Call for feedback on TEG report on EU Taxonomy

Fields marked with * are mandatory.

Introduction

Disclaimer:

This call for feedback is part of ongoing work by Directorate-general for financial stability, financial services and capital markets union, Directorate-general for environment, Directorate-general for climate action and Directorate-general for energy on sustainable finance, for which the European Commission has set up a dedicated Technical expert group (TEG).

This feedback process is not an official Commission consultation or document nor an official Commission position. Nothing in this feedback process commits the Commission nor does it preclude any policy outcomes.

In March 2018 the European Commission published its action plan: financing sustainable growth. Action 1 of the Commission’s action plan calls for the establishment of an EU classification system for sustainable activities, or Taxonomy. The European Commission followed through on this action in May 2018 with a proposal for a regulation on the establishment of a framework to facilitate sustainable investment (taxonomy regulation).

In addition, a technical expert group on sustainable finance (TEG) was set up by the European Commission in July 2018 to assist in with the implementation of four key actions of the action plan, including the development of an EU taxonomy.
Within the framework of the proposed taxonomy regulation, the TEG has been asked to develop recommendations for technical screening criteria for economic activities that can make a substantial contribution to climate change mitigation or adaptation, while avoiding significant harm to the four other environmental objectives:

1. sustainable use and protection of water and marine resources;
2. transition to a circular economy, waste prevention and recycling;
3. pollution prevention control; and (4) protection of healthy ecosystems.

On 18 June 2019, the TEG published its technical report on EU taxonomy. The report sets out the basis for a future EU taxonomy in legislation. The report contains:

- technical screening criteria for 67 activities across 8 sectors that can make a substantial contribution to **climate change mitigation**;
- a methodology and worked examples for evaluating substantial contribution to **climate change adaptation**;
- guidance and case studies for **investors preparing to use the taxonomy**.

This report builds on the work that the TEG published in December last year together with a call for feedback on the proposed criteria for these “first round” activities. The TEG has also engaged with over 150 additional experts in the past months to develop technical screening criteria for the ‘second round’ of climate change mitigation activities and climate change adaptation activities.

In addition to its technical report, the TEG has also published a supplementary report on using the taxonomy. This provides investors and companies with a concise and clear explanation of why the taxonomy is needed, what it looks like, and its ease of use.

**Call for feedback**

The TEG is inviting stakeholders to provide feedback on (parts of) its technical report through the online questionnaire. Because of technical problems, the deadline for providing feedback is extended at least until Monday 16 September 2019 23:59. If the technical problems persist, a further extension will be considered.

In the online questionnaire, you will be able to select on which parts of the report you want to provide feedback to, including a selection of the 67 individual activities that make a substantial contribution to climate change mitigation and the different elements of each activity.
Next steps

The TEG mandate has been extended until the end of this year. The TEG will use this time to:

- assess the feedback from stakeholders on its technical report;
- refine and further develop some incomplete aspects of the proposed technical screening criteria for substantial contributions and avoidance of significant harm;
- develop further guidance on implementation and use of the taxonomy.

At the end of its mandate, the TEG will make further recommendations to the European Commission on the need to adjust and complement their work on an EU taxonomy.

The TEG’s recommendations are designed to support the European Commission in the development of future delegated acts, as proposed in the taxonomy regulation.

Please note: In order to ensure a fair and transparent feedback 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 ec-teg-sf@ec.europa.eu.

Useful documents and links:

- More on EU taxonomy
- Technical report on EU taxonomy
- Supplementary report on using the taxonomy
- Specific privacy statement

1. Information about you

- Are you replying as:
  - [ ] a private individual
  - [x] a private organisation or a company
  - [ ] a public authority or an international organisation

- Name of your organisation:
  
  European Geothermal Energy Council
Contact email address:

The information you provide here is for administrative purposes only and will not be published

t.garabetian@egec.org

• Is your organisation included in the Transparency Register?
(If your organisation is not registered, we invite you to register here, although it is not compulsory to be registered to reply to this feedback process. Why a transparency register?)

☐ Yes
☐ No

• If so, please indicate your Register ID number:

114581033335-07

• Type of organisation:

☐ Academic institution
☐ Company, SME, micro-enterprise, sole trader
☐ Consultancy, law firm
☐ Consumer organisation
☐ Industry association
☐ Media
☐ Non-governmental organisation
☐ Think tank
☐ Trade union
☐ Other

• Where are you based and/or where do you carry out your activity?

