

**European Parliament  
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BELGIUM**

20 may 2022

Subject: Letter from trade unions on Taxonomy CDA

Dear Honorable Member of the European Parliament

You will soon have to decide on the Complementary Delegated Act (CDA) of the European taxonomy providing for the inclusion of nuclear and gas as sustainable activities under category 10.2 (transition activities). For the employees of the electricity and gas industries represented by the European trade union federations who signed this letter, this inclusion in the European taxonomy is of primary importance for the climate challenge, for diversifying energetic supplies and increasing Europe energetic independence, for social justice, for economic sustainability and for the future of their jobs in an essential industrial and service sector.

We cannot ignore the fact that global warming represents an existential danger for our societies and for humanity, and the need for urgent action was recently again emphasized by the IPCC (March 2022 report). We therefore need to rapidly put in place an energy transition that is not only climate efficient but also economically sustainable and socially just.

Also, the war in Ukraine has recently made it very clear that security of energy supply and energy costs must be properly anticipated and integrated into the EU's energy plans. It should act as a wake-up call for Europe to diversify its energy resources and reinforce its energetic autonomy.

The taxonomy aims to promote the entire economy and investments towards the sustainable activities needed to achieve climate neutrality. However, the scope of this potentially very broad text is not limited to directing private investment towards these activities. It is intended to serve as a basis for various European regulatory mechanisms such as access to recovery plans, European eco-labels, and also the States aid regime which guides public funding. It will therefore be a determining signal for our energy future.

The complementary delegated act represents significant progress compared to the first delegated act of 2021, which excluded gas and nuclear ; it was obtained through the determined mobilisation of a large number of Member States and also of trade unions, in particular by sending two letters to the Presidency of the European Commission (Letter from the trade unions in the European energy sector, 28 January 2021, 12 trade unions from 6 European countries, Follow-up letter from the trade unions in the European energy sector, 23 July 2021, 18 trade unions from 10 European countries) to defend the inclusion of nuclear power in the taxonomy.

Concerning nuclear power, the final Commission's decision is based on scientific and technical rationality and the international consensus of experts recognising that nuclear power with near-zero greenhouse gas emissions can make a substantial contribution to the fight against climate change, respects the DNSH (absence of significant damage), provided that certain technical criteria (effectively implemented in GENII and III reactors) are respected and does not handicap and even facilitate the development of renewable energy. On the often-cited issue of waste, deep geological disposal is now recognised by the European Commission and its experts (JRC), as well as by most nuclear countries Safety Authorities, as a safe and practicable solution to permanently isolate long-lived waste from the biosphere. For example, Finland's repository is about to be opened and similar projects are well advanced in several EU countries.

We must mention that some points have raised significant reservations among experts in the field. Without explicitly stating so, the Complementary Delegated Act clearly considers nuclear energy as a transitional energy. This status entails sunset clauses (time limits), scientific and technical reviews and detailed reports every 3 to 5 years, which seems hardly compatible with the long-term industrial development that nuclear power requires. All in all, the labeling of nuclear energy as "transitional" does seem to us not appropriate for this very low carbon, massive, dispatchable and reliable energy source, with minimal land and raw material requirements. Furthermore, the diversity of uranium resources, fuel recycling and, in the near future, Gen IV breeder reactors, open the way to full energetic autonomy.

Concerning gas, with the strict emission criteria set and the requirement that the plant replace an existing high CO<sub>2</sub> emitting plant, its inclusion in the taxonomy guarantees a substantial contribution to the fight against global warming and its mitigation. European states that currently rely heavily on coal or lignite for their electricity generation need a rapidly deployable and transitional alternative controllable source. Gas is necessary to a balanced overall energy mix, its inclusion also gives visibility to an industrial sector that is working towards the transition to green and renewable gases. Moreover, the recent war in Ukraine makes it now crystal clear that we need independent secure supplies of gas. This will need rapid and substantial investments e.g. for new EU gas reserves, gas pipes, construction of LNG terminal which will be very costly if they can't fall under the taxonomy.

In its first version, the taxonomy excluded the only two controllable energies (apart from hydroelectricity limited by geography), which are gas and nuclear. Our societies cannot do without an abundant, controllable and economic energy capable of ensuring the energy security that intermittent variable energies alone cannot provide. On the contrary, the inclusion of these two activities through the complementary delegated act, based on scientific and technical rationality, strengthens the taxonomy objective, gives it the necessary credibility and ensures consistency with the Green Deal while allowing it to ensure the traceability of investments.

The CDA as it stands now is not perfect. However, the transitional qualification for nuclear energy is better than not having it at all covered by the Taxonomy; a contrario, the transitional dimension of gas in the CDA is appropriate. As stated by the Commission, Taxonomy is intended as a living document that will evolve over time. In the opinion of the signatory Energy Trade Unions, it is a pragmatic compromise, science based, an efficient step against the climate challenge, increasing Europe energetic security and independence and lowering the cost of energy.

We insist that according to the EU procedure, the Council and the Parliament have four (to six) months to approve or reject the CDA, without the possibility of amending it. Its possible rejection would carry the seeds of a serious and double risk of splintering: splintering between our nations with more and more divergent energy choices and economic interests; social splintering within our nations through

the social consequences of an energy shortage, of the uncontrolled rise of energy prices and the unacceptable increase of energy poverty. It would seriously jeopardize the energy sector, its workers and the EU climate goals.

Since its birth, in particular with the Euratom Treaty (1957), Europe has gathered, in increasing state numbers, around the fundamental need for abundant and competitive energy; the climate threat now adds to this the urgency of rapid, efficient and economically and socially sustainable decarbonisation. This is the challenge for our generation. Taxonomy can substantially reduce the cost of this transition by decreasing investments costs.

Consequently, and for all the above-mentioned reasons, the signatory European Energy trade unions, consider that it is of the utmost importance to have the Complementary Delegated Act approved by a majority in Commission and in the European Parliament. If not voting for, then abstaining would be the best approach, in order not to have the CDA rejected.

Respectfully yours,



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FR - Sébastien MENESPLIER, general secretary



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