

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 ways to get around this problem

- **use the blue button "Next"** at the bottom of each page to navigate to the next page.
This will prevent the scrolling down issues
- **leave the questionnaire open and wait a few minutes.**
You should then be able to work on it again.
And when the questionnaire is **fully loaded the "Save as draft" button will appear** on the right side of the screen

We are aware of this issue and 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

Henriette

* Surname

Gleau

* Email (this won't be published)

hmgleau88@gmail.com

* Organisation name

255 character(s) maximum

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.

* 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.

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

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

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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

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.

While we consider the overall ambition level to be appropriate, several restrictions limit the possibility for hydropower operators to be eligible under this category, without any real justification given for the limitations:

1. It is not understandable why the measures listed in points 5.1. to 5.3. must be fulfilled cumulatively for substantial contribution to the environmental objective "protection and restoration of biodiversity and ecosystems". Individual measures that improve the environmental performance of a hydropower plant – like modernisation to construct fish passes – contribute substantially to the protection of biodiversity and should therefore also be acknowledged in this context.
2. Refurbishments of hydropower plants with a capacity below 10 MW are per definition excluded from being eligible to substantially contribute to restoration of biodiversity. This is not appropriate, as small hydro power plants are an important source of reliable and green energy for some regions. Furthermore, the electrical output of a plant does not necessarily impact the positive effect of a modernisation measure on biodiversity.

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 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.

SGI Europe believes that the energy production of bioenergy should be part of the circular economy targets instead of the biodiversity targets to ensure a proper implementation of this activity in the EU Taxonomy. Overall, we fear that the additional effort to determine the mentioned evaluation criteria for bioenergy are extremely far reaching, compared to present large-scale production and use in the Renewable Energy Directive II (Article 29). Also, it is difficult at this stage to implement such criteria without the additional external support needed to fulfil these. This is especially the case where data for all parameters (e.g. PM 10 and PM 2.5) are in several examples missing.

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:

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It is not necessary to introduce additional criteria that go beyond the sustainability criteria for biomass set out in the Renewable Energy Directive (Article 29). Especially considering those criteria are currently being revised in the context of the "Fit for 55"-package. Those criteria already define, under which conditions biomass is a renewable energy source, and this should be sufficient for the activity to be considered as contributing substantially to the protection of biodiversity and ecosystems.

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 descriptions of the activities listed under 3.2 do not take into account the regional and local variation in biomass production where adapted bioenergy production systems in agriculture and forestry may be design, located and managed to avoid, or even improve the environmental status in surrounding ecosystems. Furthermore, not including downstream environmental benefits from bioenergy when replacing fossil fuels will cause a limited and partial evaluation where indirect benefits are neglected. This is not in line with the increased requirements of holistic systems perspective in policies and legislations (e.g. the required life cycle calculation of biofuels greenhouse gas performance).

In fact, there is no scientific rationale for excluding "other crops grown primarily for the purpose of supplying biomass for energy use". Actual scientific research and publications demonstrate the potential of multi-functional biomass cultivations on agriculture land leading to reduced nutrient leaching and soil erosion and improved soil carbon sequestration and soil fertility.

<https://www.nature.com/articles/s43247-021-00247-y>

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

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

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

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

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.

It is completely unclear why wind turbines have regulations on SO₂, NO_x, ozone, PO₄ and PM 10 + 2.5 (points 1-5). These points should be completely removed, and the chapter should be designed in a similar way to chapter 3.3 - Electricity generation using solar photovoltaic technology.

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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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

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

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

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

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

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.

With reference to the threshold values of the acidification potential, it appears absolutely necessary to adopt values that are as inclusive as possible, in order to favor the use of hydroelectric generation. In fact, putting this source out of action would jeopardize the possibility of reaching the ambitious carbon neutrality targets set by European environmental policies and actions (in particular Green Deal and Fit for 55). Furthermore, it should be noted that the "life cycle emissions" assessment with third-party verification significantly increases effort and reporting costs for the operators concerned.

