



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

2025-08-22

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Sweden's response to the notification in accordance with the protocol on Strategi Environmental Assessment (SEA) to the Espoo convention for the revision of the regulations issued under the Finnish Nuclear Energy Act, SYKE/2025/1436

Sweden via the Swedish Environmental Protection Agency (SEPA) has been notified by Finland in accordance with Article 10 of the Protocol on Strategic Environmental Assessment (the SEA protocol) to the Convention on Environmental Impact Assessments in a Transboundary Context (Espoo Convention). The notification concerns the preliminary draft plan, and the SEA of the regulations issued under the Finnish Nuclear Energy Act.

Sweden acknowledges receipt of the notification and hereby confirm that Sweden intends to participate in the continued environmental assessment processes. A brief summary of views and comments on the draft document is provided below. All enclosed statement should be read in their entirety.

Consultation in Sweden

The consultation documents were circulated for review among Swedish central government agencies, relevant county administrative boards, organizations and the general public during the period from 27 May until 22 August 2025. The documents have also been made available on the Swedish Environmental Protection Agency's (SEPA) website.

Statements have been received from national and regional authorities and organizations.

The Swedish EPA is the authority responsible for fulfilling Sweden's obligations following from, inter alia, Article 10 in the protocol (SEA) to the Espoo convention. However, SEPA does not evaluate the consultations received with a view to presenting an overall Swedish position. For a comprehensive view of the comments received during the consultations, we refer to the enclosed statements.

Summary of Comments received

The statements are attached and should be read in full text. A brief summary is given by SEPA below.

National government authorities***The Swedish National Board of Housing, Building and Planning (Boverket) -***

In general, Boverket considers that harmonisation should be sought where appropriate with the constitutional regulations of the Nordic countries with regard to notification, detection, rescue services and full-scale evacuation. They also raise the need for an informal supplementary information channel to be established for radioactive emissions caused by other factors than accidents. See full statement for more details.

The Swedish Board of Agriculture considers STUK's strategy for revising the legislation to be ambitious and interesting and looks forward to seeing the results. The authority does not consider it necessary that Sweden take part in the further consultation.

The Swedish Geotechnical Institute (SGI) has no comments at this stage but would like to take part in the upcoming consultation.

Swedish Meteorological and Hydrological Institute (SMHI) consider that it is necessary that Sweden take part in further consultations. SMHI states that climate changes have to be considered. Among other things raised sea level, risk for storm flows etc. have to be considered. It is of greatest importance to minimise the risks and study the effects of the climate change and use a scenario with continued increased greenhouse gases. See the full statement for information and details.

The Swedish Food Agency states that the revision of the regulations will not have a significant transboundary impact on environment and health in Sweden. However, there are risks for the food production in case of an accident and therefore it is necessary that Sweden take part in the further environmental assessment and that risks on production of food and drinking water are considered. See full statement.

The Swedish Radiation Safety Authority (SSM) states that the regulatory changes may have a significant cross-border impact on Sweden's environment, health or other interests, but has not at this stage identified any specific such impact. SSM considers that there is a need for Sweden to participate in the continued environmental assessment, but has no other comments on the scope and focus of the environmental assessment

County board of administrations

County board of administration in Uppsala does not have any input at this stage but will take part in the further process.

County board of administration in Kalmar states that Sweden should take part in the further process. The board leaves input to three different themes in the environmental assessment. The importance of risk assessment for all different stages, responsibilities for example for radioactive waste and radiation safety and safety issues and development of new techniques and business models. See full statement for more information.

County board of administration in Halland states that the planning work is comprehensive. Though, it lacks details on the implications and parameters that will be developed as the reform is implemented. That makes it difficult to assess of the impact and therefore Sweden should continue to participate in future

consultations on environmental assessment in order to monitor the matter. See full statement for more details.

Non governmental organizations

Miljörelsens Kärnavfallssektariat, Milkas, give one statement and two additional attachments. Milkas have listed some questions that STUK have to reply to before they continue the work with the revised regulations. The questions are for example if STUK has analyzed statistics of cancer due to radio nuclides, if STUK has required knowledge regarding gene mutations and modern research in that field. See the statement for a complete list. In addition, Milkas considers that the safety levels have to be improved and comments on a long list of risks. Milkas consider that there is a significant cross-border impact on Sweden and does not accept for example exporting of foods containing unnatural radionuclides. The statement and the two additional attached documents have to be read in full text.

Conclusion and summary

Sweden acknowledges receipt of the notification. There are different views on the transboundary impact from the revision of the regulations. But based on the incoming statements Sweden will participate in upcoming consultation regarding the revised regulations and the associated strategic environmental assessment.

One organization has requested the environmental report in Swedish

The decision has been made electronically and there is no need for signatures.

For the Swedish Environmental Protection Agency

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Head of Unit

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Point of Contact for the Espoo protocol

Attachment with comments from the:

Swedish National Board of Housing, Building and Planning (Boverket)

The Swedish Board of Agriculture (Jordbruksverket)

The Swedish Geotechnical Institute (SGI)

The Swedish Food Agency (Livsmedelsverket)

The Swedish Meteorological and Hydrological Institute (SMHI)

The Swedish Radiation Safety Authority (SSM)

County board of administration in Uppsala

County board of administration in Halland

County board of administration in Kalmar

Miljörörelsens Kärnavfallssekretariat, Milkas (Milkas 3 documents)

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Ministry of Climate and Enterprise Eleonora Rönström and Bastian Ljunggren