



Contribution to the Review of the EU Taxonomy Environmental Delegated Act

Nuclear Transparency Watch (NTW) - 26 November 2026

Introduction NTW welcomes the opportunity to contribute to the review of the EU Taxonomy Environmental Delegated Act, particularly regarding the criteria for nuclear activities. Our organization focuses on transparency, public participation, and democratic decision-making in nuclear energy policies. We emphasize the need for clear, comprehensive, and verifiable information on the environmental impacts of nuclear energy, as well as the preservation of democratic processes in decisions about energy production sources.

1. Sustainability & Nuclear Energy

We align with the concerns raised by other stakeholders that nuclear energy cannot be considered sustainable due to several unresolved issues:

- **Unsolved nuclear waste management**, particularly for high-level waste (HLW) and uranium tailings.
- **Severe environmental and health impacts** in the event of accidents, such as Chernobyl and Fukushima.
- **High greenhouse gas emissions** when considering the full lifecycle of nuclear energy, including uranium mining, enrichment, fuel fabrication, and long-term waste storage which have been continuously revised upward in the last IPCC reports.
- **Slow implementation and high costs**, which delay the transition to truly renewable energy sources.

We support the exclusion of nuclear energy from the Taxonomy and urge the Commission to prioritize investments in renewable energy technologies that are genuinely more sustainable, cost-effective, and deployable at scale in the frame of the EU Net Zero target.

2. Need for Transparency and Public Participation

The current technical screening criteria for nuclear activities lack transparency and verifiability, undermining public trust and democratic accountability. We call for the following improvements:

2.1. High-Level Waste (HLW) Repository Criteria

The criterion requiring proof that an HLW repository will be operational by **2050** must be clarified and strengthened. Member States should be required to:

- Provide a **detailed, step-by-step timeline** with realistic milestones.
- Present **realistic cost estimates** and a **credible, verifiable funding scheme**, updated at regular intervals.
- Demonstrate **technological progress** through independent assessments.

Given the repeated delays in repository projects across the EU, the current lack of transparency in National Programmes under the **Nuclear Waste Directive (2011/70/Euratom)** is unacceptable. The Commission must ensure that:

- Non-compliance with the Directive is **publicly documented** and addressed.
- Consequences for failing to meet taxonomy criteria are **clearly defined and enforced**.

2.2. Compliance with Existing EU and Euratom Law

Many Member States face **infringement procedures** for failing to comply with:

- The **Nuclear Waste Directive (2011/70/Euratom)**.
- The **Basic Safety Standards Directive (2013/59/Euratom)**.

The Commission must **rigorously enforce compliance** with these directives and ensure that:

- National waste management programs are **transparent, participatory, and scientifically robust**.
- **Independent regulatory oversight** is maintained, free from political or industry influence.



2.3. Clarification of Key Terms and Technologies

The delegated act must define ambiguous terms such as:

- **"Best available technology"**
- **"Advanced technology"**
- **"Accident-tolerant fuel"**

Additionally, **Activity 4.26** ("Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste") requires clarification. The term **"advanced"** should not apply to **Light Water Reactors (LWRs) over 300 MWe**, which are neither small nor innovative.

2.4. Environmental Impact Assessments (EIAs) for Lifetime Extensions

The technical screening criteria must **mandate comprehensive EIAs** for nuclear power plant (NPP) lifetime extensions, in line with the **Espoo Convention guidance (2021)**. These assessments should evaluate:

- **Environmental impacts** from natural hazards, accidents, and man-made threats (including terrorism and war).
- **Public participation** in decision-making processes.

3. Flaws in Life Cycle Assessment (LCA) Methodology

The current LCA methodology used to assess nuclear energy's sustainability is **outdated and incomplete**. Key issues include:

- **Ignoring the back end of the nuclear lifecycle**, particularly long-term spent nuclear fuel (SNF) storage, which contributes significantly to carbon emissions.
- **Underestimating uranium mining impacts**, including declining ore quality and increased energy use.
- **Excluding critical factors** such as:
 - Routine and accidental **radionuclide releases**.
 - **Thermal pollution** from cooling systems.
 - **Long-term radiological and chemical toxicity**.

The Commission must **update its LCA models** to reflect:

- **Real-world data** (e.g., latest studies showing nuclear GHG emissions of **100-300 g CO₂/kWh**, far higher than the outdated **5 g CO₂/kWh** estimate).
 - **Full lifecycle impacts**, including **SNF storage beyond 100 years**.
 - **Independent, peer-reviewed assessments** rather than industry-influenced models.
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4. Strengthening the "Do No Significant Harm" (DNSH) Principle

The DNSH principle must be **strengthened and clarified** to ensure that nuclear activities do not undermine other environmental objectives. The Commission should:

- **Explicitly exclude nuclear energy** from the Taxonomy due to its **inherent risks and unsolved challenges**.
- **Enforce strict compliance** with Euratom and EU directives on **nuclear safety, waste management, and non-proliferation**.
- **Prioritize renewable energy investments** that align with the **EU Green Deal** and **climate neutrality goals**.



5. Democratic Accountability and Public Engagement

Decisions on energy production must be **transparent, participatory, and science based**. In general, NTW urges the Commission to **ensure meaningful public consultation** in all stages of nuclear policymaking while **rejecting the lobbying influence** from the nuclear industry, which can lead to **weakened criteria and unfair subsidies**.

Conclusions

Nuclear Transparency Watch calls on the European Commission to:

1. **Exclude nuclear energy** from the EU Taxonomy due to its **unsustainable and high-risk nature**.
2. **Strengthen transparency** by requiring **verifiable, science-based evidence** for all technical screening criteria.
3. **Enforce compliance** with **EU and Euratom laws** on nuclear safety, waste management, and public participation.
4. **Update LCA methodologies** to reflect **real-world environmental impacts** of nuclear energy.
5. **Prioritize renewable energy** as the **cornerstone of a sustainable and democratic energy transition**.

We stand ready to engage further in this process and provide additional expertise welcoming any possibility enabling more **transparency, public participation, and environmental justice** in energy policymaking.

Sincerely,

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