

# Call for feedback by the Platform on Sustainable Finance on the draft report on preliminary recommendations for the review of the Taxonomy Climate Delegated Act and additional technical screening criteria for the EU Taxonomy

Fields marked with \* are mandatory.

## Call for Feedback by the Platform on Sustainable Finance on the draft report on preliminary recommendations for the review of the Taxonomy Climate Delegated Act and additional technical screening criteria for the EU Taxonomy

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### **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.

### **Introduction**

The development of the EU Taxonomy relies on extensive input from experts from across the economy and civil society. In line with 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 framework, notably the further development of the EU Taxonomy. This report is part of the work of the Platform under its second mandate.

Under this mandate, the Platform has been tasked by the European Commission with reviewing and potentially recommending revisions to the technical screening criteria of the economic activities included in the Climate Delegated Act (DA) adopted in 2021, with a focus on making them more usable and simplify reporting. The review focused mainly on transitional activities, for which the Taxonomy Regulation stipulates a requirement for review every three years, as well as on activities that stakeholders have largely commented on as part of the [EU Taxonomy Stakeholder Request Mechanism](#).

In parallel, the Platform is developing technical screening criteria for a list of new economic activities. This involves developing technical screening criteria for these activities to make a Substantial Contribution (SC) to at least one of the environmental objectives defined by the Taxonomy Regulation while ensuring they Do-No-Significant-Harm (DNSH) to any of the other environmental objectives. Each new criteria recommendation includes a section on “usability of the criteria” which is meant to support and demonstrate that new criteria have been developed by striving for both, industrial feasibility and environmental integrity.

Additionally, the Platform’s mandate included developing DNSH criteria for activities to be included in Annex II of the Climate DA, as “adapted” activities. The Platform has done this for both, the new activities developed under the current mandate and for activities already included in the Taxonomy Delegated Acts with SC to an environmental objective other than adaptation, for which no such criteria exist yet.

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 Wednesday, 5 February 2025 23:59 (Central European Time).**

Please note: in order to ensure a fair and transparent feedback process, only responses received through the 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](mailto:fisma-platform-sf@ec.europa.eu).

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### **Important notice on the publication of responses**

\*Contributions received are intended for publication on the Commission’s website dedicated to the Platform.

\* Do you agree to your contribution being published?

- 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

I agree with the [personal data protection provisions](#)

## Section 1: Respondent's identification

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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)
- International or European organisation
- National or Local Government or Ministry
- Regulatory authority, Supervisory authority or Central bank
- Other public authority
- Trade union
- Other

First name and last name

Marco Angheben

Name of your organisation

ENGAGE for ESG

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.)

- Yes
- No

Where are you based?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary

- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland
- The Netherlands
- United Kingdom
- Other country

Where does your organisation carry out its activities (select one or more of the following)?

- Europe
- Middle East
- Africa
- Asia
- North America
- South America
- Global

What is the field of your activity?

- 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
- Agriculture, forestry and fishing
- Mining and quarrying
- Manufacturing
- Electricity, gas, steam and air conditioning supply
- Water supply; sewerage, waste management and remediation activities
- Construction and real estate activities
- Transportation and storage

- Accommodation and food service activities
- Information and communication
- 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

## Section 2: Targeted feedback on the TWG report

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What section of the TWG report do you want to comment on?

- Review of the Climate Delegated Act
- Recommendations of new activities
- Defining the missing DNSH for the inclusion of “adapted” activities
- Additional proposals

### Section 2.1: Review of the Climate Delegated Act

What sub-section do you want to comment on?

- Review of Mitigation Annex
- Review of Adaptation Annex
- Reviews relevant for both Annexes

#### Section 2.1.1. Review of Mitigation Annex

##### Energy-related thresholds

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

##### Bioenergy activities

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes

No

## Manufacturing activities

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

## Environmental protection and restoration activities

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

## Construction and real estate

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

If yes, please provide your comment by clearly highlighting which part of the chapter you are referring to.

*2000 character(s) maximum*

The ENGAGE Consortium agrees with the usability issues identified by the TWG.

In terms of the recommendations proposed by the TWG, based on its experience in the collection, analysis and reporting of credit and sustainability data through the ENGAGE Templates, the ENGAGE Consortium would like to underscore the relevance of the following:

- Allow proxies, such as high ambition green building certification systems, based on standard market practices, in the EU for a transitional period, while the EPC framework is being strengthened, and outside the EU to demonstrate equivalent ambition levels.
- Update EPBD cross-references, and also clearly stipulate the energy or carbon requirements from the EPBD in the Climate Delegated Act to ease usability of the criteria (more specific recommendations are provided under 7.1, 7.2 and 7.7).
- Clearly enhance the requirement of data collection and public disclosure of buildings' energy performance.

