SE NNEGC ENERGOATOM
NPP Safety Upgrade Program:
Ecological Assessment
This Stakeholder Engagement Plan is presented by Energoatom for the purposes of the stakeholder engagement on the Ukrainian NPP Safety Upgrade Project. It does not necessarily reflect the opinion of the Ministry of Energy and Coal Industry of Ukraine or the European Bank for Reconstruction and Development (EBRD) and European Commission.

This report was prepared with assistance of experts from Pöyry (Finland, France, Switzerland & Germany) and UCEWP (Ukraine).

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# Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Form</th>
</tr>
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<tbody>
<tr>
<td>EA</td>
<td>Ecological Assessment</td>
</tr>
<tr>
<td>EBRD</td>
<td>European Bank for Reconstruction and Development</td>
</tr>
<tr>
<td>EC</td>
<td>European Commission</td>
</tr>
<tr>
<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<tr>
<td>EU</td>
<td>European Union</td>
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<tr>
<td>FS</td>
<td>Feasibility Study</td>
</tr>
<tr>
<td>GoU</td>
<td>Government of Ukraine</td>
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<tr>
<td>IAEA</td>
<td>International Atomic Energy Agency</td>
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<tr>
<td>IFI</td>
<td>International Finance Institution</td>
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<tr>
<td>MENR</td>
<td>Ministry of Ecology and Natural Resources</td>
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<tr>
<td>MoECI</td>
<td>Ministry of Energy and Coal Industry</td>
</tr>
<tr>
<td>MoU</td>
<td>Memorandum of Understanding</td>
</tr>
<tr>
<td>NDA</td>
<td>Non Disclosure Agreement</td>
</tr>
<tr>
<td>NGO</td>
<td>Non-Governmental Organisation</td>
</tr>
<tr>
<td>NNEGC</td>
<td>National Nuclear Energy Generating Company</td>
</tr>
<tr>
<td>NPP</td>
<td>Nuclear Power Plant</td>
</tr>
<tr>
<td>PAP</td>
<td>Project Affected Persons</td>
</tr>
<tr>
<td>PIP</td>
<td>Public Information Policy</td>
</tr>
<tr>
<td>PIU</td>
<td>Project Implementation Unit</td>
</tr>
<tr>
<td>PR</td>
<td>Performance Requirement</td>
</tr>
<tr>
<td>SEA</td>
<td>Strategic Environmental Assessment</td>
</tr>
<tr>
<td>SEP</td>
<td>Stakeholder Engagement Plan</td>
</tr>
<tr>
<td>SE NNEG</td>
<td>State Enterprise National Nuclear Energy Generating Company</td>
</tr>
<tr>
<td>SNRIU</td>
<td>State Nuclear Regulatory Inspectorate of Ukraine</td>
</tr>
<tr>
<td>SoI</td>
<td>Statement of Intent</td>
</tr>
<tr>
<td>SUP</td>
<td>Safety Upgrade Program</td>
</tr>
<tr>
<td>UCEWP</td>
<td>Ukrainian Centre of Environmental and Water Projects</td>
</tr>
</tbody>
</table>
INTRODUCTION – BACKGROUND OF THE PRESENT DOCUMENT

On December 20th 1995, the Government of Ukraine (“GoU”), the Governments of the G-7 countries (the ”G-7”) and the European Commission (“EC”) signed a Memorandum of Understanding (MoU) on a programme to support the closure of the Chernobyl Nuclear Power Plant. Nuclear safety is one of the four areas developed in accordance with this MoU.

The “Ukrainian NPPs Safety Upgrade Package Program” (SUP) was developed by SE NNEG “Energoatom” and takes into account all recommendations issued through the final report of the joint project ECIAEA-Ukraine (IAEA report date February 2010 IAEA-EC Agreement 2007/45268), in accordance with the “Road Map For Nuclear Safety of Operating Ukrainian Nuclear Power Plants” of the MoU.

Within the frame of the SUP preparation, Energoatom selected the Kharkiv and Kiev-based Nuclear Engineering Design Institutes to prepare project technical documentation.

The SUP involves safety improvements at existing NPPs, with no new construction, no capacity increase and no life extension.

The Ecological Assessment (EA) of SUP is to be carried out in compliance with the national legislation and international conventions signed by Ukraine, as well as the best international environmental and social guidelines for projects financed by IFIs (including EBRD and EU environmental requirements). SUP is aiming at safety improvements at all 4 existing NPPs, without new construction, capacity increase, or lifetime extension and therefore is not under the requirements of State Construction Norms concerning the environmental impact assessment (EIA) for new constructions. EA process will be regulated by the normative document specially elaborated for this case.

Energoatom is providing information for the public and opportunities to comment, in line with the UNECE Aarhus Convention, which has been ratified by the Government of Ukraine, and also best international practice. The present document corresponds to the draft version of the Stakeholder Engagement Plan (SEP), which will be made public as part of the Scoping Study Report.
1 PROJECT BACKGROUND

1.1 Project area

The SUP covers all four of the Ukraine’s NPP sites that are currently in operation:

Khmelnytska NPP (Khmelnytska Oblast)
The Khmelnytsky NPP is located in Khmelnytska Oblast, near the River Goryn, a tributary of the Pripyat. The satellite city is Netishyn (population 36,000).

Rivne NPP (Rivne Oblast)
The Rivne NPP is located in the Rivne Oblast on the banks of the Styr River, a tributary of the Prypiat River. The satellite city is Kuznetsovsk (population 46,000).

South-Ukraine NPP (Mykolaiv Oblast)
The South-Ukraine NPP is located in the North of the Mykolaiv Oblast on the River Yuzhny Bug. The satellite city is Yuzhnoulrainsk (population 42,000).

Zaporizha NPP (Zaporizha Oblast)
The Zaporizha NPP is located in south-eastern Ukraine on the banks of the Kakhovka reservoir, 60 km from the city of Zaporizha. The satellite city is Energodar (population 56,000). The Zaporizhha NPP is the most powerful energy supplier in Europe, generating 20% of the Ukraine’s electricity; and 40 % of the electrical power produced by the Ukraine’s NPPs.

All satellite cities are subordinated directly to the respective Oblast administrations. They are not rayon (i.e. district) centers, so the territories of each satellite city borders with other rayons of the same Oblast.

1.2 Safety Upgrade Program description

The SUP has been developed as part of a long-term safety improvement framework. It includes sub-projects and investment plans for each plant and for each reactor type.

The SUP is based on over 32 sub-projects and programs at a cost of around EUR 1.18 billion. The main program is to be implemented by 2017 and will upgrade the safety of existing NPPs in Ukraine in line with similar operations worldwide.

The selection of measures to be included in the SUP was based on the following:

1) the measures should improve the safety of NPP’s operation, under both normal and emergency (accident) conditions;

2) the measures should not change the basic design of NPPs; and

3) the measures were identified on the following basis:
   • measures that are required by Ukrainian norms, regulations and standards;
   • international recommendations after IAEA and Riskaudit assessments;
   • measures recommended by the Safety Analysis Reports;
   • measures required by Ukrainian national regulatory authorities;
   • measures based on operational experience (feedback from the NPPs).

The SUP is expected to be implemented in the period 2010-2017. It includes over 800 safety improvement measures whose implementation is planned according to their priority.
2 STAKEHOLDER ENGAGEMENT PLAN

This document is the SEP for the Ukraine’s Nuclear Power Plants (NPP) Safety Upgrading Programme. Energoatom is the “Project Sponsor” for this project.

