

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.

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

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

Taina Wilhelms

Name of your organisation

Finnish Energy

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:

68861821910-84

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

Section 2: Targeted feedback on the TWG report

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 do not support tightening thresholds during ongoing implementation. While we support the taxonomy's objectives and ambitious climate targets, a linear reduction of current thresholds is problematic. The proposal is overly complex, lacks thorough impact assessment, and could undermine legal certainty for companies.

The focus should be on ensuring existing criteria are well understood and correctly applied so the taxonomy works effectively and serves its purpose. The Commission aims to improve usability and clarity, and tightening thresholds does not support this goal.

Companies already reporting under taxonomy have established practices and adapted to current criteria. Imposing additional administrative burden contradicts the Commission's goal of enhancing EU competitiveness and the upcoming Omnibus proposal. Also, other large companies under CSRD will begin mandatory taxonomy reporting from financial year 2025 and have only recently prepared for compliance with current rules.

Before considering tighter targets, the Climate DA review should assess the impact of current thresholds and TSC. A life cycle assessment is necessary to determine the feasibility of lower thresholds in the current technological landscape.

Long-term visibility on threshold evolution is crucial. Frequent revisions harm legal certainty. Investment decisions made under current criteria must be grandfathered if thresholds change, ensuring trust and investor confidence in the EU Taxonomy.

Frequent revisions, such as adjusting thresholds every three years as suggested by the Platform, create investment uncertainty and risk delaying crucial funding for sustainable activities. Tightening thresholds may deter investments, slowing climate transition and increasing costs, conflicting with the Commission's competitiveness objectives.

The platform has mentioned differentiating thresholds for new and existing energy utilities. If new thresholds are introduced, this option should be further explored.

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

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

2000 character(s) maximum

The platform notes that taxonomy criteria are stricter than others, such as RED III. We support the Platforms approach that the RED method should continue to serve as the basis for future criteria for its versatility in energy production, suitability in different cases such as electricity, heating/cooling, or biofuels or their combinations. Proposed changes should be carefully assessed, as well as the ones done on the final RED3 criteria.

We oppose tightening the GHG-emission savings target until accurate modeling shows its effects on biomass use across Europe. While low-value biomass use should increase per the cascade principle, tighter GHG limits might cause issues. We also worry about reduced CHP-plant flexibility in areas with variable heat demands. The platform stresses proper assessment of the impacts of raising the GHG savings requirement. Tightening is premature, given the recent start of RED3 criteria implementation and some MSs' deficiencies in RED2 implementation.

P.61, box10, with additional criteria for bioenergy: Text is from RED3 a3, initially for support schemes. If applied, new criteria would expand RED3 a3's context, applying not just to member states but also to operators directly. In practice, such an examination and precise reporting would be entirely new for some member state operators, and it might not even be feasible, except on a general level.

We note that the platform's analysis on pages 54-55 addresses bioenergy sustainability in a biased way. Scientists, such as the IEA Bioenergy group and the EU's JRC, have presented differing opinions
https://www.ieabioenergy.com/wp-content/uploads/2019/12/WoodyBiomass-Climate_EASACresponse_Nov2019.pdf
<https://publications.jrc.ec.europa.eu/repository/handle/JRC122719>.

On page 60, the platform incorrectly claims that ESABCC requires extra criteria in its 2024 report. ESABCC, however, emphasizes that additional use should not be encouraged.

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

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

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

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

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

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

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 do not support tightening the thresholds when the implementation process is still in progress. We support the overall objectives of the taxonomy and ambitious climate targets, but we find a linear reduction of the current thresholds problematic. The proposal is also too complicated and impacts haven't been assessed thoroughly. Legal certainty should be ensured for companies.

At this stage, the focus should be on ensuring that the existing criteria are properly understood and correctly applied by different stakeholders (interpretation challenges are significant) so the taxonomy can be implemented effectively and fulfill its intended purpose. We understand that the Commission aims to specifically improve the usability and clarity of taxonomy to advance its practical implementation, and we do not see how tightening the thresholds would support this goal.

Companies already reporting in line with taxonomy have just established practices and adapted their reporting to meet current criteria. Therefore, it would be desirable to avoid immediately imposing additional

administrative burden on companies. This would contradict Commission's objectives to enhance the EU's economic competitiveness and also the upcoming Omnibus proposal. Under Art. 8 of the Taxonomy Regulation, taxonomy reporting is partially mandatory for companies under CSRD. As CSRD applies from financial year 2025 to large companies meeting two of three criteria (employees, turnover, balance sheet), many will also face mandatory taxonomy reporting. Since these companies have already prepared based on existing criteria, any changes would increase administrative burden.

The review of the Climate DA should focus on an impact assessment of current thresholds and TSC before any tightening of targets is considered. A life cycle assessment needs to prove the feasibility of a lower emission threshold in the current technological environment.

Providing visibility about the long-term evolution of thresholds is important. Legislators should provide visibility about the step-wise evolution of thresholds, instead of triggering new discussions every few years, which is harmful for legal certainty.

Grandfathering of currently compliant projects: Investment decisions that were made under current technical screening criteria and thresholds need to benefit from grandfathering in case thresholds change in the future. This is indispensable to maintain trust and investor confidence in the EU Taxonomy.

The constant revision of standards, e.g. revision of thresholds every three years, as suggested by the Platform, creates investment uncertainty, which is likely to delay the investment decisions needed to bridge the funding gap for sustainable activities. I.e., tightening the thresholds could lead to investments not being realized, which would in turn slow the transition towards climate neutrality and make it unnecessarily expensive. This, again, is inconsistent with the new Commission's competitiveness objectives.

Platform has mentioned in its report that differentiating thresholds between new and existing energy utilities for substantial contribution might be a potential option in the future. When/if new thresholds are introduced, the possibility for different thresholds for new and existing plants should be explored more.

Industry is evolving rapidly, and we find that all new relevant technologies are not adequately considered in taxonomy or in the Platform's recent report. Electric boilers are currently not included in the EU Sustainable Finance Taxonomy and we recommend that this technology be included under the climate change mitigation criteria for the following reasons:

- o Flexible heat production: Electric boilers can be used when electricity is abundant and prices are low, such as during surplus wind or solar power situations. In these instances, electric boilers can produce heat without using fossil fuels, thereby reducing carbon dioxide emissions. This also helps increase the share of renewable energy and reduces the need for curtailment.
- o Balancing the energy system: Electric boilers can balance the electricity system by utilizing surplus electricity in district heating production. This helps reduce emissions from electricity generation because electricity can be directed to district heating production rather than being generated by burning fossil fuels.
- o Enabling heat storage production: Electric boilers can be combined with heat storage, allowing heat production during times when electricity is emission-free or cheaper. This way, heat can be produced and stored for future use, reducing the need for fossil fuels during peak demand periods.
- o Supporting heat pumps: Electric heatboilers can be used to increase the temperature after a heat pump utilising excess heat from datacentres or other industrial processes. Utilising excess heat is highly energy efficient and reduces carbon dioxide emissions by replacing use of fossil fuels in boilers.

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

[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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