

To:

Mr Valdis Dombrovskis (Executive Vice President, European Commission),

Mr Frans Timmermans (Executive Vice President, European Commission),

Ms Kadri Simson (Commissioner, DG ENERGY)

24th April 2020

Subject: Assuring the Backbone of a Carbon-free Power System by 2050 - Call for a Timely and Just Assessment of Nuclear Energy

Dear Vice-Presidents of the European Commission,

Dear Commissioner,

We are a group of scientists and environmentalists representing academia and civil society who strongly support the goal to achieve climate neutrality by 2050. Climate change is one of the biggest challenges faced by the world today, and we are convinced that leaving a better planet to those coming after us should be our legacy. If we do not act now, we will very likely face many more challenges in the future including pandemics, natural disasters, migration waves and irreversible changes to the environment. This, in turn, will create huge financial and social costs both to the global economy, and human society at large. That is why we have welcomed and embraced both the 2018 Long-Term Strategy - *Clean Planet for All*- and the 2019 European Green Deal.

We welcome the initiatives and instruments that are proposed for the financial sector to enable the green transition

Although the sustainable transition should be considered a top political priority, we realize it comes at a significant economic cost. Therefore, we strongly support the Sustainable Finance Action Plan which should enable our economic and climate change ambitions, ensuring that we preserve our planet for future generations. The Taxonomy Regulation, once implemented, should provide investors with reliable information on which activities and technologies contribute to the sustainability goals. It will be a crucial tool for investors to guide finance in the right direction and, as such, needs to be designed carefully and thoughtfully.

The energy sector faces major transformation

The energy sector still contributes the largest share of total greenhouse gas emissions (28.2 % in 2017, based on Eurostat data). To achieve climate neutrality, the sector will inevitably have to undergo a major transformation. We fully agree with the conclusions of the *Clean Planet for All* communication, which acknowledges that nuclear power, together with renewables, will form the backbone of a carbon-free European power system. Both can provide European

industries and households with low-carbon energy and substantially improve air quality for European Citizens. In other words, technologies that can make the energy transition possible already exist - and are operating today.

Nuclear should be an element of stability in a climate-neutral Europe

To fight climate change and limit the global temperature increase (ideally) below 1.5 °C, we must act now. Many European countries have decided to phase-out fossil fuels as soon as possible, and others are currently developing strategies to join them. Electrification will probably be the key enabler of the clean energy transition and will create a growing demand for electricity. This will be the case, even with a wide application of the *“Energy Efficiency First Principle”* offsetting some of the increased demand. The EU must have enough generation capacity to match the demand for clean, affordable and reliable power.

Even though developing rapidly, renewables will not be able to provide the required generation adequacy. A power system built solely on renewables, demand-side solutions, and flexibility, would create significant system stability issues. In addition, it would require major restructuring and construction of power grids across the EU.

Therefore, we call on the European Commission and all EU policymakers to adopt the pathway set by the *“Clean Planet for All”* long term strategy and build the decarbonized energy system with renewables and nuclear power *“providing the backbone”*. Nuclear provides low-carbon, zero pollution and reliable power to help meet the needs of European citizens and industries. However, to be able to do so efficiently, effectively and at the least cost to consumers it is crucial that we have a predictable policy framework that sends a clear signal to investors on the future role of nuclear, with nuclear as an important part of the solution in the fight against climate change

We call for an evidence-based assessment of nuclear power within the EU Taxonomy

The EU Technical Expert Group (TEG) on Taxonomy concluded that there is clear evidence that nuclear substantially contributes to climate mitigation. Nevertheless, the TEG also concluded that at this point *“the evidence about nuclear energy is complex and more difficult to evaluate in a taxonomy context”* regarding the potential significant harm to other environmental objectives. It recommended that more extensive technical work should be undertaken.

With the debate around nuclear energy often being primarily political and emotive, it is essential that assessing the Do No Significant Harm (DNSH) criterion for nuclear remains strictly technical, evidence-based and is conducted by qualified experts.