- Review and strengthen the EPC framework so that it is equally and timely applied across Europe.
- Establish a legal basis under GDPR to collect and process energy performance data
- Simplify the renovation criteria

Please provide a suggestion for an alternative text. Each suggestion needs to be based on scientific or technical evidence, and supported by references where applicable. Feedback where evidence is not provided cannot be considered.

*2000 character(s) maximum*

#### 7.1 Construction of new buildings

- Replace “NZEB -10%” with the definition of a Zero Emissions Buildings, whilst ensuring the energy efficiency first principle

#### 7.7 Acquisition of buildings

- Allow proxies to demonstrate compliance with the TSC, with the requirement to label proxied data as such.
- Require data used for EU Taxonomy reporting purposes to be publicly disclosed, or at the least be made available on public databases in an anonymised format.
- Incorporate real annual energy performance measurement
- Align EU Taxonomy definitions and criteria and those of the EBA to calculate GAR (Green Asset Ratio).
- Evaluate the purpose of the economic activity and its substantial contribution criteria and consider changing the criteria for portfolio assessment, or alternatively, add portfolio-level criteria.
- Harmonise EPC frameworks across Member States.

#### 7.2 Renovation of existing buildings

- Reflect changes of EPBD recast in EU Taxonomy: Replace “major renovation” with the definition of a “deep renovation”
- Facilitate compliance for residential renovations, particularly for renovations of buildings under a certain size – to ease reporting for financial institutions and energy service companies.

## Review of Appendix B on generic DNSH criteria to Sustainable Use of Water and Protection of Water and Marine Resources

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

## Review of Appendix C on generic DNSH criteria to Pollution Prevention and Control

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes

No

## Review of Appendix D on generic DNSH criteria to Protection and Restoration of Biodiversity

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes  
 No

## Section 2.1.2. Review of Adaptation Annex

### The basis and rationale for the review

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes  
 No

### Improving the usability of the Adaptation generic criteria

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes  
 No

## Section 2.1.3. Reviews relevant for both Annexes

### Review of differing activity titles and descriptions

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes



No

### Recommended future work: Addressing other potential issues with specific activities

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes  
 No

### Recommended future work: Review of DNSH of Annex II activities not consulted with the Platform

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes  
 No

### Recommended future work: Review of activities where the output of the activity requires to be "adapted" in addition to the activity itself being "adapted"

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes  
 No

### Recommended future work: DNSH Threshold updates for some "Manufacturing" activities

Do you generally support the recommendations made in this chapter?

Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes  
 No

## Section 2.2. Recommendations of new activities

Close to market research, development and innovation activities enabling substantial contribution to the protection and restoration of biodiversity and ecosystems

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

Close to market research, development and innovation activities enabling substantial contribution to the transition to circular economy

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

Close to market research, development and innovation activities enabling substantial contribution to pollution prevention and control

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

Close to market research, development and innovation activities enabling substantial contribution to sustainable use and protection of water and marine resources

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes

No

## Digital solutions and services enabling substantial contribution to the protection and restoration of biodiversity and ecosystems

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

## Digital solutions and services enabling substantial contribution to the transition to circular economy

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

## Digital solutions and services enabling substantial contribution to pollution prevention and control

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

## Digital solutions and services enabling substantial contribution to the sustainable use and protection of water and marine resources

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

### Mining of Copper, Nickel, Lithium enabling substantial contribution to climate change mitigation

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

### Manufacturing of refined Copper substantially contributing to climate change mitigation

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

### Manufacturing of refined Nickel substantially contributing to climate change mitigation

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

### Manufacturing of refined Lithium substantially contributing to climate change mitigation

Do you generally support the recommendations made in this chapter?

Yes

No

Would you like to give specific feedback on the recommendations made in this chapter?

Yes

No

## Progress report on new activity “Manufacture of tyres” substantially contributing to Pollution Prevention and Control

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

## Progress report on new activity “Manufacturing of emergency aircraft” enabling substantially enabling Climate Change Adaptation

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

## Progress report in new activity “Manufacture of energy efficient equipment for industry” substantially contributing to Climate Change Mitigation

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

## Progress report on new activity "Maintenance of bridges and tunnels" substantially contribution to the transition to a circular economy

Do you generally support the recommendations made in this chapter?

- Yes
- No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes
- No

## Section 2.3. Defining the missing DNSH for the inclusion of “adapted” activities

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

## Section 2.4. Additional proposals

Do you generally support the recommendations made in this chapter?