2.1 Aim of the SEP

The process of stakeholder engagement is an essential component of the appraisal, management and monitoring of environmental and social issues associated with the Project Sponsor’s investments. It is an ongoing process involving:

(i) the Project Sponsor’s public disclosure of appropriate information so as to enable meaningful consultation with stakeholders;
(ii) meaningful consultation with potentially affected parties (PAPs); and
(iii) a procedure or policy by which people can make comments or complaints.

Stakeholder engagement is about building and maintaining constructive relationships over time with both internal and external persons affected by or interested in the Program.

2.2 Scope of the SEP

This SEP document includes:

• a list of key stakeholders
• a description of the public consultation and information disclosure plan
• a definition of the roles and responsibilities for implementation of the public consultation and information disclosure plan
• a description of the question, comments and grievance mechanism

This version of the SEP is prepared prior to the Scoping Phase of public consultations. The Scoping Phase may provide additional information. As a result, the SEP may need to be updated prior to EA Report Public Consultations.

Separate documents will cover:

• the Feasibility Study (under finalization by Kiev and Kharkiv-based design institutes);
• the EA Report; and
• an Executive Summary of the EA Report, consisting of a short summary of the project and the main environmental and social impacts.
3 LEGAL REQUIREMENTS FOR PUBLIC CONSULTATION AND DISCLOSURE

The EA is carried out in accordance with Ukrainian regulatory requirements and the best international practices including the EU Strategic Environmental Assessment (SEA) Directive (2001) and UNECE Guidelines for public participation in environmental projects (Aarhus Convention).

3.1 Ukrainian legislation for consultation and disclosure

The Government of Ukraine has a series of policies and legislation on public participation and disclosure of information related to infrastructure investments and the environment. Citizens of the Ukraine have the right to access information (law of Ukraine "About information" dated 13.01.2011 №2938-VI), participate in public consultations (law of Ukraine "For environmental protection" (dated 25.06.1991 №1264-XII), and appeal against the authority’s decisions (Act on Citizen’s Right to Appeal 1996). These are fundamental rights outlined in the Ukraine’s Constitution (1996).

The Act on Environmental Protection (1991) defines the roles and procedures for public disclosure of environmental information and public participation for environmental protection.

The requirement for public consultation and information disclosure is obligatory for the implementation of state and regional programs for economic, social and cultural development (Decrees No. 1378 and No. 917). Such consultations are regulated by the Order of the Ministry of Environment No. 168 of 18.12.2003, "On approval of the Regulation for public participation in making decisions in the area of environmental protection"; and also the Cabinet of Ministers Resolution No. 1122 from 18 July 1998 "On the procedures of public hearings regarding nuclear energy use and radiation safety".

However, it is important to mention that this study is not under the requirements of State Construction Norms concerning the environmental impact assessment (EIA) for new constructions. The potential Lender has requested the EA as part of its due diligence. Specific guidelines for the disclosure and consultation requirements concerning SUP are described in the SOU. Best international practice will also be used as guidance for the process.

3.2 International requirements

The EA is to be carried out in compliance with the following international requirements:

- UNECE Aarhus Convention
- During the EA process, it will be determined if the "Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991) - the 'Espoo (EIA) Convention' applies to the project (ratified by Ukraine on 20.07.1999). The Espoo (EIA) Convention sets out the obligations of countries to assess the environmental impact of certain activities. It also lays down the general obligation of States to notify and consult each other on all major projects under consideration that they are likely to have a significant adverse environmental impact across boundaries. The location of the four NPP sites and the expected degree and extent of the environmental impacts resulting from the SUP makes it most unlikely that a notification and consultation of neighbouring countries will have to take place. This will be explored in the EA process and the responsibility to finally decide on this issue is with the Ministry of Environment and Natural Resources.
- IFIs best practices (including those from the potential lenders, i.e. EU environmental law, as well as EBRD 2008 Environmental and Social Policy)
4  KEY STAKEHOLDERS

4.1  Identifying stakeholders

This preliminary list of stakeholders identified for SUP includes national, regional and local government institutions; local and international NGOs; multilateral organizations (IFIs, UN organizations, etc.), NPP employees and contractors; academic institutions; communities in proximity to NPPs; and mass media.

The list focuses on stakeholders most likely to have a stake and be interested and affected by the Programme due to their location, nature of their work and/or past involvement in the nuclear sector. However, the list aims to be inclusive and the proposed communication means ensures that other potentially interested parties will be informed about the SUP and the EA. If you are not on the list and wish to receive information in the future, please send an email with your contact information to sup.public@gmail.com.

The stakeholders are categorized in two main groups:

- Group A - Involved in the SUP Delivery & Regulation
- Group B - Other stakeholders

4.2  List of stakeholders

Figure 1 – Group A and Group B Stakeholders

4.2.1  Group A: Involved in delivering SUP & Regulation

The stakeholders involved in Program implementation include national and statutory organizations and bodies, which represent public functions or other formal agencies with responsibilities related to the Programme. Group A also includes potential Lenders and employees and contractors of the NPPs and the SUP.
Table 1 Group A stakeholders

<table>
<thead>
<tr>
<th>A. National Institutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. National Security and Defense Council of Ukraine</td>
</tr>
<tr>
<td>The Council is the coordinating body in matters pertaining to national security and defence under the President of Ukraine.</td>
</tr>
<tr>
<td>2. Ministry of Ecology and Natural Resources (MENR)</td>
</tr>
<tr>
<td>MENR will participate in the public consultation process.</td>
</tr>
<tr>
<td>3. Ministry of Energy and Coal Industry (MoECI)</td>
</tr>
<tr>
<td>MoECI formulates government policy on energy and is Energoatom’s line Ministry.</td>
</tr>
<tr>
<td>4. State Nuclear Regulation Inspectorate of Ukraine (SNRIU)</td>
</tr>
<tr>
<td>The SNRIU regulates nuclear and radiation safety and monitors compliance on NPP operations, including radioactive waste management and spent fuel management.</td>
</tr>
<tr>
<td>5. Ministry of Emergencies of Ukraine</td>
</tr>
<tr>
<td>The Ministry is responsible for civil defense of the population in case of natural or technogenic disasters.</td>
</tr>
<tr>
<td>The NCRPU regulates and approves the acceptable levels of radionuclides content in potable water, foodstuffs and agricultural products; and defines contaminated areas.</td>
</tr>
<tr>
<td>7. Chief State Sanitary Epidemiological Service</td>
</tr>
<tr>
<td>This body is under the Ministry of Health and is responsible for public health in the Ukraine, including control of pollution of the air, water and soil.</td>
</tr>
<tr>
<td>“Energoatom” operates NPPs of Ukraine and is the initiator of SUP.</td>
</tr>
<tr>
<td>9. “AESKAR ltd”</td>
</tr>
<tr>
<td>AESKAR ltd was one of the developers of the SOU and is advising Energoatom on the public consultation process.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B. Regional Institutions – Volyn, Dnipropetrovsk, Zaporizhza, Mykolaiv, Rivne, Khmelnytsky Oblasts</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Oblast branches of the 64 State Administrations</td>
</tr>
<tr>
<td>11. Oblast branches of the Ministry of Ecology and Natural Resources</td>
</tr>
<tr>
<td>12. Oblast branches of the Sanitary-Epidemiological Stations</td>
</tr>
<tr>
<td>13. SNRC Inspectorates at the 4 NPPs</td>
</tr>
<tr>
<td>14. Municipality of Energodar (Zaporizhza Oblast)</td>
</tr>
<tr>
<td>15. Municipality of Yuzhnoukrainsk (Mykolaiv Oblast)</td>
</tr>
<tr>
<td>16. Municipality of Kuznetsovsk (Rivne Oblast)</td>
</tr>
<tr>
<td>17. Municipality of Netishyn (Khmelnytsky Oblast)</td>
</tr>
<tr>
<td>18. Rayon administrations (Zaporizhza Oblast)</td>
</tr>
<tr>
<td>19. Rayon administrations (Dnipropetrovsk Oblast)</td>
</tr>
<tr>
<td>20. Rayon administrations (Mykolaiv Oblast)</td>
</tr>
<tr>
<td>21. Rayon administrations (Rivne Oblast)</td>
</tr>
<tr>
<td>22. Rayon administrations (Volyn Oblast)</td>
</tr>
<tr>
<td>23. Rayon administrations (Khmelnytsky Oblast)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C. Multilateral Institutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>24. European Bank for Reconstruction and Development (EBRD)</td>
</tr>
<tr>
<td>EBRD is a potential Lender for SUP.</td>
</tr>
<tr>
<td>25. European Union (EU) / European Commission (EC)</td>
</tr>
<tr>
<td>The EC is a potential Lender for SUP.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>D. Other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>26. Employees of Energoatom and the 4 NPPs</td>
</tr>
<tr>
<td>27. Contractors and workers</td>
</tr>
<tr>
<td>This includes contractors that will be involved in the supply and installation of materials and upgrading materials.</td>
</tr>
</tbody>
</table>
4.2.2 Group B: Other stakeholders