Belgium

• Field of activity (if applicable):

at least 1 choice(s)

☐ 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

• Please specify your activity field(s) or sector(s):

Policy, advocacy

• Sector (if applicable):
Important notice on the publication of responses

- Contributions received are intended for publication on the Commission’s website. Do you agree to your contribution being published?
  (see specific privacy statement)
  - Yes, I agree to my response being published under the name I indicate (name of your organisation /company/public authority or your name if your reply as an individual)
  - No, I do not want my response to be published

- Contributions received through this survey will be reviewed by the TEG. Do you agree to be contacted by the TEG to clarify your response if necessary?
  - Yes, I agree to be contacted by the TEG if necessary through the contact details I provided
  - No, I do not want to be contacted by the TEG

2. Selection feedback

This call for feedback covers the following parts of the technical report:

1. Climate change mitigation activities
2. Climate change adaptation
3. Usability of the taxonomy

4. Future development of the taxonomy

Please tick the relevant topics and/or sectors and activities to which you would like to provide feedback:
(You will be able to answer questions for the selected topics and/or sectors and activities)

1. Climate change mitigation activities

Agriculture and forestry

☐ Growing of perennial crops
☐ Growing of non-perennial crops
☐ Livestock production
☐ Afforestation
☐ Rehabilitation, Restoration
☐ Reforestation
☐ Existing forest management

Manufacturing

☑ Manufacturing of low carbon technologies
☐ Manufacture of Cement
☐ Manufacture of Aluminium
☐ Manufacture of Iron and Steel
☑ Manufacture of hydrogen
☐ Manufacture of other inorganic basic chemicals
☐ Manufacture of other organic basic chemicals
☐ Manufacture of fertilizers and nitrogen compounds
☐ Manufacture of plastics in primary form

Electricity, gas, steam and air conditioning supply

☐ Production of Electricity from Solar PV
☐ Production of Electricity from Concentrated Solar Power
☐ Production of Electricity from Wind Power
☐ Production of Electricity from Ocean Energy
☐ Production of Electricity from Hydropower
☑ Production of Electricity from Geothermal
☐ Production of Electricity from Gas Combustion
☐ Production of Electricity from Bioenergy
☑ Transmission and Distribution of Electricity
☑ Storage of Energy
Manufacture of Biomass, Biogas or Biofuels
Retrofit of Gas Transmission and Distribution Networks
District Heating/Cooling distribution
Installation and operation of Electric Heat Pumps
Cogeneration of Heat/Cool and power from Concentrated Solar Power
Cogeneration of Heat/Cool and power from Geothermal Energy
Cogeneration of Heat/Cool and power from Gas Combustion
Cogeneration of Heat/Cool and power from Bioenergy
Production of Heating and Cooling from Concentrated Solar Power
Production of Heating and Cooling from Geothermal Energy
Production of Heating and Cooling from Gas Combustion
Production of heating and cooling from Bioenergy
Production of Heating and Cooling using Waste Heat

Water, Waste and Sewerage remediation
Water collection, treatment and supply
Centralized wastewater treatment systems
Anaerobic digestion of sewage sludge
Separate collection and transport of non-hazardous waste in source segregated fractions
Anaerobic digestion of bio-waste
Composting of bio-waste
Material recovery from waste
Landfill gas capture and energetic utilization
Direct Air Capture of CO2
Capture of anthropogenic emissions
Transport of CO2
Permanent Sequestration of captured CO2

Transport
Passenger Rail Transport (Interurban)
Freight Rail Transport
Public transport
Infrastructure for low carbon transport
Passenger cars and commercial vehicles
Freight transport services by road
Interurban scheduled road transport
Inland passenger water transport
Inland freight water transport
Construction of water projects

Information and Communication Technologies (ICT)
Data processing, hosting and related activities
Data-driven solutions for GHG emissions reductions
Buildings

- Construction of new buildings
- Renovation of existing buildings
- Individual renovation measures, installation of renewable on-site and professional, scientific and technical activities
- Acquisition of buildings

2. Climate change adaptation

- I want to provide feedback for this topic

3. Usability of the taxonomy

- I want to provide feedback for this topic

4. Future development of the taxonomy

- I want to provide feedback for this topic

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

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Manufacturing - Manufacturing of low carbon technologies

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?
   - Yes
   - No

   If yes, why and how?

   Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

The manufacturing of low-carbon technologies poses that “Greening by’ activities include: the manufacturing of products, key components, equipment and machinery that are essential to a number of key renewable energy technologies (geothermal power, hydropower, concentrated solar power (CSP), solar photovoltaic (PV) technology, wind energy and ocean energy)”
This definition should mention "geothermal energy" not "geothermal power", as geothermal energy can be used for power production, but also in cogeneration and heating and cooling projects.