- Yes  
 No

Would you like to give specific feedback on the recommendations made in this chapter?

- Yes  
 No

## Section 3: General feedback on the draft report

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Do you have any comments on the written report that you would like to make?

- Yes  
 No

If yes, please provide brief comments in the comment box below:

*5000 character(s) maximum*

The ENGAGE Consortium is especially supportive of the recommendation from the TWG regarding the use of proxies, the harmonisation of Energy Performance Certificate (EPC) scales and the open-access availability of information

Proxy data

The ENGAGE Consortium is conscious of the climate data availability challenge and the simultaneous need for this data for the purposes of identifying loans, transactions and investments as “sustainable”. As such, the ENGAGE Consortium recommends the admission of proxy values while requiring the disclosure of the specific nature of the relevant information provided, i.e., exact or proxy to prevent misinformation and greenwashing, and as long as proxies are clearly identifiable.

Energy Performance Certificates (EPC) scales

The lack of a harmonised European-wide EPC scale poses an issue for the comparison of buildings’ energy efficiency. In this regard, the ENGAGE Consortium advocates for the definition at European level of the EPC scales, including the specific indicators like, for instance, the primary energy demand (kWh/m<sup>2</sup> per year) for a clear correlation with the Taxonomy Technical Screening Criteria requirements.

Availability open access of EPC information

In our experience, the lack of open access EPC availability reduces financing for existing properties, unduly penalising dwellings rated in the lower energy performance classes (F, G in particular) as rising energy costs

impact the availability of disposable income to European citizens. Addressing energy poverty via the financing of older properties and renovations are at the core of the ENGAGE initiative consistently with the current revision of the Energy Performance of Buildings Directive.

The ENGAGE Consortium considers that EPC data should be made available open access for investors, lenders and certifying bodies.

This is crucial for financial institutions to assign an EPC label to the loans with the respective underlying properties and to facilitate the improvement of the energy efficiency of EU building stock. In our opinion, the availability of EPC information in a machine-readable format via APIs and ready for bulk upload and download would enable the matching of loan-level data with EPC data, which in turn helps the disclosure of the energy performance information of the underlying assets of loans and would therefore have a positive impact on the development of the EU sustainable finance strategy, boosting the Renovation Wave.

Finally, the ENGAGE Consortium is concerned about the risk of confusion amongst market participants due to the multiple policy, legislative and interpretative texts issued in the last months in connection with the reporting requirements under the Taxonomy regulation. This includes the reliance on Commission Notices (Q&A's) as interpretative tool, which is creating a fragmented regulatory landscape. In addition, the EU Taxonomy imposes disproportionate requirements on residential homeowners through the application of Minimum Safeguards (MS) requiring credit institutions to verify MS compliance for equipment manufacturers. Such verification for small residential loans is impractical and costly. A clear message from EU institutions with clear reporting instructions on all aspects of the EU Taxonomy regulation and delegated acts would be warmly welcome.

## Useful links

[More on this call for feedback \(https://finance.ec.europa.eu/publications/call-feedback-psf-preliminary-recommendations-review-climate-delegated-act-and-addition-activities\\_en\)](https://finance.ec.europa.eu/publications/call-feedback-psf-preliminary-recommendations-review-climate-delegated-act-and-addition-activities_en)

[Text of the draft report \(https://finance.ec.europa.eu/document/download/a3e72e4c-f2fb-4400-b06f-f7f10dc2cd09\\_en?filename=250108-sustainable-finance-platform-draft-taxonomy-report\\_en.pdf\)](https://finance.ec.europa.eu/document/download/a3e72e4c-f2fb-4400-b06f-f7f10dc2cd09_en?filename=250108-sustainable-finance-platform-draft-taxonomy-report_en.pdf)

[Specific privacy statement \(https://finance.ec.europa.eu/document/download/4de7a81f-ea3f-4a3d-bcd7-65d954e4f776\\_en?filename=2025-sustainable-finance-platform-taxonomy-report-specific-privacy-statement\\_en.pdf\)](https://finance.ec.europa.eu/document/download/4de7a81f-ea3f-4a3d-bcd7-65d954e4f776_en?filename=2025-sustainable-finance-platform-taxonomy-report-specific-privacy-statement_en.pdf)

[More on the Platform on Sustainable Finance the Platform on Sustainable Finance \(https://finance.ec.europa.eu/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance\\_en\)](https://finance.ec.europa.eu/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance_en)

[More on the EU taxonomy \(https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities\\_en\)](https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en)

## Contact

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