

Paris, 16 March 2023

Madam Agnès Pannier-Runacher  
Minister of Energy Transition

## OPEN LETTER

Madam Minister,

Nuclear Transparency Watch (NTW) is an association co-founded by ANCCLI 10 years ago and developed with European parliamentarians of various political persuasions. Its aim is to promote a **culture of safety in the nuclear energy sector** in Europe, based on transparency as defined in the Aarhus Convention, which is, as you know, adopted by France and the European Union, **ensuring transparency, participation and justice for citizens in environmental matters**.

Today **NTW, with 12 European Non-Governmental Organisations and 23 Members of the European Parliament**, shares the position of the **ANCCLI**<sup>1</sup>, requesting the Government not to rush, and not to upset the current system of nuclear safety governance in France without prior study.

NTW points out that in its recommendations, the **OPECST** in France indicated that "*... the reform cannot do without the greatest transparency regarding the strengths and weaknesses of the current control system and a complete, rigorous and rapidly made public preliminary diagnosis...*".

Indeed, **NTW, like the ANCCLI, has been working with IRSN for years** on nuclear safety through research projects, expertise and open interaction between authorities and civil society. Projects such as the European research program on radioactive waste, EURAD, work on emergency preparedness and response, the Open Radiation project, in which we are involved, and cooperation within the post-Fukushima nuclear stress-tests would certainly not be what they are without IRSN and its unique and independent position.

**We are therefore concerned about the current proposal** based, as far as we know, neither on an impact study nor on a dialogue with stakeholders, even though the Fukushima accident, the anniversary of which we have just celebrated, has reminded the world of the importance of good governance of the nuclear safety system, with the French system widely still seen as best practice. The current proposals threaten to severely undermine both the quality and the model-function of this system.

We are aware that the process decided by the President of the Republic is already underway. We wish to express through this letter our serious concerns and would like to see that important principles shared by most actors in the field, and which you stated in your press release of 23 February 2023 will be rigorously implemented in an open and transparent way. Our concerns include:

- **Inclusion of a culture of independent citizen expertise: authorities that are open to civil society in the spirit of the Aarhus Convention.**
- **Continuation of exchanges and sharing of European expertise and research on social and technical issues of nuclear energy at a European level.**

I hope, Madam Minister, that you will be able to give due consideration to the concerns we have expressed.

---

<sup>1</sup> [https://www.anccli.org/wp-content/uploads/2023/03/ANCCLI-Appel-a-la-reflexion\\_v27-fevrier-2023\\_01.pdf](https://www.anccli.org/wp-content/uploads/2023/03/ANCCLI-Appel-a-la-reflexion_v27-fevrier-2023_01.pdf)

**Members of the European Parliament signatories:**

*Rasmus Andresen (Greens/EFA)*  
*François Alfonsi (Greens/EFA)*  
*Manon Aubry (The Left)*  
*Benoît Biteau (Greens/EFA)*  
*Damien Carême (Greens/EFA)*  
*Leila Chaïbi (The Left)*  
*David Cormand (Greens/EFA)*  
*Rosa d'Amato (Greens/EFA)*  
*Gwendoline Delbos-Corfield (Greens/EFA)*  
*Karima Delli (Greens/EFA)*  
*Pascal Durand (S&D)*  
*Claude Gruffat (Greens/EFA)*  
*Francisco Guerreiro (Greens/EFA)*  
*Yannick Jadot (Greens/EFA)*  
*Pierre Larrourou (S&D)*  
*Nora Mebarek (S&D)*  
*Jutta Paulus (Greens/EFA)*  
*Sirpa Pietikäinen, (EPP)*  
*Michèle Rivasi (Greens/EFA)*  
*Mounir Satouri (Greens/EFA)*  
*Marie Toussaint (Greens/EFA)*  
*Ernest Urtasun (Greens/EFA)*  
*Idoia Villanueva (The Left)*

**French and European NGOs signatories:**

*Nuclear Transparency Watch (France)*  
*MKG (Sweden)*  
*WISE (The Netherlands)*  
*European Environmental Bureau (Belgium)*  
*Austrian Institute of Ecology (Austria)*  
*France Nacture Environnement (France)*  
*ACRO (France)*  
*NOAH (Denmark)*  
*RECH (France)*  
*CEPTA (Czech Republic)*  
*Cumbria Trust (United-Kingdom)*  
*Fondation pour l'agriculture et l'environnement (Bulgaria)*