Voices of Nuclear contribution

Experts hearing
by the European Economic and Social Committee (EESC)
On the 8th Illustrative Program for Nuclear (PINC)

9h30-11h30
Friday September 5th, 2025
Brussels

The PINC, a requirement under Article 40 of the Euratom Treaty, is established by the European Commission and provides a comprehensive, fact-based overview of nuclear development trends, as well as the scope of investment needs across the EU and recommendations. The assessment is in line with the EU's decarbonization targets, the REPowerEU Plan, and the Clean Industrial Deal goals. The precedent PINC was released in 2017.

Experts heard:

- Emmanuel BRUTIN, Director General, Nucleareurope;
- Tomas KÅBERGER, Director, Energy Area of Advance, Professor of Industrial Energy Policy –online;
- Carl FRASELLE, Central delegate for the Force Ouvrière union, Framatome;
- Myrto TRIPATHI, President, Voices of Nuclear, General Director of the Terrawater Institute;
- Gianfranco BRUNETTI, European Commission, DG ENER representative and co-author of the PINC

Contribution of Myrto TRIPATHI, president and founder of Voices of Nuclear :

1. **What is the Voices of Nuclear and from which perspective do we speak**
   The Voices of Nuclear is an independent citizen NGO made of volunteers that exist since 2018 and aims at representing the beneficiaries of nuclear energy, citizens and industrial end-users alike.

   Our aim is to ensure the users get to benefit from nuclear energy in the best conditions possible, which means not only that we aim for the nuclear industry to have the means to work in good and fair conditions, but we also keep a knowledgeable expert vigilant look on the industry to remind it as much as may be necessary of its obligations and responsibilities.

2. **As representatives of the populations, we take good note of the overview of the situation presented** in the PINC regarding the objectives Member States set for themselves as far as nuclear development is concerned,

(Based on updated National Energy and Climate Plans and investment projects reported by Member States, the Commission estimates a scenario of 109 GWe of net electricity generation capacity from large-scale nuclear reactors by 2050 requiring an investment of around €241 billion in present value terms: €205 billion for developing new large-scale reactors and €36 billion for extending the lifetime of existing ones.)

3. **We recognize the great progresses that have been made in the positive perception and perspectives set for nuclear energy, largely thanks to the recognition of the important role nuclear must play** in face of climate change, preservation of the environment and health (air pollution, nuclear medicine), economic well-being and strategic independence of the Union,

- Only clean dispatchable source of energy with hydroelectricity – a powerful pair representing only 13% of the EU's energy mix in 2022
- Very low environmental footprint, which will become even lower when generation 4 reactors will lead to near circularity[1]
- High potential for high sovereign content, unchallenged by geopolitical and market disruptions
- Enabler to all other clean energy sources and energy vectors, either through its flexibility potential or its capacity to be deployed in all geographies. Nuclear can generate low carbon heat and low carbon electricity, allowing the production of other energy vectors such as hydrogen or e-fuels or can power other low carbon technologies like carbon capture and storage
- Enabler to the preservation of certain fundamentals of democracy by reducing the need for citizens' demand monitoring and management through invasive digital means required when intermittent sources of energy take up more than, approximately 30 to 40% of the energy mix.

4. **HOWEVER, we also recognize the fact that, if the investments foreseen in the PINC may seem as a high level of ambition, they are in reality severely insufficient**

   Ambitious because:

   a. W**hat looks like a high level of ambition -** the slope of the increase in investments required (+11% of installed capacity by 2050 to reach the base case scenario and + 46% to reach the upper target) - is essentially **a late and long-awaited catch-up, due to the fact that the starting point is painfully low.** This low starting point (11.8 % in a mix still close to 70% of fossil+biomass) is the result of decades of slow investments or even disinvestments and of antinuclear policies fed by antinuclear sentiment.

[1] see JRC Technical assessment of nuclear energy with respect to the 'do no significant harm' criteria of Regulation, 2021

Insufficient because

b. **This level of ambition is insufficient** considering the challenges we collectively face and the speed at which we must answer them

   In the introduction of the PINC, the Commission estimates that "*over 90% of electricity in the EU in 2040 will be produced from decarbonised sources, primarily renewables, complemented by nuclear energy*" (when electricity still only accounts for 23% of EU's energy mix)

c. **This level of ambition is rather similar to what was presented in the previous PINC** (as highlighted in the conclusion of this PINC), which led to little to no results, and can only be qualified as a failure

d. **There doesn't seem to be in the current PINC any attempt to diagnose the reasons that led to this failure**

5. **A diagnosis of how so much delay has accumulated should be mandatory considering the**

   a. **Obligations enshrined in Article 2 of the Euratom treaty**
      "Facilitate investment and ensuring the development of basic infrastructure for nuclear development"
   b. **Responsibility in the face of the European people**. Opinion polls at the end of 2024 across the EU showed that 62.37% of citizens support the resort to nuclear energy.

6. **All counter-productive measures that led to the current situation of under-investment**, which could have been identified if a diagnosis had been run, and depend on the European institutions, or that could be influenced by them:
   - **should be addressed,** as they are at the root of what is preventing these necessary investments to take place in the future
   - **should be recognized as one of the main causes of the under-investment that occurred in the past**

7. Without pretending to be exhaustive, and focusing on elements that we feel are relevant to the Commission's work, **we observe that these counter-productive measures are the result of the following root causes** (and must be rooted out)

   a. **Past lack of a level-playing field principle applied to nuclear and all other energy sources** in all EU secondary laws, that no facts support
   b. **Past lack of recognition of the benefits and advantages of nuclear** energy
   c. **Past lack of recognition of the seriousness and urgency of the climate, environmental and strategic autonomy issues** that should have always taken precedence over fear of nuclear
   d. **Still the current lack of recognition of the many real-life experience feedbacks** we have had these past 20 years, at several EU countries' scale, of the severe insufficiencies of a "could-be" 100% renewables energy mix, which calls for firm energy sources to make up at least 50% of any electricity grid

e. **Still current contributions of European institutions and their representatives to negative, or blantly insufficient, communication on nuclear** (educational material, ad campaigns across the EU, representatives quotes etc.)

