

# Information Circular

**INFCIRC/1228**

Date: 8 July 2024

**General Distribution**

Original: English

---

## Communication from the Permanent Mission of Ukraine to the Agency

1. On 5 July 2024, the Secretariat received a Note Verbale from the Permanent Mission of Ukraine to the Agency.
2. As requested, the Note Verbale is herewith circulated for the information of all Member States.



**Permanent Mission of Ukraine**  
to the International Organizations  
in Vienna

Wallnerstrasse 4,  
1010, Vienna,  
Republic of Austria

(+431) 479 7172,  
pm\_io@mfa.gov.ua

Nº4131/35-197-92179

The Permanent Mission of Ukraine to the International Organizations in Vienna presents its compliments to the Secretariat of the International Atomic Energy Agency and has the honour to communicate the following.

On 02 March 2022, at the meeting of the IAEA Board of Governors, convened to address the safety, security and safeguards implications of the situation in Ukraine, IAEA Director General Rafael Mariano Grossi outlined seven indispensable pillars of nuclear safety and security.

Pillar six states that "there must be effective on-site and off-site radiation monitoring systems and emergency preparedness and response measures."

In his numerous reports and statements, the Director General has detailed the challenges faced by the Zaporizhzhia Nuclear Power Plant (ZNPP) in maintaining these systems in the face of Russia's ongoing war of aggression against Ukraine.

Since the beginning of the occupation of the ZNPP by the Russian Federation, Russian forces have blocked access of the IAEA Support and Assistance Mission to Zaporizhzhia (ISAMZ) to the ZNPP's on-site crisis centre, and the chain of command and responsibility for emergency response has been removed from the control of the Ukrainian authorities. The Director General stated that this action may be detrimental to the effectiveness of emergency response due to lack of clarity on the responsibility and authority to issue notification to off-site authorities and instructions to the public on protective actions (GOV/2022/66, para 49).

The online data transmission from the radiation monitoring system around the ZNPP to the State Nuclear Regulatory Inspectorate of Ukraine (SNRIU) has been persistently interrupted since the beginning of the occupation of the ZNPP. Currently, Russia has completely blocked the transmission of data to the only rightful owner of the ZNPP – Ukraine.

**Secretariat**  
**International Atomic Energy Agency**  
**Vienna**

In this regard, the IAEA Director General noted that data from the offsite radiation monitoring stations continued to be manually provided to ISAMZ several times a week and uploaded to the Agency's International Radiation Monitoring Information System (GOV/2024/30, para 73).

The lack of automated, real-time data transmission significantly hampers the effectiveness of radiation monitoring and response for the potential incident or accident.

Effective emergency preparedness is essential to ensure the protection of the public, property, and the environment in case of an emergency, especially under the conditions imposed by the Russian war of aggression against Ukraine and forceful seizure of the ZNPP.

However, the current observations by the IAEA indicate significant shortcomings in the existing emergency preparedness at the ZNPP. The IAEA Director General has expressed concerns about the deficiencies in the ability to implement effective responses, including public protective actions off-site, should an emergency arise (GOV/2024/30, para 79).

These problems are compounded by the inaccessibility of the original off-site emergency centre in Zaporizhzhia, which lies on the other side of the Russian-occupied territories. Russian forces have rendered this centre unavailable to the plant's personnel, further exacerbating the challenges in managing a potential emergency resulting from the seizure of ZNPP and its management by external forces (GOV/2023/30 para 51).

The situation is further complicated by the influx of unauthorised and unlicensed personnel at the ZNPP, particularly in key positions in the main control rooms, combined with a lack of emergency drills and exercises. In this regard, the IAEA Director General has expressed serious concerns about the site's current preparedness and ability to respond effectively to emergency situations. (GOV/2023/59, para 62). In addition, the ZNPP's radiation protection programme has been reviewed and adapted without authorization by its rightful owner, Ukraine, to align with the regulatory framework of the Russian Federation, currently occupying the site (GOV/2024/30 para 74).

The core problem underlying these deficiencies in radiation monitoring and emergency preparedness is the Russian invasion of Ukraine and occupation of the ZNPP. The presence and control exerted by Russian forces has disrupted normal operations and regulatory oversight, which are critical to maintaining nuclear safety and security. Despite the IAEA's efforts to monitor the situation and maintain a presence at the ZNPP, the occupation

has resulted in serious violations of Pillar six, significantly increasing the risk of a nuclear incident.

Restoring and maintaining effective on-site and off-site radiation monitoring systems and emergency preparedness is critical. Addressing this issue fundamentally requires ending the Russian occupation and restoring Ukrainian control over the ZNPP to ensure that the highest standards of nuclear safety and security are maintained.

The Permanent Mission of Ukraine requests the Secretariat of the International Atomic Energy Agency to circulate this Note Verbale as an Information Circular to all IAEA Member States as soon as possible.

The Permanent Mission of Ukraine to the International Organizations in Vienna avails itself of this opportunity to renew to the Secretariat of the International Atomic Energy Agency the assurances of its highest consideration *v. l.*



Vienna, 05 July 2024