Links to evidence:

1000 character(s) maximum

https://www.egec.org/about/#aboutgeot

7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

○ Yes
○ No

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

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☐ Boundary of the activity
☐ Metric for substantial contribution criteria
☐ Threshold for substantial contribution criteria
☐ Do no significant harm criteria
☐ International applicability of activity criteria

7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

○ Yes
○ No

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☐ Metric for substantial contribution criteria
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☐ Do no significant harm criteria
☐ International applicability of activity criteria

7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

☐ Yes
☐ No

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☐ Threshold for substantial contribution criteria
☐ Do no significant harm criteria
☐ International applicability of activity criteria

7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

☐ Yes
☐ No

Manufacturing - Manufacture of hydrogen
When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- [x] Boundary of the activity
- [x] Metric for substantial contribution criteria
- [x] Threshold for substantial contribution criteria
- [ ] Do no significant harm criteria
- [ ] International applicability of activity criteria

2. Should a different metric be used?

- [ ] Yes
- [ ] No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

The only legitimate motive for the classification of hydrogen as a sustainable investment is if the hydrogen is produced using renewable energy. Therefore, this should be a discriminatory criteria for investments in hydrogen production to be considered a sustainable investment (e.g. conditioning to the existence of a PPA with electricity producers for the entire energy needs of hydrogen production).

Links to evidence:

1000 character(s) maximum

3. Should the threshold be different?

- [ ] Yes
If yes, why and how? Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

- The threshold limiting the GHG emissions per unit of production to 0.95 tCO2e/t Hydrogen is not consistent with the other thresholds. It should be suppressed, and replaced by a requirement that the entire production of hydrogen is based on renewable energy.
- Establishing higher emission thresholds for eligibility as sustainable investments of some technologies goes against the principle of fair competition. Hydrogen should be subject to the same LCE requirements as energy sources that may have to compete with it: 100gCO2/kWh lifecycle emissions declining to net-zero when used for electricity production, and 30 gCO2/kWh lifecycle emissions declining to net-zero when used for heating and cooling (i.e. the threshold applied to other technologies such as geothermal energy for electricity and/or heating and cooling).

Links to evidence:

1000 character(s) maximum

7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

- Yes
- No

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:
7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

- Yes
- No

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7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

- Yes
- No

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- [ ] Metric for substantial contribution criteria
- [ ] Threshold for substantial contribution criteria
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- [ ] International applicability of activity criteria

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Electricity, gas, steam and air conditioning supply - Production of Electricity from Geothermal
When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?

- Yes
- No

2. Should a different metric be used?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

- The use of the LCE metric to assess the quality of a geothermal project as "sustainable investment" can be relevant low-carbon energy technologies to establish a field of comparability. All energy technologies should be assessed on a lifecycle basis.
- Assessing geothermal electricity projects on the basis of LCE requires a sound methodology: some areas have naturally occurring emissions from the geothermal system. The development of a geothermal project may cause the attribution of these emissions to the geothermal plant, while they were previously occurring. A sound LCE assessment for geothermal projects considers this challenge and does not attribute naturally occurring GHG emissions to the geothermal plant, only the increased in emissions induced by the geothermal project development. The GEOENVI project is working on producing such methodology. The application of threshold established by this taxonomy for the geothermal sector needs to be done according to the best practices identified by the GEOENVI project.
3. Should the threshold be different?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

- EGEC does not contest the relevance of the 100gCO2/kWh as LCE for eligibility as a sustainable investment.
- However, should this threshold be applied to geothermal energy, it should also be applied to all other energy sources. There is no reason for another renewable energy source not to be conditioned to LCE requirements, as all industrial processes currently generate emissions. If other renewable energy technologies do not have LifeCycle Emissions requirements, it creates discriminatory conditions for geothermal to have to comply with some such requirements.
- The 0gCO2/kWh threshold for LCE in 2050 requires clarification: for geothermal projects, while production emissions of 0gCO2/kWh can be achieved, 0g/kWh lifecycle emissions cannot with the current technologies for construction (e.g. trucks emit CO2 and can represent a major share of lifecycle GHG emissions for a geothermal electricity project; cement and steelmaking emits CO2). This threshold needs to be clarified. Here again, the GEOENVI project consortium should be involved, as it gathers many experts on the topic of geothermal lifecycle environmental footprints.

