



04 January 2021

***It is really time to wake up:
deep decarbonisation needs nuclear energy!***

Dear President and Vice Presidents of the European Commission,
Dear Commissioner for Energy,
Dear Honorable Members of the European Parliament,
Dear Energy Counsellors at Permanent Representations of EU Member States,

weCARE is an Alliance of NGOs for whom nuclear is a clean, affordable, reliable, and therefore sustainable energy source. We believe that nuclear energy deserves a more favourable evaluation at EU level and a larger projected share in the future very low carbon energy mix, in combination with renewable sources, thereby avoiding a gas lock-in effect.

While we take good note of the adoption at the December Council Summit of the very ambitious EU GHG reduction target for 2030, we continue to be deeply concerned not to see any clear positive statements in the most recent EU documents related to the role nuclear energy should play in this endeavour. This is particularly the case for the large majority of financing instruments, which will now be funded following the adoption of the EU Budget (including Next Generation EU). It is even usual for nuclear to be excluded explicitly (eg. InvestEU Annex 5), which we consider to be a nonsense.

The allocation of funding is connected to the fate of the Taxonomy for Sustainable Financing, which will have even wider impacts as it will set the rule,

not only for EU financing Instruments but also those of other International Institutions and private investment. While nuclear energy has been sidelined pending a further evaluation of the Taxonomy's DNSH credentials, the two first Delegated Acts on the mitigation of climate change are already close to being finalised. In our comments responding to the European Commission Consultation on the first two Delegated Acts (deadline was 18 December), we have asked the Commission to insert an explicit statement regarding the very low carbon credentials of nuclear energy for the mitigation of climate change and, as a result, to treat nuclear on an equal footing with other very low carbon sources in these Delegated Acts, avoiding unfair competition.

Work will proceed further in early 2021 on the next four Delegated Acts. weCARE considers that the way the issue of sustainability was treated under the Taxonomy is too short sighted, flawed and should be urgently corrected. For us sustainability in energy is not solely related to "green", but it is the result of a balance between environmental protection AND economics AND reliability of energy supply. Energy must be clean, affordable and reliable for the wellbeing of the society of today and not penalise the society of tomorrow – the definition of societal sustainability. weCARE hopes that the EU Institutions will consider this broader definition of sustainability... particularly when Covid-19 is starting to show its real economic impact on EU citizens. It is interesting to realise that Covid resulted in about an 8% GHG reduction in 2020... the same percentage reduction expected year after year - for the next ten years - to meet the -55% GHG target! Refusing to benefit from a clean, economic and dispatchable energy source in these circumstances is just crazy. The EU should not be driven by the anti-nuclear ideology of some Member States, while all other major worldwide powers keep pursuing the nuclear route. It would be against the spirit and the objective of the Euratom Treaty and not in line with the principle of Art 194 of the TFEU.

This brings us to the next hot issue... the myth of green hydrogen. Five Member States (Austria, Denmark, Luxembourg, Portugal and Spain) came out at the end of December urging the EU to rely solely on renewable energy sources for the production of hydrogen. weCARE strongly believes this has no economic sense. First because of the low efficiency of the P2P process (Power to Power – renewable electricity used to make and store hydrogen, to produce electricity later when there is deficit in wind and/or sun). But, also because the fleet of large electrolyzers would have to operate on an intermittent basis.

weCARE is strongly supporting the wider use of hydrogen as a way to decarbonise industrial processes and help make the transport sector cleaner. weCARE therefore urges the EU to consider the role that nuclear energy can play for the production of hydrogen, either through base load electrolysis, or, after the necessary demonstration phases, by using high temperature Generation IV reactors. This is the only way for a real low-carbon hydrogen economy to emerge... and even a very low carbon hydrogen economy, sidelining hydrogen

made from fossil gas, so as to avoid an undesirable gas lock-in effect, both from GHG emissions and energy dependency perspectives.

Such Generation IV demonstration projects will need to get financial support, as for any other innovative technology under development. And, for this to be possible, a proper Taxonomy for Sustainable Financing is critical and EU Financing Instruments need to be inclusive for all very low carbon technologies, hence living up to the EC's claim to be technology-neutral.

In conclusion, weCARE asks you, in your capacity and making best use of the means at your disposal:

1. To promote and foster the revision of the concept of sustainability used for the Taxonomy, getting away from the short sighted "green sustainability" concept, towards "societal sustainability" as a balance between environment, economy and reliability.
2. To ensure that nuclear energy is explicitly and positively included in the relevant EU documents, starting with Policies and Roadmaps, but also in Implementation Instruments, such as the Delegated Acts under the Taxonomy, Directives and Regulations, and, last but not least, Financing Instruments.
3. To ensure that the future EU Hydrogen economy is based on very low carbon production of hydrogen, which, to be economic, needs to include recourse to nuclear energy. To foster this, the carbon footprint for the production of hydrogen should be set below 50 gCO₂/kWh.

We remain at your disposal for any further information or interaction you would like to have from 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

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