



15 July 2020

To better consider the sustainability credentials of nuclear energy at European Union level

Dear President of the European Commission,
Dear Vice President Timmermans,
Dear Vice President Dombrovskis,
Dear Commissioner for Energy,

weCARE, a civil society Alliance of European pro-climate NGOs promoting an all-inclusive technology-neutral sustainable energy mix, supports the decarbonization goal of the EU Green Deal. We therefore also support the overall objective of the EU Recovery Package to foster investments in sustainable energy projects, by increasing EU financing means and tailoring EU financing tools to that end.

But we regret that, whilst renewable energy sources are rightly considered for financial support, the largest current contributor to low-carbon energy, i.e. nuclear energy, continues to be ignored or excluded from the Commission's proposals.

As an example to illustrate what is presently happening, the revision by the Commission of the InvestEU proposal, in the frame of the Recovery Package, is still excluding nuclear energy in its Annex V, keeping nuclear on an equal footing with activities violating human rights, tobacco and the sex trade ! The same happens for the Just Transition Fund, now proposed to be increased to 40 Billion Euros. The clear objective of the Fund is to support regions to get out of fossil fuels to push for deep decarbonization. Nuclear is excluded while fully decarbonized... and shockingly, some MEPs even insist to include fossil gas within the scope of the Just Transition Fund... As another example, the revised proposed budget for nuclear fission research under the next Euratom Framework Programme for the period 2021-2027 is reduced by 20%, compared to the Commission's initial proposal of 2018, while the overall Research Framework Programme proposal has been increased by 15%...

weCARE hopes that the Commission will urgently rethink this policy trend and more positively acknowledge the role that nuclear energy will have to play in the EU's sustainable energy future, a future based on clean, affordable and reliable energy for households and industry.

To put our request in perspective, we would like to refer to three important documents issued recently.

The first is the letter of the Polish Minister for Climate, Mr Michal Kurtika, dated 22 June addressed to the Vice Presidents of the Commission and the Commissioner for Energy. This letter, referring to Article 194 TFEU and to the promotional dimension of the Euratom Treaty, is a clear political signal that some Member States want to see nuclear energy treated objectively by the Commission. When preparing proposals, the Commission should have an all-inclusive low carbon technology neutral approach, leaving the real choice of the mix to the individual Member States, as long as it is low carbon. Texts would only be politically adapted later when reaching the level of the Council and Parliament. By de facto sidelining nuclear energy early in its proposals, the Commission is not living up to its claim to be technology neutral and is not fulfilling its role of guardian of the Treaties.

The second document is the IEA In-Depth Energy Review of the EU

(EU IDR), published on 25 June¹. In the nuclear chapter of the report, the IEA recommends a better alignment between the high level strategic views of the EU in the energy field (eg the Long Term Strategy “Clean Planet for All” of November 2018, mentioning the combination of RES and nuclear as the backbone of the 2050 long term low carbon energy strategy) and the dedicated implementation tools (eg the financing instruments to support effective deployment of the strategies). This is not happening when it comes to nuclear energy. During the webinar launching the publication of the EU IDR report on 25 June, the Executive Director of the IEA, Dr Fatih Birol, answering specific questions from journalists, confirmed that the path to full decarbonization will be much harder and expensive without recourse to nuclear (referring to data from the IEA Report on nuclear of May 2019), and that, for him, nuclear energy should be included in the Taxonomy for Sustainable Financing.

The third document is the NEA report on Deep Geological Disposal of Radioactive Waste, published on the 30 June². This report comes at the right time when the question of the sustainability of nuclear energy in the frame of the Taxonomy for Financing is still open. This report shows that, resulting from decades of collaborative research, there is today widespread scientific confidence in Deep Geological Repositories (DGRs) as a safe way to isolate high level waste from the environment and human beings for extremely long periods of time. DGRs are to be built in host rocks having a proven record of stability for hundreds of thousands of years. Underground Research Laboratories (URLs) are demonstrating the ability of those rocks, in combination with the engineered safety barriers to prevent the migration of long-lived radionuclides. Based on this scientific demonstration, Finland is engaged in building its DGR for operation in a few years, thus demonstrating the industrial deployment of the concept.

weCARE therefore considers that the demonstration of effective safe management of high-level radioactive waste is beyond dispute, and should allow the integration of nuclear energy without any further delay in the Taxonomy for Sustainable Financing, alongside RES and

¹ <https://www.iea.org/reports/european-union-2020>

² <http://www.oecd-nea.org/rwm/pubs/2020/7532-dgr-geological-disposal-radioactive-waste.pdf>

other technologies having very low carbon credentials.

Noting that DG FISMA has recently asked the JRC (with other “radiation protection and environment experts”) to revisit the sustainability of nuclear energy for the Taxonomy, we hope that this NEA report will constitute a centre-piece of the analysis. Rapid progress would allow nuclear energy to be properly considered by the Commission in the coming months, well before the end of this year, in time to be considered for integration in the first Delegated Acts.

We remain at your disposal for any further information/interaction you would like from/with weCARE.

Yours faithfully,

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weCARE

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weCARE is a Brussels-based alliance of NGOs campaigning in Europe for Clean, Affordable and Reliable Energy. The weCARE website (<https://www.wecareeu.org/>) describes the aims and specific activities of the alliance and lists the current member organisations: Sauvons le Climat FR, Energy for Humanity UK, 100TWh BE, Ekomodernist FI, Jihocesti TatKove CZ, Institute for Sustainable Energy PL

weCARE is listed in the EU Transparency Register under number 473723535459-78.