

Good afternoon ladies and gentleman,

Thanks to EESC for inviting Friends of the Earth Europe and giving us the chance to present our views. I do not want to repeat what Mr Haverkamp said on our participation in the ENEF and why we did not stay in the Forum. For me who took part in the RISK working group on nuclear safety and waste, I want to add that after long discussion and originally high flying attempts, the nuclear safety directive decided now corresponds to a safety level we have to call **ALARA - As Low As unReasonably Allowed**.

I consider the work done on EU level as extremely ambitionless, be it ENSREG or ENEF and is very far behind developments on the ground. While on the theoretical level, which should lay the basic fundamental rules for looking for a final disposal, the main aim seems to be to avoid any fixed and clear rules, dates and methods, reality is faster.

The prize should already be known: Germany finds itself at a point where the favoured final repository site in the last weeks turned out to be at least as inadequate as critics were pointing out in the past decades:

Now even the conservative party CDU admitted that Gorleben is not an answer and now only a new open process needs to get started. Also the other final repository, for low and intermediate level waste, called Asse, turned out to be endangered by ground water which is getting in - waste is already being stored. Also interesting – the industry did not pay for it, got rid of its waste however, the damage done will now be paid by the taxpayers – 2 billion euro are mentioned for cleaning up Asse.

For Gorleben not only investments of 1,5 billion euro are probably lost, I assume it is not necessary to explain how much trust is lost when 30 years of utter disinformation on such an issue is now confirmed. On the other hand, Germany undertook the effort of AKEND which was to define criteria how to conduct the search for a final repository. E.g. safety case to be proven is 1 million years.

I explained this to show how it is not going to work. There also are EU funded projects like ARGONA, which tries to figure out better ways. The question is whether these projects are making sense, when the mentioned “methodology” is still being applied.

This method lead by political pressure is now being applied e.g. in Romania. According to newest info from my Romanian NGO colleagues, close to Cernavoda, in Salini, a final waste storage is being prepared with public involved only locally, mostly talking only to the mayors, the process is rushed through, without real public involvement and clear rules.

Some countries still count on the export to Russia, even in their energy concepts (SR, CR). The newest update of the Czech energy concept gives the impression of absolutely no reason to hurry. This is utterly irresponsible, mainly for a country which is planning to even increase its nuclear fleet, where the search for a repository site caused so much unrest it had to be frozen, all villages considered as potential sites, organized referendums and ended up with clear NO – the government is now presenting the idea of putting the high-level waste to rest where is no resistance - on military areas! Last exit, also for safety considerations it seems like. Similar is the situation in Slovakia. On top of the problems already pointed out, the

decommissioning funds in Slovakia are completely insufficient. This is partly due to historic reasons. However, instead of trying to change this and secure needed funds, the trend of a growing deficit is kept, the new owner of the state utility - ENEL - to build Mochovce 34, pays even less into the waste fund (percentage based on electricity whole sale prize). At this point the EU would have a very clear mandate, which I know some in the EU Commission are aware of, but not acting enough.

The EU needs to play a role, it should set firm conditions on major steps, e.g. criteria for involvement, participation of stakeholders, but also geological criteria, agreeing on method to define the safety case. Right to veto of communities, no shared repositories, participation in decision taking from the very beginning, already before EIA is started should be pushed through as clear preconditions. The proposal of shared or regional repositories is unacceptable under these circumstances, to high the risk that the repository will end up in a country where the nuclear regulator is weaker than in the neighbouring country

I do not see any step towards a solution. What is worse, I do not see industry and politicians taking this enormous responsibility serious.

After 2 years of work, the EU Nuclear Safety Regulator Group presented its report to the EU Council, the highlight being „*ENSREG concluding the importance of developing national radioactive waste management programmes*“ followed by the bold idea of a “*common format for reporting*”.

Not even the fact that a common methodology for financing of waste management and final repository would be good start is mentioned anywhere. Where are standards of public participation and decision taking? The way it stands now there is only a “*presentation of the established national radioactive waste programme to the public..*”

I wonder how many more fora, R&D projects and platforms will be founded and financed without daring to come up with strict rules for repositories, deadlines to meet and methods to stick to. After 60 years of nuclear energy use no waste solution, no repository: how much longer will it take to admit that nuclear is not sustainable and the phase – out the only real solution.

http://www.nuclear-waste-watch.org/files/factsheet_euratom.pdf

<http://www.nuclear-waste-watch.org/resolution.htm>

Thank you for your attention.