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POSITION PAPER

Is EU Energy Policy Technology Neutral ? Is it time to improve ?

There is a buzz word circulating in Brussels when talking about the EU Energy Policy, in particular about electricity: “technology neutrality” or “the need for a level playing field”. weCARE wants here to raise a word of caution. Some clarification is needed.

At first reading the concept behind the buzz word looks nice, meaning that all technologies should be treated on an equal footing as long as they are decarbonized, both in terms of their integration in policy documents and getting EU financial support.

Staying at this first reading level, weCARE notes that a number of EU policies in the making are still not technologically neutral. Renewables and their means to cope with their intermittency (gas and CCS, storage, networks, demand side management), by the way voluntarily decoupled to hide the explosion of the costs associated with the management of this intermittency, are still promoted and supported as the priority solution for decarbonization. Imposing by legislation questionable high targets for renewables is the most visible part of the iceberg. Nuclear energy does not yet get the place it deserves. This can be illustrated by referring to a non-exhaustive set of documents in preparation:

- the revision of the Taxonomy may not include the Complementary Delegated Act and only cover the Delegated Act and renewables. If this happens, critical issues for nuclear may not be corrected, in particular its so-called “transitional” nature, the time limitations (so-called sunset clauses) for LTO (Long Term Operation) and new build, the obligation to have DGRs (Deep Geological Repositories for ultimate nuclear waste) in place before an arbitrary date of 2050 even for Member States launching now a nuclear program, and

the misconception behind the notion of ATFs (Accident Tolerant Fuels versus Advanced Technology Fuels). Not revising the nuclear part of the Complementary Delegated Act is not in line with technology neutrality.

- while the gas proposal was adopted under majority rule in REPowerEU, it seems that a nuclear proposal, now under discussion at the highest level between President Macron and the Commission President, might have to be adopted under unanimity. Knowing the antinuclear position of certain Member States, this is a killer. As using the Euratom Treaty as the legal base for the nuclear proposal may require the unanimity, other legal means have to be found if technology neutrality is indeed to be respected.

- the lessons learned from the past MFF (Multilateral Financial Framework - the EU budget for a seven years period), where nuclear was excluded from a number of financing instruments, raises concerns for the new one in preparation. Here again the legal base issue comes to the fore. The budget of the Euratom Research and Training Programme remains a valuable source of EU financing support for nuclear energy and its applications, but only for research activities related to nuclear safety, security and radiation protection. While probably increased compared to the very low levels of financing (except for fusion) of the former MFFs, it will nevertheless not be able even to keep pace with ongoing nuclear innovation at the international level. Further, it is not designed to support the main role nuclear energy should play for decarbonization at EU level. There is a need to find legal means to allow industrial type nuclear deployment projects to be supported financially by the EU MFF, in the same way it is done for renewables, if equal footing is more than a buzz word.

- the grid package seeks to significantly increase the transboundary interconnexions to help the ever increasing deployment of renewables. Doing so raises concerns in Member States who want to rely on nuclear power for their electricity supply, as the flawed electricity market rules may force the nuclear plants to work in “renewables induced” load following mode. This is not economically, and even technically, optimal for nuclear plants. This again is against technology neutrality.

- the condition put on the State Aid case (via CfD) for the building of the first large nuclear power plant in Poland, eluding that the plant, under present market rules, should be able to load follow to offer flexibility for renewables, is unacceptable as it would undermine the business case for the plant. Nuclear new built being highly capital intensive needs the resulting plants to work in baseload mode. Not recognizing this fact, is a deviation from the equal footing principle, favoring renewables versus nuclear, penalizing the latter to solve the intermittency problem of the first. While this might not be a problem for now in the case of Poland, it sets a precedent leading to potential restraints for further nuclear investment in the EU.

So far to show that, even at first reading, the notion of technology neutrality (or level playing field) is a buzz word that is easy to use by the EU Institutions. Nice to use but not applied in real terms. But weCARE wants here to go even further showing how the concept itself can be misleading.

Indeed when used in the context of “comparing” decarbonized sources of electricity, here renewables and nuclear, the concept does not make sense, as one can only

“compare” things which are comparable. While both nuclear and renewables can be roughly compared when it comes to decarbonization (nuclear and wind at least, solar is not so effective and depends heavily on the origin of the equipment), it is not the case in terms of the services they can supply to the electricity system. One cannot put on the same level a dispatchable source able to supply 90% of the time, with sources which are intermittent by nature (on average 15% for PV, 20% for onshore wind and maximum 40% for offshore wind) and not offering the same resilience to the grid.

If one wants to get back to something “comparable” and be able to talk about technology neutrality or level playing field, then it is necessary to integrate the whole system needed to render the renewables “dispatchable” – in other words associate them with the means needed to cope with their intermittency, be it via gas plants (then with CCS or clean gas), storage capacities, dedicated transmission and distribution grids adaptation, or even demand side management. All these means have costs which need to be properly attributed to the sources that require them - the intermittent renewables.

This leads weCARE to come back to a long-standing plea we made, already years ago for the Commission to launch a detailed and comprehensive study, independent from lobbies of all nature, to find an economically optimized, reliable and robust electricity mix. The main objective should be to look for the best price, reflecting true costs, to be paid by the consumers, households and enterprises, as the core of European society, for guaranteed decarbonized, long term, stable, and reliable supply.

weCARE believes that such a study, ensuring that only “comparable things” are compared in the true spirit of technology neutrality, would lead to a higher contribution of nuclear energy that the one of the last PINC¹. Looking at the real return of experience at national level (France and Germany in particular) and referring to studies by MIT and OECD on the electricity full system costs, a fraction of 50% of electricity coming from nuclear provides a good perspective. It also corresponds roughly to the baseload as being the optimized way of operation of the nuclear plant. Other electricity sources, including renewables with their means to cope with the intermittency, would then come in necessary complement. For sure one immediately sees that a deep revision of the electricity market design would then be required, essentially revisiting the merit order, such as to base it on the decarbonization potential and on the full system cost of a production mean and not anymore on the marginal cost.

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,

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

¹ PINC 2025 where the mean scenario of 150 GW nuclear leads to only a 15% nuclear share in electricity consumption in 2050, compared to 23% today and 33% in the past. This 15% corresponds exactly to the figure mentioned as the “2050 objective” in 2018 in the Clean Planet for All, used later in the 2019 Green Deal, assuming then that 85% would come from renewables.

marc.deffrennes@hotmail.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, Terrapraaxis UK, 100TWh BE, Ekomodernist FI, Jihocesti TatKove CZ, 18for0 IE, Stichting Energietransitie & Kernenergie NL, Amici della Terra IT, SEEN PT, Nuklearia DE, European Association for Energy Security SK.

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