

**SECURITY OF ENERGY SUPPLIES IN THE EU – GREENPEACE
INTERNATIONAL RESPONSE TO EU GREEN PAPER CONSULTATION.**

November 2001

Greenpeace International considers the existing consultation process conducted by the Directorate-General for Energy and Transport as being completely inadequate and unrepresentative of European public opinion. Greenpeace calls upon the Commission to honour its declared intention to consult widely throughout member states.

The Commission has not organised either consultation roundtables in Member States or expert discussions in Brussels as originally stated. These debates are a fundamental part of assessing the public opinion and gathering a wide range of views from people more involved in the environment and energy issues. These discussions together with other substantive consultations need to take place and the Commission needs to organise them prior to reaching any final opinion on the Green Paper. Failure by the Commission to do so will only reinforce the European public's view that the Commission is only interested in seeking the views on energy issues of the corporate lobbyists in Brussels.

Within the existing consultation process the Green Paper on Security of Energy Supply offered for comment, fails to show the vision necessary to address adequately the challenges that Europe faces on energy. Several issues in particular stand out:

- The Green Paper gives relatively little attention to the crucial issue of demand policy and energy saving measures. There is an absence of a detailed case showing how “using currently available technology, 40% of energy” could be saved, or why there is currently reluctance for the EU states to go down this route. As demand management offers the best prospects of increasing energy security and combating the environmental threats of nuclear waste and climate change consideration must be given to other policy instruments in addition to the tax incentives outlined.
- The Green Paper's presentation of the nuclear power issue is unacceptable and shows that one of the Commission's objectives with the Security of Supply legislative process is to find new ways of promoting the failed nuclear sector. Following September 11th attacks in the US there can be no future for nuclear power. The fact that anti-aircraft missiles and fighter aircraft are being stationed

around nuclear facilities across the world shows that nuclear power is vulnerable to attack. The risks are so great from a nuclear disaster following any sort of attack, that a decision to close all nuclear facilities must be taken immediately. An energy technology such as nuclear power, which can bring about such wide ranging and long term damage to human health and civilisation, can never be considered an 'energy security' option; nuclear power is an 'insecure energy' option.

- The Green Paper's favourable attitude to nuclear reprocessing, fusion and the Euratom Treaty reveals the Commission's true intentions of promoting and strengthening both discredited anachronisms of the Commission's nuclear policy. Such are the fundamentally erroneous opinions stated in the Green Paper on these issues that Greenpeace calls for an urgent reappraisal in the Commission's approach to nuclear policy.
- In the context of global climate change, the Green Paper fails to appreciate or measure the extent to which it will be necessary to restrict fossil fuel use within the next 50 years. Both the UN IPCC¹ and RCEP², for example, says cuts in CO2 emissions of at least *sixty percent* are needed;
- The Green Paper fails to truly recognise the necessary scale of the need or indeed the potential capacity for a significantly greater contribution from (abundant and indigenous) renewable sources and to set out detailed plans. Only ambitious legally binding EU renewable energy targets, for member states to meet, will succeed in establishing the renewable energy sector as the main supplier of Europe's energy needs.
- Finally many of the problems arising in the energy sector have arisen from the undemocratic and unrepresentative nature of the centralised energy providers and planners. More concrete measures are required to allow public participation in the energy supply side, not just as consumers, but as producers too. Decentralised renewable energy production with real participation of the end consumers will do more to promote a sustainable secure energy future for Europe, than reinforcing the status quo within the energy sector that the Commission's Green Paper advocates.

