

Amsterdam, 27-7-2021

Mr Frans Timmermans
Executive Vice-President for the European Green Deal

Mr Valdis Dombrovskis
Executive Vice-President for an Economy that Works for People

Ms Mairead McGuinness
Commissioner for Financial Services, Financial Stability and Capital Markets Union

Mr Virginijus Sinkevičius
Commissioner for Environment, Oceans and Fisheries

Dear Executive Vice-Presidents, dear Commissioners,

We, the undersigned, write to you in response to the [recent undated letter](#) sent by the ministers of Germany, Austria, Denmark, Luxembourg and Spain in which the European Commission is urged in effect to abandon the science-based and technology neutral process for achieving a Sustainable Finance Taxonomy Regulation.

As citizens concerned about the chronically slow pace of phasing out global fossil fuel consumption, we are dismayed at this latest apparent attempt to undermine that phase out by excluding nuclear energy, Europe's by far largest source of low-carbon energy.

As stressed recently by a number of important international institutions, including [the IEA](#), the [OECD-NEA](#), the [UNECE](#) and [the IPCC](#), ensuring that greenhouse gas emissions are kept within safe limits set by the Paris Agreement practically requires that all available and effective mitigation technologies be employed where feasible and appropriate. This includes nuclear energy because of its unique, proven strengths as a compact, scalable, versatile, flexible, inexhaustible, low-cost and clean source of energy. Therefore, all these institutions provide for the growth of the number of nuclear power stations in their scenarios for the period up to and beyond 2050.

In order to mobilise private investment in nuclear technology deployment, it is essential that this technology is recognized for its sustainable credentials, as quantified most recently in the JRC report.

Please permit us to call attention to the following key elements in the ministers' letter.

We agree with the ministers that the Taxonomy is of crucial importance for funding Europe's transition to a sustainable energy system that does not rely on scarce resources and does not pollute the environment. It is for that very reason that we must insist that the Taxonomy be technology-neutral and science-based as was promised it would be at its conception. That is the only way to ensure the efficiency and credibility of the Taxonomy, or indeed any climate policy.

We disagree with the claim that the JRC supposedly ignored accident risks and harms. On the contrary, the JRC provided a modern, quantitative and scientific review of what is known about the consequences of big nuclear accidents. It revealed what few outside of the field are aware of, namely that (paraphrasing the NRC SOARCA study):

- Existing resources and procedures can stop a nuclear accident, slow it down or reduce its impact before it can affect public health;
- Even if nuclear accidents proceed uncontrolled, they take much longer to happen and release much less radioactive material than earlier analyses suggested; and
- Nuclear accidents would cause essentially zero immediate deaths and only a negligible increase in the risk of long-term cancer deaths.

Moreover, the JRC finding that nuclear accident consequences do no significant harm to flora and fauna is not controversial and clearly borne out by observations in the field. The health impact due to radioactive pollution resulting from a nuclear accident like Fukushima has been found to be comparable to the conventional impact of air pollution in major cities.

We disagree with the claims about nuclear waste. Contrary to popular myth, regulated nuclear waste storage has never been a problem, and it has never harmed anyone, nor will it. The JRC report confirms what has been known by the involved scientists for decades: nuclear waste is a solved problem, of no more concern than the waste from any other industrial activity including the wind and solar industries.

Moreover, paraphrasing the conclusion of the American Physical Society study group report on nuclear fuel cycles and waste management, which appeared as early as 1977, "Safe and reliable management of nuclear waste and control of radioactive effluents can be accomplished with technologies that either exist or involve straightforward extension of existing capabilities. Potential radiation exposures from either wastes or effluents do not limit deployment of nuclear power."

The reason for the drawn-out process of deploying deep geological repositories is simply the lack of urgent need for them since nuclear wastes are extremely compact and therefore cheap and simple to store above ground. Deep geological disposal is also cheap in terms of cost per unit of nuclear energy supplied, so it is possible to spend a lot of time and resources on perfecting them. Furthermore, much of what is labelled high level waste is suitable for recycling into fresh nuclear fuel for nuclear reactors.

Finally, we disagree with the claim that including nuclear energy in the Taxonomy would undermine its credibility. On the contrary, **not** including nuclear would fatally harm it. It would suggest the Commission had put mere political concerns ahead of sound science and the needs of the planet, as would the inclusion, for that matter, of fossil methane fuel (more commonly known as natural gas).

Since publication of the 5 ministers' letter, the two scientific committees assigned by the Commission to review the JRC report have issued their recommendations. Both the [SCHEER](#) and the [Art. 31 group](#) have concluded that the JRC has on the whole reported correctly and sufficiently, in effect giving a green light to swift and full inclusion of nuclear in the Taxonomy.

