

Frans Timmermanns
Executive Vice-President for the European Green Deal

Stella Kyriakides
European Commissioner for Health and Food Safety

Mairead Mc Guinness
Financial services, financial stability and Capital Markets Union

European Commission Rue de la Loi /
Wetstraat 200 1049 Brussels Belgium

Brussels, February 12 2021

Subject: EC intends to add nuclear energy to taxonomy through the backdoor

Dear Commissioners,

The European Commission is currently preparing the very important and ambitious Green Deal and the taxonomy to identify solutions to climate change for the financial sector to support. After a transparent and evidence-based procedure couldn't conclude that nuclear energy would fulfill the set criteria, the Joint Research Center was commissioned to prepare a report on this issue and is expected to prove the contrary.. However, according to information from FISMA, this report will not be made public for comments. But the conclusions drawn might free the way for including nuclear energy later. The *FAQ about the work of the European Commission and the Technical Expert Group on Sustainable Finance* explains:

*“(...) the Commission has decided to request the (Commission’s) Joint Research Centre to draft a technical report on the ‘do no significant harm’ aspects of nuclear energy. This report will be reviewed by experts on radiation protection and waste management under **Article 31** of the Euratom Treaty, as well as by experts on environmental impacts from an equivalent Commission environmental group or committee.*

This process is not expected to conclude before the beginning of 2021. In the meantime, work on adopting the delegated act on all other economic activities that can substantially contribute towards climate change mitigation and adaptation by the end of 2020 continues apace, irrespective of the separate assessment on nuclear energy.

To accommodate its possible inclusion in the taxonomy later on – and of other activities that can make a substantial contribution to climate change mitigation or adaptation – the Commission could consider amending the delegated act on the climate objectives by the end of 2021, provided all conditions for inclusion are met.”

We urge you to re-consider this plan with a very restricted review and lack of public scrutiny, which would lead to a loss of credibility for the entire Taxonomy Regulation. We urge you to

open the nuclear assessment to the public and to interested experts outside of the JRC, the Art. 31 expert group and SCHEER/DG HEALTH.

Please find attached the Position Paper on Nuclear in the Taxonomy.

Yours sincerely,

Patricia Lorenz

GLOBAL 2000/Friends of the Earth Europe

PLAGE (The Independent Salzburg Platform Against Nuclear Hazards
Heinz Stockinger, Chair. Austria

Klosterport 4F, 1.floor, Gunnar Boy Olesen
DK-8000 Aarhus C
Denmark

Johanna Nekowitsch
Wiener Plattform Atomkraftfrei
Austria

Dorottya Egres, Energiaklub
Hungary

Dr Paul Dorfman
UCL Energy Institute
University College London

Women Against Nuclear Power
Ulla Klötzer, Finland

Women for Peace
Lea Launokari, Finland

Marcin Harembski,
Common Earth, Poland

Todor Todorov
Za Zemiata/Friends of the Earth-Bulgaria

Edvard Sequens
Calla – Sdružení pro záchranuprostředí / Calla - Association for Preservation of the
Environment, Czech Republic

Monika Wittingerová
Jihočeské matky, Czech Republic

Milieudefensie (Friends of the Earth Netherlands)
Jorien de Lege
Amsterdam, Netherlands

Chateau Martial
Sortir du nucléaire
France

Arnaud Schwartz
Président de France Nature Environnement
France

BI STOPPT TEMELIN
Brigitte Artmann
Marktredwitz
Germany

Environmental Planning
and Education Network
Béla Munkácsy
Hungary

Christine Hasse
Réaction en chaîne humaine pour l'arrêt du nucléaire (RECH)
France

Živa Kavka Gobbo
Focus Association for Sustainable Development / Focus, društvo za sonaraven razvoj
Slovenia

Antje Heider-Rottwilm
Church and Peace, The European Ecumenical Peace Church Network
of communities, training centres, peace organisations
and peace service agencies.

Madis Vasser, Board member
Estonian Green Movement (Friends of the Earth Estonia)
Tartu, Estonia
Christer Alm
Miljörigen Lovisa
Finland

Annemarie Mohr
Director WECF e.V.
Women Engage for a Common Future (WECF)

Collectif Anti-Nucléaire Ouest
9 Bis sente des Grès, 76920 Amfreville-la-Mi-Voie
France

Hauke Doerk
Umweltinstitut München e.V. / Munich, Germany

Hanka Konvalinková
Spolek Javořice
Czech Republic

IPPNW - International Physicians for the Prevention of Nuclear War
Angelika Claussen
Germany

Simon Banholzer
Schweizerische Energie-Stiftung SES
Schweiz

Mütter gegen Atomgefahr
Gabriele Schweiger
Austria

atomstopp_atomkraftfrei leben!
Roland Egger
Austria

Claudio Knüsli
Intl. Councillor PSR/IPPNW
Switzerland