



European Alliance for the Self-Determination of Indigenous Peoples

Statement on the pending Adoption of Nuclear Power into the EU Taxonomy

28. September 2021

The European Alliance committed to the promotion of the self-determination of Indigenous Peoples according to the UN Declaration of the Rights of Indigenous Peoples, raises the following issue of which we are highly concerned: **The use of nuclear power from mining to spent fuel disposal often affects Indigenous Peoples and endangers their lives and environment to a life-threatening extent.**

Currently, the European Parliament and Commission are discussing the adoption of nuclear power into the EU taxonomy. The procurement of the fuel for nuclear power plants, uranium, is effected to 95 - 98% by imports of uranium from outside of the European Union; uranium mining in the EU had ended around the year 2000.

Uranium is mined in and imported from Russia (19.8%), Kazakhstan (19.6%), Niger (15.3%), Australia (14.4%), Canada (11.5%) and Namibia (9.6%)¹.

The Joint Resource Center's "Technical assessment of nuclear energy with respect to the 'do no significant harm' criteria of Regulation (EU) 2020/852 ('Taxonomy Regulation')" (JRC Report) identified **uranium mining as the major source of 'Human Toxicity Potential' (HTP) within the nuclear fuel chain², i.e., as the most dangerous part.**

In Table 3.3.1-2 "Importance of mining & milling impacts on the TEG environmental objectives" (JRC Report page 81), **impacts from uranium mining** and milling are qualified as of "**critical importance**".

It is claimed that they could be prevented or mitigated by 'appropriate mitigation measures'.

¹ from: ESA – EURATOM Supply Agency, Annual Report 2019, Annex 4, https://euratom-supply.ec.europa.eu/publications/esa-annual-reports_en; 10 year average 2010-19, calculated by the author

² JRC Report, page 56

The Report then arrives at an inconclusive and inexplicable result: “As it can be seen from Table 3.3.1-2, uranium mining and milling activities do not represent significant challenge to the climate change mitigation and adaptation TEG objectives.”³

In the JRC Report’s Executive summary, the statement is then heavily put into perspective:

“Provided that all specific industrial activities in the whole nuclear fuel cycle (e.g., uranium mining, nuclear fuel fabrication, etc.) comply with the nuclear and environmental regulatory frameworks and related Technical Screening Criteria, measures to control and prevent potentially harmful impacts on human health and the environment are in place to ensure a very low impact of the use of nuclear energy.”⁴

The JRC Report lists numerous EU regulations and directives in regard to uranium mining.

=> However, these regulations do not apply in those countries from which the EU is importing uranium.

Moreover, the JRC Report mentions measures for prevention and mitigation of potentially harmful impacts⁵.

=> However, at no point does the JRC Report examine whether the measures are being implemented or whether they are effective.

⇒ **Thus, the conclusion that “uranium mining and milling activities do not represent significant challenge to the climate change mitigation and adaptation TEG objectives” remains speculative and inconclusive.**

In addition, in Canada as well as in Australia, Indigenous Peoples and their rights are seriously affected in many ways by uranium exploitation. Environmental degradation and human rights infringements accompanying uranium exploitation are well documented (see attachment).

In the 2018 resolution “Violation of rights of indigenous peoples in the world”⁶, the EP encouraged member states to ratify the International Labour Organization Convention 169 (ILO169) and to adhere to its regulations.

Including nuclear power into the EU Taxonomy will lead to the exact opposite: continuation of uranium exploitation on Indigenous Peoples’ lands and further infringements on their rights as well as environmental degradation.

⇒ **Therefore, we strongly call upon the European Parliament and the EU Commission not to adopt nuclear power into the EU Taxonomy.**

The procurement of the fuel for nuclear power, uranium, is in massive contradiction to the above-mentioned EP resolution of 2018, it is opposed to the standards of ILO 169 which the European Parliament recommended to the EU member states for ratification.

Thank you for your time.