The Group B stakeholders are listed separately below. However, the Public Councils of the relevant Ministries, Rayons and local administrations will be important vehicles for distributing information, since their membership includes NGOs not listed in the table.

Table 2 Group B stakeholders

<table>
<thead>
<tr>
<th>A. Local communities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Residents living in immediate proximity to NPPs</td>
</tr>
<tr>
<td>This includes residents within a 30 km radius of the NPPs.</td>
</tr>
<tr>
<td>2. Residents living in the adjacent areas of NPPs</td>
</tr>
</tbody>
</table>

| 3. Associations, social organizations, and interest groups in proximity to NPPs |
| This includes village and town-level associations, and all social organizations which are influenced by the NPPs’ operations: e.g. fishermen, women’s groups, youth organizations |

| 4. Potentially vulnerable populations |
| Special attention will be given to those potentially vulnerable persons living within a 30 km radius of the NPPs, including the elderly, disabled, and low-income persons. |

| B. Ukrainian NGOs |
| The list of Ukrainian NGOs includes both environmentally and socially-oriented NGOs based in the capital and also in the NPP regions |

| 5. All-Ukrainian Ecological League |
| The NGO focuses on environmental activism in the Ukraine. |
| www.ecoleague.net |

| 6. Child Well-being Fund Ukraine |
| Its activities include building up community capacity to decrease poverty, protect rights and address children, youth and family-related issues. |
| www.childfund.org.ua |

| 7. EcoPravo – Kiev |
| EcoPravo is an environmental law NGO with the mission to contribute to civil society building through environmental advocacy and enforcement, representation to citizens and NGOs on environmental and organizational issues, in order to stimulate public participation in environmental decision-making and to promote the reform of the legal system to better support democratic processes. It is affiliated with the Environmental Public Advocacy Centers in Lviv and Kiev. |
| http://www.ecopravo.kiev.ua/ |

| 8. EcoPravo – Kharkiv |
| This is the Kharkiv branch of EcoPravo (see description above) |

| 9. Environment, People, Law (EPL) |
| EPL is a public interest environmental law organization protecting environmental rights; supporting, restoring and improving the environment; and providing legal help in protecting other human rights, especially those that overlap with environmental rights. |
| http://www.epl.org.ua/en |

| 10. Information Center “Green Dossier” |
| “Green Dossier” is a member of the UN Global Compact working group on environment; and focuses on public participation, access to information, awareness raising, education for sustainable development and corporate social and environmental responsibility. |
| http://www.dossier.org.ua/ |

| 11. Initiative Center to Support Social Action (EDNANNA) |
| EDNANNA, Ukrainian for “Joining Forces” seeks to foster the professional and organizational development of Ukrainian NGOs. |
| http://www.ednanna.kiev.ua/ |

| 12. Kharkiv Human Rights Protection Group (KHPG) |
| KHPG provides assistance to individuals whose rights have been infringed, and carries out investigations into human rights violations; develops human rights education campaigns and promotes legal awareness through public actions and publications; and provides analysis of the human rights situation in Ukraine. KHPG has a national network of human rights organizations. |
| http://www.khpg.org/en/ |

| 13. Khortytsa Forum (Zaporizha) |
| The Forum is an environmental movement in the Zaporizha Oblast. |
14. **MAMA-86**

*MAMA-86 is a wide network of environmental NGOs, currently uniting 17 organizations from various regions in the Ukraine. Its activities are aimed at creating conditions for sustainable development with a special focus on addressing complex environmental challenges with an enhanced role for public participation.*

http://www.mama-86.org.ua/

15. **National Ecological Centre Ukraine (NECU)**

*NECU focuses on biodiversity protection, reserve management, energy issues, climate change and transport. NECU urges public officials and politicians to take decisions with due respect for the need to preserve the environment and public safety; and is a member of the IUCN and CEE Bankwatch Network and is associated with the Ukrainian Rivers Network*

http://www.rea.org.ua/

16. **Renewable Energy Agency**

*The Renewable Energy Agency’s mission is to research and promote the use of biomass, wind, geothermal, hydro, solar and other forms of renewable energy in the Ukraine.*

http://www.rea.org.ua/

17. **Ukrainian Society for the Protection of Birds (USPB)**

*USPB is the BirdLife International Partner in the Ukraine and is devoted to the conservation of birds living in and migrating through Ukraine.*

http://www.birdlife.org.ua/eng/index.htm

18. **Women's Consortium of Ukraine**

*An umbrella organization for women’s NGOs in Ukraine. They promote gender equality and protect children’s rights at local, regional and national levels.*

