



ENVIRONMENTAL IMPACT ASSESSMENT REPORT

for Investment Proposal:

**BUILDING A NEW NUCLEAR UNIT OF THE LATEST
GENERATION AT THE KOZLODUY NPP SITE**

**CHAPTER 13: AN OUTLINE OF THE DIFFICULTIES (TECHNICAL REASONS,
INSUFFICIENT DATA OR LACK OF DATA) IN THE INFORMATION-
GATHERING PROCESS FOR DEVELOPING THE ENVIRONMENTAL IMPACT
ASSESSMENT REPORT**

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13. AN OUTLINE OF THE DIFFICULTIES (TECHNICAL REASONS, INSUFFICIENT DATA OR LACK OF DATA) IN THE INFORMATION-GATHERING PROCESS FOR DEVELOPING THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT

In developing the Environmental Impact Assessment Report the team of independent experts faced a number of challenges. They were analysed in detail and all the measures required to address them were duly taken.

Back in the initial phase of execution of the present contract, a Risk Management Report was developed focused on identifying the issues involved in the performance of the contract before they actually occur by carefully planning relevant actions and measures to address them in order to avoid any negative effect that might hinder achievement of the intended/planned goals and results. The timely and targeted identification and awareness of the potential risks was of major importance for the successful performance of the contract because it allows making easier and more cost-effective changes and adjustments at the early stages of implementation.

The Risk Management Report presented the succession of separate steps undertaken by the consortium to address risk management, namely:

- Identify and analyse risks and limitations;
- Assess risks and evaluate the consequences resulting therein;
- Assess risk impact in the course of execution of the separate stages and activities;
- Outline measures to prevent, minimise or transfer identified risks;
- Develop a strategy to overcome risk;
- Elaborate rules for documenting, monitoring and reporting risk.

The implementation of the strategy to address risk allowed completing the activities related to the development of the Environmental Impact Assessment Report in full and within the set time limits.

The major challenges encountered by the expert team can be summarised along two lines, as follows:

- ✓ Challenges related to gathering input data and information;
- ✓ Challenges related to the sufficiency and consistency of input data and information.

13.1 CHALLENGES RELATED TO GATHERING INPUT DATA AND INFORMATION

These particular challenges were mainly related to:

- ✓ The need to have enough historical data and information allowing to trace the trends in changes and new developments;
- ✓ The need to have the latest and up-to-date data and information so as to achieve maximum accuracy and reliability of the analysis and conclusions;
- ✓ The need of input data and information valid both for the territory of the Republic of Bulgaria and the Republic of Romania in order to be able to assess the transboundary impact of the investment proposal.

These challenges were overcome by:

- ✓ Active and continuous support on behalf of the Contracting Authority in the effort to provide their own data along with data and information from other sources. A huge volume of information was gathered for the purposes of EIAR, both in historical and current context. An ongoing and phased process of communicating data and information between the Client and the Contractor was established;
- ✓ The expert team made every effort necessary to gather additional information by doing research into various public sources and a lot of field work of the separate expert teams both on the territory of the Republic of Bulgaria and the Republic of Romania.

13.2 CHALLENGES RELATED TO THE SUFFICIENCY AND CONSISTENCY OF INPUT DATA AND INFORMATION

These particular challenges were mainly related to:

- ✓ Insufficient data and information about qualitative indicators in terms of quantity for some of the environmental components with respect to NNC /for wastewater, noise, biodiversity /;
- ✓ The data about NNC from different sources cannot always be processed in a clearly comparable manner;
- ✓ Insufficient systematisation of data and information submitted by the separate owners, which held back and hindered its proper usage.

These challenges were overcome by:

- ✓ Additional efforts made by the Contractor and Client to gather a larger volume of data whose analysis could allow consistent expert assessments and conclusions;
- ✓ Additional efforts made by the expert team to further process and systematise the available data so as to enable subsequent analysis;
- ✓ In the absence of available specific data /mostly about NNC /, an approach was applied for referring to other similar sites for which there are data on hand.

13.3 CONCLUSION

Notwithstanding the challenges accompanying the development of the Environmental Impact Assessment Report, they have been successfully addressed and adequate and workable solutions have been found.

The present Environmental Impact Assessment Report of the investment proposal has been prepared by the expert team based on sufficient, systematised, verifiable and consistent data and information.