

Call for feedback by the Platform on Sustainable Finance on the draft report on preliminary recommendations for technical screening criteria for the EU taxonomy

Fields marked with * are mandatory.

Introduction

Technical issue:

We are aware that this questionnaire takes a long time to load.

Here are 2 pieces of advice to enhance your experience

- **use the latest versions of one of the following browsers: Microsoft Edge, Mozilla Firefox or Google Chrome**
- **follow the order of the questionnaire: fill it in one section after the other without skipping any section.** Jumping over unfilled section(s) can cause never ending loading of the next sections

We are aware of this issue and are still working on technical solutions to make the process of filling the questionnaire easier and faster.

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.

The climate and environmental challenges we face put an immense task ahead of us: to transition to a low carbon, climate-resilient, and environmentally sustainable economy. The aim of sustainable finance policies is to help all economic actors navigate that transition with the urgency needed to avoid risks and meet climate and environmental goals.

In March 2018, the Commission published its [action plan: financing sustainable growth](#), based on the advice of the [High Level Expert Group \(HLEG\)](#). Action 1 of the Commission's action plan calls for the establishment of an EU classification system for sustainable activities, or [EU taxonomy](#). The Commission followed through on this action by proposing a regulation for such a taxonomy, which was adopted by the co-legislators in June 2020. The [Taxonomy Regulation](#) establishes the basis for the EU taxonomy by setting out 4 overarching conditions that an economic activity has to meet in order to qualify as making a substantial contribution to environmental objectives

- i. it contributes substantially to one or more of the six environmental objectives set out in the Taxonomy Regulation [\[1\]](#)
- ii. it does not significantly harm any of the other environmental objectives
- iii. it is carried out in compliance with minimum (social) safeguards set out in the Taxonomy Regulation [\[2\]](#)
- iv. and it complies with the 'technical screening criteria' that are established by the European Commission through delegated acts. The technical screening criteria specify the conditions under which an economic activity meets criteria (i) and (ii)

The development of the EU taxonomy relies on extensive input from experts from across the economy and civil society. Building on the experience of the [Technical Expert Group \(TEG\) on Sustainable Finance](#) and in line with the 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 policy, notably the further development of the EU taxonomy. The Platform operates through a plenary in full composition of all 57 members and 11 observers, and is organised around 6 subgroups where the technical work on its opinions, reports or recommendations takes place. As one of the 6 subgroups, the [Technical Working Group \(TWG\)](#) has, as its cores tasks, to

- advise the Commission on the technical screening criteria on environmental objectives in line with Article 19 of the Taxonomy Regulation
- advise on the possible need to update those criteria
- analyse the impact of the technical screening criteria in terms of potential costs and benefits

- and assist the Commission in analysing requests from stakeholders to develop or revise technical screening criteria for a given economic activity

The first of the above-mentioned tasks is the focus of the [Platform's TWG July 2021 draft report and accompanying annex document](#) as well as this associated call for stakeholder feedback – specifically to gather further evidence and feedback on proposed draft technical screening criteria. **The draft criteria presented in the report are working documents of the Platform and do not represent a final view of the Platform.** They are presented to gather feedback so that the criteria can be further refined and developed before a final set of recommendations on the criteria are agreed by the Platform and presented to the European Commission in November 2021.

The TWG report focuses primarily on presenting a first set of priority economic activities and draft recommendations for associated substantial contribution and do no significant harm (DNSH) technical screening criteria in relation to the four non-climate environmental objects covering water, circular economy, pollution prevention, and biodiversity & ecosystems. However, a small number of economic activities and corresponding draft recommendations for technical screening criteria related to the climate mitigation and adaptation objectives have also been included.

Due to resources, workload and time available, the Platform TWG addressed a first set of economic activities per environmental objective in its first phase of the work. The proposed methodology for the selection and prioritisation of the activities is explained in detail in the [TWG draft report](#). It is important to note that an activity that is not included in this first batch of activities for the remaining 4 environmental objectives, for which the Platform will develop recommendations for technical screening criteria, may still be addressed as part of a second batch (Platform work starting after submission of the current batch of criteria). It is likely that the recommendations for additional activities and criteria included in that second batch would be addressed in a later update of the delegated act by the European Commission. Thus, non-inclusion by the Platform in the first batch of priority activities does not imply that the activity will not be considered for inclusion in the taxonomy. As recalled above, nothing in this process commits the Commission or precludes any policy outcomes.