8. **Among these counterproductive measures that should be urgently corrected, we would like to draw the attention of the Commission on the following**

a. **Nuclear is still considered as a complement to renewables and not as a pillar of the energy mix in its own right** – the aim of European institutions and all documents, directives and regulations that emanates from them should be to refer to "low carbon" objectives and technologies, instead of "renewables"

b. **Nuclear is still considered as a "transitional economic activity" in the European taxonomy for sustainable technologies, along with natural gas** (despite a carbon footprint nearly 100 times higher than that of nuclear, without even including its other environmental and strategic drawbacks)

c. Despite some progress, such as in the Net Zero Industry Act, nuclear is still
   i. **deprived of access to financial mechanisms** made available to other energy sources, especially renewables such as PPAs and CfDs, though the new PINC indicates future progress on this matter.
   ii. **deprived of access to tax incentives, state aid measures and subsidies** (fossils still enjoy some)
   iii. **excluded from 3 out of 5 structural funds** (European Regional Development Fund, Just Transition Fund, Social funds, European Cohesion Fund)
   iv. **excluded from major labels** or assimilated to gas like in the Green bonds definition, hence excluded by major banks' definition of sustainable investment
   v. timid to no support from the European Investment Bank
   vi. **the civil society supporting its fair recognition is not benefiting from support especially not by foundations at European levels**

d. Assessment methods used provide unfair treatment to nuclear in all fields
   i. **LCOE**, used for accounting for the economic soundness of a technology,
      - is biased against long-lived capital-intensive technologies (because of discount rates), while environmental concerns should advocate for the opposite
      - doesn't account for system costs
      - doesn't land price and occupation
      - doesn't account for chosen availability of power at any time
      - etc.
   ii. **absence of indicators and price mechanisms accounting for**
      - full environmental footprint
      - sovereign content,
      - resilience capacity to foreign interference and market failures,

iii. **systematic use of the term "renewable"** which doesn't carry any environmental value, and that should be systematically replaced by a term with a more rigorous definition depending on the context where it is used.

e. **Biased against R&D in access to funds as compared to renewables**

f. **Confronted with unfavorable market settings**
- Biased merit order-based access to the grid
- Short-term market mechanisms not valuing the ability to supply on the long-term
- Forced unfair competition imposed on energy companies of certain Member states (such as the one that led to Arenh on France's EDF)

g. Discriminatory legal framework
- EU renewable energy directive which only sets objectives of VRE generation at EU level
- The exclusion of pink hydrogen from the definition of "renewable hydrogen" in the REPower EU plan, the renewable energy directive and its delegated acts.

Conclusion

We want to express our confidence and, I will go as far as saying, more confidence than the Commission seems to have and convey, in the realization by the Members States of their development plans. May it be it for lifetime extension of the plants or for new builds or as far as attractiveness is concerned. This confidence is based, again, not on wishful thinking or ideology, but on experience feedback, appetite from the population and readiness of economic and industrial actors.

This confidence is, of course, also based on the conviction that counterproductive measures still in place at the European level will be progressively and collectively realigned with our common objectives and not left to prosper on fears and misconceptions over nuclear that have long been proved blatantly exaggerated, if not instrumentalized.

We particularly welcome:
- the call to **form a "regulatory coalition of willing countries", as part of which, they might converge their regulations or agree to mutually recognise their licensing decisions.**

- The call to **support civil society representatives in this sector and increase education and communication.** Up to very recent times, civil society on nuclear was active in conveying negative information and spreading fear in the very explicit objective to see an end to nuclear in Europe. **What is needed is a knowledgeable critical vigilant counterpart that wants the nuclear industry to improve, not to die. It is unwise to take advice from an enemy.**

For this, supportive, though critical, civil society, independence is key and for this the Commission, member states, independent foundations etc. should indeed play a role.

- The need to **reduce "hold up risk" perception from private financial actors, not only with clear communication by the European Commission and its representatives, but also clear policies aligned with their declarations, and, why not, innovative mechanisms involving populations in the financing, or even ownership, of the plants whose construction they support.** Several such initiatives already exist and illustrate the motivation and appetite of populations for nuclear.

We stand ready to support the EESC and the Commission and any concerned and engaged institutions, governments, organisations or citizens that would wish to reestablish rigor and objectivity in evaluating the best tools and how to implement them **so the European Union and its citizens, current and future, can achieve its objectives.**

This objective is neither an energy mix 100% renewable nor an energy 100% nuclear, but the availably of energy when, where and in the quantities we need, with the lowest environmental, health and climate footprint, providing low risk to security and safety. An energy supply supporting our democratic values and the mechanisms to preserve them including the autonomy in the decision-making of individuals and their public representatives. Such a long list of goals requires complete transparency in the operations of the energy supply chain, as well as a very long-term vision with perspectives spanning centuries and not decades.

This is what we want, and this what a fair evaluation of nuclear, that is not reflected in our current policies and policy framework, will contribute to, if we take the necessary action without further delay.

This evaluation is the opportunity to do it. We sincerely thank all those present at this hearing and this committee for seeking our point of view.