

Commissioner Miguel Arias Cañete  
Climate Action & Energy  
Rue de la Loi / Wetstraat 200

1049 Brussel  
Belgium

[cab-arias-canete-archives@ec.europa.eu](mailto:cab-arias-canete-archives@ec.europa.eu)

3 April 2019

### **Start-up of Mochovce 3 and 4**

Dear Commissioner Cañete,

We are writing as three relevant networks of local authorities in Europe who are committed to a new fossil-free, nuclear-free future:

- Cities for Nuclear Free Europe CNFE represents 29 cities with a total of more than 14 million inhabitants;
- Alliance of Regions for Phasing out Nuclear Power Across Europe represents 16 regions with more than 50 million inhabitants;
- UK & Ireland Nuclear Free Local Authorities NFLA represents 42 town, city and island councils with 8 million inhabitants.

We are following with great concern the construction process of the nuclear energy reactors number 3 and 4 being planned at the Mochovce site in Slovakia. The construction of these reactors started already in the early 1980's, with the design being as far back as the 1970's. Several considerable delays and substantial organizational changes have not improved the safety situation.

It is our understanding that at least one of the two reactors should be completed soon, probably later this year. This would mean that a new nuclear reactor will be started within Europe for the first time since 2002. We fear that this first nuclear start-up since 17 years will not be without serious risks.

We are particularly concerned about the following issues with these nuclear reactors

- The two reactors Mochovce 3 and 4 do have some basic safety provisions but they are far from complete. For instance, there is no containment, which can serve as protection against external hazards.
- Because of the proximity of the Vepor-Rab-Čertovica fault, there is a risk of seismic activities, against which the reactors are not protected sufficiently.
- Due to climate change, it is questionable if sufficient cooling water for the reactors can be guaranteed in the future.

In addition, Mochovce 3 and 4 are nuclear power reactors of a completely outdated design, with insufficient safety provisions.

There are also several additional relevant aspects of concern to this project. The Slovak Nuclear Authority (Úrad jadrového dozoru Slovenskej republiky), as well as the WANO (World Association of Nuclear Operators) have recognized in the course of the construction process several severe shortcomings. These include:

- The management of the construction activities was negatively affected by recurrent changes in structure, roles and responsibilities.
- The qualification of contractors, or sub-contractors on-site, or for actual workers, was frequently not guaranteed.
- Training and instruction for workers were given by non-qualified instructors.
- The actual achievement of (sub)contractors did not always comply with the project plan and, if and when it was recognized, had to be repeated.
- Tests were carried out in wrong order or unfinished, which caused additional damage or incomplete results.

These and many other shortcomings have already led to interruptions of the development process for these reactors, as ordered by the Slovak Nuclear Authority.

Based on all of these known irregularities and incidents, our three relevant local authority anti-nuclear European network organisations ask you as Commissioner for Climate Action & Energy to seriously consider the ongoing problems of the Mochovce 3 and 4 project.

We ask you to take all possible action to halt all activities on the site until the safety status of the project can be checked and verified by the competent authority of the Slovak Republic, in close cooperation with an independent and broad group of international and independent experts. We ask you to support our plea for an independent assessment.

Yours sincerely,

Ulli Sima, Deputy Mayor for the Environment at the City of Vienna on behalf of the Member Authorities of the Cities for a Nuclear Free Europe (Secretariat based in Vienna [www.cnfe.eu](http://www.cnfe.eu))

Rudi Anschober, Regional Minister for Environment, Climate, Consumer Protection and Integration, Upper Austria, Initiator of the Alliance of Regions for Phasing out Nuclear Power Across Europe (secretariat based in Upper Austria [www.atomfreie.eu](http://www.atomfreie.eu)).

Councillor David Blackburn, Councillor Mark Dearey and Councillor John Trainor, Vice Chairs of the UK and Ireland Nuclear Free Local Authorities on behalf of its member authorities (Secretariat based in Manchester [www.nuclearpolicy.info](http://www.nuclearpolicy.info))

Please send your reply to:

Ulli Sima,  
Deputy Mayor for the Environment at the City of Vienna  
Cities for Nuclear Free Europe  
Rathaus  
1010 Vienna  
Austria  
Email: [ulli.sima@wien.gv.at](mailto:ulli.sima@wien.gv.at)