Links to evidence:

- geoenvi.eu

4. For the objectives where DNSH criteria have been identified, should these criteria be different?
Geothermal energy projects should comply with all existing (and upcoming) EU environmental regulations for eligibility as a sustainable investment. The wording listed in the criteria on groundwater discharge thermal anomaly does not appear to reflect the reality of geothermal energy operation including in the current environmental legislative framework. Arguably, this sentence does not refer to geothermal reservoirs, but clarification would be welcome.

Activities outside the EU should respect the environmental legislations valid in those countries.
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Please select the elements of the activity to which you would like to provide feedback:

- [ ] Boundary of the activity
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- [ ] Threshold for substantial contribution criteria
- [ ] Do no significant harm criteria
- [ ] International applicability of activity criteria

Electricity, gas, steam and air conditioning supply - Transmission and Distribution of Electricity

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   - [ ] Yes
   - [ ] No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

The propose metrics do not propose a sufficiently low risk of locking in energy infrastructure that is consistent with the EU long term objectives of net zero emissions. Under the criteria listed, investments to expand the use of electricity in new areas (e.g. EV charging stations) is not systematically conditioned to a LCE threshold for the electricity. To be eligible, electricity infrastructure investments should be able to justify GHG savings consistent with the trend towards carbon neutrality by 2050.

All projects eligible should justify that they do not lock-in electricity generation assets that are not consistent with the decarbonisation objective.

Moreover, the Sustainable Finance Regulation should consider the value of avoided investments, for instance as a result of developing a baseload and flexible power plant (such as geothermal plants) in terms of grid deployment to integrate variable RES generation. The regulation should recognise the value of grid services from flexible renewable generation sources such as geothermal and reward it.

The rationale that "Increasing access to electricity throughout Europe will support its decarbonisation by enabling more consumers to transition from carbon-intensive energy supply, while increasing the utilisation of renewable energy." is erroneous, as it postulates that electrification automatically results in GHG savings. As electricity only represents one quarter of EU energy consumption, high electrification of the economy is very likely to result in maintaining fossil fuel assets in the electricity system, especially if there is no suitable framework to actively support the scale up of renewable flexibility resources such as flexible RES generation from geothermal power plants. The wording should be "Increasing access to renewable electricity [...]"

Links to evidence:
2. Should a different metric be used?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:
3000 character(s) maximum

See above.

Links to evidence:

1000 character(s) maximum

3. Should the threshold be different?

- Yes
- No

Electricity, gas, steam and air conditioning supply - Storage of Energy
When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- [x] Boundary of the activity
- [x] Metric for substantial contribution criteria
- [x] Threshold for substantial contribution criteria
- [ ] Do no significant harm criteria
- [ ] International applicability of activity criteria

1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?

   - [ ] Yes
   - [ ] No

   **If yes, why and how?**

   Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

**Explanation:**

3000 character(s) maximum

The text refers only to electricity storage. It should mention "energy storage" in general (in line with the title of the section). Thermal storage technologies such as Underground Thermal Energy Storage (UTES) or Aquifer Thermal Energy Storage (ATES) are rapidly emerging as a solution for providing grid services. The energy services of technologies such as ATES are particularly relevant as well in a more integrated energy system as this technology allows for competitive seasonal storage of energy, which is a key challenge for the decarbonisation of the EU's energy system. The section on energy storage of the taxonomy should therefore not be limiting, as storing non-electric renewable energy (e.g. solar thermal energy in an ATES system for seasonal storage) is a solution with a large potential for the decarbonisation of the EU economy, not only the electricity system which amounts to only a quarter of today's European energy needs.

**Links to evidence:**

1000 character(s) maximum

European Technology and Innovation Platform on Renewable Heating and Cooling, Geothermal Panel
https://www.egec.org/rhc-platform-geothermal-panel/
2. Should a different metric be used?

☐ Yes
☐ No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

The metric should be "All investments in energy storage (thermal, electricity) are eligible under the Taxonomy, except:"

Links to evidence:

1000 character(s) maximum

European Technology and Innovation Platform on Renewable Heating and Cooling, Geothermal Panel
https://www.egec.org/rhc-platform-geothermal-panel/

3. Should the threshold be different?

☐ Yes
☐ No

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Please select the elements of the activity to which you would like to provide feedback:
Electricity, gas, steam and air conditioning supply - Retrofit of Gas Transmission and Distribution Networks

