

Call for feedback on TEG report on EU Taxonomy

Fields marked with * are mandatory.

Introduction

Disclaimer:

This call for feedback is part of ongoing work by Directorate-general for financial stability, financial services and capital markets union, Directorate-general for environment, Directorate-general for climate action and Directorate-general for energy on sustainable finance, for which the European Commission has set up a [dedicated Technical expert group \(TEG\)](#).

This feedback process is not an official Commission consultation or document nor an official Commission position. Nothing in this feedback process commits the Commission nor does it preclude any policy outcomes.

In March 2018 the European Commission published its [action plan: financing sustainable growth](#). Action 1 of the Commission's action plan calls for the establishment of an EU classification system for sustainable activities, or Taxonomy. The European Commission followed through on this action in May 2018 with a [proposal for a regulation on the establishment of a framework to facilitate sustainable investment](#) (taxonomy regulation).

In addition, a [technical expert group on sustainable finance \(TEG\)](#) was set up by the European Commission in July 2018 to assist in with the implementation of four key actions of the action plan, including the development of an EU taxonomy.

Within the framework of the proposed taxonomy regulation, the TEG has been asked to develop recommendations for technical screening criteria for economic activities that can make a substantial contribution to climate change mitigation or adaptation, while avoiding significant harm to the four other environmental objectives:

1. sustainable use and protection of water and marine resources;
2. transition to a circular economy, waste prevention and recycling;
3. pollution prevention control; and (4) protection of healthy ecosystems.

On 18 June 2019, the TEG published its [technical report on EU taxonomy](#). The report sets out the basis for a future EU taxonomy in legislation. The report contains:

- technical screening criteria for 67 activities across 8 sectors that can make a substantial contribution to **climate change mitigation**;
- a methodology and worked examples for evaluating substantial contribution to **climate change adaptation**;
- guidance and case studies for **investors preparing to use the taxonomy**.

This report builds on the [work that the TEG published in December last year](#) together with a call for feedback on the proposed criteria for these “first round” activities. The TEG has also engaged with over 150 additional experts in the past months to develop technical screening criteria for the ‘second round’ of climate change mitigation activities and climate change adaptation activities.

In addition to its technical report, the TEG has also published a [supplementary report on using the taxonomy](#). This provides investors and companies with a concise and clear explanation of why the taxonomy is needed, what it looks like, and its ease of use.

Call for feedback

The TEG is inviting stakeholders to provide feedback on (parts of) its technical report through the online `q u e s t i o n n a i r e`.

Because of technical problems, the deadline for providing feedback is **extended at least until Monday 16 September 2019 23:59**. If the technical problems persist, a further extension will be considered.

In the online questionnaire, you will be able to select on which parts of the report you want to provide feedback to, including a selection of the 67 individual activities that make a substantial contribution to climate change mitigation and the different elements of each activity.

Next steps

The TEG mandate has been extended until the end of this year. The TEG will use this time to:

- assess the feedback from stakeholders on its technical report;;
- refine and further develop some incomplete aspects of the proposed technical screening criteria for substantial contributions and avoidance of significant harm;
- develop further guidance on implementation and use of the taxonomy.

At the end of its mandate, the TEG will make further recommendations to the European Commission on the need to adjust and complement their work on an EU taxonomy.

The TEG's recommendations are designed to support the European Commission in the development of future delegated acts, as proposed in the taxonomy regulation.

Please note: In order to ensure a fair and transparent feedback process **only responses received through our 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 ec-teg-sf@ec.europa.eu.