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 Friday 24 September 2021 at 18:00 Central European Summer Time.

¹ The environmental objectives as set out in Article 9 of the Taxonomy Regulation are: climate change mitigation, climate change adaptation, pollution prevention and control, water and protection of marine resources, a circular economy, resource efficiency and recycling, and protection of ecosystems.

² Article 18 of the Taxonomy Regulation specifies those as the OECD guidelines for multinational enterprises and UN guiding principles on business and human rights, including the declaration on fundamental principles and rights at work of the International Labour Organisation (ILO), the eight fundamental conventions of the ILO and the international bill of human rights.

Please note: In order to ensure a fair and transparent consultation process **only responses received through our 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.

More information on

- [the call for feedback document](#)
- [the draft report of the Platform Technical Working Group on proposed \(TSC\)](#)
- [the Platform on Sustainable Finance](#)
- [sustainable finance](#)
- [the protection of personal data regime for this consultation](#)

About you

* 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)
- Public authority
- Trade union
- Other

* First name

Mari

* Surname

Nasser

* Email (this won't be published)

mari.nasser@energia.fi

* Organisation name

255 character(s) maximum

Finnish Energy

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

68861821910-84

* Organisation size

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

* Where are you based?

Please add your country of origin, or that of your organisation.

- | | | | |
|--|-------------------------------------|-------------------------------------|--------------------------------------|
| <input type="radio"/> Austria | <input type="radio"/> France | <input type="radio"/> Lithuania | <input type="radio"/> Slovakia |
| <input type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Luxembourg | <input type="radio"/> Slovenia |
| <input type="radio"/> Bulgaria | <input type="radio"/> Greece | <input type="radio"/> Malta | <input type="radio"/> Spain |
| <input type="radio"/> Croatia | <input type="radio"/> Hungary | <input type="radio"/> Netherlands | <input type="radio"/> Sweden |
| <input type="radio"/> Cyprus | <input type="radio"/> Iceland | <input type="radio"/> Norway | <input type="radio"/> Switzerland |
| <input type="radio"/> Czech Republic | <input type="radio"/> Ireland | <input type="radio"/> Other country | <input type="radio"/> United Kingdom |
| <input type="radio"/> Denmark | <input type="radio"/> Italy | <input type="radio"/> Poland | |
| <input type="radio"/> Estonia | <input type="radio"/> Latvia | <input type="radio"/> Portugal | |
| <input checked="" type="radio"/> Finland | <input type="radio"/> Liechtenstein | <input type="radio"/> Romania | |

* Where does your organisation carry out its activities (you can select more than one answer)?

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

Field of activity

* Financial activity

Please select as many answers as you like

- 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
- Other
- Not applicable

* Non-financial activity (NACE)

Please select as many answers as you like

- Agriculture, forestry and fishing
- Mining and quarrying
- Manufacturing
- Electricity, gas, steam and air conditioning supply
- Water supply; sewerage, waste management and remediation activities
- Construction
- Transportation and storage
- Accommodation and food service activities
- Information and communication
- Real estate activities
- 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
- Not applicable

*

Contributions received are intended for publication on the Commission's website dedicated to the Platform. Do you agree to your contribution being published?