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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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

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

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

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.

The rationale that led to the exclusion of liquid fuels from the scope of the activity in the question is not clear. For consistency with the delegated act on climate change referred to in articles 10 and 11 of Regulation (EU) 2020/852, and in particular the Annex relating to climate change mitigation, in fact, production should also be included in the activity of electricity from renewable non-fossil liquid fuels.

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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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

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

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
- ☐

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

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
- ☐ 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.

As with 3.10, the rationale that led to the exclusion of liquid fuels from the scope of the activity in the question is not clear. For consistency with the delegated act on climate change referred to in articles 10 and 11 of Regulation (EU) 2020/852, and in particular the Annex relating to climate change mitigation, in fact,

production should also be included in the activity. of electricity from renewable non-fossil liquid fuels.

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

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

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

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

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

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

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

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

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

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
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- ☐ The DNSH TSC

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
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- ☐ The DNSH TSC

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
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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

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

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- ☐ The DNSH TSC

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

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

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

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

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

Please identify your concern(s) on the ability to implement the proposed DNSH 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.

SGL Europe thinks that the need to apply the Life-Cycle Assessment analysis with third party audits for the equipment envisaged in the water cycle, to guarantee the choice of sustainability, is difficult and expensive to apply. For this reason, it would be preferable to include the possibility of using other systems for measuring energy efficiency and quantifying GHG emissions, such as energy audits or carbon footprint calculations.

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

- ☐ The description/boundary of the activity
- ☐

The substantial contribution TSC

☐ The DNSH TSC

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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
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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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- ☐ The DNSH TSC

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Please select as many answers as you like

- ☐ The description/boundary of the activity
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Please select as many answers as you like

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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
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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

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

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

Water supply 11.1

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.

SGI Europe welcomes that the Platform links the technical screening criteria for water supply to the recently adopted revised Drinking Water Directive and fully supports this coherence. In order not to undermine the coherence, we advise not to propose parallel ILI thresholds beyond the Directive, but to ensure consistency in this context as well. Therefore, SGI Europe proposes to link the technical screening criteria to the threshold to be set out by the Commission in a delegated act in accordance with Article 21 of the Drinking Water Directive. This would also prevent setting an arbitrary ILI threshold.

In this context, it also has to be taken into account that investments are not automatically linked to significant impacts on the water losses of the infrastructure system, which is why the accuracy of the criterion for assessing sustainable investments in water supply in general should be well considered.

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

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.

While the description of the activity also contemplates the management of the distribution networks, as well as the water treatment plants, the proposed technical screening criteria focus exclusively on new networks, network extensions or renewal of sections of the networks. Regarding this, the proposal is not accurate enough, as it does not define the criteria for the management of a supply system for the purpose of protecting the taxonomy compliant water resource. Probably, it would be appropriate to identify specific criteria to determine also the eco-compatibility of the infrastructure management activity.

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.

With reference to the technical screening criteria relating to the construction of new networks, as well as to the extension and renewal of the networks, it is considered necessary to eliminate the reference to the ILI and refer only to the decisions that will be taken in the European context regarding the units of measurement to be use and the limit values to be defined based on Article 4 of the new Drinking Water Directive. Pending these, moreover, the possibility of using the metrics established by national regulators and legislators should be envisaged.

Furthermore, it should be noted that the "consumer level" (referring to the measuring points) corresponds to the point of delivery of the water to the final consumer (equipped with a meter), whether it is represented by a single housing unit or a multi apartment houses. In the case of multi apartments houses, this means to transform the existing distribution meters serving the individual housing units into meters directly connected to the distribution network. Tele intervention not only involves a costly and strong interference with civil and private life, but would force the need to adopt high network pressures to be able to serve the higher floors, with relative greater losses and energy costs (and consequent additional production of GHG), issue currently solved by the individual "private" booster systems, intended to serve the real estate units located beyond the level of achievement of the network piezometric.