That said, the SCHEER has questioned whether the fact that nuclear energy does less harm than energy technologies already included in the Taxonomy is equivalent to satisfying the Do No Significant Harm requirement. This may be regarded as a call on politicians to be specific about what Significant Harm constitutes, difficult though this may be. It does not invalidate the JRC finding of no significant harm.

Also, SCHEER is of the view that it is not sufficient to depend on an operating regulatory framework to mitigate the potential health or environmental impacts of nuclear energy. This may also be regarded as nothing more than a call on politicians to be specific about the context in which the potential for doing Significant Harm should be investigated. All energy technologies have the potential to do significant harm if not subject to appropriate regulatory frameworks, and that includes all of the technologies already included in the Taxonomy.

While drafting our letter, EUMEP Sara Skyttedal and 86 colleagues have also [called on the Commission](#) to ensure fair treatment of nuclear energy, and to oppose the creation of disadvantages to investment in it. We are happy to support their plea.

Nuclear energy is sustainable, it is beneficial and necessary for dealing cost-effectively with the global climate- and energy challenge and we want it deployed smartly, broadly and expeditiously.

We are relying on the Commission to do everything in its power to help ensure that the European Union remains at the forefront of science and policy for global environmental stewardship and human prosperity.

Yours sincerely,

Joris van Dorp and Olguita Oudendijk
Dutch Ecomodernist Society
<https://www.ecomodernisme.nl/>

We are part of a global network of environmentalists helping to ensure that challenges around energy, agriculture and economic development are solved in a science-based, efficient and humanist manner.

Co-signing organisations: see following pages, order ascending by organisation name.

Andre Wakker
Animo Consulting
<https://www.animoconsulting.com/nl/home>

Carl Wurtz
Californians for Green Nuclear Power
<https://cgnp.org/>

Xavier Moreno
Cérémé
<https://cereme.fr/>

Valerie Gardner
Climate Coalition
<http://climatecoalition.org/>

Pierluigi Totaro
Comitato Nucleare e Ragione
<https://nucleareeragione.org/>

Björn Peters
Deutscher Arbeitgeber Verband e.V.
<https://www.deutscherarbeitgeberverband.de/>

Rob De Schutter
Ecomodernisme.be
www.Ecomodernisme.be

Esko Pettay
Ecomodernist Society of Finland
<https://ekomodernismi.fi/>

Gabriel Ignetti
Ecomodernist Society of North America
<https://ecomodernistpodcast.org/the-ecomodernist-society-of-north-america/>

Zion Lights
Emergency Reactor
<https://www.emergencyreactor.org/>

Rick Maltese
Energy Reality Project
<https://energyrealityproject.com/>

Adam Blažowski
FOTA4Climate
<https://fota4climate.org/>

Eric Meyer
Generation Atomic
<https://generationatomic.org/>

Sebastien Richet
GISOC
<http://gisoc.srweb.biz/gisoc/gisoc.html>

Mark Yelland
Greens For Nuclear Energy
<https://www.greensfornuclear.energy/>

Jay Cho
Green Nuclear Student Alliance
nuclear.inssa@gmail.com

Horizon 238
<https://horizon238.org/nl/homepagina/>

Bálint Zoltán Téglásy
Klimavenner for Kjernekraft
<https://klimavenner.no/>

Myrto Tripathi
Les Voix du Nucléaire
<https://www.voix-du-nucleaire.org/>

Britta Augustin
Mothers for Nuclear Deutschland Österreich Schweiz
<https://critical-climate-action.de/mothers-for-nuclear-dach/>

Dietmar Detering
Nuclear New York
<http://www.nuclearny.org/>

Friso Sikkema
Nuclear Pride (NL group)
<https://nuclear-pride.eu/>

Amardeo Sarma
Oekomoderne e.V.
<https://www.oekomoderne.de/>

Michel Simon
PNC-France
<https://pnc-france.org/>

Eric Maucort
Sauvons le Climat
<https://www.sauvonsleclimat.org/en/>

George Verberg
Stichting Energietransitie en Kernenergie (SEK)
<https://energietransitiekernenergie.nl/>

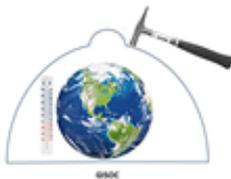
Take Aanstoot
Swedish Ecomodernists
<https://www.ekomodernisterna.se/>

Malisol Ohirko
TerraPraxis
<https://www.terrapraxis.org/>

Mathijs Beckers
The e-Lise foundation
<https://www.e-lise.nl/>

Marc Deffrennes
weCARE
<https://www.wecareeu.org/>

Paul Bossens
100 TWh
<https://100twh.be/>





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