

World Nuclear Association Submission to the European Commission's Delegated Regulation on a climate change mitigation and adaptation taxonomy

Submitted 27 April 2020

The World Nuclear Association (WNA) is grateful for the opportunity to provide comment on the sustainable finance taxonomy. Given the global nature of the nuclear industry, developments in the taxonomy will impact it beyond EU borders. We therefore wish to support the submissions made by the European nuclear body Foratom and other EU based nuclear companies/organizations, while also adding our own points.

WNA commends the EU for seeking to harmonise green investment labeling across its member states. We believe that the taxonomy and the Green Deal are vital steps for achieving a clean energy transition to a net-zero carbon economy. However, in order to maximize both policy robustness and probability of success, the process to determine what is 'environmentally sustainable' must be science-led and evidence-based. This means using consensus science wherever possible, as produced by recognised institutions and regulators. For example, just as IPCC produces internationally recognized climate assessments, there are intergovernmental organisations which provide scientific assessments on nuclear energy – notably the IAEA and OECD NEA.

It is clear that the consensus scientific view was not factored into the TEG final report when it choose not to include nuclear, citing principally concerns over nuclear waste and the Do No Significant Harm criteria (see attachment for a detailed discussion). This weakness now dramatically undermines the entire taxonomy. WNA believes that the taxonomy should not exclude a particular technology without providing a scientific justification. In order to identify whether an energy source is sustainable or not, it is important to evaluate all technologies consistently – using a whole life-cycle approach applying the same objective criteria. We support calls to establish a group of experts with an in-depth knowledge of the nuclear life-cycle as quickly as possible so they can finalise their assessment in time for nuclear to be included in the first round of Delegated Acts.

As a dispatchable low-carbon technology, nuclear can form the 'backbone' of the reliable energy system which advanced economies depend on. Leading energy bodies now recognize the importance of a 'system approach' in decarbonizing electricity. For example OECD NEA has concluded that even in a low-cost renewables future, a cost-optimized national electricity mix would need to consist of "40%-60% provided by dispatchable low-carbon technologies such as nuclear or, perhaps one day, fossil-fuelled plants with carbon capture, utilisation and storage". WNA therefore welcomes the introduction of the "transition" and "enabling" activities as part of the Taxonomy Regulation.

The nuclear sector needs ongoing investment i) into the long term operation of existing nuclear plants and ii) into nuclear new nuclear plant construction that can help decarbonize industry and heating in addition to further decarbonising electricity. These investments should be recognized as sustainable and benefit from inclusion in the taxonomy. Currently nuclear energy provides about 40% of the EU's low carbon electricity. No other energy source has played a greater role in driving down historic EU CO2 emissions. About half of EU member states choose to use nuclear energy now (Belgium, Bulgaria, Croatia, Czech Republic, Finland, Germany, Hungary, Netherlands, Romania, Slovakia, Slovenia, Spain, Sweden) and others are choosing to introduce it in the future (Estonia, Poland). It is their sovereign right to do so.

The Covid-19 pandemic brings a renewed focus on the resilience of the economy and energy systems, which WNA believes should be added as an additional sustainability criteria. There are many ways in which nuclear energy contributes to resilience, for example through the creation and maintenance of long-term local jobs and by reducing the dependence on volatile imported fossil fuels.