

# Call for feedback by the Platform on Sustainable Finance on the draft report on preliminary recommendations for the review of the Taxonomy Climate Delegated Act and additional technical screening criteria for the EU Taxonomy

Fields marked with \* are mandatory.

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### **Disclaimer:**

The draft report is a working document by the Platform on Sustainable Finance and contains preliminary technical screening criteria that do not represent a final view of the Platform.

This call for feedback is part of ongoing work by the Platform, which was set up by the Commission to provide advice on the further development of the EU taxonomy. The call for feedback represents an opportunity to gather feedback and evidence from a wider set of stakeholders, to improve the draft criteria and make them more robust and usable.

This feedback process is not an official Commission consultation. The draft report produced by the Platform is not an official Commission document. Nothing in this feedback process commits the Commission nor does it preclude any policy outcomes.

### **Introduction**

The development of the EU Taxonomy relies on extensive input from experts from across the economy and civil society. In line with Article 20 of the [Taxonomy Regulation \(\(EU\) 2020/8521\)](#), the European Commission set up a permanent expert group, the [Platform on Sustainable Finance](#), which advises the Commission on issues related to its sustainable finance framework, notably the further development of the EU Taxonomy. This report is part of the work of the Platform under its second mandate.

Under this mandate, the Platform has been tasked by the European Commission with reviewing and potentially recommending revisions to the technical screening criteria of the economic activities included in the Climate Delegated Act (DA) adopted in 2021, with a focus on making them more usable and simplify reporting. The review focused mainly on transitional activities, for which the Taxonomy Regulation stipulates a requirement for review every three years, as well as on activities that stakeholders have largely commented on as part of the [EU Taxonomy Stakeholder Request Mechanism](#).

In parallel, the Platform is developing technical screening criteria for a list of new economic activities. This involves developing technical screening criteria for these activities to make a Substantial Contribution (SC) to at least one of the environmental objectives defined by the Taxonomy Regulation while ensuring they Do-No-Significant-Harm (DNSH) to any of the other environmental objectives. Each new criteria recommendation includes a section on “usability of the criteria” which is meant to support and demonstrate that new criteria have been developed by striving for both, industrial feasibility and environmental integrity.

Additionally, the Platform’s mandate included developing DNSH criteria for activities to be included in Annex II of the Climate DA, as “adapted” activities. The Platform has done this for both, the new activities developed under the current mandate and for activities already included in the Taxonomy Delegated Acts with SC to an environmental objective other than adaptation, for which no such criteria exist yet.

In line with the Taxonomy’s guiding principle of establishing robust, science-based criteria, the call for feedback puts emphasis on providing a clear scientific and technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for any comments made with respect to the proposed technical screening criteria.

### **Call for feedback**

The Platform is inviting stakeholders to provide feedback on the draft report through this online questionnaire.

**The deadline for providing feedback is Wednesday, 5 February 2025 23:59 (Central European Time).**

Please note: in order to ensure a fair and transparent feedback process, only responses received through the online questionnaire will be taken into account and included in the report summarising the responses.

Should you have a problem completing this questionnaire or if you require particular assistance, please contact [fisma-platform-sf@ec.europa.eu](mailto:fisma-platform-sf@ec.europa.eu).

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### **Important notice on the publication of responses**

\*Contributions received are intended for publication on the Commission’s website dedicated to the Platform.

\* Do you agree to your contribution being published?

- Yes, I agree to my response being published under the name I indicate (name of your organisation/company /public authority or your name if your reply as an individual
- No, I do not want my response to be published

I agree with the [personal data protection provisions](#)

## Section 1: Respondent's identification

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I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- International or European organisation
- National or Local Government or Ministry
- Regulatory authority, Supervisory authority or Central bank
- Other public authority
- Trade union
- Other

Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

First name and last name

Lennart Paetz

Name of your organisation

IOGP Europe

Is your organisation included in the Transparency Register?

(If your organisation is not registered, [we invite you to register here](#), although it is not compulsory to be registered to reply to this feedback process.)

- Yes
- No

If yes, please indicate your Register ID number:

3954187491-70

Where are you based?

- Austria
- Belgium
- Bulgaria

- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland
- The Netherlands
- United Kingdom
- Other country

Where does your organisation carry out its activities (select one or more of the following)?

- Europe
- Middle East
- Africa
- Asia
- North America
- South America
- Global

What is the field of your activity?

