

## Overview

There is heightened activity across your sector. Governments grapple with financing the management and disposal of nuclear waste. First-generation plants require life-extension or decommissioning. Climate change, energy security and a need for stable energy prices are driving new nuclear development in existing and new nuclear states. Increased demand is driving upstream investment. In challenging times like these, you need an informed partner to help you make difficult decisions.

Let Dentons ease the way forward. Our knowledgeable lawyers have the depth of experience you need. With our understanding of your sector, we provide cutting-edge advice whether you are a leading developer, operator, contractor, technology provider or a government. You receive insightful solutions that span law-writing, procurement, new builds and work across the fuel cycle, including front end, decommissioning and a range of other matters. You can also rely on us to assist you with the development of the innovative financial models you need.

By partnering with us, you have a team that recognizes the value of nuclear energy and how it sits within the world's power markets. Our work with the UK regulator, Ofgem, in establishing the British wholesale power trading framework, and with more than 30 governments on reform of their energy markets, bears testament to our high quality team.

Look to our lawyers for innovative business and legal solutions across the nuclear industry, including:

- National, regional and international regulatory frameworks
- Advice on uranium mining rights
- Strategies for the management of medium and low level waste, and long-term storage policy issues
- Planning and environmental permitting requirements
- Innovative financing models
- Uranium purchase and trading contracts
- New build projects and procurement
- National and treaty-based nuclear liability law
- Acquisitions, mergers and disposals
- Decommissioning
- Transport of nuclear materials
- Operation and maintenance of nuclear sites.

## Representative Experience

- **Spanish engineering consortium operating:** Advising on a joint venture project related to the development of a

nuclear power reactor located in France. Our tax teams in Spain and France advised the client on the tax treatment of the joint venture, on the establishment of a branch in France, and on the tax implications for the seconded employees. We successfully dealt with complex CIT liability, VAT, PIT, a double tax treaty between France and Spain, and sophisticated permanent establishment issues. We helped the client to reduce tax burdens by avoiding paying double taxation in France and Spain. We also helped the client organize the arrangements between the members of the consortium.

- **TVEL Nuclear Fuel Company:** Advising one of the world leaders in nuclear fuel production and technology (up to 17% of the global market) in connection with construction of a nuclear fuel production plant in Ukraine. The project involved legal advice and assistance on various corporate matters in Ukraine, including establishing a Joint Stock Company “Nuclear Fuel Production Plant” in Ukraine (established by TVEL Nuclear Fuel Company and its Ukrainian partner in this project Ukrainian State Concern “Nuclear Fuel”), preparation of the Framework Agreement between the parties, Loan Agreement, and legal advice on corporate governance matters in Ukraine, as well legal advice on competition law issues stemming from setting up a JV in Ukraine.