19. **Zeleny Svit - Korobko**

*Zeleny Svit’s mission is to “promote the co-ordination of effort to radically change the environmental situation in Ukraine; to ensure the sustainable co-existence of people and environment; and to satisfy the common interests of the members.”*

http://www.zsfoe.org/

20. **Zeleny Svit “Green World”– Samoilenko**

*This is the Samoilenko branch of Zeleny Svit (see description above)*

C. **International NGOs**

21. **Central and Eastern Europe (CEE) Bankwatch Network**

*Bankwatch monitors the activities of IFIs which operate in CEE and propose alternatives to their policies and projects. Bankwatch is the only international NGO currently active in the nuclear sector in the Ukraine.*

http://www.bankwatch.org/

22. **Greenpeace International**

*Greenpeace’s mission is to change attitudes and behavior, to protect and conserve the environment and to promote peace. Greenpeace is active in the global nuclear sector but does not currently have a presence in the Ukraine.*

http://www.greenpeace.org/international/en/

23. **International Union for Conservation of Nature (IUCN)**

*IUCN is a global environmental network. Its mission is to influence, encourage and assist societies throughout the world to conserve the integrity and diversity of nature and to ensure that any use of natural resources is equitable and ecologically sustainable. IUCN has some Ukrainian partners.*

www.iucn.org

24. **World Wildlife Fund (WWF)**

*WWF’s mission is the conservation of nature. WWF has Ukrainian partners, mostly focusing on wetland biodiversity in the Danube Delta.*

www.worldwildlife.org

25. **Friends of the Earth (FOE)**

*FOE focuses on climate change, environmental justice, green economy and natural resources. The Ukrainian NGO Zeleny Svit is a member of the FOE federation.*

www.foe.co.uk

D. **International Institutions**

26. **The Environment and Security Initiative (EnvSec)**

*EnvSec is an international partnership for managing conflict and risk. Its membership includes UNECE, UNEP, UNDP, NATO, REC and OSCE.*
27. World Bank
   The World Bank is currently financing some energy sector projects in Ukraine, including a Power
   Transmission Project and a Hydropower Rehabilitation Project.

   OSCE specializes in early warning, conflict prevention, conflict management and post-conflict rehabilitation.
   OSCE has a Project Coordinator based in Ukraine.

E. Academic Institutions

29. Institute of Geology, Academy of Science

30. Institute of Hygiene and Medical Ecology, Academy of Medical Science

31. Institute of Sociology, Academy of Science

32. National Institute of Strategic Studies

33. Institute of Safety of Nuclear Power Plants of the Academy of Science

Note: The list of stakeholders is not conclusive – additional stakeholders may be added to
the list during the Scoping and Consultation Phases. Contact sup.public@gmail.com if you
wish to be added to the Stakeholder List.

5 PREVIOUS PUBLIC CONSULTATION AND DISCLOSURE

To date of this report, Energoatom has not undertaken any public consultations on the
SUP. However, Energoatom has published a Statement of Intent (SoI) on its website, which
announces the overall SUP to the public.

Public consultations will begin with the Scoping Phase.
6 FUTURE DISCLOSURE OF INFORMATION AND PARTICIPATION

The SEP has been designed with the following basic principles in mind: (i) transparency; and (ii) meaningful consultation.

6.1 Information disclosure & stakeholder engagement

The public consultation plan is categorized into two main phases:

- Phase 1 - Scoping Consultations; and
- Phase 2 - Public Consultations on the EA Report.

The following documents will be made publicly available:

| Phase 1 (scoping) | - Statement of Intent
|                  | - Stakeholder Engagement Plan (this document)
|                  | - Summary of the results of the scoping consultations
| Phase 2 (Ecological Assessment) | - Updated Stakeholder Engagement Plan (if amended after the scoping phase)
|                  | - Executive Summary of EA Report
|                  | - Draft EA Report (full text)
|                  | - Final EA Report (full text), including questions and answers resulting from the 90-day public consultation and how comments have been taken into account
| Phase 3 (SUP installation and operation) | - Annual report on implementation of radiation and non-radiation operating NPPs impact.

6.1.1 Phase 1: Scoping Consultations

Objective

The Project Sponsor (supported by the Consultant) will meet with key stakeholders during the scoping stage of the EA study.

The specific objectives of these meetings are three-fold:

- to introduce the NPP safety upgrade program;
- to introduce the EA scope and procedure (including the approved SEP);
- to gather initial feedback on the program or the public consultation process.

Step 1.1 Notification of project

Best international practice states that potentially affected persons (PAP) and NGOs be notified about the nature of a project early in the project preparation.

This notification corresponds to the Statement of Intent (SoI) that was published in 2010 on Energoatom’s website at the following link:
http://energoatom.kiev.ua/ua/about_nngc/statements.htm?_m=pubs& t=rec&id=27222
Step 1.2 Consultations

Energoatom will organize scoping meetings with key stakeholders in Kiev and also in all 4 NPP satellite cities in May 2011.

Energoatom will send invitation letters by post and by email for the scoping consultations to all stakeholders identified in Section 4.2 at least two weeks before the scoping meetings. The letters will include the following phrase “please forward this invitation to other potentially interested parties” so that these scoping meetings are as inclusive as possible.

The 4 Municipalities will have hard copies of the SEP in case stakeholders would like to review prior to the Scoping Meeting.

Step 1.3 – Prepare output

The Consultant will prepare minutes of the five scoping meetings. These minutes will be published on Energoatom and NPP’s websites, and will be sent via email to those stakeholders who would like to receive them.

Energoatom will at this stage release a presentation of the SUP for the public on its website.

6.1.2 Stage 2: Public consultations on draft EA report

6.1.2.1 Objective

The objective of Phase 2: Public Consultations on EA Report is to provide interested parties the opportunity to comment on the findings of the draft EA.

Step 2.1 Disclosure of the draft EA findings

Energoatom will publicly disclose the Executive Summary and draft EA Report for 90 days so it is available to the public for information and comment. During the consultation period, comments may be sent to Energoatom to take into account in the final EA Report. The Executive Summary and draft EA report will be available in both English and Ukrainian languages.

The final EA Report will be disclosed following the public consultations and shall include a summary of the public consultation process, including all comments received on the draft EA report.

Step 2.2 Public meetings

Energoatom would like to provide a forum for the public to provide feedback on the results of the EA report. Energoatom will coordinate with each municipality to select the location and date for public meetings.

Public meetings are currently anticipated in July 2011.

Step 2.3 – Prepare output

The Consultant will prepare a summary of the 90-day public consultation process, including all comments received via the website, public meetings, fax and mail. This information will be included in the final EA Report.

Once the EA Report has been finalized, Energoatom will release a statement to the media announcing the closure of the EA process, the results of the consultation and how comments were taken into account. This statement shall be published in the same newspapers that the initial notification was published in.

6.1.2.2 Disclosure modalities

Scoping meetings are held in May 2011 and the EA is scheduled for disclosure in June 2011.
(i) **Online access**

Following the approvals of the Executive Summary and draft EA, the documents will be posted on Energoatom’s website (http://www.energoatom.kiev.ua) and the Executive Summary will be posted on EBRD’s (www.ebrd.com) website. The web link will be shared via email to all identified stakeholders. The document may be downloaded. Comments may be submitted to Energoatom for the first 90 days following posting of the documents and the deadline for comments will be specified on the documents.

Energoatom’s website will allow users to post comments and grievances related to the EA. These comments will be filtered by an Energoatom staff to ensure that no inappropriate language is posted onto the website. The Consultant will categorize all questions received and work closely with Energoatom to prepare responses to all questions. The answers to all oral questions and comments will be provided during public meetings and the detailed professional answers in written - in the summary of the 90 day public consultation process to be included in the final version of the EA Report.

(ii) **Information centers**

Hard copies of the Executive Summary and draft EA will be available at various sites, including: (a) the 4 municipalities; (b) Energoatom Headquarters; and (c) the EBRD offices in Kyiv and London. Interested parties may review the hard copy during the respective institution’s office hours. Each information centre in the municipalities and Energoatom Headquarters will also have available forms for comments and grievances, to be collected and submitted to Energoatom on a monthly basis.

The addresses for each information centre are provided in the Table below.

