



Input for Commission Consultation on EU climate taxonomy – Key Points

The EEB welcome the Commission determination to progress with the development of the Taxonomy, to finance the transition to a climate-neutral economy. Setting the right framework is crucial to redirect capital to truly sustainable economic activities.

The following economic activities should be kept out of the Taxonomy:

- **Nuclear power.** The TEG has highlighted the international consensus on lack of safe, long-term technical solution for nuclear waste. The long-term impacts of nuclear waste can significantly harm the objectives of pollution prevention, biodiversity and circular economy. The inclusion of nuclear energy would go against the “do not significant harm principle”. Nuclear power is responsible for some of the worst man-made industrial disasters in recent times. The EEB has joint a call from a wide range national and regional NGOs, institutions, and scientists with long-standing involvement in the field of nuclear energy to keep nuclear out of the Taxonomy (see attachment).
- **Fossil fuels.** The TEG has rightly excluded fossil fuels operating on emissions that are far beyond the 100 gCO₂/KWh threshold to align with the Paris Agreement goals. Midstream oil and gas should not be reincluded either. Hydrogen from fossil origin (“grey hydrogen” or fossil hydrogen), even with carbon capture and storage (CCS) should be also excluded as it presents no improvement for the climate – or too high uncertainties.
- **Waste incineration.** The TEG has recognised the environmental impact and lock-in caused by incineration, which undermines the waste hierarchy and the circular economy objectives. The Circular Economy Action Plan and the Waste Framework Directive set goals for preventing, reuse and recycling of resources that regrettably are currently being used as incinerator’s feedstock. Moreover, CO₂ emissions from waste incineration have increased by around 50% since 2010, hindering the EU climate neutrality goal by 2050. Lastly, large parts of the incineration feedstock is produced from fossil fuels, thus resulting in plain CO₂ emissions from fossil fuels burning.

The following activities should be removed from the Taxonomy:

- **Biofuels and biogas use in transport.** The taxonomy should exclude trucks, coaches, and ships, and the related refuelling infrastructure, that can also run on fossil diesel or gas, as otherwise it will not be possible to enforce and verify whether they are really using advanced biofuels or fossil fuels. We would not support either the inclusion of the aviation sector as a major contributor to climate change.
- **Livestock** activities should not be included for the time being, as it is difficult to assess greenhouse gas emissions. This industry is highly carbon-intensive, polluting, strongly linked to deforestation



and biodiversity loss. It can hinder a faster transition to plant-based diets in line with Paris-compliant scenarios. Organic livestock could exceptionally be included.

The following economic activities should be tightened:

- **Hydropower.** Hydropower is one of the key degraders of freshwater biodiversity. New greenfield power plants should not be taxonomy eligible. With the uncertainty and the risks associated with new hydro and pumped storage power plants, only environmentally-compatible upgrade of current hydro and pumped storage should be eligible to the taxonomy. Outside Europe, the EU's stringent standards should be followed.
- **Passenger cars and vans**

The threshold for vehicle emissions should be set at 0g of CO₂/km to comply with the EU 2050 targets.

- **Cross-cutting 'do no significant harm' criteria on biodiversity**

The 'do no significant harm' criteria for infrastructure still need to be improved further, to ensure that risky infrastructure developments in any environmentally protected area or biodiversity hotspot cannot be taxonomy-eligible.