

Dr Ursula von der Leyen
President of the European Commission
Rue de la Loi/Wetstraat 200 1049 Brussels
Belgium

Brussels, 31st January 2022

Subject: Taxonomy CDA

Dear President von der Leyen,

With the EC's final decision coming up, we would like to contact you again and ask you to reconsider your plans concerning nuclear energy in the taxonomy.

Contrary to the EC's claims, no consultation was conducted on the inclusion of nuclear power in the taxonomy, simply because the first Delegated Act did not include nuclear following the TEG expert group's conclusion. Therefore, we demand a public consultation also for this Complementary Delegated Act or any new proposal in this area.

Nuclear energy is an unsustainable form of energy generation, which should not be included in the taxonomy. We, NGOs from all over Europe ask the European Commission to modify the Complementary Delegated Act in line with the following statements made by the EC's own advisory body, the Platform on Sustainable Finance in its response to the consultations on the CDA:

- *'The overall assessment of the Platform is that the draft CDA activities are not in line with the Taxonomy Regulation and most members see a serious risk of undermining the sustainable Taxonomy framework. Further, Platform members have doubts about how the draft criteria would work in practice and many are deeply concerned about the environmental impacts that may result.'*
- *Activities 4.27 new nuclear energy facilities & 4.28 existing nuclear energy facilities: The TSCs do not ensure no significant harm (Article 17 of Taxonomy Regulation) to the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, or the protection and restoration of biodiversity and ecosystems, and would require substantial changes to do so. In the case of new nuclear plants, the TSCs do not ensure a substantial contribution to 2050 climate neutrality goals and would require substantial changes to do so. Recommendation: That activities 4.27 and 4.28, as defined by the TSCs should not be considered as taxonomy aligned on the basis that they do not ensure DNSH and therefore do not meet the requirements of the Taxonomy Regulation.*

We believe that the European Commission is aware of those facts and hope that scientific assessments will be the decisive factor rather than political and economic interests.

Sincerely yours,

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