosure Plan. They will be then informed on any issue having potential trans-boundary impact.

The SEA will be developed through these main activities:

- Development of a public information and consultation plan
- Definition of the scoping to identify important issues that should be examined in a EIA, and to ensure that adequate stakeholders are included in the process.
- Establishment of close relationship with the relevant Russian Authorities to ensure that all relevant national and international stakeholders, the public, NGOs etc. are notified and as far as reasonable and practical involved in the scoping and the development of the SEA.
- Organise and carry out the public consultation process as required under the Bank's Environmental Policy and its Public Information Policy (see Annexes 1 and 2). This should include at least three public information meetings (one locally; one in Moscow; one at the EBRD HQ in London). Develop and provide all necessary information material for these meetings.

- Structure and provide input for a dedicated environmental website, to be part of the NDEP website. The purpose of this website will be dissemination of information and provision of a forum for input from interested third parties.
- Provide a summary of the public consultation process

10 Task 3 - ASSISTANCE TO SMP

■ Assist the SMP Team in the development and implementation of the SMP

The SEA outcomes will provide **relevant environmental information** that will serve as the basis for more detailed EIA when needed later on, during implementation of the projects (SMP phase 2).

The EBRD will establish a close relationship between the consultants in charge of the SEA and the SMP with a view to providing additional environmental information relevant for the SMP.

The SEA outputs will also provide assistance to the decision makers in the prioritisation of actions identified under the SMP.

11 SEA NEXT STEPS

- consultant selection in compliance with EBRD procurement Rules and Policy
- invitation to Expression of interest and preparation of a short list
- shortlisted consultants will be invited to submit tender
- the consultant will be selected
- work to commence after the SMP interim report (June)

Conclusion

This approach will provide an early identification of key environmental issues. It will augment the basis of the SMP and facilitate the appraisal of the decision-makers for the NDEP Nuclear Window. It will also allow a degree of transparency over the programme and allow Civil Society to be consulted at an early stage of the programme.