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- Yes, I agree to my responses being published under the name I indicate** (name of your organisation/company/public authority or your name – your email address will never be published)
- No, I do not want my response to be published**

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

Activities you would like to comment on

Please select the activity(ies) and the aspect(s) of the activity(ies) and its criteria that you would like to comment on:

Sector 1: Agriculture, forestry & fishing

Please select as many answers as you like

- Animal production 1.1
- Crop production 1.2
- Forestry logging 1.3
- Fishing 1.4

Sector 2: Manufacturing

Please select as many answers as you like

- Manufacture of basic pharmaceutical products 2.1
- Manufacture of basic pharmaceutical preparations 2.2
- Manufacture of chemicals 2.3
- Manufacture of chemicals products 2.4
- Manufacture of plastic packing goods 2.5
- Manufacture of durable electrical and electronic equipment 2.6
- Manufacture of circular electrical and electronic equipment 2.7
- Resell and/or remanufacture of used electrical and electronic equipment 2.8
- Manufacture of equipment generating electricity and/or heat 2.9
-

Manufacture of high, medium and low voltage electrical equipment that result in or enable substantial GHG emissions reductions 2.10

- Manufacture of machinery enabling closed-loop systems, and high-quality waste collection and waste management 2.11
- Manufacture of machinery, equipment and solutions enabling a substantial contribution to the circular economy 2.12
- Manufacture of machinery, equipment and solutions enabling a substantial contribution to pollution prevention and control 2.13
- Manufacture of machinery, equipment and solutions enabling a substantial contribution the sustainable use and protection of water and marine resources 2.14
- Manufacture of motor vehicles, trailers and semi-trailers 2.15
- Manufacture of other transport equipment 2.16
- Design, manufacture, remanufacture, and reselling of furniture 2.17
- Manufacture of food products and beverages (making a substantial contribution to biodiversity) 2.18
- Manufacture of food products and beverages (making a substantial contribution to the transition to a circular economy) 2.19
- Finishing of textiles 2.20
- Manufacture, repair, refurbishment and resale of wearing apparel 2.21
- Manufacture, remanufacture and reselling of footwear and leather goods 2.22
- Tanning of leather 2.23

Sector 3: Energy

Please select as many answers as you like

- Environmental refurbishment of electricity generation facilities that produce electricity from hydropower 3.1
- Electricity generation from bioenergy for protection and restoration of biodiversity and ecosystems 3.2
- Electricity generation using solar photovoltaic technology 3.3
- Electricity generation using concentrated solar power (CSP) technology 3.4
- Electricity generation from wind power 3.5
- Electricity generation from ocean energy technologies 3.6
- Electricity generation from hydropower 3.7
- Electricity generation from geothermal energy 3.8
-

Electricity generation from natural gas 3.9

- Electricity generation from renewable non-fossil gaseous fuels 3.10
- Electricity generation from biogas 3.11
- Power from cogeneration of heat/cool and power from solar energy 3.12
- Power from cogeneration of heat/cool and power from geothermal energy 3.13
- Power from cogeneration of heat/cool and power from natural gas 3.14
- Power from cogeneration of heat/cool and power from renewable non-fossil gaseous fuels 3.15
- Power from cogeneration of heat/cool and power from biogas 3.16

Sector 4: Civil engineering

Please select as many answers as you like

- Construction of civil engineering objects 4.1
- Civil engineering for climate change adaptation 4.2
- Maintenance of roads and motorways 4.3
- Maintenance of bridges and tunnels (railway, road and cycling infrastructure) 4.4

Sector 5: Buildings

Please select as many answers as you like

- Construction of new buildings and major renovations of buildings for the transition to a circular economy 5.1
- Construction of new buildings and major renovations of buildings for protection and restoration of biodiversity and ecosystems 5.2
- Acquisition and ownership of buildings 5.3
- Demolition or wrecking of buildings and other structures 5.4

Sector 6: ICT

Please select as many answers as you like

- Digital solutions exploiting space-based earth observations enabling climate change mitigation 6.1
- Digital solutions exploiting space-based earth observations enabling climate change adaptation 6.2
- Digital solutions exploiting space-based earth observations enabling the protection and restoration of biodiversity and ecosystems 6.3

- Digital solutions exploiting space-based earth observations enabling pollution prevention and control 6.4
- Digital solutions exploiting space-based earth observations enabling sustainable use of waters and marine resources, and their protection 6.5
- Provision of data-driven solutions enabling to prolong asset's lifetime, provide value chain material and product information, or enable product designers to make a substantial contribution to the circular economy 6.6
- Provision of data-driven solutions enabling map and monitor water quality and scarcity, and manufacture of equipment enabling the efficient use and treatment of water resources 6.7