Useful documents and links:

- [More on EU taxonomy](#)
- [Technical report on EU taxonomy](#)
- [Supplementary report on using the taxonomy](#)
- [Specific privacy statement](#)

1. Information about you

* Are you replying as:

- a private individual
- a private organisation or a company
- a public authority or an international organisation

* Name of your organisation:

Austrian Compost & Biogas Association

Contact email address:

The information you provide here is for administrative purposes only and will not be published

stuermer@kompost-biogas.info

* 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. [Why a transparency register?](#))

- Yes
 No

* Type of organisation:

- | | |
|---|--|
| <input type="radio"/> Academic institution | <input type="radio"/> Media |
| <input type="radio"/> Company, SME, micro-enterprise, sole trader | <input checked="" type="radio"/> Non-governmental organisation |
| <input type="radio"/> Consultancy, law firm | <input type="radio"/> Think tank |
| <input type="radio"/> Consumer organisation | <input type="radio"/> Trade union |
| <input type="radio"/> Industry association | <input type="radio"/> Other |

* Where are you based and/or where do you carry out your activity?

Austria

* Field of activity (*if applicable*):

at least 1 choice(s)

- 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
 Other
 Not applicable

* Please specify your activity field(s) or sector(s):

Business consulting at the field of energy and waste management, especially at the compost and biogas sector

* Sector (*if applicable*):

at least 1 choice(s)

- A Agriculture, forestry and fishing
 B Mining and quarrying

- C Manufacturing
- D Electricity, gas, steam and air conditioning supply
- E Water supply; sewerage, waste management and remediation activities
- F Construction
- H Transportation and storage
- I Accommodation and food service activities
- J Information and communication
- K Financial and insurance activities
- L Real estate activities
- M Professional, scientific and technical activities
- N Administrative and support service activities
- O Public administration and defence; compulsory social security
- P Education
- Q Human health and social work activities
- Not applicable

Important notice on the publication of responses

* Contributions received are intended for publication on the Commission's website. Do you agree to your contribution being published?

[\(see specific privacy statement\)](#)

- 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

* Contributions received through this survey will be reviewed by the TEG. Do you agree to be contacted by the TEG to clarify your response if necessary?

- Yes, I agree to be contacted by the TEG if necessary through the contact details I provided
- No, I do not want to be contacted by the TEG

2. Selection feedback

This call for feedback covers the following parts of the technical report:

- 1. Climate change mitigation activities**
- 2. Climate change adaptation**
- 3. Usability of the taxonomy**
- 4. Future development of the taxonomy**

Please tick the relevant topics and/or sectors and activities to which you would like to provide feedback :
(You will be able to answer questions for the selected topics and/or sectors and activities)

1. Climate change mitigation activities

Agriculture and forestry

- Growing of perennial crops
- Growing of non-perennial crops
- Livestock production
- Afforestation
- Rehabilitation, Restoration
- Reforestation
- Existing forest management

Manufacturing

- Manufacturing of low carbon technologies
- Manufacture of Cement
- Manufacture of Aluminium
- Manufacture of Iron and Steel
- Manufacture of hydrogen
- Manufacture of other inorganic basic chemicals
- Manufacture of other organic basic chemicals
- Manufacture of fertilizers and nitrogen compounds
- Manufacture of plastics in primary form

Electricity, gas, steam and air conditioning supply

- Production of Electricity from Solar PV
- Production of Electricity from Concentrated Solar Power
- Production of Electricity from Wind Power
- Production of Electricity from Ocean Energy
- Production of Electricity from Hydropower
- Production of Electricity from Geothermal
- Production of Electricity from Gas Combustion
- Production of Electricity from Bioenergy
- Transmission and Distribution of Electricity
- Storage of Energy
- Manufacture of Biomass, Biogas or Biofuels
- Retrofit of Gas Transmission and Distribution Networks
- District Heating/Cooling distribution
-

- Installation and operation of Electric Heat Pumps
- Cogeneration of Heat/Cool and power from Concentrated Solar Power
- Cogeneration of Heat/Cool and power from Geothermal Energy
- Cogeneration of Heat/Cool and power from Gas Combustion
- Cogeneration of Heat/Cool and power from Bioenergy
- Production of Heating and Cooling from Concentrated Solar Power
- Production of Heating and Cooling from Geothermal Energy
- Production of Heating and Cooling from Gas Combustion
- Production of heating and cooling from Bioenergy
- Production of Heating and Cooling using Waste Heat

