



REPLIES OF THE EUROPEAN
COMMISSION AND OF THE
EUROPEAN EXTERNAL ACTION
SERVICE
TO THE EUROPEAN COURT OF AUDITORS'
SPECIAL REPORT

on **International nuclear safety cooperation**

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This document presents the replies of the European Commission and the European External Action Service to observations of a Special Report of the European Court of Auditors, in line with Article 265 of the [Financial Regulation](#). These replies are to be published by the European Court of Auditors together with the special report.

I. THE COMMISSION AND EEAS REPLIES IN BRIEF

The Commission, together with the EEAS, has supported non-EU countries and regions in international nuclear safety cooperation since concerns of nuclear safety were triggered by past accidents, in particular the 1986 accident at the Chornobyl Nuclear Power Plant in the former Soviet Union. The ongoing Russia's war of aggression against Ukraine further underscores the importance of nuclear safety.

The Instrument for Nuclear Safety Cooperation and the Euratom loans are the main financial instruments based on the Euratom Treaty supporting nuclear safety, radioprotection, radioactive waste management and safeguards, globally with priority given to neighbourhood and candidate countries, in coordination with the Commission's policy priorities and initiatives.

In line with existing external Commission policy strategy, priorities and commitments, with existing bilateral and multilateral partnerships and agreements, as well overarching support programmes and instruments, the Commission plans and implements activities, in close cooperation with the EEAS, in the area of international nuclear safety cooperation. Namely, the Commission, together with the EEAS where relevant:

- Continues to contribute to remedying the consequences of the Chornobyl accident as part of the international community and to nuclear safety in Ukraine including since the start of the ongoing war of aggression by the Russian Federation.
- Supports conducting and following-up post-Fukushima stress tests in third countries in coordination with Member States via the European Nuclear Safety Regulators Group (ENSREG) and with financial support through the Instrument for Nuclear Safety Cooperation and where possible Euratom loans, to have a strategic and coherent approach. Under this partnership, the Commission has contributed to the continued improvement of the nuclear safety of Ukrainian and Armenian nuclear power plants through the use of grants and/or loans.
- Strengthens the alignment of nuclear regulatory authorities with the EU/Euratom *acquis* on nuclear safety to accelerate the accession of candidate countries.
- Supported the Joint Comprehensive Plan of Action with Iran, also known as 'the nuclear deal', despite adverse international conditions, thereby ensuring continued constructive dialogue and cooperation to improve nuclear safety in Iran.
- Plays a key role in financing the remediation of former Soviet uranium mining legacy sites in Central Asia to prevent further environmental contamination.
- Contributes to the expansion of environmental radiation monitoring capacities world-wide and manages a publicly accessible information database (EURDEP) that shares real time radiological data from inside the EU and third countries with policy makers and the public.
- Advances international nuclear safety through Euratom's research and training programmes that play a key role by supporting cutting-edge scientific work, harmonised safety methodologies and high-level skills development. Through collaborative projects with international partners, shared experimental facilities, and training networks for regulators and experts, Euratom strengthens global knowledge and fosters consistent safety practices.
- Coordinates regularly with international partners, in particular the International Atomic Energy Agency, to mitigate the recognised risk of overlap between Commission actions and those of international partners.

The Commission and the EEAS welcome the report of the European Court of Auditors, which identifies areas of improvement to ensure a more effective and optimal use of public funding related to this important global public good.

II. REPLIES TO THE RECOMMENDATIONS

Recommendation 1. Strengthen the Commission's strategic framework for international nuclear safety cooperation

The Commission should strengthen its strategic framework for international nuclear safety cooperation by developing an up-to-date comprehensive strategy to guide its cooperation actions. Such a strategy should identify the areas of greatest added value of EU action, while considering initiatives by other relevant stakeholders. It should also identify what goals the Commission intends to accomplish (including quantifiable key targets where possible), which tools it plans to use, which stakeholders should be involved and how they should coordinate.

(Target implementation date: end 2028)

The Commission and the European External Action Service **partially accept** this recommendation.

We acknowledge the potential added value of a strategy covering international nuclear safety cooperation as a whole, including all tools.

The EU's overall political strategy is developed jointly by its institutions.

Therefore, the Commission and EEAS position is that the development of an up-to-date strategy should be done by updating and complementing the 2008 strategy in the context of the next MFF 2028–2034 and the related budgetary allocations.

As the Commission and the EEAS cannot prejudge the outcome of the negotiations on the next MFF 2028–2034, nor its future mandate, it will act upon a positive and timely outcome of those negotiations and will aim to implement this recommendation by the end of 2029.