Sector 7: Disaster risk management

Please select as many answers as you like

- Emergency services – Emergency health services 7.1
- Emergency services – Disaster response coordination 7.2
- Emergency services – Disaster relief 7.3
- Emergency services – Search and rescue 7.4
- Emergency services – Hazardous materials response 7.5
- Emergency services – Firefighting 7.6
- Emergency services – Technical protection response and assistance 7.7
- Flood risk prevention and protection infrastructure for inland and coastal floods 7.8
- Nature based solutions (Nbs) for flood risk prevention and protection for both inland and coastal waters 7.9

Sector 8: Transport

Please select as many answers as you like

- Sea and coastal freight water transport 8.1
- Sea and coastal passenger water transport 8.2
- Retrofit and upgrade of vessels for the transport of freight on vessels designed for operating on sea or coastal waters 8.3
- Retrofit and upgrade of vessels for the transport of passengers on vessels designed for operating on sea or coastal waters 8.4
- Inland freight water transport 8.5
- Inland passenger water transport 8.6
-

Urban and suburban passenger land public transport 8.7

- Transport by motorbikes, passenger cars and light commercial vehicles 8.8
- Manufacturing of aircraft 8.9
- Passenger air transport 8.10
- Air transportation ground handling operations 8.11

Sector 9: Restoration, remediation

Please select as many answers as you like

- Conservation of habitats/ecosystems 9.1
- Restoration of ecosystems for protection and restoration of biodiversity and ecosystems 9.2
- Restoration of ecosystems for climate change adaptation 9.3
- Remediation activities enabling restoration of waterbodies 9.4
- Remediation activities for the transition to a circular economy 9.5
- Remediation activities for pollution prevention and control 9.6
- Remediation activities enabling restoration of ecosystems 9.7

Sector 10: Tourism

- Hotels, holiday, camping grounds and similar accommodation 10.1

Sector 11: Water supply

Please select as many answers as you like

- Water supply 11.1
- Desalination 11.2

Sector 12: Sewerage

Please select as many answers as you like

- Urban wastewater treatment 12.1
- Phosphorus recovery 12.2
- Production of alternative water resources 12.3
- Sustainable urban drainage systems (SUDs) 12.4

Sector 13: Waste management

Please select as many answers as you like

- Collection and transport of non-hazardous and hazardous waste 13.1

- Separate collection and transport of hazardous waste 13.2
- Treatment of hazardous waste as a means for pollution prevention and control 13.3
- Treatment of hazardous waste as a means for material recovery 13.4
- Recovery of bio-waste by anaerobic digestion and/or composting 13.5
- Remediation of legally non-conforming landfills and abandoned or illegal waste dumps 13.6
- Depollution and dismantling of end-of-life products for material recovery 13.7
- Sorting and material recovery of non-hazardous waste 13.8
- Preparation for re-use of end-of-life products and components they are made of having become waste 13.9

Sector 14: Services

Please select as many answers as you like

- Provision of electrical and electronic equipment through circular business models 14.1
- Provision of repair and maintenance services and of directly related activities 14.2

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

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- The DNSH TSC

Environmental refurbishment of electricity generation facilities that produce electricity from hydropower 3.1

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

-

The description/boundary of the activity

- The substantial contribution TSC
- The DNSH TSC

Description/boundary of the economic activity

What does your comment about the description/boundary of the activity concern?

Please select as many answers as you like

- The granularity of the activity
- The boundary of the activity
- The clarity with which the activity has been defined

Please provide a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your selection:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Activity 3.1. should be removed as the scope and criteria of activity 4.5 (ref DA CC mitigation) Electricity generation from hydropower is sufficient. We would also like to emphasize the work being done under the EU Biodiversity Strategy 2030, such as the Commission's guidance on river restoration targets (Draft 9th June 2021). The proposed Activity in 3.1 introduces new and non-aligned criteria, unnecessary and artificial division between generic hydropower activities and specific environmental refurbishments, and it adds to the administrative burden without a contribution to sustainability. Also, the proposed criteria re-introduce many items that have already been discussed and changed in the scope of the DA for objective 1 and 2.

