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,

UNDESIgnED GROUPS

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