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

○ Yes
○ No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

The marginal increase of the share of so-called low-carbon gases to the energy system is not consistent with the priorities of the sustainable investment regulation if it results in maintaining a need for fossil gas. Typically, the retrofit of a pipe to accept a certain blend of hydrogen/fossil methane locks in decades of methane consumption or results in this investment being a stranded asset. The sustainable finance regulation should only deem eligible those investments in the gas infrastructure that result in a total elimination of fossil gas.
Electricity, gas, steam and air conditioning supply - District Heating/Cooling distribution

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?
   - Yes
   - No

2. Should a different metric be used?
   - Yes
   - No

3. Should the threshold be different?
   - Yes
   - No
If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Heating and cooling distribution networks need to put the EU on track with a decarbonised heating and cooling sector as early as possible, with the objective for instance of the decarbonisation of the building sector in the Energy Performance of Building Directive by 2050.

While district heating and cooling is a valuable tool for the decarbonisation of the heating and cooling sector, only investments that can justify the supply of renewable heating and cooling should be considered eligible in the sustainable finance regulation.

Links to evidence:

1000 character(s) maximum

Electricity, gas, steam and air conditioning supply - Installation and operation of Electric Heat Pumps

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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Please select the elements of the activity to which you would like to provide feedback:

- [ ] Boundary of the activity
- [ ] Metric for substantial contribution criteria
- [ ] Threshold for substantial contribution criteria
- [ ] Do no significant harm criteria
- [ ] International applicability of activity criteria
1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?
   - Yes
   - No

2. Should a different metric be used?
   - Yes
   - No

3. Should the threshold be different?
   - Yes
   - No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

- EGEC supports the threshold regarding the SPF = 3.33 for the eligibility of heat pumps as a sustainable investment. This is consistent with ensuring as effective an use of electricity for heating and cooling as possible.
- Regarding refrigerants, a requirement of compliance with the F-Gas regulation may be more relevant for the sake of regulatory readability for manufacturers and investors.

Links to evidence:

1000 character(s) maximum

EGEC technology brochure on geothermal heat pumps: https://www.egec.org/media-publications/technology-brochures-geothermal-heat-pumps/

EGEC briefing paper on heat pumps: https://www.egec.org/media-publications/egec-briefing-paper-on-heat-pumps/

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- [ ] Metric for substantial contribution criteria
- [ ] Threshold for substantial contribution criteria
- [ ] Do no significant harm criteria
- [ ] International applicability of activity criteria

Electricity, gas, steam and air conditioning supply - Cogeneration of Heat/Cool and power from Geothermal Energy

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- [x] Boundary of the activity
- [x] Metric for substantial contribution criteria
- [x] Threshold for substantial contribution criteria
- [x] Do no significant harm criteria
- [x] International applicability of activity criteria

1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?
   - [ ] Yes
   - [ ] No

2. Should a different metric be used?
   - [ ] Yes
   - [ ] No

   If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.
The use of the LCE metric to assess the quality of a geothermal project as "sustainable investment" can be relevant low-carbon energy technologies to establish a field of comparability. All energy technologies should be assessed on a lifecycle basis.

Assessing geothermal combined heat and power projects on the basis of LCE requires a sound methodology: some areas have naturally occurring emissions from the geothermal system. The development of a geothermal project may cause the attribution of these emissions to the geothermal plant, while they were previously occurring. A sound LCE assessment for geothermal projects considers this challenge and does not attribute naturally occurring GHG emissions to the geothermal plant, only the increased in emissions induced by the geothermal project development. The GEOENVI project is working on producing such methodology. The application of threshold established by this taxonomy for the geothermal sector needs to be done according to the best practices identified by the GEOENVI project.

GEOENVI project: https://www.geoenvi.eu/

The GEOENVI project has the objective to make sure that deep geothermal energy can play its role in Europe’s future energy supply in an increasingly sustainable way and to create a robust strategy to answer environmental concerns. It will engage with all geothermal stakeholders to ensure the exchange of best practices, the test of harmonized methods in selected areas and then, to facilitate its replication across Europe. The project is funded by the European Union’s Horizon 2020 research and innovation programme.

3. Should the threshold be different?

Yes

No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

The question remains as to why there should be a different threshold for LCE performance of a kWh of heat compared to a kWh of electricity. Indeed, under this proposal, the use of electricity for heating and cooling is considered a sustainable investment at 100gCO2/kWh while a renewable heating and cooling project is not considered as such at 31gCO2/kWh on an LCE basis. This is not consistent and represents an undue competitive advantage for electricity investment compared to heating and cooling one.

