

Aktionsgemeinschaft Energiesicherung und Kerntechnik - AEK e.V.

Der Vorsitzende des Vorstandes

**Commissioner for Energy
Mrs Kadri Simson**

**Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium**

EU Taxonomy on Sustainable Finance– Nuclear Energy Sector

Dear Commissioner Simson,

The Technical expert group on sustainable finance has been working on developing the so-called EU taxonomy. Its 35 members from civil society, academia, business and finance sector, as well as additional members and observers from EU and international public bodies engaged with over 200 additional experts to develop technical screening criteria for the second round of climate change mitigation and adaptation activities. The final report including the technical annex became available on 12th of March 2020. The 593-page annex summarizes the deliberations on nuclear energy on pages 209-211 (in sum one page out of 593).

No conclusion on nuclear power has been drawn, because two governments, notably Germany and Austria, refuse to acknowledge nuclear energy as a sustainable energy source. In order to assure the “result” of the report, the German partner to the TEG was the “Ecologic Institute”, a well-known Think Tank of our Green Party. This institute has no expertise on the nuclear fuel cycle and is driven by ideology rather than well-established scientific standards. Thus, the 3 citations to the discussions are arbitrary rather than referring to renowned scientific literature.

Germany is the only country in the world, which plans to phase-out both basic load energy sources, coal and nuclear at the same time. The ideological driven decision does not only put our industry at risk. In times, when wind and solar both flat out, we must import electricity from our neighboring countries at high costs, while we give away renewable energy at negative prices when wind and solar producing too much. Ignoring physics and market economy, our energy costs are the highest in the world.

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It is simply inappropriate to argue on missing prove of safe long-term storage of high-level (radioactive) waste while ignoring the fact that highly toxic waste (e.g. from the production of solar cells) has been disposed-off without notice by the public for years. In fact, at very early stages during the development of nuclear energy, scientists & engineers focused on the disposal of all possible waste forms including decommissioning of power plants. The "life cycle assessment" (from cradle-to grave including environmental impact assessments) was considered by nuclear industry long before recycling was on the agenda of our politicians.

Simply because the energy contained in nuclear fuel is millions of times higher than in any other energy source, the amount of waste is so small that there is no urge on finding a disposal. Moreover, scientists & engineers know that the so-called nuclear waste is in fact no waste. We developed early reprocessing of fuel and the re-use of the uranium. Additionally, the so-called spent fuel contains highly valuable chemical elements, rare earths and platinum metals, which are no longer radioactive and could be used in industry as catalyst etc. The so-called nuclear waste is in fact a resource.

The "spent fuel" contains newly formed plutonium as a "by-product" of the energy production process, thus nuclear energy is sustainable by definition. Thorium sources around the world (which exceed the occurrence of uranium) will drive nuclear energy even further along those lines of sustainability.

The TEG could also not conclude on the DNSH (Do No Significant Harm) to the other environmental objectives. This is surprising, because Fukushima for example has shown no casualty due to radiation. Compared to any other energy source, nuclear energy has caused the lowest number of deaths. On the other hand, offshore wind turbines have caused dozens of deaths, disturbing noise to animals and environmental pollution.

We urge you to familiarize yourself with the term sustainability and its true meaning. The term goes back to Hans Carl von Carlowitz 1713 and his book on „Silvicultura oeconomica“ and many of the considerations at that time are still applying today. The term is used too likely by politicians. Political decisions must be based on scientific facts, no myths or ideological agenda. We call on the European commission, in the spirit of Art. 20 AEUV ("We do not create a *union* of States, we unite *people*"), to act towards save and secure energy production, because energy is of strategic interest to our industry and our citizens and crucial for the future including digitalization.

The supply of save and secure energy (at acceptable costs) will succeed including nuclear energy as the backbone; challenges are increasing with an increasing share of renewable (volatile) energy. We have to face the fact that there was no technological breakthrough neither with solar nor wind energy generation. Battery capacities required for the real world are far in the future and will not be available for the next 20 years or so. The renewable energy supply depends on random parameters. Instead of promoting an increasing expansion of solar and wind energy, it is more reliable to set an upper limit. Instead, the European commission shall increase the research of new nuclear power technology, new reactor types e.g. for nuclear-driven ships.

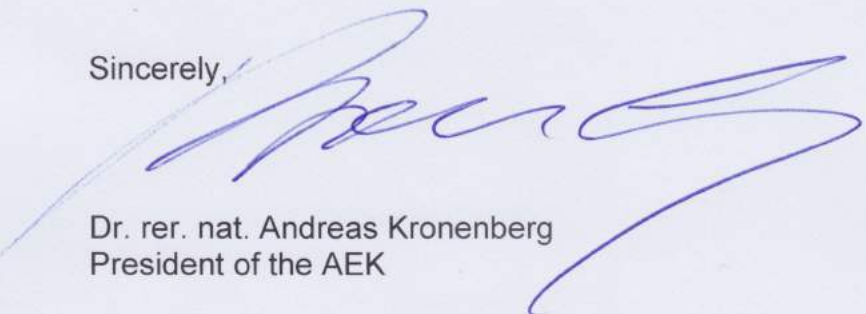
The Corona Crisis has shown the vulnerability of our industry and our prosperity. We do not need expensive experiments which ignore basic physics. We need to build on the world-wide experience of our engineers; we have 18'442 reactor-years of safe operation.

We agree to the request by the European Nuclear Society, which wrote: *"The debate concerning nuclear energy is often political. It is therefore essential that the assessment of the Do No Significant Harm (DNSH) issue for nuclear remains strictly technical, evidence-based and is conducted by qualified experts. It must not be conducted by those with a political or ideological agenda. Some anti-nuclear groups are already calling for the exclusion of nuclear from the list of sustainable activities under the Taxonomy. It is obvious that most of the arguments being put forward are not based upon scientific evidence."*

Please give us scientists and engineers, who have studied the field, have practical experience and knowledge, the chance to clarify some of the statements used to discredit the nuclear sector. We are not paid for speaking up for our profession, we choose the nuclear field because we are realistic, and enthusiastic about our daily work and we know what we are actually talking about.

The AEK is a German-wide group representing scientists and engineers as well as civil society concerned with energy security and nuclear energy. Founded 1981, we engage with scientific studies and public discussions regarding environmental protection, environmental air water and soil pollution, nature conservation as well as with the safety of nuclear installations.

Sincerely,



Dr. rer. nat. Andreas Kronenberg
President of the AEK

18th of April 2020