<table>
<thead>
<tr>
<th>Information Centre</th>
<th>Address</th>
<th>Office hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energoatom Headquarters</td>
<td>01032 Kyiv, Vietrova 3</td>
<td>8:30 am – 5:30 pm</td>
</tr>
<tr>
<td>Energoatom Headquarters</td>
<td>Tel +380 44 206 9757</td>
<td></td>
</tr>
<tr>
<td>EBRD Office (Kyiv)</td>
<td>16 Nemirovivtsa-Dantchenko 01001 Kyiv</td>
<td>9 am – 5 pm</td>
</tr>
<tr>
<td>EBRD Office (London)</td>
<td>Tel: +380 44 277 11 00</td>
<td></td>
</tr>
<tr>
<td>Environment and Sustainability Department</td>
<td>One Exchange Square, London EC2A 2JNM UK</td>
<td></td>
</tr>
<tr>
<td>Municipality of Energodar</td>
<td>11 Kourtchatov Street, 71502</td>
<td>9 am – 5 pm</td>
</tr>
<tr>
<td>Municipality of Energodar</td>
<td>Tel: +380 061 393 2253</td>
<td></td>
</tr>
<tr>
<td>Municipality of Yuzhnoukrainsk</td>
<td>Email: <a href="mailto:adm@en.gov.ua">adm@en.gov.ua</a></td>
<td></td>
</tr>
<tr>
<td>Municipality of Yuzhnoukrainsk</td>
<td>48 Duuzhbi Narodiv, 55000</td>
<td>9 am – 5 pm</td>
</tr>
<tr>
<td>Municipality of Kuznetsovsk</td>
<td>Email: <a href="mailto:yu_gik@ukrpost.ua">yu_gik@ukrpost.ua</a> / <a href="mailto:yuvk@ukrsat.mk.ua">yuvk@ukrsat.mk.ua</a></td>
<td></td>
</tr>
<tr>
<td>Municipality of Kuznetsovsk</td>
<td>1 Maidan Nezalezhnosti, 134400</td>
<td>9 am – 5 pm</td>
</tr>
<tr>
<td>Municipality of Netishyn</td>
<td>Email: <a href="mailto:office-vkkmr@kuznetsovsk-rada.gov.ua">office-vkkmr@kuznetsovsk-rada.gov.ua</a></td>
<td></td>
</tr>
<tr>
<td>Municipality of Netishyn</td>
<td>1 Shevchenka Str, 30100</td>
<td>9 am – 5 pm</td>
</tr>
<tr>
<td>Municipality of Netishyn</td>
<td>Email: <a href="mailto:miskrda@nh.km.ua">miskrda@nh.km.ua</a></td>
<td></td>
</tr>
</tbody>
</table>
(iii) **Public meetings**

Energoatom will liaise with each of the 4 municipalities to plan the public meetings – to decide on the exact date and the location in their respective jurisdictions. These meetings would be held within 60 days of public disclosure of the draft EA documents; and stakeholders would be notified of the date, time and venue at least 30-days prior to the meeting.

Energoatom, the EA Consultant, and the Design Institutes will be present at the public meetings.

(iv) **Mass media**

Following public disclosure of the draft EA, Energoatom will release a press release to the mass media, including (but not limited to the following):

1. National newspapers – Day, Dzerkalo Tyzhnya, Uryadovyi Kurier
2. National television – Channel 5, Tonis, TVi

The press release will be drafted and distributed by Energoatom and will include the key findings of the EA and information on where interested parties may access the report. A press release will also be issued to announce the dates of public meetings on the draft EA.

(v) **Targeting vulnerable populations**

The Consultant will prepare a leaflet in Ukrainian that describes the SUP, the disclosure process and grievance mechanisms. Energoatom will ask each of the 4 municipalities to distribute these leaflets at appropriate institutions (e.g. elderly homes, schools, hospitals, social centres, etc.) and to post them on the municipalities’ information boards. Energoatom will be responsible for finalizing the leaflet, and printing and delivering the leaflets to the municipalities (see outline in Section 9.2.3).
### 7 CALENDAR AND RESPONSIBILITIES

The tables below summarize the key actions of the SEP, including delegation of roles and responsibilities, timetable and stakeholders to engage with for each action.

**Table 5 Stakeholder Engagement Plan (Phase 1)**

<table>
<thead>
<tr>
<th>No</th>
<th>Action</th>
<th>Roles and Responsibilities</th>
<th>Stakeholder(s) Targeted</th>
<th>Planned Timetable (tentative)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Statement of intent (SoI) posted on the Energoatom website</td>
<td>− SoI is posted online (E)</td>
<td>All</td>
<td>2010</td>
</tr>
<tr>
<td>2</td>
<td>EA kick-off</td>
<td>NA</td>
<td>NA</td>
<td>24.03.11</td>
</tr>
<tr>
<td>3</td>
<td>Prepare website content</td>
<td>− Suggest format and content (C)</td>
<td>NA</td>
<td>By 30.04.11</td>
</tr>
<tr>
<td>4</td>
<td>Draft Stakeholder Engagement Plan for Phase 1 (Scoping Consultations)</td>
<td>− Draft plan is prepared (C)</td>
<td>All</td>
<td>26.04.11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Plan reviewed &amp; approved (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Plan is posted online – Energoatom and 4 NPP websites (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Posted on Municipal information boards (E,M)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Letters of invitation for scoping meetings are mailed to targeted stakeholders</td>
<td>− Preparation of draft letter (C)</td>
<td>Ukrainian NGOs</td>
<td>from 26.04.11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Preparation of list of invitee addresses (C)</td>
<td>NPP employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Letter text and list of invitees reviewed &amp; approved (E)</td>
<td>Academic institutions</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Letters mailed by post &amp; email (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Project description (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>First scoping meeting is held in Kyiv</td>
<td>− Payment of all associated costs (E)</td>
<td>Ukrainian NGOs</td>
<td>10.05.11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Preparation of draft agenda and presentation (C)</td>
<td>NPP employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Leading the meeting (E)</td>
<td>Academic institutions</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Take meeting minutes (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Distribution of meeting minutes to all participants via email (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Scoping meetings are held in Netishyn and Kuznetsovsk</td>
<td>− Payment of all associated costs (E)</td>
<td>Ukrainian NGOs</td>
<td>11.05.11 – 13.05.11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Preparation of draft agenda and presentation (C)</td>
<td>NPP employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Leading the meeting (E)</td>
<td>Academic institutions</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Take meeting minutes (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>− Distribution of meeting minutes to all participants via email (E)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
8 Scoping meetings are held in Energodar and Yuzhnoukrainsk
- Payment of all associated costs (E)
- Preparation of draft agenda and presentation (C)
- Leading the meeting (E)
- Take meeting minutes (C)
- Distribution of meeting minutes to all participants via email (E)
- Ukrainian NGOs
- NPP employees
- Academic institutions

9 Finalize the SEP and the summary of the scoping stage
- Preparation of summary of Phase 1: Scoping Consultations, including meeting minutes and feedback to date (C)
- Energoatom
- EBRD

10 Publish the SEP and the summary of scoping stage online
- Posted onto its website (E)
- All

Table 6 Stakeholder Engagement Plan (Phase 2)

