



**To the attention of:  
United Nations Economic Commission for Europe**

**Mr. King Lee  
Chain, EGRM Nuclear Fuel Resources Working Group**

**Mr. Scott Foster  
Director, Sustainable Energy Division United Economic Commission for Europe**

**Ref: “The Role of Nuclear Energy in Sustainable Development” Report**

The Romanian Nuclear Industry Association, ROMATOM, welcomes the UNECE report on the “The Role of Nuclear Energy in Sustainable Development” and appreciates the scientific approach and detailed analysis of the benefits of nuclear power in relation to meeting decarbonization targets as well current and future needs of the population. We believe that such a report is much needed in the current European level debate about the role of nuclear power in the future energy mix, as current regulatory frameworks such as the EU Taxonomy and the Green Deal are pushing for the exclusion of nuclear power from the possibility of accessing sustainable development funds, without scientific evidence about its life cycle impact.

ROMATOM represents the interests of more than 30 companies in Romania across the supply chain. In Romania, nuclear energy represents 18% of the national energy consumption. The nuclear power sector ensures Euro 590 million turnover and 11.000 jobs which is estimated to increase to 19.000 if new nuclear projects are launched. Romania has developed an integrated nuclear cycle from raw material, to horizontal industry, to education, R&D, engineering and eventually waste management and decommissioning. As we look towards the future, we are concerned about the current ambitions of the EU to build the future energy mix entirely based on renewable power and natural gas as a transition source, while nuclear which currently ensures 50% of the entire low carbon energy production in Europe is challenged with the difficult task of securing financing for current and future projects under the context of the Taxonomy regulation.

We notice a severe discrepancy between the benefits of nuclear power as highlighted in the UNECE report backed by the EC forecasts which appreciate that the *“nuclear share in 2050 remains rather fairly similar across all scenarios (12-15%, compared to 26% in 2015 and 18% in the 2030 projection and 26% in 2015), estimating that the “installed capacity in 2050 is only slightly lower than current level (99-121 GW versus 122 GW in 2015)”*<sup>1</sup> and the phase out policy of nuclear power across the board in Europe, which goes against the principle of technology neutrality.

We also notice that nuclear power is an important strategic pillar in the energy policies of many countries, including Romania, which is planning to further develop nuclear projects such as the refurbishment of Unit 1 of Cernavoda NPP and the construction of additional capacity.

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<sup>1</sup> <https://op.europa.eu/en/publication-detail/-/publication/e0544b72-db53-11e9-9c4e-01aa75ed71a1>

Several EU Member States are forecasting an increase in the contribution of nuclear energy in conjunction with the achievement of the 2050 decarbonisation targets and quotas predicted: Bulgaria, Czech Republic, Finland, France, Poland, Romania, Slovakia, Slovenia and Hungary, focusing on large scale Generation III/III+ new nuclear build. Also, some member states are considering small modular reactors for their energy mix, such Czech Republic, Estonia, Poland and Romania. This approach ensures the expected prerequisites for the contribution of nuclear energy in meeting the environmental targets considered for 2050.

However, under the conditions of the first two Delegated Acts for climate change mitigation and adaptation launched for public consultation by the European Commission in November 2020, nuclear power has not been included due to the fact that the life cycle analysis of its benefits against the “Do No Significant Harm” criteria which is conducted by JRC has not yet been completed. We believe that this approach causes a great competitive disadvantage to nuclear power projects since it permits early access to financing for other low carbon energy sources.

Our main concerns about the future of nuclear power in Europe can be summarized as follows:

- The EU Taxonomy has far exceeded its initial mission to provide screening criteria for sustainable investments for the private sector. The Taxonomy is already forming the basis of the Just Transition Fund, the EU Ecolabel and it seems that EIB is also looking to adjust its investments based on the Taxonomy regulation (currently the EIB allows investments in nuclear power projects). The European Commission will also reassess the criteria for state aid and funding on the basis of the Taxonomy, which leads to great uncertainty about the potential of nuclear power to access financing of any kind. As UNECE report indicates, the implication of the Government in successful nuclear projects is crucial.
- Exclusion of nuclear will lead to an increased cost of the transition to a low carbon energy sector and greater energy grid imbalances due to the increase in the share of intermittent renewables. Without investments, it is estimated that more than two thirds of the nuclear fleet in advanced economies will be reduced by 2040, which would increase the cost of the transition to a sustainable energy sector by 1.6 trillion USD<sup>2</sup>
- Lack of funding for the R&D sector in nuclear will affect the possibility to deploy new improved reactor types and would render the investments done so far in new nuclear technologies as sunk costs if these technologies cannot be deployed successfully into the market. It would also lead to loss of human talent and capabilities and of the high level paying jobs in the nuclear sector.
- Excluding nuclear from future regulatory frameworks will severely affect the national policies of many EU countries which rely on nuclear power to reach decarbonization needs and will create energy poverty, which goes against the UN SDGs.

Under the current context, we consider it critical that UNECE expert group responsible for the report on “The Role of Nuclear Energy in Sustainable Development” takes an active role in the ongoing debate about nuclear power in the context of the EU Taxonomy and signals the need for concrete scientific data to counter the misconceptions about nuclear power. We believe that the UNECE report should

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<sup>2</sup> The Covid-19 crisis is undermining nuclear power’s important role in clean energy transitions, OECD/IEA, June 12, 2020, <https://www.iea.org/commentaries/the-covid-19-crisis-is-undermining-nuclear-power-s-important-role-in-clean-energy-transitions>



become a point of reference for nuclear countries as well as countries looking to start nuclear programs and therefore, it needs to be brought into discussion at the level of EU decision makers. The pro-nuclear Member States could greatly benefit from the support and scientific evidence provided by the UN in favour of nuclear power.

ROMATOM President

Lucian Rusu

**About ROMATOM**

ROMATOM was incorporated on January 10<sup>th</sup>, 2001 with 14 private and state owned companies as well as two NGOs. Currently, ROMATOM has 31 members.

The Association's mission is to promote nuclear power for peaceful purposes and to support the Romanian national nuclear program as well as the coordination of the membership to the European Atomic Forum – FORATOM. Also, ROMATOM protects the interests of its members, representing the voice of the Romanian nuclear industry and functions as a hub of knowledge and experience acquired from the participation of its members to the Romanian nuclear program.

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