

FEEDBACK on

Sustainable finance – EU classification system for green investments

TEG experts keep nuclear out of the Green Taxonomy

The TEG report was conducted in a concise manner with a clear result - also concerning nuclear. The experts who prepared the TEG report concluded that they cannot see a sustainable way of managing nuclear waste. Since some member states and some industry representatives continue their efforts to have nuclear included at least as transition technology, we need to shine some light on some arguments in particular nuclear waste management, where we share the TEG expert's view that high level waste is incompatible with fulfilling the sustainability goals.

Nuclear waste remains unsolved – and it might stay that way

After 60 years of commercial operation of nuclear power plants not a single final repository for and spent fuel and other high level waste is working anywhere around the world. Here again, facts weigh more than arguing that experts agree that in theory a Deep Geological Repository might be best and R&D is almost there.

Another popular argument used by industry: The EU has strict rules on waste. However, it is an illusion to believe that the Nuclear Waste Directive 2011/70/Euratom solves all open questions. **In its 2nd Report on the progress of implementation of the Nuclear Waste Directive The European Commission summarized that: „[...] more needs to be done.”**

Impacts of nuclear accidents affect the world forever

While some would like to forget them as quickly, they are actually everyday business of the nuclear generation. The debris and molten core are still there, another enormously expensive shelter was recently installed, but the 1986 **Chernobyl** accident consequences continue being a threat for people and environment. The situation is far from safe, **current forest fires** threaten large parts of Europe with radioactive contamination. Also the 2011 Fukushima accident is still out of control, not even robots can work in this environment to start clean-up. The pollution of the environment is still everyday reality, currently the tanks on site will be emptied, because no other solution seems to be viable. This water does not only contain the radioactive isotope Tritium, but also numerous other harmful radioactive isotopes, including long-lived isotopes such as Cesium-137, Strontium-90 and others. More details can be found on the website of the plant operator TEPCO¹. The Japanese government's plan (!) suggest to release:

Nuclear energy is not CO₂-free

Nuclear energy is definitely not CO₂-free. Its CO₂ emissions are only slightly higher than those of renewable energies like solar and wind – but only as long as the uranium ore grade is high. As uranium has to be produced from ore with a low grad, which will be the case within this century, CO₂ emissions are going to rise significantly. The range seems to be differing widely, however one those

¹www.tepco.co.jp/en/decommission/progress/watertreatment/index-e.html

few companies who ever mentioned this was e.g. EDF by stating that their fleet produces around 57 CO₂eq/kWh currently.

Recommendations

We agree with the assessment the TEG report arrived at and see no further need for another group of experts, a close look at the much-quoted 2018 IPCC 1.5 degrees report also refrained from recommending nuclear energy as a means to combat climate change. We would recommend the European Commission respects this assessment and does give in to nuclear industry's call for the establishment of yet another expert group. Clearly the usual closed circle of pro-nuclear institutions such as IAEA, NEA etc. is meant who will copy-paste their reports into another format.

The **Platform** which is supposed to start work in autumn 2020 will be responsible for updating and extending the technical criteria. We demand that - in case nuclear energy is still on the agenda – also academics and other experts are included to avoid the “nuclear” experts from hijacking this exercise.

Instead we hope that this EU policy initiative of defining a Green Taxonomy will stick to scientific evidence and simple reality and prepare a future without the threat of nuclear accidents and the production of ever more nuclear waste as a legacy to future generations.

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