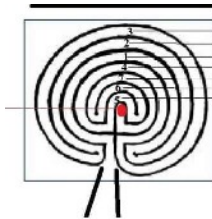


# AGENT GREEN euronatur RiverWatch

ROBIN WOOD



MăEduc.ro



**December 17th 2020**

**Dear President von der Leyen,  
Dear First Executive Vice-President Timmermans,  
Dear Commissioner McGuinness,**

### **Joint NGO Comment EU Sustainable Taxonomy Draft Delegated Act**

We, the undersigned organisations, would like to raise the following critical issues in response to the EU Sustainable Taxonomy Draft Delegated Act.

#### **Forest Biomass**

Given the urgency of the climate crisis, the EU Taxonomy needs to be much more ambitious than what is currently allowed under EU legislation. In particular, treating forest biomass as a “zero carbon” fuel for energy production dangerously undermines efforts to reduce emissions because forest regrowth to recapture emissions takes decades to centuries, time we do not have in the race to avoid the worst impacts of climate change.

A [letter](#) to the European Parliament, signed by almost 800 scientists, warned that support for burning forest biomass can lead to perverse climate impacts. On a number of occasions, the European Academies’ Science Advisory Council has raised the critical issue of burning forest biomass, recently urging [“a review of the role of biomass in meeting renewable energy targets”](#) and [calling for radical reform](#) for the treatment of forest carbon as “renewable”. The European Commission’s own staff acknowledged that forest biomass is not carbon neutral in its [Impact Assessment](#) on bioenergy sustainability in 2016. The EU’s [Biodiversity Strategy](#) - a core initiative to help reverse the negative trends of the health of the EU’s biodiversity - raised the issue of the impacts forest biomass burning has on biodiversity. The Partnership for Policy Integrity’s [Paper Tiger](#) report demonstrates the clear failures of existing RED forest biomass “sustainability criteria” (to which the draft DA defaults) to adequately protect the climate and biodiversity. More recently, over 100 civil society organisations have called for an end to the eligibility of forest biomass as a source of “renewable energy” under RED and to the subsidies and incentives that flow from this eligibility.

The Draft Delegated Act, which proposes that most forest biomass sourced directly from forests is considered “sustainable” is clearly out of step with these warnings and statements from scientists, civil society and the EC’s own staff. The perverse climate impacts of burning forest biomass are clear. The Technical Expert Group had already recognised that the REDII eligibility criteria are not sufficient safeguards when it proposed additional, albeit weak, criteria in its technical report. **Accordingly, forest biomass does not provide a substantial contribution to climate change mitigation and arguably accentuates the problem of biodiversity loss, and hence, should not be classified as “sustainable” and removed from the Taxonomy.**

#### **Hydropower**

The TEG recognised the nonsensical nature of small hydropower plants - the disproportionate environmental damage small hydropower installations cause whilst creating only small

amounts of electricity, and recommended that “construction of small hydropower (<10MW) should be avoided.” This is in line with the TEG’s “Do No Significant Harm” (DNSH) criteria where activities “must avoid significant harm...to the protection of healthy ecosystems”. The environmental damage caused by [small hydropower](#), particularly those built in cascades, [can be similar to, or even greater than](#), the more widely known [negative impacts](#) of large hydropower plants. In the EU, [60% of rivers do not have a good ecological status](#), [fish and mollusc species comprise the two most threatened taxonomic groups](#), [migratory fish populations have declined by 93% between 1970 and 2016](#) and in the Mediterranean Basin, including countries from Portugal to Turkey, [161 of the region’s 251 threatened fish species will be negatively impacted by planned small hydropower plants alone](#).

Consequently, [150 NGOs have recently called for an end to the building of hydropower plants in Europe](#). Support for hydropower in the Draft Delegated Act is clearly out of step with civil society and scientific calls to end the damage that hydropower has caused and continues to inflict on freshwater systems. The DNSH criteria are clearly breached. Given the almost non-existent benefit that new hydropower plants can play in greening the economy, hydropower should also not be included in the Taxonomy.

### **Declining ceiling of greenhouse gas intensity**

Amongst the EU Commission Technical Expert Group’s proposed screening criteria was the concept of a declining ceiling on the greenhouse gas intensity of energy production over time. This critical concept to help achieve climate neutrality by mid-century has been unfortunately removed from the Draft Delegated Act. Recently, a letter signed by 123 scientists was [published](#) in the media stating that there is a “disconnect” between the EU’s climate goals and the EU Taxonomy.

This gaping omission must be rectified and the concept of the declining intensity ceiling reinstated in order that the Sustainable Finance mechanism be brought in line with the EU’s other climate objectives and strategies, including the [European Green Deal](#), the [EU’s commitment to the Paris Agreement](#) and its proposed [European Climate Law](#).

The EU Taxonomy needs to be scientifically robust. These critical issues must be addressed in order for this to be the case.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Paun', is written over a light blue rectangular background.

Gabriel Paun  
President  
Agent Green, Romania

On behalf of the following organisations:

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