<table>
<thead>
<tr>
<th>No</th>
<th>Action</th>
<th>Roles and Responsibilities</th>
<th>Stakeholder(s) Targeted</th>
<th>Planned Timetable (tentative)</th>
</tr>
</thead>
</table>
| 11 | An executive summary of the EA report is posted on-line | - Preparation of Executive Summary (C)  
- Review and approve Executive Summary (E,B)  
- Post Executive Summary on respective websites (E,B) | All | 01.06.11 |
| 12 | Hard copies of executive summary are delivered to 4 municipalities | - Draft the letter (C)  
- Approve the letter (E)  
- Mail letter and follow up with municipalities (E)  
- 1 week to reply (M) | Municipalities (4) | 01.06.11 |
| 13 | Letters are sent to all 4 municipalities to start coordinating public meetings | - Open Information Centers (E, B, M)  
- Targetting vulnerable population: Energoatom asks each of the 4 municipalities to distribute leaflets at appropriate institutions (e.g. elderly homes, schools, hospitals, social centres, etc.) and to post them on the municipalities' information boards. (E,M) | Municipalities (4) | 01.06.11 (Decision to be communicated by 07.06.11) |
<p>| 14 | Information Centers are opened | - Posted on Energoatom website and hard copies at information centres (E) | All | 01.06.11 |
| 15 | Draft EA Report is disclosed (beginning of the 90 days disclosure period) | - | All | by 15.06.11 |</p>
<table>
<thead>
<tr>
<th></th>
<th>Activity Description</th>
<th>Responsible Parties</th>
<th>Date Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>Public meeting in 1 NPP municipality</td>
<td>All</td>
<td>between 18.07.11 – 29.07.11</td>
</tr>
<tr>
<td></td>
<td>Prepare agenda and presentation (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Announce public meetings at least 30 days in advance (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Prepare logistics (C,E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pay for all associated costs (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Deliver presentation (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Take minutes (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Public meetings in 3 other NPP municipalities</td>
<td>All</td>
<td>between 18.07.11 – 29.07.11</td>
</tr>
<tr>
<td></td>
<td>Prepare agenda and presentation (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Announce public meetings at least 30 days in advance (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Prepare logistics (C,E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pay for all associated costs (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Deliver presentation (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Take minutes (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>Public consultation in Kyiv</td>
<td></td>
<td>between 18.07.11 – 29.07.11</td>
</tr>
<tr>
<td></td>
<td>Prepare agenda and presentation (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Announce public meetings at least 30 days in advance (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Prepare logistics (C,E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pay for all associated costs (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Deliver presentation (E)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Take minutes (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Preparation of summary of 90 day public consultations, including how comments were</td>
<td>EBRD, Energoatom</td>
<td>September</td>
</tr>
<tr>
<td></td>
<td>taken into account.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Draft the summary (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Final version of EA approved and posted online</td>
<td>All</td>
<td>End of September</td>
</tr>
<tr>
<td></td>
<td>EA Report finalized (C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Final EA Report reviewed and approved (E,B)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Final EA Report posted on respective websites (E) and provided to municipalities.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1 The Design Consultant will also be present at public hearings to answer any technical questions on the Programme.
8 QUESTIONS, COMMENTS AND GRIEVANCE MECHANISM

8.1 Public Grievances

The procedures described in previous chapters, including scoping meetings and public meetings, are stakeholder feedback mechanisms. This type of feedback typically is related to the content of the EA Report and the public consultation process.

The Grievance Mechanism is different. It provides stakeholders a means to formally register any complaints/grievances to Energoatom about any part of the EA process and SUP implementation.

Energoatom will be responsible for implementing the Grievance Mechanism. Energoatom will designate a Public Liaison Officer (PLO) for the EA Assessment of the NPP Safety Upgrading Programme. The PLO is responsible for responding to grievances during the EA process. Later on, Energoatom will review the grievance concerning SUP implementation in accordance with the law.

During the EA preparation, a “Public Grievance Form” has been prepared (see Annex 9.3.2). However, this form is not the only way to formally lodge a complaint with Energoatom. Grievances may be placed with the PLO via letter, email or fax; as well as through Energoatom’s website. The PLO is responsible for recording all grievances, acknowledging receipt and responding to each grievance within the following timeframes:

- Acknowledge receipt of grievance within 10 working days
- Respond to grievances within 20 working days
- Resolve grievance within 30 working days (Note: Energoatom reserves the right to extend the timeframe for responding to complex issues).

Should the need arise, Energoatom will consider establishing a conflict resolution working group to manage complex grievance issues. This working group would comprise representatives of Energoatom, the relevant NPP municipalities, and other persons as appropriate. The flow chart below illustrates the SUP grievance mechanism.

8.2 NPP Employee Grievances

Energoatom will develop a separate SUP grievance mechanism for NPP employees, both through trade unions and also individually with employees. The mechanism will not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.
Figure 2 Flow chart - Grievance mechanism

Registration of grievance – Acknowledgement of receipt

Internal review

Resolution proposed by Energoatom

Grievance closed

Complainant satisfied with proposed resolution

YES

Either party resorts to working group

NO

Working group reviews grievance and seeks resolution

Working group proposes resolution

Both parties satisfied with proposed resolution

YES

Final closure agreement with complainant; SUP incorporates agreed resolution

NO

Complainant or Energoatom resort to Justice
9 APPENDICES

9.1 References

CONVENTION ON ACCESS TO INFORMATION, PUBLIC PARTICIPATION IN DECISION-MAKING AND ACCESS TO JUSTICE IN ENVIRONMENTAL MATTERS done at Aarhus, Denmark, on 25 June 1998


9.2 Communication materials

9.2.1 Invitation letter (draft) – Scoping Meetings
Invitation to take part in the scoping meetings concerning EA of the “Complex (joint) safety upgrade program of power units of NPPs of Ukraine”

According to the “Statement of intent concerning the safety upgrade program of the power units of NPPs of Ukraine” (“Statement of intent”) made public on the 8th October 2010 and following the clauses of the “Concept of safety upgrade of power units of the nuclear power plants” approved by the decree of the Cabinet of Ministers of Ukraine on the 13th December 2005 No 515-r, the State Enterprise “National Nuclear Energy Generating Company “Energoatom”” (SE NNEC “Energoatom”) developed and agreed with the State Committee of the Nuclear and Radiation Safety of Ukraine the “Complex (joint) Safety Upgrade Program of the Power Units of NPPs in Ukraine” (CSUP) implementation, which is planned with the support of the European Bank for Reconstruction and Development (EBRD) and European Commission (EC).

CSUP aims to further improve the safety levels of all 15 operating power units of Zaporizhzhya, Rivne, Khmelnitsky and South-Ukrainsk NPPs by 2017 and does not apply to new construction or rehabilitation of the existing NPPs.

According to the “Statement of Intent” “POYRY” on request of SE NNEC “Energoatom” and with the support of the EBRD had started the works for Ecological Assessment of CSUP, which will be implemented according to the legislation of Ukraine, requirements of EBRD and international recommendations, namely the Protocol of UNECE for the Strategic Ecological Assessment, the directive document of EBRD for Ecological and Social Policy, corresponding clauses of Ukrainian state building norms (ДБН А.2.2.1-2003), etc.

“POYRY” company and SE NNEC “Energoatom” are starting the appropriate public consultations with the goal to promote a transparency and openness policy in the sphere of nuclear energy usage, including wider participation of citizens and their associations in this policy development and negotiation of issues concerning the safety improvement of the operating power units of NPPs.