- Accounting
- Auditing
- Banking
- Credit rating agencies
- Insurance
- Pension provision

- Investment management (e.g. hedge funds, private equity funds, venture capital funds, money market funds, securities)
- Market infrastructure operation (e.g. CCPs, CSDs, Stock exchanges) Social entrepreneurship
- Agriculture, forestry and fishing
- Mining and quarrying
- Manufacturing
- Electricity, gas, steam and air conditioning supply
- Water supply; sewerage, waste management and remediation activities
- Construction and real estate activities
- Transportation and storage
- Accommodation and food service activities
- Information and communication
- Professional, scientific and technical activities
- Administrative and support service activities
- Public administration and defence; compulsory social security
- Education
- Human health and social work activities
- Other

If other, please specify:

Oil & Gas

## Section 2: Targeted feedback on the TWG report

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What section of the TWG report do you want to comment on?

- Review of the Climate Delegated Act
- Recommendations of new activities
- Defining the missing DNSH for the inclusion of “adapted” activities
- Additional proposals

### Section 2.1: Review of the Climate Delegated Act

What sub-section do you want to comment on?

- Review of Mitigation Annex
- Review of Adaptation Annex
- Reviews relevant for both Annexes

#### Section 2.1.1. Review of Mitigation Annex

##### Energy-related thresholds

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

If yes, please provide your comment by clearly highlighting which part of the chapter you are referring to.

*2000 character(s) maximum*

We disagree with the conclusions in Chapter II.1.i on energy-related thresholds, particularly regarding activities 4.29, 4.30, and 4.31 concerning natural gas use in electricity and heat production. Legal certainty is essential for energy investments due to long payback periods and reliance on external financing. The Complementary Delegated Act (CDA) 2022/1214 must be upheld, with any revisions limited to the scope outlined in Article 2a of DA 2021/2139. Changes should only apply to generating units where investment decisions occur after amendments take effect.

The proposed emission limit reductions present significant feasibility challenges:

- The LCA CO<sub>2</sub> thresholds for “substantial contribution” proposed by the PSF’s report are below the technical limits of any available or emerging hydrocarbon-based electricity and heat generation with carbon capture.
- The proposed LCA thresholds are also problematic for some renewable technologies, such as large-scale photovoltaics, due to geographic variations in manufacturing and deployment emissions. (Schlömer et al., 2014, p. 135)
- Increased reliance on non-programmable energy sources will likely expand battery storage use, indirectly raising overall GHG emissions.

CCS risks being excluded from the Taxonomy. A dedicated CCS framework or revised thresholds are necessary to prevent the premature exclusion of viable transition technologies. We support the PSF’s statement recognizing CCUS as a priority area for future work & the need to assess its potential inclusion in the Taxonomy.

Regulatory misalignment remains a concern:

- The proposal contradicts Article 19 of Taxonomy Regulation 2020/852, as no significant scientific or technological advances justify these changes
- Lowering gas thresholds in the CDA by 2025 disregards its role as transitional fuel replacing more polluting alternatives, contradicting the Commission’s recognition of natural gas’s role in the energy mix until at least 2030

Please provide a suggestion for an alternative text. Each suggestion needs to be based on scientific or technical evidence, and supported by references where applicable. Feedback where evidence is not provided cannot be considered.

*2000 character(s) maximum*

## Bioenergy activities

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

## Manufacturing activities

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

If yes, please provide your comment by clearly highlighting which part of the chapter you are referring to.

*2000 character(s) maximum*

We disagree with aspects of the proposed recommendations for activity 3.14, “Manufacture of Organic Basic Chemicals,” and activity 3.17, “Manufacture of Plastics in Primary Form.”

For activity 3.14, we propose narrowing Appendix C requirements to align strictly with the REACH Regulation (EC) No 1907/2006, which provides well-established chemical restrictions and should be the primary reference for pollution prevention and control (PPC). This aligns with Article 19(1)(k) of Regulation 2020/852, ensuring criteria remain practical and verifiable while avoiding excessive burdens on businesses.

We welcome the Platform for Sustainable Finance’s recommendation that, while companies report only on four substances under high-value chemicals, emissions calculations can follow the EU ETS scope, including benzene and hydrogen (p.78). This ensures consistency with ETS methodologies and provides a more comprehensive emissions assessment. We also support the Platform for Sustainable Finance’s statement that usability, data, and guidance improvements will enhance compliance without introducing additional data requirements, addressing stakeholder concerns and improving clarity.

For activity 3.17, the requirement to use recycled raw materials lacks flexibility and may discourage recycling due to supply constraints. A more practical approach is needed to promote waste recovery while ensuring Taxonomy alignment. Proportional alignment should be allowed for production sites using partial recycled feedstock, with a clear methodology to determine alignment for blended feedstocks.

