



15 April 2022

***The Taxonomy Complementary Delegated Act
needs to be approved!***

Dear Honorable Member of the European Parliament,

The war in Ukraine is a wake-up call for the European Union, inter alia for the EU energy policy. It is now abundantly clear that security of energy supply and energy costs have not been properly anticipated and integrated into the EU's energy plans such as the Green Deal. The focus has indeed been restricted to the sole "green" dimension. We see the result today: the "green" German Energiewende is a failure; the "green" Belgian nuclear phase-out had to be reversed... The time has therefore come to revisit the whole approach to energy policy at national and EU level.

weCARE has, on numerous occasions, insisted on the need to take all three energy fundamentals into consideration: environmental protection AND economics AND security of supply. As the name of our organization implies, what is needed is Clean AND Affordable AND Reliable Energy (CARE) for SOCIETAL SUSTAINABILITY, which is more than the limited "green" sustainability of the Taxonomy for Sustainable Finance. For sure, fighting climate change is a top

priority, as once more reinforced in the last IPCC report, and therefore all low carbon sources of energy (for heat and power) need to be supported. At the same time, their strengths and weaknesses in terms of economics and reliability need to be considered from a global energy system perspective.

The Complementary Delegated Act (CDA) of the Taxonomy, covering both nuclear and gas, has been tabled by the Commission a few weeks ago. The Council and the Parliament have four (to six) months to approve or reject the CDA, without the possibility of amending it.

The CDA as it stands now is not perfect. weCARE has provided its views on this in different letters to EU policy makers, proposing improvements. The labeling of nuclear energy as “transitional” is particularly not appropriate for this very low carbon, massive, dispatchable and reliable energy source, which we believe will be necessary for the long term in order to sustain a viable low carbon energy mix (power and heat). In our view, the 100% renewable energy target espoused by the Greens is a myth – the land and raw material requirements, as well as the enormous challenges of providing large scale hydrogen conversion and/or battery storage to overcome the intermittency of wind and solar are simply too great to envisage such a system ever being technically, let alone economically viable. But at least the transitional qualification for nuclear energy is better than not having it at all covered by the Taxonomy. A contrario, the transitional dimension of gas in the CDA is appropriate. While one might hope to see industrial developments to produce carbon-free gas (hydrogen), in the meantime, carbonised gas will still be needed for the sustainability of European society.

In conclusion, weCARE believes that it is important to have the Complementary Delegated Act approved by a majority in the European Parliament. We understand that the gas crisis impacting the EU due to the overdependence of some Member States on Russian gas, may lead some Members of the European Parliament to vote against the CDA. For the reasons explained above, weCARE, as a representative of civil society, considers this would not be the right thing to do. If not voting for, then abstaining would be the best approach, in order not to have the CDA rejected, particularly because of its nuclear dimension.

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

Yours faithfully,

Marc Deffrennes, Richard Ivens, Serge Crutzen
weCARE

marc.deffrennes@hotmail.com

richard.ivenstelenet.be

crutzen.serge@gmail.com

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, Patrimoine Nucléaire et Climat FR, Terraprxaxis UK, 100TWh BE, Ekomodernist FI, Jihocesti TatKove CZ, Institute for Sustainable Energy PL, 18for0 IE, European Association for Energy Security SK, Stichting Energietransitie en Kernenergie NL.

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