Some anti-nuclear groups are already calling for the exclusion of nuclear from the list of sustainable activities under the Taxonomy. Most of the arguments being put forward are not based upon scientific evidence. Therefore, as scientists and researchers, we feel the need to clarify some of the statements used to discredit the nuclear sector:

- Nuclear currently provides more than 47 % of the low-carbon electricity generation in the EU. **Nuclear also saves half a billion tonnes of CO₂ emissions every year in Europe compared to fossil fuels, which is more than the emissions of the UK or France alone;**

- **Life cycle emissions produced by nuclear compare favourably with those from renewables technologies.** According to Intergovernmental Panel on Climate Change (IPCC) figures, nuclear emissions are equal to those of wind power and are four times lower than solar power, with 12g of CO₂/KWh. The IPCC analysis for nuclear includes the whole life cycle, including uranium mining, enrichment and fuel fabrication, plant construction, use, decommissioning and long-term waste management;
- **An analysis of recognised Levelized Cost of Energy (LCOE) figures, clearly shows that nuclear energy is competitive with other low-carbon power sources.** Again, based on the IPCC figures, the LCOE of nuclear is on average half of solar or offshore wind and comparable to onshore wind;
- Moreover, the Levelized Cost of Electricity does not consider the value of stable, reliable power supply. Nuclear power generation doesn't rely on weather conditions and provides reliable power to industry, transport, hospitals, homes and businesses 24 hours a day, 365 days a year. The current COVID-19 crisis has provided clear evidence that it is in the time of a crisis when scarcity defines value. **Ensuring reliable power should always remain an imperative during policymaking;**
- **With a strong, positive regulatory framework in place, there is huge potential to decrease build time and cost of new nuclear projects.** Recent projects on modernization and harmonization of the nuclear supply chain have shown that streamlined requirements on vendors, combined with the benefits of series build, can rapidly increase the speed of new-builds while decreasing costs and maintaining safety;
- **Nuclear can be flexible and does not undermine the deployment of renewables.** Recent findings by the Massachusetts Institute of Technology (MIT) have shown that operating nuclear plants flexibly can reduce overall electricity costs and cut carbon emissions in electric power systems. Developing and releasing the potential of the Small Modular Reactors (SMRs) can also contribute to making nuclear reactors more scalable and potentially decreasing costs and build time requirements;
- **Flexible nuclear operation can help add more wind and solar to the grid.** Nuclear and renewables should be partners in fighting climate change, but sadly, some anti-nuclear activists are building barriers and support the narrative of nuclear power undermining the deployment of renewables. The time for action to fight climate change is very tight. Thus, all low-carbon and clean technologies that can contribute to the fight against climate change must be allowed to contribute and be part of the solution;
- **Nuclear power plants are protected against rising sea levels and flooding.** The International Atomic Energy Agency (IAEA) global safety standards require operators to take account of risks arising from rising sea levels. It is also important that even in the worst-case scenarios modelled by the IPCC if sea levels rise one metre by 2100, the current nuclear fleet will be already decommissioned, and the new-build power plants can easily be adapted to any potential challenges when being designed and built;
- **Both IAEA and EU regulatory framework ensure that nuclear power plants comply with the highest safety standards.** The framework applies to the full nuclear lifecycle including

the management of nuclear waste and ensures that nuclear waste is safely managed in the long-term. Interim storage solutions that are fully operational worldwide are licensed by competent authorities, comply with the highest safety regimes, are developed in a transparent manner and undergo strict environmental impact assessments;

- At the same time the **nuclear industry, in cooperation with regulators, have identified and, in some cases, have already started to deliver facilities for the safe, long-term disposal of nuclear waste.** The European Commission has recently acknowledged that Finland, France and Sweden are advancing their solutions for long term storage of high-level waste.

Nuclear power is an important and established power source for European citizens and industries and is crucial for the stability of energy systems. The existing strict regulatory regime defines the “Do No Significant Harm” principle for the nuclear sector and guarantees that nuclear power plants are operated in a safe and sustainable manner, including their decommissioning and spent fuel management.

International bodies including the Intergovernmental Panel on Climate Change and the International Energy Agency acknowledge the role of nuclear in the fight against climate change and their analysis and conclusions provide compelling evidence that nuclear power is safe, competitive and sustainable. Also, the European Commission itself has recognized that nuclear power, together with renewables, should be the backbone of the climate-neutral energy system.

For the reasons mentioned above, we call on the Commission to follow-up on the TEG Report and enable a “just” and timely expert assessment of nuclear power regarding the DNSH criteria. This assessment must be based on scientific evidence and should not be influenced by any political or ideological agenda. Fighting climate change is a matter of the highest urgency, all low-carbon energy sources must be allowed to contribute, and the final Taxonomy on Sustainable Finance must respect these points.

Copy to:

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Mr Patrick Anthony Child, Deputy Director-General, DG RTD

Mr Mario Nava, Director, Horizontal Policies, DG FISMA;

Members of the Member States Expert Group on the EU Taxonomy of Sustainable Finance



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