

Subject: Taxonomy Regulation; nuclear energy, natural gas

Dear....,

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On the 31<sup>st</sup> of December 2021 the EU Commission submitted a draft for a "Proposal on Natural Gas and Nuclear Activities in the EU Taxonomy"<sup>1</sup> for review, without media publicity and with an unusually short deadline (until 12.01.2021). Member states and the EU parliament can comment. The public is excluded - quite contrary to the handling of the part of the taxonomy dealing with renewable energies. It is also worrying that the draft regulation cites the much-criticised report of the JRC on nuclear energy, but not e.g. the report of the EU taxonomy subgroup DNSH.

According to the draft, nuclear energy and natural gas are to be recognised as sustainable, "green" forms of energy by including them in the taxonomy, thus making them eligible for EU funding and more attractive for investors.

However, the classification of nuclear energy and natural gas power as sustainable contradicts the facts<sup>2</sup>:

- Nuclear fuels and natural gas are – in human time scales – not renewable and therefore by no means available in perpetuity.
- Both forms of energy are not emission-free. Besides greenhouse gases, other substances, some of them hazardous, are emitted from fuel extraction to the unsolved waste problem (in the case of nuclear energy). Emissions along the extraction – transport – transformation path of natural gas can raise GHG emissions to the level of those of coal.
- Nuclear energy currently covers (globally) about 2 - 3% of final energy demand. A doubling would require the construction of - at a low estimate - around 700 new nuclear power plants (according to the IEA even 1000).
- If one wanted to achieve this with the currently propagated (but nowhere yet in commercial operation) concept of small modular reactors, many thousands of plants would be required.
- This would still leave the contribution of nuclear energy in the low, single-digit percentage range.
- Nuclear energy can therefore not be generated in quantities that are relevant for the energy transition.
- Achieving greenhouse gas neutrality by means of nuclear power, or even making a significant contribution to it, is therefore technically impossible.
- Nuclear power plants are notoriously unsafe. This is shown not only by the major catastrophes, but also by problems in so-called normal operation and the unsolved waste issue.
- Nuclear energy is not economical, it is becoming increasingly expensive and already costs many times more than renewable energies, which are becoming more and more cost-effective.

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<sup>1</sup> („COMMISSION DELEGATED REGULATION (EU) .../... of XXX amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities“)

<sup>2</sup> For the sake of readability literature citations are omitted here. References can be found in the discussion paper 1-98 by the Scientists for Future, Germany: //zenodo.org/record/5573719#.YdVXT1kxk2w

- In practice nuclear power plants are only built if state guarantees, default guarantees, subsidies or similar are granted, i.e. if taxpayers finance the investment at least partially.
- In order to achieve similar prime costs with small modular reactors as with conventional large reactors, a standardised series production of many thousands of plants would be necessary. Only then would cost ratios such as those shown in Figure 1 be achieved. Moreover, it has already been proposed to lower the safety standards for SMRs in order to save costs. In fact, the risk of this type of energy generation would be even greater than for conventional projects.

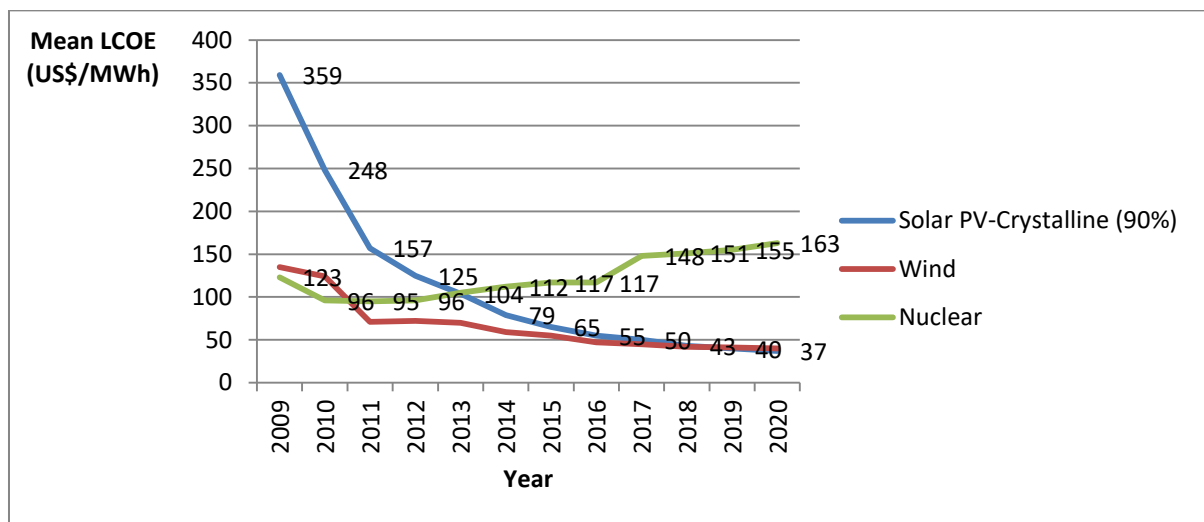


Figure 1: Development of Levelized Cost of Energy (LCOE) in the USA

- Experience shows that it takes an average of 20 years to plan, receive the permits, build and commission a nuclear power plant. Projects in Finland and France show enormous construction delays and cost increases. The necessary expansion of nuclear power would therefore come much too late for climate protection.
- Energy efficiency and renewable energies have high potentials for green house gas (GHG) neutrality. Making the transition to GHG neutrality through efficiency and renewables in a timely manner is a major task, but unlike nuclear power, it is feasible in a timely manner!

The "qualifying restrictions" and conditions envisaged by the draft are not suitable to invalidate the above arguments, because they are unspecific and leave much room for interpretation: What could a guarantee that the operation of a waste management facility will work from 2050 onwards look like, when no solution to the waste problem is in sight? What will serve to demonstrate that there are no renewable energy alternatives to the construction of nuclear or gas power plants? Even the basic condition that the plants should make a substantial contribution to climate protection and not violate other environmental goals cannot be fulfilled if it is taken seriously.

These "qualifying restrictions" do not change the risks, to unproportionate costs, the late and limited availability, i.e. the non-sustainability of nuclear energy. With such "restrictions", the controversial debate among member states and within the EU Commission on the sustainability of nuclear energy and natural gas is apparently postponed to a later date or to the national level.

Those who support nuclear energy advocate investing taxpayers' money in an extremely costly, limited, non-emission-free, non-sustainable form of energy that will lock societies in a dangerous and burdensome path for thousands of years - and thus draining this money from truly sustainable energies, storage systems and social balance.

The main argument against natural gas as a sustainable form of energy, apart from the fact that it is non-renewable (see above), is that it causes substantial greenhouse gas emissions and therefore has no place in the "net zero" strategy of the EU, except maybe in very small niches.

These considerations are supported by a text from members of the EU taxonomy sub-group DNSH (see attachment), an expert group set up specifically to review the contents of the Taxonomy Regulation, which was also involved in the development of the draft amendment, but whose arguments were not heeded.

**We therefore appeal to you as representatives of the people at EU level: Stand up for a decision that does justice to these facts and the long-term requirements of climate protection and sustainability! Reject the proposal unequivocally!**

You bear responsibility for the well-being of people today and in the future. You should therefore not decide against the climate targets you have set yourself, nor give in to pressure from individual states to give priority to the short-term economic interests of a few investors at the expense of taxpayers and the future of our children.

We will be happy to provide you with further information and arguments!

With best regards