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Activity 3.1. should be removed, but if the activity is left, TSC need to be revised as the criteria presented here substantially tightens hydropower operations thus raising concerns that the criteria will create overlapping legislation:

- o Impact assessment need to take into account also effects to climate change mitigation and adaptation.
- o The limitation of capacity below 10 MW needs to be removed. The electrical output of a hydro powerplant by itself does not tell anything about plant's impact. Smaller hydropower plants are not only a crucial source of renewable electricity across Europe but also deliver essential flexibility and systems services, helping to integrate volatile RES. All possible evaluations need to be site-specific and take local circumstances into consideration.
- o Requirement 4 on non-eligibility of existing barriers converted into plants is not justified. It is possible to equip existing dams with turbines and environmental restoration measures, which is positive for climate change mitigation and biodiversity. Also, plants constructed after the DA should be included as in the future new efficient systems beneficial to the environment may be found
- o Requirement 5 restricts the perimeter of environmental refurbishment ignoring that environment may be improved not only through fish passes. Also, it did not consider the best practice on adapting hydropower plants to fish migration. Limited and minimum list of operations to be labelled environmental refurbishment should be left to local authorities
- o Further consideration is needed especially for points 5.1. and 5.3. We would like to point out that too stringent criteria could exclude restoration project with substantial potential to enhance biodiversity. Measures 5.1-5.3 need to be categorized "where relevant" as are points 5.4-5.6. Used measures need to be in line with WFD, and under the scrutiny of competent authority

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Please identify the missing aspects or the improved definitions together with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion(s)

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

An overlap with previous and other related documents should be double checked. Also, the rationale behind DNSH needs to be further defined. If increasing dam height or water volume does not affect the status of water body, it shouldn't matter.

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)

- No
- Don't know / no opinion / not applicable

Please identify your concern(s) on the ability to implement the proposed substantial contribution criteria, together with a brief explanation and rationale as well as supporting evidence (including links to published journals and articles) for your concern(s):

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

We believe that the proposed activity 3.1. introduces an unnecessary and artificial division between generic hydropower activities and specific environmental refurbishments. This adds a complicated layer for companies that shall report and stakeholders that shall understand how companies can meet the technical screening criteria.

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do No Significant Harm (DNSH) technical screening criteria (TSC)

Does the proposed DNSH criteria ensure no significant harm to the environmental objective?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

What should the performance limit level be in your view?

Please provide a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

- o DNSH (1): The criteria presented here cannot cause significant harm to climate change mitigation. Hydropower provides renewable and flexible energy needed for the energy transformation.
- o DNSH (3): It is not justified to limit dam height or water volume used. For example, some dams are located on rivers with natural barriers, so dam's height is not a meaningful parameter. A more flexible and site-specific approach will facilitate new and sustainable solutions. Limiting water volume is also not justified: If the dam and the plant exist, it is clearly positive for the community to use them to produce low carbon energy. One should also keep in mind that water is only circulated through hydropower plants and there is therefore no supplementary impact to circulate more water.

Are there any key factors which have been omitted from the draft proposed DNSH criteria or that need better defining?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Please identify the missing aspects or the improved definitions together with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion(s):

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The proposed DNSH criteria disregard that an environmental impact assessment will assess whether an increase of the dam height or reservoir would have an impact of environmental factors. In practice, the impact can be very limited (i.e. no significant harm), while the benefit of increasing the reservoir can have major impact on the power systems ability to integrate more intermittent renewables.

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed DNSH criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Electricity generation from bioenergy for protection and restoration of biodiversity and ecosystems 3.2

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Description/boundary of the economic activity

What does your comment about the description/boundary of the activity concern?

