



15 July 2020

***TIME TO ACT
To better consider the sustainability credentials of
nuclear energy at European Union level***

Dear Energy and/or Nuclear Representatives of EU Member States
Permanent Representations,

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 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 the Annex V, keeping nuclear on an equal footing with activities violating human rights, tobacco and 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 push 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 has written to the Commission asking to urgently correct this trend and to more positively acknowledge the role that nuclear energy will have to play in the EU sustainable energy future, meaning a future based on clean, affordable and reliable energy for households and industry.

But experience has shown that the probability for this correction to happen is low... By, de facto sidelining nuclear energy in its proposals, the Commission is not playing its role as guardian of the Treaties. Leaving the choice of their energy mix to the Member States, as per the Art 194 of the TFEU should not be "lip service", but the way things should really be.

Therefore, weCARE puts a lot of hopes in EU Member States "open to nuclear" to make their voice heard when proposals by the Commission are coming for discussion to the table of the Council.

weCARE is most grateful to the Polish Minister for Climate, Mr Michal Kurtika, for having made his views so clear and so well expressed in his recent letter to the Vice Presidents Timmermans and Dombrovskis, and Commissioner Simson. We are hoping that this might be a signal for building a strong coalition of Member States ready to stand-up to defend a real all-inclusive technology neutral low carbon approach for a sustainable European society, based on clean, affordable and reliable energy, including nuclear.

Dear Madam, Dear Sir, to support this political process, science based facts and evidence are necessary. weCARE wants to use the opportunity of this letter to inform you about two recently published reports by the OECD International Energy Agency (IEA) and Nuclear Energy Agency (NEA) respectively.

The first is the IEA In Depth Energy Review of the EU (EU IDR), published on the 25 June¹. In the nuclear chapter of the report, the IEA recommends to have 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) with 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 of 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 second 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 definite 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 are demonstrating the ability of those rocks, in combination with the engineered safety barriers to avoid the migration of long-lived radionuclides. Based on this scientifically based

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>

demonstration, Finland is engaged in building its DGR for operation in a few years, as such demonstrating the industrial deployment of the concept.

weCARE therefore considers that the demonstration of the effective safe management of high level radioactive waste has been done, allowing to integrate nuclear energy without any further delay in the Taxonomy for Sustainable Financing, alongside RES and technologies having very low carbon credentials.

Noting that, after months of delays, DG FISMA has recently asked the JRC (and 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 center piece of the analysis, away from politically driven pressures and bias. Rapid progress would allow nuclear energy to be properly considered by the Commission in the coming months, as early as September, now that work on the Delegated Acts is starting.

We remain at your disposal for any further information/interaction you would like to get from/with weCARE, as a representative of civil society.

Yours faithfully,

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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.