The preparation phase of these consultations is meant to involve a broad group of stakeholders in the Ecological Assessment of CSUP. From the early stages of this activity there will be a cycle of scoping meetings concerning the Ecological Assessment with the participation of representatives of the non-governmental organizations and mass-media, and individual stakeholders. The meetings will take place with the participation of the local executive and self-government authorities’ representatives, administration of the operating NPPs, experts of “POYRY” company and the specialists of SE NNEC “Energoatom” in the city of Kiev and the satellite cities of NPPs:

- 10th May 2011 – in Kiev, at 15:00 at Gaidara 6, room 218
- 11th May 2011 – in Kuznietsovsk of Rivne oblast at 17:00
- 13th May 2011 – in Netishyn of Khmelnitsky oblast at 10:00
- 17th May 2011 – in Energodar of Zaporizhzhya oblast at 10:00
- 18th May 2011 – in South-Ukrainsk of Mykolaiv oblast at 10:00

We are inviting all the individual stakeholders, non-governmental organizations’ representatives and mass-media to take part in these meetings, to express your thoughts during the meetings, to provide your comments or suggestions concerning the Ecological Assessment of CSUP or to send the above mentioned via email to sup.public@gmail.com by May 5th 2011. We are also kindly asking you to forward this invitation letter to any other stakeholders. All comments and suggestions received will be taken into account in the Ecological Assessment of SUP.

To get any additional information we kindly ask you to contact us through the mentioned e-mail or by phone (044)201-09-08 (Kochugov A. A. or Boyko V. B.).
9.2.2 Agenda for Scoping Meetings

1. Presentations

<table>
<thead>
<tr>
<th>Organization</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAEK Energoatom</td>
<td>Brief introduction to the Program. Legal pre-conditions and requirements for implementation of the project. Finance opportunities. Non-technical description of the proposed safety improvement measures</td>
</tr>
<tr>
<td>POYRY</td>
<td>Requirements of Environmental Assessment (EA) and EA timeline</td>
</tr>
<tr>
<td></td>
<td>Stakeholder Engagement Plan</td>
</tr>
</tbody>
</table>

2. Questions and Answers

3. General discussion

9.2.3 1-page leaflet (outline) – Public consultations

Programme information
- Short programme description, including objectives
- EA scope

Public consultation process
- Timeline
- Information on types of documents available to public
- Physical address of locations where hard copies are available
- Website link for online access to documents
- Information on Grievance Mechanism (how and where to lodge a complaint)
9.3 Public consultation forms
9.3.1 Comments, questions, and suggestions form

PUBLIC COMMENTS & SUGGESTIONS FORM
concerning the Ukraine’s Nuclear Power Plants Safety Upgrade Program

Date: __________________

<table>
<thead>
<tr>
<th>Full name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mailing address</td>
</tr>
<tr>
<td>Telephone / Fax</td>
</tr>
<tr>
<td>Email</td>
</tr>
</tbody>
</table>

- Preferred contact medium (please select one)
  - Email
  - Mail
  - Fax

- Preferred contact language
  - Ukrainian
  - Russian
  - English

**Section 2: Comment or suggestion**

Description of comment(s) or suggestion(s) concerning the Safety Upgrade Program:

Signature: ______________________
Date: ______________________

Please return this form to:
Energoatom - Public consultation concerning SUP
Address: Ukraine, Kiev, 01032
3, Vetrova str.
Email: sup.public@gmail.com
Fax: +38 (0)44 201 09 05

Contact persons: MM. Kochugov A. A. and Boyko V. B
9.3.2 Public grievance form

PUBLIC GRIEVANCE FORM
concerning the Ukraine’s Nuclear Power Plants Safety Upgrade Program

Date: ____________________

Section 1 : Contact information

Full name
Mailing address
Telephone / fax
Email
Preferred contact medium (please select one)
  □ Email
  □ Mail
  □ Fax
Preferred contact language
  □ Ukrainian
  □ Russian
  □ English

Section 2: Grievance

Description of grievance:

What would you like to see happen to resolve your grievance?

Signature: ____________________________
Date: ____________________________

Please return this form to:
Energoatom
Public consultation for SUP
Address: Ukraine, Kiev, 01032
3, Vetrova str.
Email: sup.public@gmail.com
Fax: + 38 (0)44 201 09 05

Contact persons: MM. Kochugov A. A.
and Boyko V. B
9.4 Powerpoint presentation for scoping meetings
Ecological Assessment

Scoping Meetings concerning Ecological Assessment of Ukraine NPP Safety Upgrade Program

Objectives of scoping meetings

1. Introduce the Safety Upgrade Program (SUP)
2. Explain the Ecological Assessment process (including stakeholder engagement)
3. Gather initial feedback from key stakeholders
   - On the SUP and its Ecological Assessment;
   - On the public consultation & information disclosure activities
The NPP Safety Upgrade Program (1)

- Based on recommendations of national and international experts
- Ministry of Fuel & Energy (on behalf of Energoatom) submitted finance request to EC & EBRD (2009) – concerning SUP financing for all 4 NPPs
- Kharkiv & Kiev-based Nuclear Engineering Design Institutes will be involved in working documents preparation

The NPP Safety Upgrade Program (2)

- SUP is aiming at safety improvements at all 4 existing NPPs, without new construction, capacity increase, or lifetime extension.
- The aim of the SUP is to solve the tasks of disparities elimination of the projects of existing NPP power units according to the modern safety national standards and/or reduce the impact of those disparities by implementing the compensatory measures and the recommendations of IAEA
- Implementation period - 2012-2017 years

Комплексна (Зведена) Програма Підвищення Безпеки АЕС (1)

- Базується на рекомендаціях національних та міжнародних експертів
- Міністерство Палива та Енергетики (від імені ДП НАЕК "Енергоатом") подало фінансовий запит до ЄС та ЄБРР (2009) – щодо фінансування КЗПБ на усіх 4-х АЕС
- Харківський та Київський проектні інститути “Енергопроект” будуть залучені до розроблення робочої документації

Комплексна (Зведена) Програма Підвищення Безпеки АЕС (2)

- Дана програма направлена на підвищення безпеки всіх 4х діючих АЕС та не передбачає нового будівництва, збільшення потужностей чи подовження терміну експлуатації
- Мета програми - вирішення завдань з усунення невідповідностей проектів енергоблоків діючих АЕС сучасним національним нормам з безпеки та/або зменшення впливу цих невідповідностей на безпеку шляхом впровадження компенсуючих заходів, і виконання рекомендацій МАГАТЕ
- Период виконання - 2012-2017 р.р.
The Ecological Assessment (1)

- Carried out by Pöyry & UCEWP
- SUP is developed for the existing power units and is not fully subject to EIA under the requirements of National Construction Norms for the new objects
- Developed in accordance with UNECE SEA Protocol; EU SEA Directive; EBRD policies on:
  - Environmental & Social Impacts
  - Public Information
  - Stakeholder Engagement

The Ecological Assessment (2)

- Objectives: environmental impacts review concerning the SUP implementation in compliance with the requirements of the nature protection and ecological safety resulting from program’s implementation
- Basic tasks
  - Identify the environmental impact sources, types and objects connected with the SUP;
  - impact assessment of SUP implementation on environmental resources and people in Ukraine;
  - assessment of possible impacts on other countries;
  - providing stakeholders with access to information developed during EA, consult with stakeholders on the SUP and EA, and consider all comments, questions, and remarks that are provided by stakeholders.