If these threshold be applied to geothermal energy, it should also be applied to all other energy sources (and to the use of electricity in the heating and cooling sector: unfortunately, investors cannot control what will be the use of the electricity produced by a given project). There is no reason for another renewable energy source not to be conditioned to LCE requirements, as all industrial processes currently generate emissions. If other renewable energy technologies do not have LifeCycle Emissions requirements, it creates...
discriminatory conditions for geothermal to have to comply with some such requirements.

- The 0gCO2/kWh threshold for LCE in 2050 requires clarification: for geothermal projects, while production emissions of 0gCO2/kWh can be achieved, 0g/kWh lifecycle emissions cannot with the current technologies for construction (e.g. trucks emit CO2 and can represent a major share of lifecycle GHG emissions for a geothermal electricity project; cement and steelmaking emits CO2). This threshold needs to be clarified. Here again, the GEOENVI project consortium should be involved, as it gathers many experts on the topic of geothermal lifecycle environmental footprints.

Links to evidence:

1000 character(s) maximum

GEOENVI project: https://www.geoenvi.eu/


4. For the objectives where DNSH criteria have been identified, should these criteria be different?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Geothermal energy projects should comply with all existing (and upcoming) EU environmental regulations for eligibility as a sustainable investment. The wording listed in the criteria on groundwater discharge thermal anomaly does not appear to reflect the reality of geothermal energy operation including in the current environmental legislative framework. Arguably, this sentence does not refer to geothermal reservoirs, but clarification would be welcome.

Links to evidence:

1000 character(s) maximum
5. Are there any additional objectives where DNSH criteria need to be identified to avoid significant harm?

☐ Yes
☐ No

6. Can the proposed criteria for substantial contribution and DNSH be used for activities outside the EU?

☐ Yes
☐ No

If not, please propose alternative wording that could be considered and a brief rationale for the proposed change.

2000 character(s) maximum

Activities outside the EU should respect the environmental legislations valid in those countries.

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

☐ Boundary of the activity
☐ Metric for substantial contribution criteria
☐ Threshold for substantial contribution criteria
☐ Do no significant harm criteria
☐ International applicability of activity criteria

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Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Electricity, gas, steam and air conditioning supply - Production of Heating and Cooling from Geothermal Energy

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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- [ ] Boundary of the activity
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- [ ] Threshold for substantial contribution criteria
- [ ] Do no significant harm criteria
- [ ] International applicability of activity criteria
1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?

☐ Yes  
☐ No

2. Should a different metric be used?

☐ Yes  
☐ No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

- The use of the LCE metric to assess the quality of a geothermal project as "sustainable investment" can be relevant low-carbon energy technologies to establish a field of comparability. All energy technologies should be assessed on a lifecycle basis should it be the case of geothermal.
- Assessing geothermal combined heat and power projects on the basis of LCE requires a sound methodology: some areas have naturally occurring emissions from the geothermal system. The development of a geothermal project may cause the attribution of these emissions to the geothermal plant, while they were previously occurring. A sound LCE assessment for geothermal projects considers this challenge and does not attribute naturally occurring GHG emissions to the geothermal plant, only the increased in emissions induced by the geothermal project development. The GEOENVI project is working on producing such methodology. The application of threshold established by this taxonomy for the geothermal sector needs to be done according to the best practices identified by the GEOENVI project.

Links to evidence:

1000 character(s) maximum

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3. Should the threshold be different?
If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

- Establishing a threshold of 30gCO2/kWh for geothermal heating and cooling, when the threshold is 100gCO2/kWh for all the electricity generating technologies deemed as eligible in this proposed taxonomy represents a major breach in the drive to establish a level playing field in the heating and cooling sector. Under the proposed criteria of the, the direct use of electricity for heating and cooling (e.g. resistance heating) is considered a sustainable investment at 100gCO2/kWh while a renewable heating and cooling project is not considered as such at 31gCO2/kWh on an LCE basis. This is not consistent and represents an undue competitive advantage for electricity investment compared to heating and cooling one.
- Should this threshold be applied to geothermal heating and cooling, it should also be applied to all other energy sources (and to the use of electricity in the heating and cooling sector: unfortunately investors cannot control what will be the use of the electricity produced by a given project). There is no reason for another renewable energy source not to be conditioned to LCE requirements, as all industrial processes currently generate emissions. If other renewable energy technologies do not have Life Cycle Emissions requirements, it creates discriminatory conditions for geothermal to have to comply with some such requirements.
- The 0gCO2/kWh threshold for LCE in 2050 requires clarification: for geothermal projects, While production emissions of 0gCO2/kWh can be achieved, 0g/kWh lifecycle emissions cannot with the current technologies for construction (e.g. trucks emit CO2 and can represent a major share of lifecycle GHG emissions for a geothermal electricity project; cement and steelmaking emits CO2). The impact of other sectors on the eligibility of geothermal projects should be considered in that regard. This threshold needs to be clarified. Here again, the GEOENVI project consortium should be involved, as it gathers many experts on the topic of geothermal lifecycle environmental footprints.

