



26 April 2020

**European Commission Consultation
Roadmap for Sustainable Finance
EU Classification System for Green Investments**

... GOING FROM MYTHS TO REALITIES...

WeCARE fully shares the objective of the EU Green Deal to reach carbon neutrality in 2050. To make it happen, an ambitious decarbonization target will have to be set already for 2030. We await the figure which will be proposed by the European Commission. 2030 is tomorrow and to meet the figure will require to use technologies which are already well developed and demonstrated.

Focusing on the Energy sector, where a major decarbonization effort is at reach, we want to recall the words used by Commissioner Canete during his Press Conference launching the Long Term Strategy on 28 November 2018:

First, the European energy system will need to decarbonise. By 2050, 80% of electricity will be coming from renewable energy sources. Together with nuclear power, this will be the backbone of a carbon-free European power system. We will also see a substantial electrification of the European economy – at least a doubling of its share in final energy

demand by 2050 - with electricity spreading to more uses, such as heating and transport.

Today, more than 100 European nuclear power plants are delivering a quarter of the electricity consumed in the EU. The 2016 European Commission PINC (Euratom Treaty Art 40 - Programme Indicatif Nucléaire de la Communauté – Illustrative Nuclear Programme of the Community) estimates that, over time for the decades to come, the number of nuclear plants in the EU will stay rather stable. As, on average, the European nuclear plants are reaching their initial design lifetime (of 30 or 40 years depending the type), this number would be made of plants going into long term operation and, at pace, new build, so as to maintain the capacity.

As per the Lisbon Treaty Art 194, 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.

Because nuclear energy is the most decarbonized way to produce electricity, together with wind power (five times less than solar power and fifty times less than natural gas) weCARE does not see how nuclear energy could be excluded from Sustainable Financing.

We believe there is a fundamental weakness, even a flaw, in the way “Sustainability” is defined in the discussions at EU level, particularly during the last months on the issue of the Sustainable Financing Taxonomy. The very origin of the problem is the univoqual link made between sustainability and environment (protection) – or even worse, the notion of “green” (which is just a colour and nothing else – apart of an empty slogan).

For us, sustainability is more complex and we prefer to use the historical Bruntlandt concept, putting society in the center and not (solely) environment: *Sustainable Development is development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs.*

For energy, this brings us to the notion of “Societal Sustainability” of the energy mix, going well beyond the limited “Environmental Sustainability”, and being based on the three pillars of a sound energy policy. We agree that one pillar is indeed environment protection, but the two others, as much important, are economics/affordability, and security/reliability of energy supply.

This “Societal Sustainability” of the energy mix must be evaluated at the global energy system level, beyond the sustainability characteristics of the individual energy sources composing the mix, because we know the interactions between these components. This is particularly true for electricity where the sources of production are interacting via the network (including storage means or other 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.

At a time when the COVID crisis is rigging the bell, leading to major concerns for the global economy, weCARE hopes that the European Commission will develop a proposal for a Sustainable Finance classification making the distinction between myths and realities. It is a unique opportunity for the European Commission to declare nuclear energy eligible for sustainable investments, alongside renewable sources, as it was announced in 2018 by Commissioner Canete. Ensuring consistency of the proposal with other European Commission documents, such as the PINC in the promotional spirit of the Euratom Treaty, is a question of credibility. Beyond that, Member States have 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.

We remain at your disposal for any further information/interaction you would like to get from/with weCARE, as a representative of civil society, promoting true “Societal Sustainability” of the EU Energy – being Clean, Affordable and Reliable.

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 (<http://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

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