



06 April 2021

***Taxonomy for Sustainable Financing:
Time to pause and act beyond ideology!***

Dear Ms von der Leyen, President of the European Commission,
Dear Mr Timmermans, Executive Vice President of the European Commission,
Dear Mr Valdis Dombrovskis, Executive Vice President of the European Commission,
Dear Ms McGuinness, Commissioner for Financial Services and Capital Markets
Dear Ms Simson, Commissioner for Energy,
Dear Mr Breton, Commissioner for Internal Market,

Cc: Member State Permanent Representations and Members of the European Parliament.

On the 30 March, the Commission published the report of the Joint Research Center "Technical Assessment of Nuclear Energy with respect to the DNSH criteria of Regulation (EU) 2020/852 (Taxonomy for Sustainable Financing Regulation)".

weCARE, an Alliance of NGOs promoting the development and deployment of a very low carbon energy mix to limit climate change, is pleased to see that nuclear energy is assessed positively when applying a non-biased science-based approach.

The report will now be analysed by two expert groups mandated by the Commission - the Art 31 Euratom Group, specialized in radiation protection, and the SCHEER Group on Health, Environment and Emerging Risks. We hope that the experts of these groups will work in full independence and not be influenced by ideological positions, from wherever these may come. We understand that these two groups are expected to deliver their opinions to the Commission in June. The Commission will then integrate all the elements and make its decision on how to handle nuclear energy in the Taxonomy, a tool that will be widely used to ease so necessary investments to limit climate change.

This needs time to be done properly. This is understandable.

What is therefore concerning is to see that the first Delegated Acts (on climate change mitigation and adaptation) may still be tabled by the Commission as early as April for decision making at the Council and the European Parliament, which means before the Commission might have cleared the path to include nuclear energy. Why the haste? We all know that modifying the texts afterwards may be time-consuming and difficult. And how could nuclear be included in the second Delegated Acts (on DNSH), supposed to come out at the end of 2021/early 2022, without having discrepancies of treatment in the two sets of Delegated Acts?

All this seems a recipe for a big confusion. Noting the recent signals sent by a number of Member States (ia the letter of seven Heads of State, the letter from Finland, and a message from Sweden) on the importance of not excluding nuclear energy, there is a risk that the first Delegated Acts, if submitted before clearing the fate of nuclear energy, might be strongly opposed by a number of Member States, and may even be rejected.

As European citizens very much convinced of the need to have an effective EU climate & energy strategy, we believe the only reasonable and easy way for the Commission to handle this situation is to postpone the tabling of the first Delegated Acts until it has made its final decision regarding the inclusion of nuclear energy in the taxonomy for Sustainable Financing, taking full account of the unbiased views of its scientific experts.

Finally, we would like to recall the important point made by the seven Heads of State that EU law, including in particular the Euratom Treaty, requires the Commission to maintain a true level playing field when it comes to the inclusion of nuclear energy in EU energy & climate policy and related incentives.

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, European Association for Energy Security SK, Institute for Sustainable Energy PL, 18for0 IE, Stichting Energietransitie & Kernenergie NL.

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