



4 MAY 2020

***The EU Green Deal at times of COVID...
Going from Dreams to Realities...***

***The need for a proper definition of “Sustainability”
as a tool for a geopolitical EU***

Dear President von der Leyen,
 Dear Vice President Dombrovskis,
 Dear Vice President Timmermans,
 Dear Commissioner Simson,

weCARE, an Alliance of European NGOs promoting a pro-climate very low carbon energy mix, has been hesitating to send this letter to the highest hierarchical level of the European Commission, at a time when the COVID crisis is putting enough pressure on the Institution.

But we cannot avoid to react to a shocking letter sent to you, a few days ago, by a group of 53 anti-nuclear organisations, using the argument of the actual crisis, to further push the European Commission towards excluding nuclear energy in the frame of the Taxonomy for Sustainable Financing.

weCARE considers that these organisations are fighting a battle of the past, pursuing their dogmatic anti-nuclear stance, as this is their founding principle... it is pathetic but not surprising, since the dogma cannot be abandoned without destroying the religion...

We therefore feel it necessary, at this difficult time of crisis, to nevertheless take a bit of your precious time to provide you with our understanding of sustainability and why nuclear energy, alongside renewable sources (as the backbone of the low carbon energy mix as per the European Commission's Long Term Strategy of November 2018), deserves full eligibility in the Taxonomy for Sustainable Financing.

Nuclear energy today is providing half of the decarbonised electricity in the European Union, with 110 plants operating in half of the Member States. It is worth recalling that IPCC and IEA unambiguously and recurrently mention nuclear fission as part of the solution.

The main difficulty in the actual debate, as we see it, is related to a too restricted definition of "sustainability". Indeed, this concept is most of the time associated with environmental protection, usually also simplistically coupled with the notion of "green". This is a flaw at the origin of endless debates.

weCARE prefers to get back to the historical Brundtland's definition of sustainability: *Sustainable Development is development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs*. This leads to the wider concept of "societal sustainability" compared to the too limited concept of "environmental sustainability".

When it comes to energy, this "societal sustainability" has to be based on the right balance between the three pillars of the energy policy: environment protection indeed, but also economics and security of supply. Energy has to be clean AND affordable (for households and the actors of the economy) AND reliable (available when needed). This is by the way the logo and moto of weCARE (we care for Clean Affordable and Reliable Energy for a sustainable society).

Since there is no "silver bullet" fulfilling the three "AND" in one shot, this "societal sustainability" of the energy mix must be evaluated at the global energy system level, beyond the sustainability characteristics of each individual energy sources composing the mix, because we know that these components are interacting and influencing each other. This is particularly true for electricity where the sources of production are interacting via the network (including consideration of storage means or other potential vectors) and via the electricity market. A 2019 OECD Nuclear Energy Agency study, using this global electricity system approach, has shown that too large shares of intermittent renewable sources are not optimal from the economic and reliability perspectives, when nuclear is available to contribute to the low carbon objective.

Because nuclear energy is quasi carbon free (together with wind power, but four to five times better than solar power and fifty times better than natural gas!), is cost effective (IEA Report of 2019 on nuclear energy) and is reliable as a fully

dispatchable way to produce electricity, weCARE does not see how nuclear energy could reasonably be excluded from the Taxonomy for Sustainable Financing. The DNSH argument that the proper management of nuclear waste has still to be *demonstrated* is flawed – since in each location where a geological disposal site is under construction (eg Finland, Sweden), the safety *demonstration has been done*, following decades of deep scientific research, in an site-specific underground laboratory.

As per the Lisbon Treaty, it is the sole prerogative of the Member States to decide on their energy mix. We know that views of the Member States are diverging a lot, and even opposing, when it comes to the recourse to nuclear power. We realise that this makes the task of the European Commission difficult when developing proposals related to the decarbonization of the energy sector and its financing.

But, at a time when the COVID crisis is ringing the bell, leading to major concerns for the global economy, weCARE hopes that the European Commission will further develop the criteria for a Sustainable Energy Financing Classification making the distinction between dreams and realities, and integrating all parameters. It is a unique opportunity for the European Commission to declare nuclear energy eligible for sustainable investments, alongside renewable sources. Ensuring consistency of the proposal with other European Commission documents, such as the Long Term Energy Strategy of 2018, or the PINC of 2016 (Euratom Art 40), is a question of credibility for the Institution. Beyond that, Member States keep the freedom to decide to rely or not, at national level, on nuclear energy. But it should not stop the European Commission to act for the common good of the European people. Declaring nuclear fission sustainable is essential to reboot the economy of European households and businesses, while being fully aligned with the 2050 climate-neutrality target.

Dear Madam, Dear Sir, allow us to end this letter going even a bit wider by making a reference to President von der Leyen vision to have a more geopolitical European Commission. weCARE feels a lot of sympathy for this view. Indeed, since at least ten years, the European Union has been too shy and too dispersed when it comes to its visibility and effectiveness in a rapidly evolving global world. Allowing the European Commission to contribute to improve this visibility and efficiency should be most welcome.

Energy is certainly a domain with an important geopolitical dimension. At a time when all the other main global actors, China, Russia, India, the Anglo-Saxon world (US, Canada, UK), even Japan, are promoting nuclear energy in their long term low carbon portfolio, it would be a mistake for the European Commission not to expressly support this option. The European Commission is understandably keen, in global international frameworks, to put its leadership in nuclear safety at the forefront... but this will soon becoming lip service if there is

no formal perspective for investment in nuclear power on the continent... and therefore the integration of nuclear energy in the sustainable financing taxonomy is a geopolitical must for the European Union.

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

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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.