

1 February 2022

Dear Commissioner McGuinness,

We are writing to you in relation to the draft EU Taxonomy Regulation Complementary Delegated Act covering certain nuclear and gas activities. This statement only addresses the proposals related to nuclear.

We would first like to express our concerns regarding the adoption process. Even though we welcome that member states were given the opportunity to comment on the draft delegated act, the consultation period was too short given the complexity and controversy of the matter. We believe that a public consultation concerning the draft would have been justified. We would like to stress the importance of a more transparent and inclusive process in future work, to ensure trust in and the usefulness of the Taxonomy.

As you are aware, Finland and Sweden are strong supporters of ambitious climate action. We consider sustainable finance to be an essential part of our joint efforts in meeting the EU's common target for climate neutrality by 2050.

It is important to respect the principle of technological neutrality. We therefore acknowledge and welcome that nuclear-related activities are included in the draft delegated act, as a complement to activities involving renewable energy. However, we would like to raise the following three points in relation to the proposed technical screening criteria.

First, the criteria should recognise the concrete advancements Finland and Sweden have made in nuclear waste management. In general, the criteria should build on the Euratom treaty and its secondary legislation together with national regulations for nuclear safety and licensing of installations.

Second, the time limits specified for new and existing nuclear facilities should be removed.

Third, the description of the economic activity related to existing nuclear facilities covers only modification of existing nuclear installations for the purposes of plant lifetime extension. It should be clarified that the activity also covers operation of existing nuclear installations.

We trust that you will give these comments due consideration when finalizing the delegated act.

Yours sincerely,

Mika Lintilä

Minister of Economic Affairs of Finland

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Minister for Energy and Digital Development of Sweden