



Madis Vasser
Estonian Green Movement
madis@roheline.ee

Your ref 1 November 2021

Our ref 26 November 2021 No: 11-1/21/5370-2

Patricia Lorenz
Friends of the Earth Europe
patricia.lorenz@foeeurope.org

Information on Small Modular Reactors

Dear Mr Madis Vasser and Ms Patricia Lorenz,

We would like to draw your attention to the fact that Estonia is a country without nuclear power or research reactors. Today, our competences on nuclear technology are limited and we are not in the position to answer many questions. We can only provide information on our current standpoint and main prospects.

Taking into account the goal to reduce CO2 emissions and achieving climate neutrality, we must consider all options for adequate and sustainable energy production in the future. In the field of nuclear energy, Estonia will require a lot of prior knowledge and research before we are able to make an informed and knowledge-based decision in principle whether to go nuclear or not. So far, Estonian Government authorities have not conducted any reports, analyses or other documents on SMR's.

Estonian Government adopted a decision to establish a Nuclear Energy Working Group (WG) to define the nation's positions towards the issue. WG was established by Ministry of Environment with the decree of minister on 20 April 2021. Meeting protocols and other relevant materials are available in thematic website (currently only in Estonian) - <https://envir.ee/kliima-ja-keskkonnakaitse/kiirgus/tuumaenergia-tooruhm>.

According to the discussions in the EU and International Atomic Energy Agency (IAEA), organizational models for SMR are not going to differ much from the ones implemented for larger units. The difference is only in the size of regulatory infrastructure – smaller nuclear programs require smaller institutions with smaller number of staff.

SMR reactor designs running on plutonium as fuel are out of our consideration, because these reactors pose nuclear proliferation risk and are currently operated only in nuclear weapon states. Broader use of this type of reactors could jeopardize the global non-proliferation regime.

Regards licensing regulations for SMR's Estonia has not adopted any regulations since there are no nuclear energy activities in the country. We expect that simplified standardized approach should be considered for SMR's at the EU level and harmonized safety criteria developed. Licensing rules for SMR's should be established preferably at the EU level before 2030.

Sincerely Yours,



Harry Liiv
Deputy Secretary General

Marily Jaska
marily.jaska@envir.ee

Reelika Runnel
reelika.runnel@envir.ee