Water, Waste and Sewerage remediation

- Water collection, treatment and supply
- Centralized wastewater treatment systems
- Anaerobic digestion of sewage sludge
- Separate collection and transport of non-hazardous waste in source segregated fractions
- Anaerobic digestion of bio-waste
- Composting of bio-waste
- Material recovery from waste
- Landfill gas capture and energetic utilization
- Direct Air Capture of CO₂
- Capture of anthropogenic emissions
- Transport of CO₂
- Permanent Sequestration of captured CO₂

Transport

- Passenger Rail Transport (Interurban)
- Freight Rail Transport
- Public transport
- Infrastructure for low carbon transport
- Passenger cars and commercial vehicles
- Freight transport services by road
- Interurban scheduled road transport
- Inland passenger water transport
- Inland freight water transport
- Construction of water projects

Information and Communication Technologies (ICT)

- Data processing, hosting and related activities
- Data-driven solutions for GHG emissions reductions

Buildings

- Construction of new buildings
- Renovation of existing buildings

- Individual renovation measures, installation of renewable on-site and professional, scientific and technical activities
- Acquisition of buildings

2. Climate change adaptation

- I want to provide feedback for this topic

3. Usability of the taxonomy

- I want to provide feedback for this topic

4. Future development of the taxonomy

- I want to provide feedback for this topic

Agriculture and forestry - Growing of perennial crops

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the [Technical report on Taxonomy](#).

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

Agriculture and forestry - Growing of non-perennial crops

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principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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3. Should the threshold be different?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Agricultural production plays a major role lowering GHG emissions. Carbon storage in biomass and the usage of biomass instead of fossil resources is a key element at the worldwide carbon cycle. Beside this, using organic fertilizers lower the demand of artificial fertilizer, which are limited in production (p.e. Phosphorous) or energy-intensive in production (p.e. Nitrogen). The recycling of biogenic wastes and agricultural residues in combination with the application as fertilizer is crucial. The mature technologies of composting and anaerobe digestion close the circle. Moreover, the increase of humus content of soils store carbon. Compost and digestate support the increase of humus content.

Beside a proper crop rotation, catch crop cultivation helps to counteract humus depletion. In best case, catch crops are harvested and stored for anaerobic digestion. On the one hand for energy production, on the other hand for nutrient cycling at an ideal moment. The combination of catch crops and straw increase energy production and has phytosanitary effects particularly at corn production. Manure management can be supported by anaerobic digestion to lower GHG emissions.

The usage of manure, catch crops, farm residues and organic wastes in a nearby compost or biogas plant should be forced

Links to evidence:

1000 character(s) maximum

Agriculture and forestry - Livestock production

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3. Should the threshold be different?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Agricultural production plays a major role lowering GHG emissions. Carbon storage in biomass and the usage of biomass instead of fossil resources is a key element at the worldwide carbon cycle. Beside this, using organic fertilizers lower the demand of artificial fertilizer, which are limited in production (p.e. Phosphorous) or energy-intensive in production (p.e. Nitrogen). The recycling of biogenic wastes and agricultural residues in combination with the application as fertilizer is crucial. The mature technologies of composting and anaerobe digestion close the circle. Moreover, the increase of humus content of soils store carbon. Compost and digestate support the increase of humus content.

Beside a proper crop rotation, catch crop cultivation helps to counteract humus depletion. In best case, catch crops are harvested and stored for anaerobic digestion. On the one hand for energy production, on the other

hand for nutrient cycling at an ideal moment. The combination of catch crops and straw increase energy production and has phytosanitary effects particularly at corn production. Manure management can be supported by anaerobic digestion to lower GHG emissions.

The usage of manure, catch crops, farm residues and organic wastes in a nearby compost or biogas plant should be forced

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Manufacturing - Manufacturing of low carbon technologies

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7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

- Yes
- No

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the [Technical report on Taxonomy](#).

