UK Green Taxonomy Consultation – Response from the Nuclear Institute

About the Nuclear Institute

The Nuclear Institute is *the* professional membership body dedicated to nuclear. Representing over 4000 professionals at all levels across the nuclear industry, we maintain the Nuclear Professionalism Standard, an industry-wide standard that sets the benchmark for professionalism in the nuclear sector. We work with individual and organisational members to facilitate continuing professional development, provide independent recognition and accreditation of nuclear professionals, as well as offering professional registration and chartership routes.

Our national network also provides a place for the nuclear community to interact through our events programme, branch network, Young Generation Network, Special Interest Groups and our many volunteer-led activities.

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The Nuclear Institute fully supports the implementation of a UK Green Taxonomy and specifically in the energy sector (power, heat and beyond). Nuclear-derived energy is clean, sustainable and reliable whether being produced from large, small or advanced nuclear plants. We fully support the UK Government intention to include nuclear energy as part of any future technology as we know that both as a clean energy technology and a technology that is regulated against to ensure adherence to significant environmental criteria, it must be part of any future taxonomy.

We are only addressing the questions asked that have a particular interest to energy and nuclear energy production.

1. To what extent, within the wider context of government policy, including sustainability disclosures, transition planning, transition finance and market practices, is a UK Taxonomy distinctly valuable in supporting the goals of channeling capital and preventing greenwashing?

   Nil Response

2. What are the specific use cases for a UK Taxonomy which would contribute to the stated goals? This could include through voluntary use cases or through links to government policy and regulation.

   Nil Response

3. Is a UK Taxonomy a useful tool in supporting the allocation of transition finance alongside transition planning? If so, explain how, with reference to any specific design features which can facilitate this.

   Nil Response

4. How could the success of a UK Taxonomy be evaluated? What measurable key performance indicators could show that a UK Taxonomy is achieving its goals?

   Nil Response

5. There are already several sustainable taxonomies in operation in other jurisdictions that UK based companies may interact with. How do respondents currently use different taxonomies (both jurisdictional and internal/market-led) to inform decision making?

   Nil Response

6. In which areas of the design of a UK Taxonomy would interoperability with these existing taxonomies be most helpful? These could include format, structure and naming, or thresholds and metrics.

   Nil Response

7. Are there any lessons learned, or best practice from other jurisdictional taxonomies that a potential UK Taxonomy could be informed by?

   While developing a green taxonomy the UK should pay close attention to lessons learned around the creation of an EU green taxonomy. In particular, ensuring that a "level playing field" is established for any technologies and sectors being taken forward through the taxonomy. This should be based on defined criteria that apply equally and consistently against any technologies being assessed.

8. What is the preferred scope of a UK Taxonomy in terms of sectors?

   Several sectors will benefit from a green taxonomy including energy, manufacturing, water supply, environmental / waste management, construction and transportation. These sectors are all reliant in raising capital funds that will enable construction and operation of significant infrastructure. The energy sector in particular will benefit from a green taxonomy and both nuclear and renewable technology should be part of this taxonomy. Accessing these funds will be fundamental to enable capital investments and having green credentials from the taxonomy will assist in enabling this.

   We fully agree with the UK Government's proposal to include nuclear energy in any future green taxonomy.

9. What environmental objectives should a UK taxonomy focus on (examples listed in paragraph 3.3)? How should these be prioritised?

   A key environmental objective is climate change mitigation. This should be the key priority for any green taxonomy. This criterion is non-negotiable and technology will either pass or fail. On passing this criterion, several additional criteria should be used

to further assess the technology. These additional criteria should cover climate change adaption, sustainable use of water and protection of marine resources, circular economy, land use, pollution prevention, and protection of biodiversity and ecosystems. Technologies should either meet the criteria already or through development be moving to meeting the criterion in the future. A path to enabling these criteria to be passed should be provided. It should be noted that nuclear energy, whether large, small or advanced technology is carbon free at point of generation and as such will automatically pass the pass / fail criterion of climate change mitigation. On the others, nuclear either is regulated to meet those criteria already or has a plan to meet the criteria at a future point in time.

We fully agree with the UK Government's proposal to include nuclear energy in any future green taxonomy.

10. When developing these objectives, what are the key metrics which could be used for companies to demonstrate alignment with a UK Taxonomy?

The following metrics should be considered to demonstrate alignment with a UK taxonomy with respect to energy.

Climate change mitigation: g CO_2/kWh

Sustainable use of water and protection of marine resources: plans / designs in place to mitigate

Circular economy: resource depletion / materials recyclability / land use / waste management

Pollution prevention and control: liquid and gaseous discharges through demonstrable application of BAT/ALARA

Protection of biodiversity and ecosystems: land and marine ecotoxicity and radiotoxicity

11. What are the key design features and characteristics which would maximise the potential of a UK Taxonomy to contribute to the stated goals? Please consider usability both for investors and those seeking investment. This may include but not be limited to the level of detail in the criteria and the type of threshold (e.g. quantitative, qualitative, legislative)

Any taxonomy should be based on quantitative standard metrics that can be applied consistently and rigorously across technologies being assessed. One example would be the consistent use of life cycle analysis. Using qualitative information can drive subjectivity and is not consistent with enabling assessment on a "level playing field". Legislative and regulatory requirements should be set for any technologies that have been taken forward through the taxonomy using the quantitative metrics established

as the baseline.

12. What are respondents views on how to incorporate a Do No Significant Harm principle, and how this could work?

We fully support the "Do no significant harm" principle. This should be applied against all environmental criteria being assessed. No one criterion should impact negatively on the others. However, this should be applied against all criteria (as mentioned above) other than the pass/fail criterion of climate change mitigation. This criterion is stand alone. For the other criteria, there should be no situation whereby meeting one single criterion should negatively impact on the others. As long as quantitative metrics are used this approach should work. It's worthwhile noting that nuclear already meets the 'no significant harm' criteria in the UK as any new developer has to prove the design is ALARP with respect to risk and dose and uses BAT to reduce discharges to ALARA.

13. It is likely a UK Taxonomy would need regular updates, potentially as often as every three years.

- Do you agree with this regularity?
- Would this pose any practical challenges to users of a UK Taxonomy?
- Would this timeframe be appropriate for transition plans?

Regular updates to the taxonomy will be required as the UK progresses towards net zero. It is recommended that an update is planned every 4 or 5 years in line with parliamentary cycles. To enable users of the taxonomy to have time to incorporate changes over this time it is suggested that users are allowed to remain within the taxonomy as long as transition plans are in place and progress is being demonstrated towards meeting the existing and any new metrics being implemented.

14. What governance and oversight arrangements should be put in place for ongoing maintenance and updates to accompany a UK Taxonomy?

Nil response