Finally, we propose including plastic compounding and physical recycling under this activity, recognizing their role in the circular economy. Further clarification is needed on lifecycle GHG emissions in chemical recycling, including the allocation of avoided emissions from landfill and incineration.

Please provide a suggestion for an alternative text. Each suggestion needs to be based on scientific or technical evidence, and supported by references where applicable. Feedback where evidence is not provided cannot be considered.

*2000 character(s) maximum*

## Environmental protection and restoration activities

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

## Construction and real estate

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

## Review of Appendix B on generic DNSH criteria to Sustainable Use of Water and Protection of Water and Marine Resources

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

If yes, please provide your comment by clearly highlighting which part of the chapter you are referring to.

*2000 character(s) maximum*

We recommend that only the most important aspects or only the largest elements in terms of material or quantity should be examined pursuant to Appendixes A, B, C and D. An activity can still be considered compliant with the taxonomy as long as the key criteria are met, even if costly and overly detailed analyses with minimal impact on the final outcome are not performed.

Please provide a suggestion for an alternative text. Each suggestion needs to be based on scientific or technical evidence, and supported by references where applicable. Feedback where evidence is not provided cannot be considered.

*2000 character(s) maximum*



## Review of Appendix C on generic DNSH criteria to Pollution Prevention and Control

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

If yes, please provide your comment by clearly highlighting which part of the chapter you are referring to.

*2000 character(s) maximum*

In general, Appendix C should not go beyond the requirements and definitions set out in the REACH regulation, which sets clear and widely accepted rules for the restriction of certain chemicals in specific processes and is the standard for chemical compliance in the EU. Therefore, compliance with this Regulation should already be considered as not causing significant harm to the objective of Pollution Prevention and Control (PPC). A more proportionate approach would also be in line with Article 19(1)(k) of Regulation 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, which requires that technical screening criteria shall 'be easy to use and be set in a manner that facilitates the verification of their compliance'. The current wording of Appendix C imposes an undue burden on businesses.

We recommend that only the most important aspects or only the largest elements in terms of material or quantity should be examined pursuant to Appendixes A, B, C and D. An activity can still be considered compliant with the taxonomy as long as the key criteria are met, even if costly and overly detailed analyses with minimal impact on the final outcome are not performed.

Please provide a suggestion for an alternative text. Each suggestion needs to be based on scientific or technical evidence, and supported by references where applicable. Feedback where evidence is not provided cannot be considered.

*2000 character(s) maximum*

## Review of Appendix D on generic DNSH criteria to Protection and Restoration of Biodiversity

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

If yes, please provide your comment by clearly highlighting which part of the chapter you are referring to.

*2000 character(s) maximum*

We recommend that only the most important aspects or only the largest elements in terms of material or quantity should be examined pursuant to Appendixes A, B, C and D. An activity can still be considered compliant with the taxonomy as long as the key criteria are met, even if costly and overly detailed analyses with minimal impact on the final outcome are not performed.

Please provide a suggestion for an alternative text. Each suggestion needs to be based on scientific or technical evidence, and supported by references where applicable. Feedback where evidence is not provided cannot be considered.

*2000 character(s) maximum*

## Section 2.1.2. Review of Adaptation Annex

The basis and rationale for the review

Improving the usability of the Adaptation generic criteria

## Section 2.1.3. Reviews relevant for both Annexes

Review of differing activity titles and descriptions

Recommended future work: Addressing other potential issues with specific activities

Recommended future work: Review of DNSH of Annex II activities not consulted with the Platform

Recommended future work: Review of activities where the output of the activity requires to be "adapted" in addition to the activity itself being "adapted"

Recommended future work: DNSH Threshold updates for some "Manufacturing" activities

## Section 3: General feedback on the draft report

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Do you have any comments on the written report that you would like to make?

- Yes  
 No

If yes, please provide brief comments in the comment box below:

*5000 character(s) maximum*

We acknowledge the importance of advancing towards climate neutrality while ensuring a balanced and pragmatic energy transition. It is essential to maintain energy security and a stable electricity supply for end-

users, providing legal certainty for investments within the EU. Activities 4.29, 4.30, and 4.31 play a crucial role in balancing the electricity system and ensuring heat supply in large district heating networks during the transition phase. Their classification should reflect their necessity in achieving a fair and responsible energy transition.