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7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

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7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

- Yes
- No

Manufacturing - Manufacture of fertilizers and nitrogen compounds

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- International applicability of activity criteria

7. Are there science-based approaches that can be used to tailor manufacturing thresholds to national circumstances?

- Yes
- No

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Electricity, gas, steam and air conditioning supply - Production of Electricity from Bioenergy

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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3. Should the threshold be different?

- Yes

No

I f y e s , w h y a n d h o w ?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Sustainable finance is a very important issue regarding to investments in sustainable projects and to increase sustainable production. Renewable energy and circular economy help reaching the EUs ambitions, decreasing dependency on energy and raw materials imports. Therefore, the improvement of infrastructure in the areas of renewable energy production and circular economy is the basic prerequisite for economic growth and wealth creation. Especially existing small and medium-sized enterprises and private persons, starting up small companies help to counteract the current structural change and contribute to the diversity and the economic potential of rural areas.

Energy production from bioenergy plays a major role at the security of supply, especially at winter months. While in this critical months, other renewables have their lowest energy production potential, while energy demand is highest. Using bioenergy in in gaseous form, high energy transportation and storage capacities can be used to supply energy when demanded. Because of the carbon cycle within the bioenergy production, the GHG emissions will be reduced by 100%, setting equal system boundaries as fossil energy sources.

Using organic wastes, residues of arable farming and animal husbandry reduces iLUC effects but also energy import dependency and therefore drain of money. To be able to use bioenergy at the highest demand, the gas grid has to be improved, especially for connection of biogas or biomass conversion plants to renewable gas and for re-compression into gas grids with higher-pressure level.

Supporting a transition to a net-zero emission economy can be done by thermal insulation and substitution of fossil energy sources. In the case of district heating, this can be done by usage of biomass and biomethane. Especially, the ratio of biomethane in the gas grid need to be increased. District heating via cogeneration from gas power plants also need to be fueled with rising shares of biomethane.

The cogeneration and usage of heat in biomass resp. biogas plants is state-of-the-art.

Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

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Electricity, gas, steam and air conditioning supply - Storage of Energy

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

I f y e s , w h y a n d h o w ?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Sustainable finance is a very important issue regarding to investments in sustainable projects and to increase sustainable production. Renewable energy and circular economy help reaching the EUs ambitions, decreasing dependency on energy and raw materials imports. Therefore, the improvement of infrastructure in the areas of renewable energy production and circular economy is the basic prerequisite for economic growth and wealth creation. Especially existing small and medium-sized enterprises and private persons, starting up small companies help to counteract the current structural change and contribute to the diversity and the economic potential of rural areas.

Energy production from bioenergy plays a major role at the security of supply, especially at winter months. While in this critical months, other renewables have their lowest energy production potential, while energy demand is highest. Using bioenergy in in gaseous form, high energy transportation and storage capacities can be used to supply energy when demanded. Because of the carbon cycle within the bioenergy production, the GHG emissions will be reduced by 100%, setting equal system boundaries as fossil energy sources.

Using organic wastes, residues of arable farming and animal husbandry reduces iLUC effects but also energy import dependency and therefore drain of money. To be able to use bioenergy at the highest demand, the gas grid has to be improved, especially for connection of biogas or biomass conversion plants to renewable gas and for re-compression into gas grids with higher-pressure level.

Supporting a transition to a net-zero emission economy can be done by thermal insulation and substitution of fossil energy sources. In the case of district heating, this can be done by usage of biomass and biomethane. Especially, the ratio of biomethane in the gas grid need to be increased. District heating via cogeneration from gas power plants also need to be fueled with rising shares of biomethane.

The cogeneration and usage of heat in biomass resp. biogas plants is state-of-the-art.

Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

**Electricity, gas, steam and air conditioning supply -
Manufacture of Biomass, Biogas or Biofuels**

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the [Technical report on Taxonomy](#).