Please select as many answers as you like

- The granularity of the activity
- The boundary of the activity
- The clarity with which the activity has been defined

Please provide a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your selection:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

In general, the Platform has kept the same headlines and DNSH criteria for activities which have already been covered in the climate delegated act. However, the Platform has changed the headline of bioenergy from "Electricity generation from bioenergy" to "Electricity generation from bioenergy for protection and restoration of biodiversity and ecosystems". The Platform has also changed the DNSH criteria. The content of the proposed DNSH criteria is not alarming from our point of view, but it is not aligned with the DNSH criteria of bioenergy in the climate delegated act. We do not support creation of overlapping legislation within the Taxonomy. We strongly support an approach, where an activity has the same DNSH criteria in all

delegated acts of the Taxonomy.

The title of the activity is “Electricity generation from bioenergy for protection and restoration of biodiversity and ecosystems electricity”, but in the text the Platform mentions Operation of installations generating electricity and/or heat that produce exclusively from biomass, biogas or bioliquids. Later in the text, the activity is classified under NACE code D35.30 which is normally used for heat production. As a comparison, under 3-12, 3-13, 3.14, 3.15 and 3.16 the Platform emphasizes that these include only power activities.

As the size of the plant has not been mentioned in the criteria, does it mean that all plants need to fulfil the criteria, no matter which size the plant is? That would be a deviation from RED2.

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

- o All projects are required to have an EIA procedure (or screening). We are unsure what would that mean? The process according to EIA Directive should be applicable only for projects mentioned in the Directive. For other projects not mentioned in the Directive it should be clarified that environmental impacts can be evaluated through less formative procedure.
- o The draft criteria require avoiding the use of whole trees, without reference to a definition and without defining it in the draft. The use of undefined terms must be avoided and instead refer to valid legislation (for example REDII) and the definitions used in.
- o A total ban of coarse woody debris would mean excluding the use of all tops, reeds and other industrial waste. With such limitation there would not be much biomass available for use.
- o We suggest verifying the requirements for the sourcing plan. It seems that the proposals do not comply with the requirements and current implementation of the RED II, which allows the Member States (incl. Finland) to establish a national system for the proof of sustainability.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Electricity generation using solar photovoltaic technology

3.3

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
-

Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Electricity generation using concentrated solar power (CSP) technology 3.4

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Electricity generation from wind power 3.5

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the **ambition level** set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the **ability to implement (e.g. **technical feasibility**) the proposed substantial contribution criteria?**

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the **rationale and scientific evidence on which the proposed criteria are based is **sufficient and robust**?**

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the **state-of-the-art in technological and/or practice terms?**

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Electricity generation from ocean energy technologies 3.6

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

-

Yes

- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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You can upload several files.

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Electricity generation from hydropower 3.7

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

We propose that the obligation to perform LCA is removed. However, if this is not possible, the criteria should only apply to new hydro power constructions. Applying these criteria on existing assets will be an unnecessary administrative burden and will not contribute effectively for this environmental objective.

Reasoning: the current standards for EPDs relies on current database values and nearly all the pollution from HPP in a life-cycle perspective occurs in the upstream supply chain. Conducting the analysis on assets built 40-50 years ago - which is the case for the bulk of the hydropower fleet – will produce values that have no real value for disclosure purposes. It is also unrealistic to retrieve actual environmental data from the supply chain as the practice for documenting these values would be non-existent. The requirements should also be based on existing regulation and not create/add new requirements above existing directive, etc. Therefore, reaching WFD objectives should be the target for water biodiversity. Requirements 3, 4, 5 should be deleted from document.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Please identify the missing aspects or the improved definitions together with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion(s)

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The draft proposal does not recognize that most of the pollution from HPP occurs in the upstream supply chain or unavailability of data for the existing HPP. New assets are required to perform an LCA and thus relevant information is available.

Do you have any major concerns with respect to the **ability to implement (e.g. **technical feasibility**) the proposed substantial contribution criteria?**

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the **rationale and scientific evidence on which the proposed criteria are based is **sufficient and robust**?**

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the **state-of-the-art in technological and/or practice terms?**

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do No Significant Harm (DNSH) technical screening criteria (TSC)

Does the proposed DNSH criteria ensure no significant harm to the environmental objective?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

What should the performance limit level be in your view?