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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Desalination 11.2

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

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

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)

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In the Mediterranean basin, in some island areas, there are still realities in which the supply is ensured through the transport of drinking water with tankers (or barges). In addition to the higher cost of water transported by sea compared to modern reverse osmosis systems (even of an order of magnitude), these situations must be overcome as soon as possible with the implementation of modern on-shore desalinators. In this regard, it should be considered that:

1) - The transport of drinking water by sea contributes significantly to the production of GHG. In fact, as the EU itself recalls, maritime transport contributes about 3% to the CO2 emissions of the Union (this corresponds to the total emissions of a State such as Belgium [Report from the Commission 2019 Annual Report on CO2 Emissions from Maritime Transport {C (2020) 3184 final}]).

2) - An on-shore desalination system represents a guarantee for the continuity of the water supply even in the face of rough seas, which could prevent navigation and / or docking of barges. Fixed desalinators thus make it possible to increase the resilience of the communities concerned for a good (drinking water) that is essential for them.

Basically, an incident of the type should be added to the technical screening criteria "The installation of RO desalination systems should therefore be considered as a priority for those islands served by tankers ships, whose function should at most be limited to making up for any maintenance periods or seasonal peaks water demand. "

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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Urban wastewater treatment 12.1

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.

SGI Europe is welcoming greatly the draft reports approach and recognition of the waste- water treatment plants activity as a substantial contribution to reduce pollution and pressure from the environment that other activities cause. The waste-water sector plays an important role in environmental and water protection in the EU. At the same time, waste-water treatment plants are an enabler and ultimate prerequisite for the environmental contribution of other activities considered within the Taxonomy. For some economic activities, it is them that enable other economic activities to make a positive contribution in the first place. This is why it is of particular importance to prevent reduced access to financing, which would have detrimental spill-over effects on the sustainability of other activities. Understanding this key role and, consequently, not placing

waste-water treatment plant activities on the same level as such as buildings or manufacturers of heavy metal, is a vital step to ensure a sustainable finance mechanism for the waste- water sector.

SGI Europe has actively worked for a long period on the revision of the Sewage Sludge Directive and the Urban Waste-water Directive and remain in the position that until the revision process is finalised, we asked the experts in the European Commission to await the revision results before applying stricter measurements.

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:

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The obligation for the the sludge to anaerobic digestion in situ for plants with a size greater than 100,000 p.e. and the load exceeding 6000 kg of BOD5 is too rigid, and difficult to comply with the provisions of the annex in question in the context of the activity "12.2 Phosphorus recovery from waste water", where high phosphorus recovery yields are required from mono-incineration of sewage sludge.

Moreover, due to the size of the plants indicated, it is appropriate that the anaerobic treatment, if necessary, can also take place off-site, in order to allow the creation of sludge management hubs for several plants. The following words could therefore be added to the text: "anaerobic digestion for sludge stabilization can take place both in situ and ex situ"; "Anaerobic digestion is not foreseen if the sludge is destined for mono-incineration with recovery of phosphorus

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

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

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):

2000 character(s) maximum

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

With reference to the "Pollution prevention and control" criterion, it is stated that "Sewage sludge is used in accordance with Council Directive 86/278 / EEC727 or as required by national law relating to the spreading of sludge on the soil or any other application of sludge on and in the soil ". In this regard, it should be specified that, if national legislation does not allow spreading on the soil and the technical / economic conditions for mono- incineration with phosphorus recovery do not exist - due to the modest quantities produced - it should be possible to send them to landfill or to proceed with their co- incineration in suitably

equipped plants. In essence, it would be necessary to add a sentence such as: "If national legislation does not allow spreading on the ground and technical / economic conditions for mono-incineration with recovery of Phosphorus do not exist (due to the scarce quantities produced), the possibility should be envisaged of sending them to landfills or proceeding with their own co-incineration in suitably plants. "

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.