³ JRC Report page 81, Table 3.3.1-2 and text below table

⁴ JRC Report page 8, Exec. Summary, penultimate paragraph

⁵ JRC Report, Table 3.3.1-2, page 81

⁶ “Violation of rights of indigenous peoples in the world” https://www.europarl.europa.eu/doceo/document/TA-8-2018-0279_DE.html?redirect Resolution adopted ([P8_TA\(2018\)0279](#))

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on behalf of the European Alliance

Copy to: Mr. Francisco Calí Tsay, UN-Special Rapporteur for the Rights of Indigenous Peoples;
Mrs. Ursula von der Leyen, President of the European Commission
President and Members of the European Parliament

The European Alliance for the Self-Determination of Indigenous Peoples

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Co-signatories (in alphabetic order)



**Aktionsbündnis Münsterland
Gegen Atomanlagen**

Action Alliance against Nuclear Installations, Münsterland area, Germany



**Beyond
Nuclear**

Beyond Nuclear, Takoma Park, Maryland, USA



**Bürgerinitiative Umweltschutz Lüchow-Dannenberg / Citizens' Initiative for Environmental Protection,
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**Society for
Threatened Peoples**

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**Nuclear Free Future
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Appendix

from:

„EU Taxonomie - Der JRC Report – Grundlage für Entscheidungen zu Atomkraft?“

by uranium-network.org, July 2021

<https://uranium-network.org/wp-content/uploads/2021/08/2021-Juli-u-n-org-zu-JRC-Report.pdf>

English translation of Chapter C.1. Uranium mining, page 16 - 19

C. The JRC Report versus reality - some examples

The JRC Report almost exclusively examines non-real situations, as shown above, it is based on simulations. In the following, some examples of real-life situations are presented; these show the shortcomings of the JRC Report and the lack of realism in the conclusions of the JRC Report.

C. 1. example: uranium mining

Almost all of the fuel for nuclear power, uranium, is imported into the European Union (EU) from abroad (see table).

The JRC report identifies uranium mining as the main source of "human toxicity potential", i.e. the risk to human health (mainly due to radioactivity but also due to the chemical properties of the mined material (uranium ore) or the waste products ("tailings")).

"With regard to potential radiological impacts on the environment and human health, the dominant lifecycle phases of nuclear energy significantly contributing to potential radiological impacts on the environment and human health are: uranium mining and milling (ore processing);"
(JRC Report, Exec. Summary, page 7/8)

"Poinssot et al [3.2-8], also report that the main contributor (99%) to HTP [Human Toxicity Potential] for the nuclear energy chain is mining, ..." (JRC Report, page 56)

Continuing the use of nuclear power means perpetuating a system that is
(a) is based on colonialism or its continuation in fuel procurement, and
(b) infringes on human and land rights of indigenous peoples.

On (a)

We refer in particular to the uranium mining in Niger by the French state-owned company Cogema / AREVA / ORANO, which causes severe damage to the environment and human health. Uranium mining has demonstrably contributed nothing to the development of Niger, which remains one of the five poorest countries in the world.

Russia	19,8%
Kazakhstan	19,6%
Niger	15,3%
Australia	14,4%
Canada	11,5%
Namibia	9,6%
Uzbekistan	4,8%
(together:	95%)

Source: ESA - EURATOM Supply Agency, Annual Report 2019, Appendix 4, 10 year average calculated by author

The problem area is too extensive to be detailed here, thus we refer to further information:

UraniumAtlas - Facts and Data about the Raw Material of the Atomic Age

English version: edited by Nuclear Free Future Foundation, Rosa-Luxemburg-Stiftung, Beyond Nuclear, and International Physicians for the Prevention of Nuclear War (IPPNW)

www.rosalux.de/fileadmin/rls_uploads/pdfs/sonst_publicationen/UraniumAtlas_2020.pdf

German version: edited by Le Monde diplomatique, der Nuclear Free Future Foundation, der Rosa-Luxemburg-Stiftung sowie dem Bund für Umwelt und Naturschutz Deutschland

www.nuclear-free.com/files/assets_nuclear_free_foundation/de/pdf/URANATLAS_Web_11_2019.pdf

Areva en Afrique. Une face cachée du nucléaire français, by Raphaël Granvaud.

Marseille, Agone, Survie, col. " Dossiers Noirs ", 2012, 300 p., ISBN : 978-2-7489-0156-6.

The Impact of the Uranium Exploitation by the Niger Subsidiaries of COGEMA-AREVA

CRIIRAD, 2005, <http://www.criirad.org/actualites/dossiers2005/niger/notecriiradarlit.pdf>

Abandonnés dans la poussière - L'héritage radioactif d'AREVA dans les villes du désert nigérien,

Greenpeace, 2010

French version : <https://cdn.greenpeace.fr/site/uploads/2017/02/abandonnes-dans-la-poussiere.pdf>

English version: **Left in the dust AREVA's radioactive legacy in the desert towns of Niger**

www.sortirdunucleaire.org/IMG/pdf/greenpeace-2010-left_in_the_dust-areva_s_radioactive_legacy_in_the_desert_towns_of_niger.pdf

The uranium curse - The Northern Niger's suffering from its wealth,

by Association Tchinquaghen, 2007

<https://uranium-network.org/wp-content/uploads/2009/05/2009-Tchinaghen-TheUraniumCurse.pdf>

(b) Human and land rights of indigenous peoples are put at risk

JRC Report and EU Taxonomy

The origin of uranium, the fuel for nuclear power plants, is not investigated, even though the JRC Report identifies it as the largest contributor to the Human Toxicity Potential, and even though, according to the EU's European Supply Agency (ESA), 95% of the uranium consumed in the EU is imported.