Links to evidence:

1000 character(s) maximum

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4. For the objectives where DNSH criteria have been identified, should these criteria be different?

☐ Yes

☐ No
I f y e s , w h y a n d h o w ?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Geothermal energy projects should comply with all existing (and upcoming) EU environmental regulations for eligibility as a sustainable investment. The wording listed in the criteria on groundwater discharge thermal anomaly does not appear to reflect the reality of geothermal energy operation including in the current environmental legislative framework. Arguably, this sentence does not refer to geothermal reservoirs, but clarification would be welcome.

Links to evidence:

1000 character(s) maximum

5. Are there any additional objectives where DNSH criteria need to be identified to avoid significant harm?

☐ Yes
☐ No

6. Can the proposed criteria for substantial contribution and DNSH be used for activities outside the EU?

☐ Yes
☐ No

If not, please propose alternative wording that could be considered and a brief rationale for the proposed change.

2000 character(s) maximum

Activities outside the EU should respect the environmental legislations valid in those countries.

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Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

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Buildings - Construction of new buildings

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

2. Should a different metric be used?

- Yes
- No

**If yes, why and how?**

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

**Explanation:**

3000 character(s) maximum

In addition to the requirements that all new buildings be NZEB, in accordance with EPBD requirements, the sustainable investment regulation should specify that all remaining energy needs of the building be covered by renewable energy sources (in compliance with the Sustainable Finance Taxonomy for instance), especially for heating and cooling. Otherwise the buildings risk locking-in fossil fuel energy needs (for instance if they are developed around a gas boiler, instead of a connection to a renewable district heating or a geothermal heat pump system, which are sustainable solutions per this taxonomy)

**Links to evidence:**

1000 character(s) maximum

3. Should the threshold be different?

- Yes
- No
If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

The threshold should establish that 100% of the building's energy needs be covered by renewable energy sources.
EGEC welcomes the exclusion of all buildings “for the purpose of occupation by fossil fuel extraction, transporting transport of fossil fuels or manufacturing of fossil fuels activities (either for actual extraction, transporting, manufacturing and/or administrative purpose)” from the possibility of being considered as a sustainable investment.
EGEC recommends that all new buildings including fossil fuel equipment (e.g. condensing gas boiler…) should be excluded from the taxonomy to prevent fossil fuel lock-in.

Links to evidence:

1000 character(s) maximum

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Buildings - Renovation of existing buildings

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the proposed Taxonomy regulation and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria
2. Should a different metric be used?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

In addition to the requirement of compliance with the EPBD - which is barely the minimal requirement of energy performance of a building - the sustainable investment regulation should specify that all remaining energy needs of the building be covered by renewable energy sources (in compliance with the Sustainable Finance Taxonomy for instance), especially for heating and cooling. Otherwise the buildings risk locking-in fossil fuel energy needs (for instance if they are developed around a gas boiler, instead of a connection to a renewable district heating or a geothermal heat pump system, which are sustainable solutions per this taxonomy).

Links to evidence:

1000 character(s) maximum

3. Should the threshold be different?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

The threshold should establish that 100% of the building's energy needs be covered by renewable energy sources.

EGEC welcomes the exclusion of all buildings “for the purpose of occupation by fossil fuel extraction, transporting transport of fossil fuels or manufacturing of fossil fuels activities (either for actual extraction, transporting, manufacturing and/or administrative purpose)” from the possibility of being considered as a sustainable investment.
EGEC recommends that all renovated buildings including fossil fuel equipment (e.g. condensing gas boiler...) should be excluded from the taxonomy to prevent fossil fuel lock-in.

