To:
European Commissioner for Energy
European Commissioner for International Partnerships

Brussels, 8 July 2020

Subject: The report from the Euratom Supply Agency (ESA) on the security of nuclear fuel supply

Dear Commissioner Kadri Simson,

Dear Commissioner Jutta Urpilainen,

We are contacting you about the latest report on the security of nuclear fuel supply published on 5 May 2020 by the Euratom Supply Agency¹. The report identifies the threats and restrictions that "could potentially jeopardise the availability of nuclear fuel and the provision of electricity at affordable prices to all EU consumers". It has identified the three biggest threats to the availability of nuclear fuel in the EU: a lack of transport hubs open to nuclear shipments; a lack of investment in conversion facilities; and permanent reduction of production and withdrawal from uranium exploration. However, this report fails to raise key principles: the application of radiation protection principles, the respect for the rights of indigenous peoples and local communities and trusting partnership relationships.

The report mentions the need to maintain an appropriate strategic inventory level but neglects the fact that uranium exploration must be carried out in accordance with environmental objectives. A recent and challenging example is the agreement between Kazakhstan and Orano which authorises the razing of a protected forest in order to exploit a new uranium deposit. 366 hectares of Saxaul will be cut down, whereas it has been forbidden since 2015 to cut down this threatened and essential plant in the Kazakh deserts. By fixing the sand dunes, Saxaoul helps prevent erosion and especially sandstorms, two increasingly pressing problems in this desert part of Central Asia. In addition, Orano will use the technique of in situ leaching extraction, a technique that releases considerable quantities of radioactive gas (radon) and produces large quantities of contaminated sludge and effluents. This technique presents a risk of irreversible contamination of groundwater².

What was the European Commission's involvement to ensure that this decision³ authorising the Orano mining license did not impact on environmental and social objectives? How does the European Commission intend to ensure consistency between the 2030 biodiversity strategy and uranium mining?

² [https://blogs.umass.edu/natsci397a-eross/contamination-risks-associated-with-in-situ-recovery-mining-for-uranium/]
³ [http://adilet.zan.kz/rus/docs/P1900000556?fbclid=IwAR2Zj7gOR1rHh541SOGfzdZ06PY6XDHx1nNKp0Vo9UCBXuD0AMtdAuLYI#z5]
Another example is Niger, where two Areva branches, Somaïr and Cominak, have been operating uranium mines in Arlit and Akokan for more than 30 years. A whole series of problems have been raised for years by the associations: contaminated scrap metal and plastic are on sale on local markets; radioactive waste rock is scattered and uranium mining consumes an enormous amount of water (270 million m³ since the mines have existed) and pollutes it (in the case of Arlit and Akokan, some of the wells used have a uranium contamination 10 times higher than World Health Organization standards).

What initiatives has the European Union taken to ensure that serious, independent and transparent scientific and epidemiological studies can be carried out on the employees of the mining companies located in Arlit and Akokan and on the surrounding population living in these mining towns, that pathologies linked to mining activities can really be treated and that the sites can be effectively decontaminated? How is the application of radiation protection measures applied in countries supplying uranium for member states?

The report also fails to report on the harm caused to indigenous peoples in many countries. In Namibia, the indigenous Topnaar-Nama tribe is affected by the Rössing mine, which is draining the agricultural and hunting lands of its members. In addition, they are exposed to ever-higher levels of radiation due to radioactive dust. In Niger, pollution from the Arlit mine has driven wildlife away and destroyed an area inhabited by Tuareg nomads. In India, the Adivasis have not been informed about the nature of the mine that would be extracted, nor about its risks. Many work in the mines without any protection, and the sludge from the mines flows into the rivers where people bathe and wash their food.

As this report by the Euratom Supply Agency pushes for uranium mining, what is the European Commission's strategy to ensure respect for indigenous rights in this context? What guarantees are in place to ensure the rights to a healthy environment, an adequate standard of living, health and the right of peoples to freely dispose of their natural wealth and resources?

Finally, with regard to transport, the report recommends harmonisation of rules, simplification of procedures and reduction of administrative burdens. We are opposed to such opinions. Nuclear shipments on our roads and railways must be kept to a minimum and must be made as safe as possible. Transport must avoid transiting through densely populated areas and must be carried out with absolute transparency. Harmonisation would run the risk of transit via countries that have chosen to go nuclear-free. Such an injunction cannot be allowed.

Thank you for your attention,

Michèle Rivasi
David Cormand

5 https://unpo.org/article/9336
6 https://www.dianuke.org/a-nightmare-called-jaduguda/