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Phosphorus recovery 12.2

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:

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

Despite the evidence related to the lack of phosphorus in Europe, which justifies the need to incentivize the recovery of this material from any economically and environmentally sustainable source, it is not clear why the activity in question is not extended to all other materials. That would be theoretically (and economically) possible to recover from sludge. This extension would be absolutely consistent with all European policies on the circular economy adopted in recent years.

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

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

Collection and transport of non-hazardous and hazardous waste 13.1

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

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In "push" separate collection systems, the costs and investments for the collection and transport of the undifferentiated residue, as well as the respective revenues, should be able to be included. The collection of undifferentiated residue, in fact, represents a phase of the collection activity that cannot be physically eliminated, but which in any case contributes to the reduction of the anthropic impact, ensuring the correct management of waste that would otherwise have an impact on the environment.

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

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The criterion that imposes the application of "pay-as-you-throw" tariffs in order to be able to consider the activity taxonomy compliant is not acceptable. In many European realities, the choice to introduce punctual tariff systems does not lie with the managers, but with the local authorities. Furthermore, the switch to PAYT systems requires a not short implementation time. Therefore, in any case, an adequate time frame should be provided for the review of the collection and pricing processes. However, it should be noted that it is advisable to include payment systems that provide for the recognition of users on the undifferentiated basis.

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.

In line with Article 10, paragraph 3, of the WFD, it would be appropriate to introduce specific criteria, or in any case limited exceptions, in the application of the criteria relating to the activity in question, to intercept situations in which derogations from the collection obligations are envisaged and differentiated due to the disproportionate economic costs that would be associated with it. This would make it possible to further promote the diffusion of selective collection systems in all areas of the Union.

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

Please identify your concern(s) on the sufficiency and robustness of the rationale and scientific evidence, together with a brief explanation and rationale as well as supporting evidence (including links to published journals and articles) for your concern(s):

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As clarified in the previous answer to the question "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?"

The exception referred to in Article 10 (3) (d) of Directive 98/2008 does not appear to be absolutely acceptable. In fact, Member States may allow derogations from the obligations of separate collection in the event that the "would entail disproportionate economic costs, taking into account the costs of the negative impacts of the collection and treatment of unsorted waste on the environment and on health, the potential for improving the efficiency of waste collection and treatment, revenues from the sale of secondary raw materials, as well as the application of the 'polluter pays' principle and extended producer responsibility".

The possible inclusion of specific criteria for the situations described above, far from representing a risk for the environment, would in any case allow a greater diffusion of more eco-sustainable collection and transport practices, even where separate collection is subject to limits (permitted by law).

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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Separate collection and transport of hazardous waste 13.2

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

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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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.

It does not appear correct to exclude disposal from the scope of the activity. It is evident that a correct disposal of what cannot be recovered, in fact, contributes to the reduction of pollution.

For this reason, SGI Europe does not agree with the approach to exclude disposal operations and non-dedicated incineration plants that also have a permit to incinerate hazardous waste from the scope. Given that there is a need to run incineration plants to treat residual waste also in the future, it would be hard to justify why these plants cannot also accept hazardous waste in certain cases if this contributes to make good use of their capacity. Directing all hazardous waste for incineration to dedicated incineration plants would include tremendous amounts of e.g. potentially Corona infective household waste. On the other hand, certain hazardous waste such as hazardous mineral waste, e.g. asbestos, is not suitable for incineration but must be landfilled. It is not right to argue that only dedicated facilities incinerating hazardous waste are sustainable.

The 6 DNSH criteria are environmental and resource protection criteria. These are already addressed in the waste legislation. Moreover, member states have to consider prevention and sustainability (see art. 4 (2) subparagraph 3 of directive 2008/98/EC). Therefore, any waste management activity that complies with the waste legislation must be considered as sustainable in the taxonomy. The taxonomy should support best practice such as effective source segregation, energy-efficient WtE plants (R1) and controlled landfills. The best practice criteria have to be established in the respective legislation, i.e. waste, water or emission control legislation including BREF documents but not in the taxonomy. There is no harm to CE objectives if the waste management activity in question complies strictly with waste etc. legislation. strictly with waste etc. legislation.