The Taxonomy framework is vital for the development of low carbon technologies , but it must remain consistent with other EU regulations and avoid adding unnecessary administrative burdens. Currently, hydrogen production qualifies under the Taxonomy only if it achieves a 73.4% lifecycle greenhouse gas reduction. However, other EU regulations, such as the Gas and Hydrogen Package and RED III, set the benchmark at 70%. Aligning these thresholds would prevent inconsistencies that may hinder hydrogen producers and consumers. Additionally, stringent updates to Taxonomy criteria should not disadvantage technologies essential for decarbonization, particularly those at early market stages like low-emission and renewable hydrogen production. The requirements for hydrogen-related activities, including storage and equipment manufacturing, should remain feasible to avoid increasing costs that could slow deployment. Similarly, supporting activities such as metal extraction and processing for electrolyzers and fuel cells should not be burdened with excessive criteria. Any revisions to the Taxonomy should further align with the EU's simplification ambitions, the upcoming first omnibus simplification package and its goal to reduce reporting and compliance obligations by 25%, ensuring regulatory clarity without hindering innovation and investment. We propose introducing a new Taxonomy activity: 'Material recovery of non-hazardous waste using chemical recycling.' This addition would promote circular economy principles by incentivizing advanced recycling methods. Chemical recycling (CR) plays a crucial role in waste management by enabling the high-quality recycling of plastics and other chemical materials. It enhances resource efficiency by reducing reliance on virgin materials, mitigating environmental impact, and minimizing waste toxicity. CR should be recognized as a complementary method to mechanical recycling, ensuring that hard-to-recycle materials are effectively reintegrated into production cycles. Recognizing this activity within the Taxonomy would accelerate the adoption of sustainable waste management solutions.

Furthermore, the entire electricity value chain is critical for the energy transition, yet electricity marketing activities are currently excluded from the Taxonomy. These activities significantly contribute to climate objectives by:

- Promoting and selling decarbonized energy (renewables and nuclear) to residential and commercial consumers.
- Encouraging energy savings through tailored offers and real-time grid monitoring.
- Enhancing grid flexibility by supporting load offset and compensation mechanisms.

Electricity marketing activities facilitate the adoption of clean energy by ensuring consumers can access and actively choose sustainable power sources. The calculation and documentation of electricity sales should incorporate guarantees of origin (GO) for renewable energy and official national energy mix data for nuclear and gas-based production. Electricity suppliers also play a key role in educating consumers about energy efficiency and load management, thereby optimizing grid usage and reducing overall emissions.

To maximize the effectiveness of the Taxonomy framework, we recommend greater alignment with existing EU policies, the inclusion of complementary activities that support decarbonization, and a balanced approach to criteria updates that takes into account landmark legislation like the upcoming Clean Industrial Deal. Additionally, any revision of the Taxonomy should be consistent with the EU's drive for simplification and its objective to cut reporting and compliance requirements by 25%. This will ensure a just, effective, and technologically inclusive transition towards climate neutrality while minimizing unnecessary administrative burdens.

## Useful links

[More on this call for feedback \(https://finance.ec.europa.eu/publications/call-feedback-psf-preliminary-recommendations-review-climate-delegated-act-and-addition-activities\\_en\)](https://finance.ec.europa.eu/publications/call-feedback-psf-preliminary-recommendations-review-climate-delegated-act-and-addition-activities_en)

[Text of the draft report \(https://finance.ec.europa.eu/document/download/a3e72e4c-f2fb-4400-b06f-f7f10dc2cd09\\_en?filename=250108-sustainable-finance-platform-draft-taxonomy-report\\_en.pdf\)](https://finance.ec.europa.eu/document/download/a3e72e4c-f2fb-4400-b06f-f7f10dc2cd09_en?filename=250108-sustainable-finance-platform-draft-taxonomy-report_en.pdf)

[Specific privacy statement \(https://finance.ec.europa.eu/document/download/4de7a81f-ea3f-4a3d-bcd7-65d954e4f776\\_en?filename=2025-sustainable-finance-platform-taxonomy-report-specific-privacy-statement\\_en.pdf\)](https://finance.ec.europa.eu/document/download/4de7a81f-ea3f-4a3d-bcd7-65d954e4f776_en?filename=2025-sustainable-finance-platform-taxonomy-report-specific-privacy-statement_en.pdf)

[More on the Platform on Sustainable Finance the Platform on Sustainable Finance \(https://finance.ec.europa.eu/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance\\_en\)](https://finance.ec.europa.eu/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance_en)

[More on the EU taxonomy \(https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities\\_en\)](https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en)

## Contact

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