

To: The Arctic Council

Oslo, 15/05/2021

Dear Members of the Arctic Council

Norway's Bellona Foundation welcomes the Russian Federation's chairmanship of the Arctic Council. For over 25 years, Bellona has been involved in projects aimed at eliminating the nuclear and radiation legacy accumulated during the Cold War in Northwest Russia. Under the Russian Federation's leadership, we propose that the Arctic Council adds to its agenda the question of international cooperation to implement a project to secure radiation and nuclear hazards at the bottom of the Barents and Kara sea.

In the late nineties, Bellona was among the first environmental groups to raise international alarm about decommissioned nuclear vessels and accumulated spent nuclear fuel at formerly Soviet naval bases, and the group emphasized the need to assist Russia in dismantling this legacy. Through Bellona's initiative, international groups were formed to summon resources from donor countries to help finance the disposal of these pressing hazards.

In the ensuing years, Bellona used its influence at all levels to support projects aimed at reducing nuclear and radiation hazards on the Kola Peninsula and in other Arctic regions. Today we know that, since the beginning of the century, a total of some €2.5 billion in foreign funding has been spent on eliminating the nuclear and radiation legacy on the Kola Peninsula.

Bellona pioneered the project that led to the disposal of the *Lepse* floating spent nuclear fuel storage facility, which for decades was based in the Kola Bay near Murmansk, posing grave threats to the environment and the city's half-million strong population. In the Arctic area, the past decade and a half has seen the disposal of 123 nuclear submarines, seven technological ships – including the *Lepse* – that were used for nuclear vessel support. Overall, 98.5 percent of the nuclear fuel once loaded in the reactors of submarines has been extracted and sent for reprocessing at the Mayak Production Association.

Bellona is deeply gratified by Norway's participation in projects at Andreyeva Bay, where spent nuclear fuel accumulated since the 1960s is being unloaded from what, at the time, was deemed a temporary storage facility. As of today, some 8,500 spent nuclear fuel assemblies – out of the 22,000 assemblies the base amassed – have finally been removed and sent for reprocessing.

The Arctic today is huge territory whose impact on global environmental, economic and security issues cannot be underestimated. Bellona welcomes the Russian Federation's adoption of a strategy for Arctic zone development, as well as its plan to implement that across social, economic and infrastructure spheres. And most especially, Bellona welcomes Russia's action plan for environmental protection and ecological safety.

Bellona had been encouraged by Rosatom's recent initiatives to spearhead the raising of the K-27 and B-159 nuclear submarines – which both sank with nuclear fuel in their reactors – and the forthcoming development of a roadmap for that project. It is Bellona's belief that these objects pose a threat to Arctic seas and should be raised and disposed of using infrastructure currently available at Gremikha, Sayda and elsewhere on the Kola Peninsula. Bellona will work actively to attract international participation for the efficient and quick implement of projects to raise these vessels.

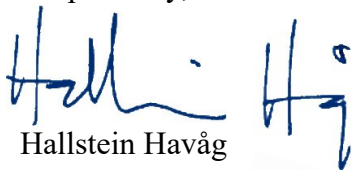
We also believe that long term plans for researching and monitoring other sunken and dumped radiation hazards – such as the Komsomolets nuclear submarine, the shielding assembly from the Lenin nuclear icebreaker, the reactor from the K-140 nuclear submarines, among others (see table) - should be developed and implemented.

Bellona sincerely believes that the period of the Russian Federation's chairmanship in the Arctic Council can and should become a new stage in fruitful cooperation between the Arctic countries to bring the Arctic seas to a safe condition. We further believe that the recovery and disposal of sunken radiation hazards is to Russia's benefit, as well as to the benefit of all participating countries.

Based on the foregoing, and understanding the relevance and importance of this topic, Bellona proposes adding to the Arctic Council's agenda the question of international cooperation to develop and implement initiatives to remove nuclear hazards in the Arctic seas once and for all. We believe a project for "Safe Arctic Waters", promoted by the Arctic Council and its leadership, would receive broad support. Such a project would encompass a comprehensive engineering radiation survey of the underwater areas surrounding the sunken objects, provide basis for making decisions on lifting the objects, and envision financial and technical support for both underwater and surface operations that are compliant with safety standards.

We hope the Arctic Council will consider this proposal under the new chairmanship, and wish you all the best in your endeavours.

Respectfully,



Hallstein Havåg

CEO

Bellona Foundation



Table 1

Radiation and nuclear hazards at the bottom of the Barents and Kara Seas

2 nuclear submarines (the K-27 and the B-159)	Barents and Kara Seas
5 reactor compartments (from nuclear submarines)	Kara Sea
One container with a shielding assembly of the Lenin nuclear icebreaker	Kara Sea
19 vessels containing solid radioactive waste	Kara Sea
735 radioactive structures and blocks	Kara Sea
More than 17,000 containers with radioactive waste	Kara Sea