Recommendation 2. Strengthen the process for selecting EU-funded actions supporting nuclear safety

The Commission should:

- (a) reinforce the selection of cooperation proposals, basing it on predefined relevant criteria, such as the urgency and magnitude of the nuclear safety risk that the proposals address, the added value of EU action, the maturity of the proposed action, the likely sustainability of the expected results, and the geopolitical context in which support is to be provided. This process should be appropriately documented;*
- (b) where actions concern revenue-generating nuclear facilities such as power plants, assess the beneficiary's capacity to fund its own safety programmes and consider whether financing via loans would be a suitable alternative.*

(Target implementation date: end 2027)

The Commission **accepts** recommendation 2(a).

The Commission **accepts** recommendation 2(b) but notes that it can only consider financing via loans in EU Member States and in non-EU countries (currently Ukraine, Armenia and Russia) covered by Council Decision 77/270/Euratom.

Recommendation 3. Mitigate the risk of delays and cost overruns in international nuclear safety cooperation actions

The Commission should establish, from the outset, mitigating conditions to minimise delays and cost overruns during the implementation of actions. In particular, the Commission should ensure that:

- (a) costs, including any management costs, are estimated upfront (e.g. through feasibility studies based on the most accurate information available);*
- (b) where multi-donor funding mechanisms are concerned, it takes into account, among others, the estimated costs and the availability of sufficient pledges from other donors before deciding whether to fund the action;*
- (c) contractual arrangements with implementing partners under indirect management mode include performance incentives that promote the delivery of outputs on time and on budget.*

(Target implementation date: end 2027)

The Commission **accepts** recommendation 3(a).

The Commission **partially accepts** recommendation 3(b).

The Commission concurs that it is important to take into account the estimated costs and the availability of pledges of all donors. However, the Commission's experience with large multi-donor funds and complex projects/situations, is that it is not always necessary – and it could even be counterproductive – to wait for the availability of sufficient pledging before proceeding with financing sub-projects.

Moreover, the Commission is represented in each trust fund board which decides on individual financing proposals submitted by the trust fund manager on the basis of fund availability, full descriptions and cost estimates, including any ulterior revisions.

The Commission **partially accepts** recommendation 3(c).

The Commission only accepts to include performance incentives whenever relevant and possible.

Recommendation 4. Improve the monitoring of EU-funded actions on nuclear safety

The Commission should improve its monitoring of future EU-funded nuclear safety actions:

- (a) by collecting information on the actual use of the respective outputs after the completion of the action, and by complementing such information, where necessary, by means of on-the-spot visits;*
- (b) in the case of Euratom loans, by reinforcing the monitoring mechanism with the aim of ensuring the borrower's compliance with key sound financial management obligations;*

(c) in the case of grants from the Instrument for Nuclear Safety Cooperation, by enhancing logical frameworks through the systematic inclusion of outcome indicators that align with action objectives and capture the effects of the actions on nuclear safety.

(Target implementation date: end 2028)

The Commission **accepts** recommendation 4(a).

The Commission **accepts** recommendation 4(b).

While the Commission is of the opinion that this monitoring framework was robust and efficient, it is acknowledged that with regard to any future Euratom loans improvements are necessary with regard to the legal basis and framework of roles and responsibilities.

The Commission **accepts** recommendation 4(c), noting that setting and measuring outcome indicators in the area of nuclear safety is inherently difficult.

The improvement of the Commission's framework to measure the performance of EU-funded projects and to communicate key results is an ongoing process. Over the course of the next years, the framework will guide efforts related to implementing results-based management and instilling a results-based culture. This goal is also reflected for all Commission instruments in the proposal for a Regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities, COM(2025) 545, 16 July 2025.

III. REPLIES TO OBSERVATIONS

1. Commission's intervention strategy

Referring to the illustrative case in Box 1, the Commission considers that it acted within the provisions of the respective INSC Regulations to implement INSC actions in Armenia. The emergency mobile diesel generators were contracted and are owned by the Armenian Nuclear Regulatory Authority.

2. Commission's monitoring of current Euratom loans

With reference to §§ 51 to 54 of the report, the monitoring mechanism for this joint EBRD/Euratom safety upgrade project was based on assurance obtained from the 'Lenders' Monitoring Consultant' hired by the EBRD, being one of the 'Big Four' international audit firms. This audit firm (i) had the technical expertise and (ii) due to its location was able to carry out on-the-spot visits. The auditors reported on a quarterly basis about the state-of-play of the project. In addition, the EBRD, which had a permanent office in Kyiv, monitored the project closely, including changes to the project implementation plan. The Commission considers that these levels of monitoring provided the necessary assurance for the Commission – in a cost-efficient manner and that the conditions laid down in the loan agreement were met at the time of disbursement of the loan tranches. Such conditions included financial covenants to ensure sound financial management.