Please provide a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

DNSH requirement 2.1 is redundant with respect of requirement 1. The requirement should be based on existing regulation and not create or add new requirements above existing directive. Therefore, reaching WFD objectives should be the target for water biodiversity, and keep the identical wording to WFD.

Are there any key factors which have been omitted from the draft proposed DNSH criteria or that need better defining?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed DNSH criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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You can upload several files.

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Electricity generation from geothermal energy 3.8

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)

- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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You can upload several files.

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Electricity generation from natural gas 3.9

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Electricity generation from renewable non-fossil gaseous fuels 3.10

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the **ambition level** set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any **key factors which have been omitted** from the draft proposed substantial contribution criteria or that **need better defining** that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the **ability to implement (e.g. **technical feasibility**) the proposed substantial contribution criteria?**

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the **rationale and scientific evidence on which the proposed criteria are based is **sufficient and robust**?**

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the **state-of-the-art in technological and/or practice terms?**

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Electricity generation from biogas 3.11

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the **ambition level** set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions

Are there any **key factors which have been omitted** from the draft proposed substantial contribution criteria or that **need better defining** that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the **ability to implement** (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the **rationale and scientific evidence** on which the proposed criteria are based is **sufficient and robust**?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Power from cogeneration of heat/cool and power from solar energy 3.12

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Power from cogeneration of heat/cool and power from geothermal energy 3.13

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Power from cogeneration of heat/cool and power from natural gas 3.14

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the **ambition level** set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions

Are there any **key factors which have been omitted** from the draft proposed substantial contribution criteria or that **need better defining** that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Power from cogeneration of heat/cool and power from renewable non-fossil gaseous fuels 3.15

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
-

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. We strongly believe that the obligation to perform LCA should be removed. This means that all non-combustion energy production would fulfil the requirements. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions.

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
-

Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

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Power from cogeneration of heat/cool and power from biogas 3.16

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

Substantial contribution technical screening criteria (TSC)

Do you consider the ambition level set by the proposed substantial contribution criteria to be appropriate?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Please provide an alternative suggestion with a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your suggestion:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The pollution criteria (acidification potential, ozone creation potential, eutrophication potential, PM10 and PM2,5) are given as life cycle emissions. In the pollution criteria, the lifecycle emissions are rather complicated to determine, and therefore we would propose to consider only direct emissions

Are there any key factors which have been omitted from the draft proposed substantial contribution criteria or that need better defining that should be addressed?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you have any major concerns with respect to the ability to implement (e.g. technical feasibility) the proposed substantial contribution criteria?

- Yes (please comment)
- No
- Don't know / no opinion / not applicable

Do you consider that the rationale and scientific evidence on which the proposed criteria are based is sufficient and robust?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Do the criteria for the activity represent the state-of-the-art in technological and/or practice terms?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Additional information

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On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

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Please select as many answers as you like

- The description/boundary of the activity
- The substantial contribution TSC
- The DNSH TSC

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Please select as many answers as you like

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The DNSH TSC

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Please select as many answers as you like

The description/boundary of the activity

The substantial contribution TSC

The DNSH TSC

Treatment of hazardous waste as a means for pollution prevention and control 13.3

On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

The description/boundary of the activity

The substantial contribution TSC

The DNSH TSC

Description/boundary of the economic activity

What does your comment about the description/boundary of the activity concern?

Please select as many answers as you like

The granularity of the activity

The boundary of the activity

The clarity with which the activity has been defined

Please provide a brief scientific/technical explanation and rationale as well as supporting evidence (including links to published journals and articles) for your selection:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Activity includes sub-activities: construction, revamping, upgrade, and operation of dedicated facilities for the treatment of hazardous waste, including the incineration of hazardous waste. However, in the next part, it is

stated: “The following sub-activities are excluded from the scope: 1) Disposal operations of hazardous waste e.g., landfilling or permanent storage.” This creates unnecessary confusion, because in some countries, e.g. in Finland, incineration of hazardous waste is under a waste management code for disposal regardless of whether the energy is recovered or not. In practice, it creates a risk that incineration of hazardous waste is not included.

