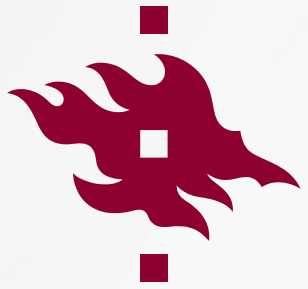




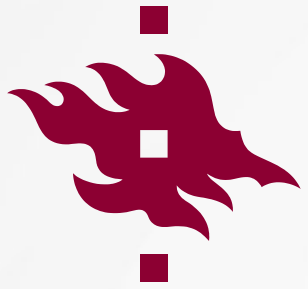
PERMITTING NUCLEAR POWER GENERATION FACILITIES UNDER THE FINNISH LAW

Kim Talus



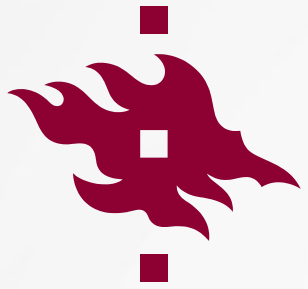
Notable recent developments in Finnish nuclear

- Reform of the Nuclear Energy Act, entry into force 1.1.2027
- Finnish Radiation and Nuclear Safety Authority (STUK) approval of "Onkalo", the final repository for spent nuclear waste
- Litigation relating to different stages of the nuclear value chain



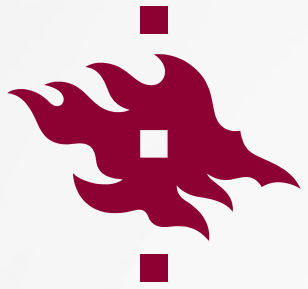
Licensing regime for nuclear installations in Finland

- Nuclear Energy Act, supplemented with Nuclear Energy Decree + YVL Guides
- Nuclear energy installations in Finland are subject to a specific licensing regime.
- The details of the licencing regime depends on whether the nuclear installation has "considerable general significance".



Licensing regime for nuclear installations in Finland

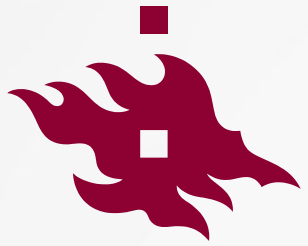
- All nuclear power plant projects with the objective to generate nuclear energy with a thermal capacity exceeding 50 MW are deemed to have a considerable general significance and therefore require a Decision-in-Principle by the Government.
- The Ministry of Economic Affairs and Employment can take the decision-in-principle if the nuclear power plant project comprises one or more nuclear power plants whose combined nominal thermal power is no more than 50 megawatts (Nuclear Energy Act of 2026)



Licencing regime for nuclear installations in Finland under the Nuclear Energy Act of 13 June 2026

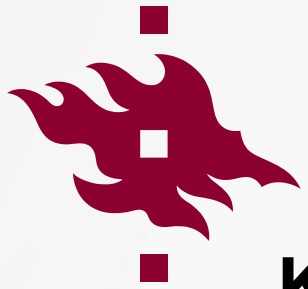
Licencing consists of various separated but related steps:

1. Decision-in-principle, granted by the Government after positive statement from STUK, followed by government report to the Parliament;
2. Construction licence, granted by the Government after STUK verifies that the detailed technical and safety requirements are met; approval by the host municipality is granted and EIA has been concluded.
3. Operating licence, granted by the Government for a fixed term, after approval of key operational safety documents by STUK, subject continuous regulatory oversight and safety reviews by STUK throughout the plant's lifecycle
4. Decommissioning licence, granted by the Government after receiving a favorable safety evaluation by STUK



Common elements throughout the process

- Throughout the licencing process the Government will re-evaluate that the nuclear power plant (including decommissioning) aligns with the overall good of Finnish society and the other general principles (safety and waste) under NEA.
- The decision-making is divided between two main authorities:
 - **Ministry of Economic Affairs and Employment:** the competent ministry responsible for the overall management and regulation of the nuclear energy sector throughout the process, on behalf of the Government that takes the final decision in most cases.
 - **Finnish Radiation and Nuclear Safety Authority (STUK):** the independent regulatory authority responsible for protecting people, society, and the environment from harmful effects of radiation. It decides on construction, operation, and decommissioning licences for certain small facilities and, for others, acts as the competent authority in specific areas. A nuclear power unit cannot begin operation until STUK has approved that safety requirements are met.
 - New: A binding statement on the nuclear facility concept by STUK (for SMR). STUK evaluates the safety principles, calculation and analysis methods, the design concept's maturity, supply-chain management, and the feasibility of decommissioning.



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