

3 February 2022

European Commission

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

We write in regard to forestry and bioenergy criteria in the Taxonomy Climate Delegated Regulation (the “Delegated Regulation”).

As you know, in prior communications about the Delegated Regulation, numerous NGOs expressed strong concerns with these criteria, noting an absence of adequate standards to assure climate mitigation and adaptation; lack of scientific justification, review and legitimacy; a lack of internal and external controls; inclusion of numerous provisions that contravene climate and ecosystem science; and clear violations of the requirement of the Taxonomy that listed activities should “Do No Significant Harm” to other environmental objectives, among other issues.

The European Commission failed to incorporate critical input from NGOs, scientific advisors and civil society into the final Delegated Regulation. As a result, the final Delegated Regulation gives an imprimatur of “sustainability” to activities that increase greenhouse gas emissions and damage ecosystems.

Given the European Commission’s disregard for science and the public good in finalizing the forestry and bioenergy criteria, some organizations have taken initiative to request that the EC review the Delegated Regulation. We, the undersigned, support this request for internal review, and any subsequent legal challenge, should this be necessary.

As the Taxonomy Regulation points out, greenwashing is the “practice of gaining an unfair competitive advantage by marketing a financial product as environmentally friendly, when in fact basic environmental standards have not been met.” We believe this precisely describes the situation with regard to the forestry and bioenergy criteria in the Delegated Regulation, and accordingly urge the Commission to review these provisions.

Regards,

UNDERSIGNED GROUPS

Paulo Pimenta de Castro	ACRÉSCIMO, Associação de Promoção ao Investimento Florestal
Wolfgang Kuhlmann	ARA
Ronald Schout	Arnhems Peil
Mange Ram Adhana	Association For Promotion of Sustainable Development
Meredith Stanton	Australian Forests and Climate Alliance (AFCA)
Sondre Molteberg Dalen	Attac Norway
Almuth Ernsting	Biofuelwatch
Ariel Brunner	BirdLife Europe and Central Asia
Louise Morris	Blue Derby Wild

Joost Blasweiler	Bomenbond
Marjan Houpt	Bomenstichting Achterhoek
Andy Wood	Coastal Plain Conservation Group
Fenna Swart	Comite Schone Lucht NL
Jeroen Spaander	De Klimaatcoalitie
Raymond Plourde	Ecology Action Centre
Mathilde Crepy	ECOS
Marloes Spaander	EDSP ECO
Ruth Y. Story	Education, Economics, Environmental, Climate and Health Organization
J Redwood	Environment East Gippsland inc.
Gabriel Schwaderer	EuroNatur
Jan van de Pol	Federatie tegen Biomassacentrales
Hannah Mowat	Fern
Emanuele Lombardi	Fondo Forestale Italiano
Gry Bossen	Forests of the World
Zoltan Kun	Friends of Fertö lake Association
Tony Lowes	Friends of the Irish Environment
Piotr Skubisz	Instytut Spraw Obywatelskich
Marjan Houpt	Landelijk Netwerk Bossen- en Bomenbescherming
Maarten Visschers	Leefmilieu
Kęstutis Kupšys	Lithuanian Consumers Alliance
Jonas Hulsens	Milieudefensie - Friends of the Earth Netherlands
Johan Vollenbroek	Mobilisation for the Environment
Bob Bancroft	Nature Nova Scotia
Bente Hessellund Andersen	NOAH - Friends of the Earth Denmark
Directors	Bomenstichting Achterhoek
Liina Steinberg	Päästame Eesti Metsad (Save Estonia's Forests)
Peter Riggs	Pivot Point
Jan Willem van Gelder	Profundo
Lina Burnelius	Protect the Forest Sweden
Paul Schreiber	Reclaim Finance
Eugene Simonov	Rivers without Boundaries International Coalition
Soojin Kim	Solutions For Our Climate (SFOC)
John R. Spruill	Southern Forests Conservation Coalition
Virginia Young	The Australian Rainforest Conservation Society
Toby Aykroyd	Wild Europe
Radosław Ślusarczyk	Workshop for all Beings