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

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We agree that the taxonomy should carefully assess derogation and support ambitious activities within the waste legislation.

However, no waste management activity that complies with the waste hierarchy or even improves WM according to the waste hierarchy may be considered to significantly harm CE objectives as laid down in art.

17 (1) (d) (ii) of regulation (EU) 2020/852 in general. That non-hazardous WtE has been excluded in the first, climate-related taxonomy delegated act must not be used as a justification to exclude e.g. energy efficient MSW WtE activities here. For example will activities according to 13.6 that include excavation of waste frequently require incineration of a significant portion of the waste.

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.

It is not clear the reason that led to considering a priori as non-compliant plants that benefit from a derogation in accordance with the procedure referred to in Article 15 (4) of the IED. The law assesses ex ante the setting of higher emission values as admissible in cases where the application of BAT would impose disproportionate costs. The exclusion from the activity in question of the plants that make use of this derogation would have the sole effect of depressing the investments capable of contributing positively to the environmental performance of the activity in question.

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):

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It does not seem reasonable to foresee the obligation to use, for the examinations, only an on-site laboratory (it should also be possible to use third party laboratories, providing, if necessary, a certification obligation for the latter).

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

Please identify your concern(s) on the sufficiency and robustness of the rationale and scientific evidence, 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

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As clarified in the answer to the question "What does your comment about the description / boundary of the activity concern?", It is not justified to exclude disposal activities: the correct disposal of what cannot be recovered contributes significantly to the reduction of pollution. This is especially true for hazardous waste. Basically, also for disposal, the statement that "The treatment of hazardous waste is an activity that makes a substantial contribution to the objective of pollution prevention and control (PPC), provided that it is performed based on effective techniques, and takes place in appropriate treatment facilities ". And if, as specified in the report scheme in question, "Only between 35 - 39% of hazardous waste was recovered between 2010 and 2018", the importance of having efficient hazardous waste disposal plants is evident.

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

Please identify your concern(s) on the criteria for the activity, 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

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Concerning point 2, it says:

"The treatment and disposal of toxic live or dead animals and other contaminated waste."

Generally speaking, "contaminated waste" (i.e., with other pollutants - for example, contamination with organic solvents) should in any case not be exempted, because almost all plants receive such waste streams and subsequently the whole chapter would no longer be applicable. Hence, we propose the following suggestion:

"The treatment and disposal of toxic live or dead animals and other waste contaminated with toxic live or

dead animals”.

Concerning point 3, it says:

“The disposal of used goods such as refrigerators”.

It should be made clear here that this applies to the good itself, but not the material that is processed at a later stage. The reprocessing of refrigerators has residues (e.g., solvents) that must be treated in waste incineration plants. We therefore suggest the following changes:

“The disposal of non-dismantled used goods such as refrigerators”.

Concerning the point “Pre-acceptance procedures”, the waste producer is not always known. A lot of waste is collected in collection vehicles, from which the origins cannot be deduced. This also applies to the collection of waste in tankers. Furthermore, waste recyclers, disposers and collectors often have no insight into the manufacturing process (i.e., beyond the designation, for example, “pharmaceutical industry”). This also and above all applies to details on chemical processes (some of which are trade secrets) and thus also to the required level of detail for the point “variability”.

There are pre-acceptance routines, that are established and have worked in our practice for many years. In these cases, particular attention is paid to criteria of worker protection and operational safety, reactivity, and HP criteria. They are also regulated in BAT 2 (Waste Treatment) and BAT 9 (Waste Incineration)

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.

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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

Recovery of bio-waste by anaerobic digestion and/or composting 13.5

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

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

Please identify your concern(s) on the sufficiency and robustness of the rationale and scientific evidence, 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.

There are (and are the most widespread) processes that separate bioplastics upstream of anaerobic digestion. In these cases, the opportunity to compost the digestate must not depend on the possible presence of bioplastics input. For this reason, the statement according to which "In case of anaerobic digestion of biowaste containing packaging and plastics compliant respectively with EN 13432 and EN 14995, the digestate need always to be submitted also to a subsequent aerobic treatment (composting)" is not clear.