Buildings - Individual renovation measures, installation of renewable on-site and professional, scientific and technical activities

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Please select the elements of the activity to which you would like to provide feedback:

- [ ] Boundary of the activity
- [ ] Metric for substantial contribution criteria
- [ ] Threshold for substantial contribution criteria
- [ ] Do no significant harm criteria
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1. Should the boundaries, as set for the purposes of applying principles, metrics and thresholds of the activity, be different?
   - [ ] Yes
   - [ ] No

2. Should a different metric be used?
   - [ ] Yes
   - [ ] No
3. Should the threshold be different?

- Yes
- No

**If yes, why and how?**

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

**Explanation:**

*3000 character(s) maximum*

Heat exchangers to connect to district heating using renewable fuels and waste heat should be included. This would incentivise production of heat through renewable district heating. Heat pump should be only eligible with a threshold of Seasonal Performance Factor = 3.33 as stated in the heat pump category of this taxonomy.

**Links to evidence:**

*1000 character(s) maximum*


4. For the objectives where DNSH criteria have been identified, should these criteria be different?

- Yes
- No

5. Are there any additional objectives where DNSH criteria need to be identified to avoid significant harm?

- Yes
- No

6. Can the proposed criteria for substantial contribution and DNSH be used for activities outside the EU?

- Yes
- No

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principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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Please select the elements of the activity to which you would like to provide feedback:

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2. Climate change adaptation

1. Do you consider that the qualitative criteria for adaptation apply equally to all sectors?
   - Yes
   - No
   - Don’t know / no opinion / not relevant

Please explain your answer:

2000 character(s) maximum

Adaptation to climate change is a transversal issue. Applying it equally to all sectors reinforces the resilience of the European economy as a whole, reducing thereby the risk of disruption and the magnitude of adverse impacts. Moreover, a transversal and integrated approach to adaptation to climate change has positive synergies with the mitigation drive, which also requires an integrated understanding of the EU’s economy.

2. Should the qualitative criteria be different?
   - Yes
   - No
   - Don’t know / no opinion / not relevant

3. Are the illustrative templates provided in the Technical report useful for indicating the potential application of the criteria?
   - Yes
   - No
   - Don’t know / no opinion / not relevant
Please explain what other information would be useful:

3000 character(s) maximum

4. Would any additional data or tools would improve the usability of the Adaptation qualitative screening criteria?
   - Yes
   - No
   - Don’t know / no opinion / not relevant

Are there areas of potential harm that TEG should consider for DNSH criteria for the activities that make a substantial contribution to adaptation objectives?
   - Yes
   - No
   - Don’t know / no opinion / not relevant

3. Usability of the taxonomy

1. Do you expect to use the Taxonomy in your business activities in the short term (1-3 years) or long term (4 years or more)?
   - Yes
   - No
   - Don’t know / no opinion / not relevant

2. Can the Taxonomy be made more useful for disclosures related to your specific financial product? This question covers only financial products where disclosure obligations are foreseen by the Taxonomy proposal.
   - Yes
   - No
   - Don’t know / no opinion / not relevant

3. Can the Taxonomy be made more useful for your investment decisions in different asset classes?
   - Yes
   - No
   - Don’t know/no opinion/not relevant
4. Is it sufficiently clear when the entire activities of a company or other entity should be considered as Taxonomy eligible (revenues or turnover) and when only expenditures by companies or other entities should be considered Taxonomy eligible?

- Yes
- No
- Don’t know / no opinion / not relevant

5. What practical tools or measures could be developed to facilitate the implementation of the taxonomy by financial actors?

Please specify what these tools would be used for and provide sufficient explanation on how they can help to implement the taxonomy:

2000 character(s) maximum

Robust standards will need to be applied. However these standards would need to reflect as much as possible the real world operating conditions of investments. The car industry has dramatically underlined the limits of poorly designed standards in recent years, with Dieselgate and more generally vehicles whose real world emissions were vastly different from the testing conditions.

In the geothermal sector, the GEOENVI project is working on providing a methodology for assessment of LCE in large projects.

To evaluate the performance of geothermal heat pump systems, a level playing field should be established in the ECODESIGN framework, where the testing conditions for geothermal are much less representative to real world operations compared to other heating and cooling appliances (in particular other heat pumps).

6. What practical tools or measures could be developed to help non-financial companies assess what share of their economic activities is taxonomy-eligible?

3000 character(s) maximum

4. Future development of the taxonomy

1. What economic activities that can make a substantial contribution to the climate change mitigation objective should next be considered for the Taxonomy?

3000 character(s) maximum
2. Should any of the economic activities included in the Technical report be reconsidered as regards their inclusion in the taxonomy?

☐ Yes
☐ No
☐ Don’t know / no opinion / not relevant

3. For what economic activities should an illustrative template for substantial contribution to climate change adaptation be developed next?

3000 character(s) maximum

Useful links


Contact

ec-teg-sf@ec.europa.eu