



## **Citizens' Nuclear Information Center**

Akebonobashi Co-op 2F-B, 8-5 Sumiyoshi-cho,  
Shinjuku-ku, Tokyo 162-0065, JAPAN  
URL: <http://cnic.jp/english/>

Phone: 81-3-3357-3800  
Fax: 81-3-3357-3801  
e-mail: [cnic@nifty.com](mailto:cnic@nifty.com)

### **To the Commissioners of the International Commission on Nuclear Non-proliferation and Disarmament**

#### **Submission Concerning the Civilian Use of Nuclear Energy**

##### **Introduction**

In their 25 September 2008 joint statement Co-Chairs of the International Commission on Nuclear Non-proliferation and Disarmament, Mr Gareth Evans and Ms Yoriko Kawaguchi, stated, “The implications of the likely “nuclear renaissance” due to climate change and energy security concerns will be a focus for the Commission, including the need for renewed attention to nuclear safeguards, safety and security.” Among the “major developments of concern in the nuclear landscape”, they identified “the major renewal of interest in nuclear energy for electricity generation generated by concern about climate change and energy security”.

The Commission is wise to focus on the challenges for nuclear non-proliferation posed by the civil use of nuclear energy. This submission makes recommendations about the appropriate mission and focus for the Commission in this area of its work. The submission also offers perspectives on key issues that the Commission should address and identifies pitfalls that the Commission should avoid.

Myth and reality frequently become confused in discussions about the civilian use of nuclear energy. We have therefore prepared a background paper, which sheds light on some of the prevalent myths (see appendix to this submission). The background paper also provides arguments in support of the recommendations contained in this submission.

##### **Mission and Focus of the Commission**

1. The mission of the Commission is NOT to take either a positive or a negative position with regard to the civil use of nuclear energy. It is important to reach consensus on this point as a common understanding among all commissioners.
2. The Commission should focus on the proliferation risks associated with sensitive technologies

and materials. These risks will increase if there is an expansion in the use of sensitive technologies, including uranium enrichment and reprocessing, or an expansion of stockpiles and flows of sensitive fissile materials (HEU and plutonium).

3. In considering these risks, the Commission should bear in mind that the problem of diversion of sensitive fissile materials does not only apply to diversion by state governments for military use. It also applies to theft and use by non-state actors, commonly referred to as “nuclear terrorism”.

4. Enhancing the current safeguards system, physical protection of sensitive materials and facilities, and improving export control should be key components of the Commission’s discussions.

5. The Commission should consider possible new conditions and global norms governing civilian nuclear power programs and the nuclear fuel cycle. It should consider new conditions which are universal, transparent and economically viable.

### **Perspectives and Pitfalls**

1. The Commission should remain agnostic about whether a “nuclear renaissance” is “likely”. It should refrain from expressing an opinion about whether an expansion of nuclear power is desirable as a response to climate change, on energy security grounds, or for any other reason. In its discussions about the civilian use of nuclear energy the Commission should restrict itself to addressing existing and emerging proliferation problems.

2. The underlying problems with the IAEA safeguards system are a lack of resources, a lack of legal authority and the inherent technical limits of the inspections system. The Commission should address these problems frankly and objectively. It should clearly indicate the limitations, not just the benefits of any proposals that it makes to address these problems. In its discussion of safeguards, the Commission should give special consideration to the Strategic Studies Institute report, *Falling Behind: International Scrutiny of the Peaceful Atom*.<sup>1</sup>

3. The Commission should state unequivocally that if the international community is unwilling to provide adequate resources to effectively safeguard nuclear energy programs, or if fundamental proliferation problems cannot be solved, it is inappropriate to provide support for an expansion of

---

<sup>1</sup> Henry D. Sokolski (Ed.), *Falling Behind: International Scrutiny of the Peaceful Atom*, Strategic Studies Institute, February 2008  
<http://www.strategicstudiesinstitute.army.mil/pubs/display.cfm?pubID=841>

nuclear energy.

4. Many proposals have been made and some initiatives have been taken for a multilateral approach to the nuclear fuel cycle. However, none of them have achieved great success in enhancing the non-proliferation regime. The Commission should take a fresh look at civilian nuclear fuel cycle activities. International arrangements are one important topic for discussion, but the Commission should rigorously scrutinize proposals to ensure that they will not exacerbate the problems they purport to solve.

5. The reprocessing of spent nuclear fuel presents particularly serious nuclear proliferation risks. It is uneconomic and it is also unnecessary for the continued civilian use of nuclear energy. Therefore, the Commission should recommend that reprocessing be phased out. If the Commission judges this to be a politically unrealistic proposal, it should at least recommend that existing stocks of plutonium be eliminated before new reprocessing take place.

**Citizens' Nuclear Information Center, Tokyo, Japan**

26 January 2009

**Contact**

Philip White

International Liaison Officer

Citizens' Nuclear Information Center

Akebonobashi Co-op 2F-B, 8-5 Sumiyoshi-cho,

Shinjuku-ku, Tokyo, 162-0065, Japan

Tel: 03-3357-3800

Fax: 03-3357-3801

Email: [white@cnic.jp](mailto:white@cnic.jp)

Web: <http://cnic.jp/english/>