

Brussels 14 December 2021

To: Vice President Frans Timmermans

With the news of the passing of the first climate taxonomy Delegated Act, and while awaiting the complementary climate taxonomy Delegated Act, the undersigned would like to take this opportunity to remind the European Commission of its dedication to a broad stakeholder consultation process.

Market credibility and trust is key for the Sustainable Finance Taxonomy to deliver on its potential to shift capital to sustainable economic activities. Recognising this, the European Commission has, since the establishment of the Technical Expert Group (TEG) and of the EU Platform on Sustainable Finance, stated its strong dedication to broad stakeholder engagement and incorporation of the Commission's own Expert Groups' advice as part of this process.

The undersigned are alarmed by recent developments, signaling a shift away from this approach. The complementary climate Delegated Act expected before the end of the year, setting out the Sustainable Finance Taxonomy's criteria for both fossil gas and nuclear, must be subjected to the same process of public engagement and consultation process as the first delegated act.

The criteria of the first delegated act were put to public consultation three times before it was adopted. This process was in line with the Interinstitutional Agreement on Better Law Making, in which the Commission committed to enable stakeholders to provide feedback on draft delegated acts. It was also corresponding to the Commission's general engagement expressed in the recently adopted Commission's own Better Regulation Guidelines. It would be completely at odds with this process not to allow a single consultation on the other delegated acts (i.e. gas and nuclear), which are politically very sensitive and therefore deserving of scrutiny and citizen engagement. If the Taxonomy aims to create trust and transparency for the public, then it is vital to ask consumers what they think about its content.

Diverting from the promise and precedent already established would not only constitute a democratic deficit: it would increase concerns that the complementary Delegated Act is guided by lobby interests more than by climate science.

We, the undersigned, therefore call on the European Commission to ensure that the European public is allowed the opportunity to provide its input to the upcoming complementary Delegated Act on the Sustainable Finance Taxonomy on Climate Change Mitigation through a public consultation or feedback process and that such input will be duly taken into account.

We would be pleased to discuss this issue with you in a call at your earliest convenience.

Respectfully,



Donald Pols – Director Milieudefensie

Bellona Europa - Jonas Helseth, Director

Bellona Deutschland - Erika Bellmann, Head of Germany Programs

BirdLife Europe and Central Asia - Ariel Brunner, Head of Policy, member of the PSF

BEUC - Monique Goyens, Director General, member of the PSF

CEE Bankwatch Network - Petr Hlobil, Leader of Fossil Fuels Area

ClientEarth - Anaïs Berthier, Head of EU Affairs

Climate Action Network (CAN) Europe - Chiara Martinelli, Director

Climate Strategy - Peter Sweatman, CEO

ECCO Climate - Matteo Leonardi, Luca Bergamaschi, Co-founders

ECOS - Mathilde Crepy, Manager, member of the PSF

Environmental Action Germany (DUH) - Sascha Müller-Kraenner, Executive Director

Environmental Coalition on Standards (ECOS) - Mathilde Crepy, Senior Programme Manager

E3G - Third Generation Environmentalism, Tsvetelina Kuzmanova, Policy Advisor

Germanwatch e.V. - David Ryfisch, Team Leader - International Climate Policy

Greenpeace - Magda Stoczkiewicz, Programme Director, Greenpeace European Unit

Transport & Environment - William Todts, Executive Director, member of the PSF

WWF European Policy Office - Ester Asin, Director, member of the PSF

ZWE - Zero Waste Europe, Janek Vahk, Programme Coordinator