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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Remediation of legally non-conforming landfills and abandoned or illegal waste dumps 13.6

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

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.

Although not strictly relevant to the activity, it should be noted that the collection of biogas (and possible upgrade to biomethane) from landfill is a fundamental activity for the reduction of emissions into the atmosphere, as well as for the exploitation of energy potential, not only for end-of-life or illegal landfills, but also for those in operation. This activity, however, does not seem to have been taken into consideration at any point in the proposed report in question.

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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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

Sorting and material recovery of non-hazardous waste 13.8

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

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.

Referring to the point on the origin of the feedstock, we suggest adding non-hazardous incinerator of bottom ash for material recovery. This area is becoming more and more important, especially for the circular economy and a great future potential for material recycling is seen here. There are processing plants that go beyond pure metal extraction and produce glass and minerals of ever better quality. These materials can in turn be reused in the manufacturing industry. In order to establish such key technologies, it would be important that they also fall under the scope of this point.

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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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

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

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

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.

The maximum file size is 1 MB.

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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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General feedback on the draft report

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

SGI Europe has generally welcomed the European Commission's draft Report on the preliminary recommendations for the Technical Screening Criteria for the EU Taxonomy second Delegated Act. SGI Europe is very supportive to continue the progress with the development of the EU Taxonomy that aims to finance the transition to climate-neutrality by 2050. Realising these challenges will require to set the right framework to redirect capital flows towards an environmentally friendly and socially sustainable economic activities. We strongly believe that the concept of the sustainable finance mechanism and the Taxonomy Regulations can act as an enabling tool to realise the objective set in the EU Green Deal.

Having an observer role with the Sustainable Finance Platform, SGI Europe is in clear favour and supports the European Commission on its path to further develop the EU Taxonomy, strengthen its tools and applications for a functional sustainability reporting scheme. Sending additional policy recommendations on the Technical Screening Criteria to the work of the Platform is therefore from high importance to our members of the public services and services of general interest (SGIs).

In fact, SGI Europe strongly believes that more attention should be paid to the public sector as they are the providers of general interest. There is an unbalanced assessment of the impact for the public sector, comparing with the private sector. As the taxonomy is very complex, we would like to see assurances that not only bigger stakeholders will be able to implement it. We call upon the European Commission to ensure technical assistance and capacity building by providing enabling EU funds. This will be essential for assessing public sector's compliance with the EU Taxonomy and ensure a secure continuity of general services to the public in this green transition phase. It will be also important that this policy framework will continue to follow the key objective of improving the data's availability regarding the green and social sustainability performance, including for essential services and social infrastructure and services, for becoming more attractive for investments.

Furthermore, for the second Delegated Act to be effective, and making the EU Taxonomy complete and functioning, SGI Europe sees it as essential that this framework is guided by common principles that safeguard similar level of ambition across various sectors and aims for a technology neutral approach and respects the role of public undertakings, which we fear is not reflected in its current form. It will be also important to ensure that the EU Taxonomy takes into account the maturity of the technologies and its contribution that it will make in reducing CO2 emissions and add to the circular economy principle.

Additionally, SGI Europe wants to emphasise again the high relevance to ensure that the EU Taxonomy is fully taking into account the respected national and EU Legislations and apply them accordingly. The key element should be to simplify the process to make sustainable and resilient projects more attractive. For this, a guidance paper as regards to the transposition into national law would be much appreciated by all actors in the EU and secure a harmonious application.

In this context, SGI Europe has summarised its high-level policy recommendation reflecting a wide range of public service and services of general interest sectors in the energy, transport, building and water/waste-water sector, that we wish to have recognised by the European Commission

Please see attached document (4 pages)

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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/SGL_Europes_accompanying_communication_paper_to_the_TSC_of_the_EU_Taxonomy_1_.pdf

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