Additional information

Should you wish to provide additional information on this activity (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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On which aspect(s) of this activity would you like to comment?

Please select as many answers as you like

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Please select as many answers as you like

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Horizontal considerations with respect to the proposed TSCs

Substantial contribution technical screening criteria (TSC)

Where economic activities are linked (e.g. through the supply chain) or have similar characteristics, are the associated substantial contribution criteria for a particular environmental objective suitably aligned and consistent?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Should you wish to provide additional information (e.g. a position paper, report) on the TSC or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Do No Significant Harm (DNSH) technical screening criteria (TSC)

For each environmental objective, is the proposed performance level of DNSH criteria generally consistent and aligned across the different economic activities?

- Yes
- No (please comment)
- Don't know / no opinion / not applicable

Should you wish to provide additional information (e.g. a position paper, report) on the DNSH TSC or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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You can upload several files.

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General feedback on the draft report

Please provide us with any additional comments you would like to make on the report:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

- We believe that the draft would benefit from more information on the Platform's methods of how they decided inclusion of certain energy production activities under certain environmental targets. For example, it would make more sense to include bioenergy under circular economy target instead of biodiversity target.
- Report, 4.1: "Headline ambition" of the objective 3 (water) is missing references to Heavily Modified Water Bodies and their status, good ecological potential. Also, less stringent objectives are possible (WFD art. 4.5) and should be taken into consideration in the criteria.
- Report, 4.4: "Headline ambition" of the objective 6 (biodiversity) refers to the ecosystems. This is not defined in EU context. EU legislation protects habitats and species and aims to achieve their favorable status. The ambition level should be bound to them.

Alignment with the ongoing workstream on the Complementary DA:

- While both nuclear energy and natural gas will be assessed in the complementary delegated act on climate change mitigation and adaptation (yet to be published), we note that they are not treated equally in the draft delegated act on the four remaining environmental criteria. The production of electricity from natural gas is included, while electricity from nuclear energy is not assessed. We ask the Platform to assess the contribution of nuclear energy to the four remaining environmental objectives.
- In addition, several activities related to nuclear energy have been explicitly excluded from the Platform's list. Since nuclear production is still being examined in the context of the preparation of the complementary delegated act on climate change mitigation and adaptation, there is no justification for this decision. We call on the Platform to wait for the adoption of the complementary delegated act on climate change mitigation and adaptation before taking any decision on that matter.

Assessment of Waste-to-Energy in Taxonomy:

- According to the Technical Expert Group's ('TEG') final report from March 2020, the Platform should yet consider and clarify the role of the thermal treatment of non-recyclable waste as part of Taxonomy. The Platform should thoroughly consider the sustainability merits of the thermal treatment of both non-hazardous and hazardous waste ('WTE').
- We believe that safeguards are needed to ensure that the WtE installations are planned, designed and operated so that they are in line with the waste hierarchy, hence considering waste prevention and recycling efforts.

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below.

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Useful links

[Call for feedback document \(https://ec.europa.eu/info/files/2021-technical-screening-criteria-taxonomy-report-call-for-feedback-document_en\)](https://ec.europa.eu/info/files/2021-technical-screening-criteria-taxonomy-report-call-for-feedback-document_en)

[Draft report by the Platform on Sustainable Finance on preliminary recommendations for technical screening criteria for the EU taxonomy \(https://ec.europa.eu/info/publications/210803-sustainable-finance-platform-technical-screening-criteria-taxonomy-report_en\)](https://ec.europa.eu/info/publications/210803-sustainable-finance-platform-technical-screening-criteria-taxonomy-report_en)

[More on sustainable finance \(https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance_en\)](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance_en)

[Platform on Sustainable Finance \(https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance_en\)](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance_en)

[Specific privacy statement \(https://ec.europa.eu/info/files/2021-technical-screening-criteria-taxonomy-report-specific-privacy-statement_en\)](https://ec.europa.eu/info/files/2021-technical-screening-criteria-taxonomy-report-specific-privacy-statement_en)

Contact

fisma-platform-sf@ec.europa.eu