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21 June 2023

18for0 Submission on "Public consultation on the life extension of Doel 4 and Tihange 3"

With this submission 18for0 would like to express our support for the 10 year lifetime extension applications for Doel 4 and Tihange 3 on the basis of the results of the EIA assessment and how these results apply to Ireland. We would like to draw attention to three topics discussed in the EIA assessment to outline the reasons for our support:

Alternatives and security of supply

The EIA describes the Belgian government's findings that there are no practicable alternatives to extending the lifetimes of these plants, with regards to ensuring the delivery of electricity. Ireland is indirectly interconnected with Belgium through the UK, and any shortage of electricity generation capacity in Belgium may have a negative impact on Ireland's electricity system and market. In the absence of alternatives, we believe these lifetime extensions should be granted for this reason.

Avoided impacts

The EIA describes the direct carbon emissions which will be avoided if these lifetime extensions are granted. In addition, the continued operation of these nuclear power plants will mitigate against additional environmentally damaging energy infrastructure development projects, particularly from a land-use change and biodiversity perspective, as well as the embodied carbon associated with such projects. Extending use of the existing plants is consistent with the 'precaution' and 'prevention' general principles of European environment policy.

Irish public health risk

The Belgian response to Ireland's enquiry about potential radiation doses to the public in Ireland in the event of an emergency (5 April 2023), in combination with the potential dose assessments for neighbouring countries within the EIA, highlight the insignificance of any potential dose to Irish public health.

There is, however, substantial risk to Irish public health from future impacts of climate change and biodiversity loss. It is clear that the avoided impacts of these lifetime extensions lessen these risks. Therefore, these lifetime extensions would overall lower risk to Irish public health.