Statement on the call for evidence for the 2025 Nuclear Illustrative Programme (PINC) update

We welcome the opportunity to submit a statement before the PINC will be finalized and hope that our comments will be properly taken into account.

We call for a realistic assessment of the role of nuclear power in the EU

The number of NPPs in the EU is constantly decreasing. 100 reactors are in operation in 2025, while in 2017 (when the last PINC was published) there were still 125. Only 2 reactors started operation in the last two decades (after being built for 17 and 18 years). And the existing reactor fleet is ageing, the mean age in the EU in February 2025 was already 38.3 years – most reactor design (https://www.worldnuclearreport.org/European-Union, seen 12 May 2025).
The SMR designs that are on the wish list of some countries are neither licensed yet in the EU, nor are they modularly available.
Nuclear power is on the decline, not only in the EU but also globally.

We call for an effective climate policy

New NPP will not contribute to climate protection as they take much too long to be in operation, they are too risky and cost too much in comparison to renewables.
Saving energy, increasing energy efficiency and fostering energy policies without nuclear are more realistic pathways for decarbonization and energy security than putting hope in a nuclear renaissance.

We call for more efforts in nuclear waste management

Backend solutions for high radioactive waste are missing in all EU member states. No member state has a final repository for HLW in operation yet. All deep geological repository projects suffer delay, and most member states have not even started their planning. When assessing the implementation of the Nuclear Waste Directive 2011/70/Euratom in the member states, the EC concluded that "[…]the transposition and implementation of the Directive in the Member States have not to date fully achieved the Directive's objectives for all categories of radioactive waste." And: "[…] the targets set in some national programmes are not sufficiently ambitious and envisage long implementation periods that risk burdening future generations. Several Member States keep an option for shared disposal solutions with other countries. However, this may lead to deferral of decisions rather than acceleration especially because of import bans in numerous Member States." (COM(2024) 197 final).
Long-term interim storage is the solution that remains when there are no final repositories available. But this option increases environmental risks due to ageing and outdated designs of interim storage facilities and casks; interim storages were not built for hundred years or longer. They will need proper environmental impact assessments when it comes to lifetime extension.
Historic legacy radioactive waste including waste from uranium mines is not fully under the nuclear waste regimes of EU member states yet, but should be.
The financing of upcoming costs for the backend management is not secured in most member states, leading to burdens for taxpayers.

We call for putting more effort into security and independence from Russa

The ageing European reactor fleet needs to undergo a stress test on the issue of security if they are able to withstand all types of terroristic acts and acts of war.
Nuclear fuel which is currently advertised as entirely European by the French company Framatome to replace the VVER fuel delivered by Russian state company Rosatom, does not exist yet and most

likely never will, because Framatome announced that the VVER fuel will be produced with a joint venture with Rosatom in Germany. This is not the way to achieve independency from Russia.