Екологічна Оцінка (1)

- Виконується компаніями Роюр та УЦЕВП
- КЗПБ розроблена для діючих енергоблоків і не цілком підпадає під вимоги ДБН до ОВНС для нових об’єктів
- У відповідності до Протоколу ЕЕ ООН щодо стратегічної екологичної оцінки (СЕО), Директиви ЄС щодо СЕО, ЄБРР проводить політику, засновану на:
  - оцінках впливів на навколишнє природне та соціальне середовище;
  - публічності інформації;
  - залюченні зацікавлених сторін.

Екологічна Оцінка (2)

- Ціль: огляд екологічних впливів, пов’язаних з реалізацією КЗПБ, для забезпечення дотримання вимог з охорони навколишнього середовища та екологічної безпеки наслідок її реалізації
- Основні завдання:
  - визначення джерел, видів та об’єктів впливів на навколишнє середовище, пов’язаних з реалізацією КЗПБ;
  - оцінка впливу заходів КЗПБ на природні ресурси та населення в Україні;
  - оцінка можливого впливу на інші країни;
  - забезпечення зацікавлених учасників доступом до інформації під час ЕО, консультації з ними щодо КЗПБ та ЕО, розгляд всіх коментарів, питань, зауважень учасників;
Stakeholder Engagement (3)

- Objectives
  - Enable meaningful consultation
  - Formalize procedure for questions, comments, suggestions, and grievance (if any).

- Stakeholder Engagement Plan (SEP)
  i. Identifies key stakeholders
  ii. Describes public consultation & information disclosure plan
  iii. Defines roles & responsibilities for SEP
  iv. Describes procedure of receiving and processing questions, remarks, comments and grievance (if any).

Zalучення зацікавлених сторін (3)

- Цілі
  - забезпечити проведення якнайширших консультацій;
  - узгодити процедуру отримання запитань, коментарів, пропозицій, скарг (в разі наявності).

- План Залучення Зацікавлених Сторін (ПЗЗС)
  i. Визначає ключові зацікавлені сторони
  ii. Описує громадські консультації та план оприлюднення інформації
  iii. Визначає ролі та відповідальність щодо ПЗЗС
  iv. Описує процедуру отримання та опрацювання запитань, коментарів, пропозицій, скарг (в разі наявності).

(i) Key Stakeholders

- Group A
  - National Institutions (Ministries, Agencies)
  - Multilateral Institutions (Potential Lenders)
  - ENERGOATOM (Project Sponsor)

- Group B
  - National Institutions (Ministries, Agencies)
  - Local communities
  - Local, National & Regional Media
  - ENERGOATOM (Project Sponsor)
  - Local, National & Regional Media

- Other
  - (MEP employees, contractors, etc.)

- ENERGOATOM
  - (Project Sponsor)
**Stakeholder Engagement (3)**

(i) Public consultation & information disclosure

**Time frames:**
EA implementation is planned according to the next time frames:

- Scoping meetings: 10 May (Kyiv), 11 May (Rivne NPP), 13 May (Khmelnytsky NPP), 17 May (Zaporizka NPP), 18 May (Yuzhnoukrainska NPP)
- Finalizing the EA report elaboration: June
- EA report disclosure: June
- Public consultations: June, July and August (90 days)
- Final EA report elaboration and public consultations report: September

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**Organization/Agency** | **Roles & responsibilities**
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**Energoatom**
**« Project Owner »** | • Overall coordination  
• Review and approve consultant’s work  
• Organize scoping meetings  
• Organize public consultations on EA Report  
• Open information center & host website  
• Composition of answers for the questions, comments, suggestions and grievance (if any) in technical field  
• Review of consultant’s work

**Pouy/UCEWP**
**« Consultant »** | • Elaboration of SEP and EA report  
• Informational support throughout scoping meetings and public consultations concerning the EA report  
• Composition of answers for the questions, comments, suggestions and grievance (if any) in ecological field and PC questions  
• Finalization of EA report with incorporating the results of PC

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**Залучення зацікавлених сторін (3)**

(i) Громадські консультації та оприлюднення інформації

**Часові рамки:**
Планується виконання завдань ЕО в наступні строки:

- Зустрічі з масштабів робіт: травень
- Завершення розроблення Звіту про ЕО: червень
- Оприлюднення Звіту про ЕО: червень
- Консультації з громадськістю: червень, липень та серпень (90 днів)
- Формування остаточної версії Звіту про ЕО та звіту про громадські консультації: вересень
- Консультації з масштабів робіт відбудуться: 10.05 в Києві, 11.05 у м. Кузнецівськ, Рівненської обл., 13.05 у м. Нетішин, Хмельницької обл., 17.05 у м. Енергодар, Запорізької обл., 18.05 у м. Южноукраїнськ, Миколаївської обл.

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<thead>
<tr>
<th>Організація</th>
<th>Ролі та відповідальність</th>
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| ДП НАЕК Енергоатом «Власник проекту» | • Загальна координація  
• Прийняття та затвердження результатів робіт Консультанта  
• Організація зустрічей щодо визначення обсягів робіт  
• Організація громадських консультацій щодо Звіту з ЕО  
• Відкриття інформаційних центрів та хостинг веб-сайту  
• Складання відповіді на запитання, коментарі, пропозиції, скарги (за наявністю) за технічними аспектами  
• Огляд результатів робіт Консультанта

| Розгід/УЦЕВП Енергоатом «Консультант» | • Розроблення ПЗЗС та Звіту з ЕО  
• Інформаційне забезпечення зустрічей щодо визначення обсягів робіт та громадських консультацій щодо Звіту з ЕО  
• Складання відповідей на запитання, коментарі, пропозиції, скарги (за наявністю) за екологічними аспектами та питаннями ГК  
• Доопрацювання Звіту з ЕО за результатами громадських консультацій

| ЄБРР «Потенційний кредитор» | • Огляд результатів робіт Консультанта

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**Organization/Agency** | **Roles & responsibilities**
--- | ---
**Pouy/UCEWP**
**« Consultant »** | • Elaboration of SEP and EA report  
• Informational support throughout scoping meetings and public consultations concerning the EA report  
• Composition of answers for the questions, comments, suggestions and grievance (if any) in ecological field and PC questions  
• Finalization of EA report with incorporating the results of PC

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**EBRD**
**« Potential Lender »** | • Review of Consultant’s work
Stakeholder Engagement (3)
(iv) questions, comments, suggestions and grievance mechanism

- Reference contacts for the public with “Owner of the project” and “Consultant”:
  - through the web-site, e-mail and ordinary post;
  - via phone (with the person responsible for the public connections);
- Providing questions, comments, suggestions and grievance:
  - according the standard form filled by the public;
  - through the web-site, e-mail and ordinary post;
- Questions, comments, suggestions and grievance registration:
  - Confirmation receipt – while 10 working days;
- Questions, comments, suggestions and grievance treatment:
  - composition and submission of answers for the questions, comments, suggestions and grievance – while 20 working days (for the complex issues the increase of this term is possible).

Comments and suggestions welcome

If you would like to communicate any questions, comments, suggestions or grievance, you may send an email to sup.public@gmail.com; fill in the form on http://www.energoatom.kiev.ua/ or within the above-mentioned information centres in municipalities. Contact: phone (044)201-09-08 (Mr. Kochugov A. A. or Mr. Boyko V. B.).