The reality

Uranium mining, example Canada, province of Saskatchewan

In this region and in adjacent North-West Territories, now partially Nunavut, uranium mining has taken place since 1930, on large scale since 1942, at that time for the US atomic bomb program.

Uranium mines and their tailings in northern Saskatchewan (as well as other parts of the country) were left to their own devices for about 40 years without any remediation, contaminating the environment.⁷

The indigenous inhabitants, referred to as 'First Nations' in Canada (in the UN framework 'Indigenous Peoples'), had considerable reservations against uranium mining right from the start, but their reservations – among others, they wanted their land rights clarified first - were not taken into account.

As a result, a non-violent blockade of the road leading to the uranium mines at Wollaston Lake area in the north of the province took place in 1985.^{8, 9}

Uranium mining continued and expanded massively in the 1990s - against the resistance of the Dene First Nation, among others, in whose territory the new uranium mines are located.

In 2011, a Master's thesis explicitly names uranium mining in northern Saskatchewan as colonialism.

“Nehithawak [Cree territory] stand in the way of a colonial agenda that requires access to land for its survival. In the context of northern Saskatchewan, the Canadian state and the Province of Saskatchewan require access to uranium ore underneath traditional Nehithaw and Denesuline territories for the development and maintenance of the nuclear industry one of the key components of the capitalist framework in Canada. This is the latest form that colonialism has taken in northern Saskatchewan and is one of many in a long history of threats which our people have had to respond to and protect ourselves from. (...)

Many of the world’s largest and most profitable uranium mining and milling operations are located on or just north of our traditional territory, as well as the territory of our northern neighbours, the Denesuline. The Denesuline bear the brunt of contamination as they live and work in close proximity to the mines. Milled uranium ore is transported south through Nehithaw and traditional territory and Métis communities, putting our lands and waters at risk. Millions of dollars in revenue are generated annually by northern Indigenous communities through direct and indirect collaborations with the uranium mining industry.(...) Upon further research, however, it is clear that the uranium mining industry in Saskatchewan has serious health and environmental costs both locally and worldwide. (...) Once I had completed this research, I began to realize the enormity of the threat posed to the Nehithaw nation and others by uranium mining.”¹⁰

While uranium mining continues in the province of Saskatchewan – despite the closure of one of the uranium mines after the Fukushima disaster due to lack of demand for uranium – the Cree people in the province of Quebec, in cooperation with environmental NGOs, put up considerable resistance to planned uranium projects.

⁷ The Legacy of Uranium Mining in Saskatchewan: The Unacceptable Environmental Impacts of Uranium Mining, by SES – Saskatchewan Environmental Society, March 2015, https://www.sortirdunucleaire.org/IMG/pdf/saskatchewanenvironmentalsociety-2015-the_legacy_of_uranium_mining_in_saskatchewan-he_unacceptable_environmental_impacts_of_uranium_mining.pdf

⁸ VOICES FROM WOLLASTON LAKE - Resistance against Uranium Mining and Genocide in Northern Saskatchewan, by Miles Goldstick, 1987, <https://nonuclear.se/files/voices-from-wollaston-lake1987goldstick.pdf>

⁹ Resistance at Wollaston, from: Open Road Spring 1986, www.zisman.ca/openroad/1986-Spring/pages/P6-7.pdf

¹⁰ “Becoming Onîkânîwak: Defending Nehithaw-Askiy from Saskatchewan’s Uranium Industry”, by Kirstin Scansen, 2011 / 2015, <https://pdfs.semanticscholar.org/32d2/09e8fcb64a5f734f83bc10bd7addfedc064b.pdf>, Quotes from pages 6,7,9

At the World Uranium Symposium 2015, Quebec City, participants spoke out against all uranium mining with the 'Declaration of the World Uranium Symposium 2015'.

**A de facto moratorium on uranium mining was then imposed in the province of Quebec.
None of the uranium projects were continued.**

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