

31st March 2021

Dear President von der Leyen,  
Dear Executive Vice-Presidents Timmermans and Dombrovskis,  
Dear Commissioner McGuinness,

We, a group of scientists and environmental and consumer experts appointed to the EU Commission's Platform on Sustainable Finance, are writing to express the deep concern that we and the organisations we represent feel about the contents of the draft climate Taxonomy Delegated Act which was leaked last week, and the process through which it was significantly and unacceptably weakened compared to the November version.

**We believe the new draft's provisions are in breach of the Taxonomy Regulation in several instances**, particularly the definition of transitional activities in Article 10.2 and the requirement in Article 19 that technical criteria be 'based on conclusive scientific evidence'.

**In particular, criteria for forestry, bioenergy, and fossil gas are in clear contradiction to climate science.** These criteria are not simply weak: they are counter-productive and label as "sustainable" activities that may cause significant harm to the climate and the environment. If the leaked text for these sectors were adopted, the Taxonomy would become a greenwashing tool instead of being the gold standard in the fight *against* greenwashing that it was promised to be. Its roll out would be even more harmful to investors than the current situation, as they would reasonably expect the taxonomy to have set high standards of sustainability. It would also penalise sectors which are making real efforts to align with the Paris Agreement. **At a broader level it would openly discredit the European Green Deal**, leading to significant reputational damage for the EU.

The process to create the climate Taxonomy lasted for three years. It involved experts from many industries, financial institutions, civil society and academia working in the Technical Expert Group to develop technical screening criteria in line with science. This hard work has been dismissed in a last-minute, opaque, politicised process. This politicised process is already hampering progress within the Platform's work on developing technical screening criteria for the remaining four objectives. We are concerned that the time and effort we invest - pro-bono - in developing science-based criteria could be undone by lobbying behind the scenes without the same due attention, debate and evidence required in the Platform.

Hence, as demanded by [226 scientists, financial institutions and civil society groups](#), **fossil gas must be removed from the EU science-based Taxonomy. Similarly, the current criteria that classify forestry and bioenergy as "significantly contributing to climate mitigation" have no scientific basis.** While the leaked draft shows widespread and unjustified watering down of criteria, several of which had already been weakened compared to the TEG recommendations, these three sectors represent a red line that would fatally and openly undermine the entire taxonomy's credibility. **We therefore urge the Commission to remove forestry and bioenergy from the current Delegated Act, as done with agriculture, to give more time to the discussion on land-based sectors in order to find adequate, credible**

**climate criteria that allow the Taxonomy to take its rightful place as a science-based guide for sustainable investments.**

The new draft puts us in an extremely difficult position: this politicised process, and the overriding of the experts' work, questions the very purpose of the Platform and the value of our work in it, creating reputational risks for us and the organisations we represent. **Should politics and lobbying prevail over science, it is our responsibility to inform you that we would be forced to reconsider our contribution to the Platform.**

Yours sincerely,

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