Responding to some of the particular questions in the call for evidence:

(Q.1) Greenpeace believes that an increased reliance on imports *per se* does not create any significant doubt about the security of energy supplies over the short to medium term. Nevertheless, by advocating the rapid and substantial growth of renewable energy sources - coming in the main from indigenous production - and energy efficiency measures, we expect that as these technologies are taken up then the reliance on imports will decrease over time. Such a scenario would also carry with it additional benefits including:

- preparing the ground for new and tougher targets under an increasingly stringent international climate control regime;

¹ United Nations Inter-Governmental Panel on Climate Change

² Royal Commission on Environmental Pollution

- reducing air pollution from fossil fuel power stations and making possible nuclear phase-out;
- dramatically reduce the potential security risk from attacks, when compared to conventional facilities and infrastructure;
- the strengthening the industrial base of the EU through the manufacture and installation of renewable energy systems within its borders;
- guarding against the eventual exhaustion of fossil fuel supplies both inside and outside Europe;
- provide an overall increase in jobs in the EU energy sector;
- provide a significant benefit to the EU's balance of payments with the rest of the world as the cost of importing fossil fuels falls.

(Q.2) The key EU energy policy objectives (and those of Member States) may be compatible with each other if approached in the right way. Environmental objectives can be met by state interventions into markets that nevertheless maintain competition and flexibility providing that other aspects of the market do not harm those objectives. Energy *prices* will have to increase to reflect the true costs of nuclear power and fossil fuels, but if combined with efficiency measures energy costs overall would not rise.

(Q3 & Q7) The Green Paper's position that established energy technologies need to provide subsidies to renewable energies misses the point about what is wrong with the current European energy market. The energy market is clearly an unfair market with major direct and indirect subsidies to established energy technologies such as nuclear and fossil fuels. Establishing a true 'level-playing field' within the energy sector would be the most effective way of developing renewable energy. All direct and indirect subsidies to nuclear and fossil fuels must be abolished and the major cost externalities connected to these unsustainable energy technologies - such as the true costs of nuclear contamination and climate change emission - must be reflected in the price of these energies.

Many renewable energy technologies are already at or near competitive market prices. Some others require a greater level of support over the short to medium term. For established technologies such as wind power, quota based systems provide flexible and competitive support regimes that allows private sector investment and skills to meet public policy objectives. To date, EU energy policy has only set non-binding targets for renewable energy up to 2010. Yet, as the Green Paper stresses, renewable energy is the key to producing Co2 free electricity. Consequently it is necessary for the EU to develop longer-term legally binding targets and strategies for the development of renewable energy.

(Q.8) The Green Paper's statements that nuclear power is an option for combating climate change is completely misleading and shows the Commission's lack of understanding on such issues. Nuclear power's role in undermining real energy solutions to climate change, namely energy saving and renewable energies, are well documented throughout the European Union. Europe now could have been leading the world in establishing a true sustainable energy sector had the Commission and its member states not wasted countless billions of Euros on the failed nuclear sector. The Commission's view that nuclear power (and particularly new plant construction) is an acceptable option, are not acceptable when substantial radioactive waste issues have not been resolved, nor are they likely to be.

Nuclear generation, nuclear materials and associated practices pose unacceptable risks to people and to the wider environment both today and long into the future. Public policy should be to manage and wherever possible reduce these risks. In particular spent fuel reprocessing must be ended immediately and existing nuclear power plants must be replaced by renewable generating technologies immediately. There is no case, including no economic case, for building new nuclear power plants. The expertise held by staff within the nuclear industry should be re-deployed toward the decommissioning and clean up of nuclear sites and the conditioning of existing nuclear materials into forms that are safer to handle and store.

(Q.9) The management of the demand for energy is seen by Greenpeace as requiring foremost attention and so the acknowledgement on this by the Commission Green Paper is therefore welcome. Although the Green Paper makes reference to the potential for energy efficiency it fails to adequately explain how this can be realised. However, there remain many substantial opportunities to reduce energy use - for example, by improving building and appliance standards, improving vehicle efficiency, and a large expansion of co-generation - that have not been pursued, or at least not pursued adequately. In most cases these are more cost-effective options than increasing or replacing conventional supply and over longer periods these will create a much more efficient European economy.