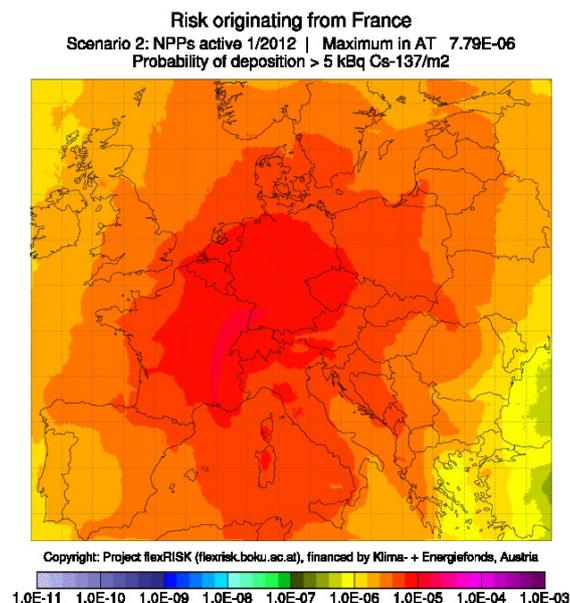


## France Multi-Annual Energy Plan - Consultation

We respond to the draft of the Multi-Annual Energy Plan which is open for consultation until Feb 19, 2020. Our main focus of response is on the plans for nuclear energy due to the risk it poses for Europe.

1. This Multi-Annual Energy Plan (MAEP) should be subjected to a transboundary Strategic Environmental Assessment (SEA). A voluntary consultation is no alternative for a legally binding transboundary participation procedure under the SEA-Directive.
2. The public in Europe could not participate in discussing effects of the MAEP on the environment including human health. For the concerned public in Europe, this is a very important issue. A transboundary environmental assessment should be provided in the framework of a SEA. Especially environmental impacts of nuclear energy compared to alternative energies should be made. Nuclear energy's assessment has to include the whole fuel chain from uranium mining to final repositories.
3. It is argued that nuclear energy emits only 6g kWh CO<sub>2e</sub>. Scientific studies<sup>1</sup> give average values of 66 g CO<sub>2</sub>/kWh, with up to 500 g CO<sub>2</sub>/kWh if the uranium ore grade is below 0.01%.
4. Nuclear safety of old NPP: In 2019, a consultation was open for the review of the lifetime extension of the 900 MW NPP fleet. Austria submitted an expert statement<sup>2</sup>. The experts reached the conclusion that the scope of the lifetime extension program concerning core melt accidents was not in compliance with current safety requirements – even after performing the envisaged lifetime extension program, a considerable gap between the safety level of the 900 MW reactor and the EPR will persist. For the 900 MW reactors a core melt accident with a major release is possible today and will also be possible after the implementation of the currently envisaged lifetime extension program.
5. Nuclear risk resulting from France's NPP fleet: The following figure shows the risk of contamination by a severe accident in France's old NPPs with more than 5 KiloBecquerel Cs-137/m<sup>2</sup>. For comparison: In Austria, agricultural countermeasures have to start when a contamination of 0.65 kBq Cs-137/m<sup>2</sup> is expected.



<sup>1</sup> [https://www.energyagency.at/projekte-forschung/energie-klimapolitik/detail/artikel/energiebilanz-der-nuklearindustrie-ueber-den-lebenszyklus.html?no\\_cache=1](https://www.energyagency.at/projekte-forschung/energie-klimapolitik/detail/artikel/energiebilanz-der-nuklearindustrie-ueber-den-lebenszyklus.html?no_cache=1)

<sup>2</sup> [https://www.umweltbundesamt.at/fileadmin/site/umweltthemen/kernenergie/Frankreich/REP0686\\_VD4\\_900.pdf](https://www.umweltbundesamt.at/fileadmin/site/umweltthemen/kernenergie/Frankreich/REP0686_VD4_900.pdf)

6. We demand an Environmental Impact Assessment (EIA) for every lifetime extension of an old NPP that goes beyond the originally foreseen lifetime of 40 years.
7. Until today, no final repositories for spent fuel are in operation. Still a lot of research has to be done and it stays open if there will ever be a final repository that can be considered as safe enough to be operated. Also costs of such a final repository can only be assumed as of today. Until the problem of waste management is not solved, no lifetime extensions should be licensed and no new NPP should be built. Moreover, the planned Cigeo final repository is too small to host all spent fuel from lifetime extension and possible newbuild NPP.
8. The cost argument should be reviewed carefully: Are costs for managing spent fuel and radioactive waste and for decommissioning included? Are the costs for newbuild NPP realistic? Are liability costs for severe accidents included? A study from IRSN (2012) assessed costs of a severe accident in France with 172-946 bn Euro. Operators and the French state together are liable for only about 0.2 bn Mio Euro.<sup>3</sup>

We ask France for an earliest possible shut-down on the old NPP fleet, and to replace plans for nuclear newbuild with renewable energies.

---

<sup>3</sup> See <http://www.wua-wien.at/images/stories/publikationen/true-costs-nuclear-power.pdf>