



Joint Statement

An EU Taxonomy Delivering for the Economy and the Environment

We, the signatories of this statement, represent sectors of major importance for European economic development and wealth. We make the move to a competitive, climate-neutral economy in Europe possible and support an EU taxonomy that helps accelerate investments in sustainable solutions.

We are strongly concerned about the European Commission's (EC) draft Taxonomy Delegated Regulation proposal¹, which unless changed, will prevent investors from making fully informed decisions, undermine affordable financing and jeopardise energy supply security at an acceptable cost, which are key to maintain jobs in Europe and avoid carbon leakage.

We urge the EC to better address the following principles in its revised proposal:

- **The future Taxonomy should help implement coherent EU climate and energy legislation.** A predictable policy framework is key to secure a successful economic and industrial transition ensuring long-term sustainability. Businesses, governments and financial market participants must not face different targets, standards or thresholds that will disrupt markets, distort

¹ To implement Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088. Available [here](#).

competition and result in burdensome and costly implementation. Coherence should also be ensured with existing investment classifications, for example, the European Investment Bank's (EIB) Energy Lending Policy. The EC proposal departs from already ambitious forward-looking and so far coherent EU legislation and undermines investment predictability, which may prevent or delay much-needed investments for a sustainable and cost-effective transition to climate neutrality.

- **The future Taxonomy's criteria and thresholds must be impact assessed prior to their application.** The EC proposal presents serious inconsistencies as well as technical and methodological flaws that result in an unlevel playing field and would not allow businesses and investors to make fully informed decisions on sustainable solutions that meet their varying needs. Given the expected major impact on the European economy, technical screening criteria must be properly developed and impact assessed. Prior to application, they also must receive scrutiny by the co-legislators and stakeholders, in line with the Better Regulation Agenda. As such, proper stakeholder involvement in all relevant fora has not been sufficiently considered so far and urgently needs to be addressed to avoid unintended consequences for the sectors in which EU Taxonomy will apply.
- **The future Taxonomy should guarantee a transitional, evidence-based and pragmatic approach.** EU countries will have different starting points entailing varying investment capabilities and needs. The EU Taxonomy must leave sufficient flexibility to consider today's technological development, existing infrastructures and current energy mixes, while offering development pathways for low-carbon and renewable energy sources and technologies. Investments considered 'sustainable' today should not become 'unsustainable' overnight because they are not listed or do not fit the Taxonomy definition. Economic sectors and Member States must be empowered through adequate screening criteria, including for transitional activities, to embark on progressive and achievable pathways, in line with EU climate and energy goals. Above all, no one should be left behind as outlined in the European Green Deal.
