

**Vice-President Timmermans**  
**Vice-President Dombrovskis**  
**Commissioner McGuinness**  
**Commissioner Sinkevicius**  
European Commission  
Rue de la Loi / Wetstraat 200  
1049 Brussels  
Belgium

Dear Vice-Presidents Timmermans and Dombrovskis,  
Dear Commissioners McGuinness and Sinkevicius,

Vienna, 1 July 2021

**Object: Assessment of the JRC analysis on taxonomy and nuclear energy**

We are pleased to send you in attachment our Austrian Institute of Ecology's Critical Review "*Taxonomy and Nuclear Energy. Critical Review of the Joint Research Centre's Assessment for the EU Taxonomy Regulation.*" It assesses the JRC analysis on taxonomy and nuclear energy published in March.

We believe that the EU taxonomy deserves the highest scientific standards. As authors of this Critical Review we have analyzed the JRC assessment and concluded that it contains several deficiencies and therefore does not constitute a sufficient decision-making basis for the EU Commission or any other institutions.

Our Critical Review highlights the consequences of nuclear energy use that the JRC analysis ignored but should be considered:

- Severe accidents with catastrophic and long-term consequences have been downplayed by the JRC: the risk of chronic illness due to a severe accident, the risk of loss of agricultural areas due to severe contamination, and the disastrous social and economic impacts on people forced to live in contaminated territories. The JRC failed to include either of the major accidents – Chernobyl and Fukushima – in its comparison of fatality rates.
- After decades of research, there is still no final disposal for nuclear waste. The Swedish copper canister solution, which Finland also intends to use at its planned Onkalo disposal, has not yet been approved because copper appears to corrode under the expected underground conditions. There is currently no solution for the safe disposal of tons of high-level nuclear waste and spent fuel.
- JRC failed to discuss non-proliferation problems; the risk of more countries acquiring nuclear weapons via civil nuclear programs has been entirely omitted.
- JRC appears to believe that regulations alone will ensure nuclear safety, and that the achievable safety improvements identified during the EU stress tests have been implemented. The claim that the new Generation III+ reactors will guarantee safety is also incorrect; the only Generation III+ reactor (EPR) currently in operation is Taishan in China. Instead, the existing fleet of reactors will continue to operate beyond their planned lifespans, with outdated designs and increased risk associated with aging components.

- Nuclear energy significantly harms human health, even in the low dose range resulting from normal nuclear power plant operations and nuclear workplaces.

We urge you to not include nuclear power in the EU taxonomy on the basis of a deficient report.

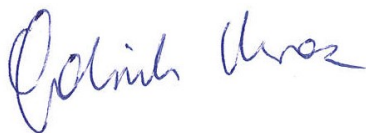
Moreover, as this particular issue was not the subject of a public consultation, we ask you to support our demand for a public consultation similar to the consultation opened for the last draft taxonomy delegated act<sup>1</sup>, making the process consistent with that undergone by other economic activities which might be part of the taxonomy.

We also ask you to include the forthcoming comments from the Art. 31 Committee and the SCHEER Committee on the JRC analysis in the public consultation to provide complete information to everyone interested.

Many NGOs contacted us concerning our Critical Review and would like to voice their support for our evidence-based report and approach.

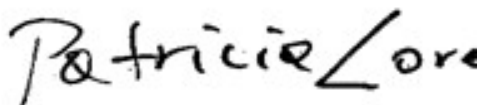
We would be pleased to discuss with you the main findings of our Critical Review in a call at your convenience. We are looking forward to your reply.

Yours sincerely,



**Gabriele Mraz**

Nuclear expert and author of the report  
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**Patricia Lorenz**

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<sup>1</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12302-Nachhaltiges-Finanzwesen-EU-Klassifizierungssystem-fur-grune-Investitionen\\_de](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12302-Nachhaltiges-Finanzwesen-EU-Klassifizierungssystem-fur-grune-Investitionen_de).

**This letter is supported by the following organizations:**

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