

Ministry of Economic Affairs and Employment of Finland

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Reef Origin – Response to Draft Nuclear Energy Act Reform (VN/12625/2023)

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On behalf of Reef Origin, we welcome the opportunity to provide input to the consultation on the draft reform of Finland's Nuclear Energy Act (VN/12625/2023). We commend the Finnish Government for its leadership in modernising the legislative framework to support next-generation nuclear energy solutions and address the urgent decarbonisation challenges facing Europe.

We strongly support the proposed changes that promote a technology-neutral, risk-informed, and streamlined licensing regime for nuclear energy deployment in Finland. In particular, we welcome the recognition of Small Modular Reactors (SMRs) and advanced nuclear systems as viable options for clean, dispatchable, and industrial-scale energy solutions.

SMRs are uniquely positioned to help Finland meet its climate and energy security targets while revitalising its industrial base. SMR technology brings multiple national benefits:

- Decarbonises hard-to-abate industrial sectors, including steel, chemicals, and data centres
- Provides baseload electricity and process heat for manufacturing clusters
- Creates high-quality, long-term jobs in engineering, construction, operations, and research
- Attracts strategic capital investment and strengthens regional economic growth
- Enhances Finland's global leadership in advanced nuclear safety and regulatory excellence

Reef Origin is actively exploring development opportunities in Finland for SMR-based clean energy hubs, particularly in partnership with industrial end-users and existing licensed operators. We believe that collaboration between private developers, technology providers, and Finnish regulatory bodies will be essential to accelerate early deployment and scale-up of SMRs.

We are particularly encouraged by the reform's effort to streamline licensing processes, support district heat and hybrid-energy applications, and reduce barriers for SMR deployment on or adjacent to industrial sites.

We fully support the objectives of the proposed reform and urge its timely implementation. We would welcome the opportunity to engage further with the Ministry, STUK, and other stakeholders as this legislative process advances. Reef Origin stands ready to contribute technical, commercial, and strategic expertise to help realise Finland's ambitions for clean, resilient, and job-creating nuclear energy infrastructure.

Yours sincerely,

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