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Sustainable finance is a very important issue regarding to investments in sustainable projects and to increase sustainable production. Renewable energy and circular economy help reaching the EUs ambitions, decreasing dependency on energy and raw materials imports. Therefore, the improvement of infrastructure in the areas of renewable energy production and circular economy is the basic prerequisite for economic growth and wealth creation. Especially existing small and medium-sized enterprises and private persons, starting up small companies help to counteract the current structural change and contribute to the diversity and the economic potential of rural areas.

Energy production from bioenergy plays a major role at the security of supply, especially at winter months. While in this critical months, other renewables have their lowest energy production potential, while energy demand is highest. Using bioenergy in in gaseous form, high energy transportation and storage capacities can be used to supply energy when demanded. Because of the carbon cycle within the bioenergy production, the GHG emissions will be reduced by 100%, setting equal system boundaries as fossil energy sources.

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Supporting a transition to a net-zero emission economy can be done by thermal insulation and substitution of fossil energy sources. In the case of district heating, this can be done by usage of biomass and biomethane. Especially, the ratio of biomethane in the gas grid need to be increased. District heating via cogeneration from gas power plants also need to be fueled with rising shares of biomethane.

The cogeneration and usage of heat in biomass resp. biogas plants is state-of-the-art.

Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

Electricity, gas, steam and air conditioning supply - Retrofit of Gas Transmission and Distribution Networks

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the [Technical report on Taxonomy](#).

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

I f y e s , w h y a n d h o w ?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Sustainable finance is a very important issue regarding to investments in sustainable projects and to increase sustainable production. Renewable energy and circular economy help reaching the EUs ambitions, decreasing dependency on energy and raw materials imports. Therefore, the improvement of infrastructure in the areas of renewable energy production and circular economy is the basic prerequisite for economic growth and wealth creation. Especially existing small and medium-sized enterprises and private persons, starting up small companies help to counteract the current structural change and contribute to the diversity and the economic potential of rural areas.

Energy production from bioenergy plays a major role at the security of supply, especially at winter months. While in this critical months, other renewables have their lowest energy production potential, while energy demand is highest. Using bioenergy in in gaseous form, high energy transportation and storage capacities can be used to supply energy when demanded. Because of the carbon cycle within the bioenergy production, the GHG emissions will be reduced by 100%, setting equal system boundaries as fossil energy sources.

Using organic wastes, residues of arable farming and animal husbandry reduces iLUC effects but also energy import dependency and therefore drain of money. To be able to use bioenergy at the highest demand, the gas grid has to be improved, especially for connection of biogas or biomass conversion plants to renewable gas and for re-compression into gas grids with higher-pressure level.

Supporting a transition to a net-zero emission economy can be done by thermal insulation and substitution of fossil energy sources. In the case of district heating, this can be done by usage of biomass and biomethane. Especially, the ratio of biomethane in the gas grid need to be increased. District heating via cogeneration from gas power plants also need to be fueled with rising shares of biomethane.

The cogeneration and usage of heat in biomass resp. biogas plants is state-of-the-art.

Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

Electricity, gas, steam and air conditioning supply - District Heating/Cooling distribution

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the [Technical report on Taxonomy](#).

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Please select the elements of the activity to which you would like to provide feedback:

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- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

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Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

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- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

Electricity, gas, steam and air conditioning supply - Cogeneration of Heat/Cool and power from Gas Combustion

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria

- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

I f y e s , w h y a n d h o w ?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

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The cogeneration and usage of heat in biomass resp. biogas plants is state-of-the-art.

Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

Electricity, gas, steam and air conditioning supply - Cogeneration of Heat/Cool and power from Bioenergy

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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3. Should the threshold be different?

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- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

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Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

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- Threshold for substantial contribution criteria
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- International applicability of activity criteria

Electricity, gas, steam and air conditioning supply - Production of Heating and Cooling using Waste Heat

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the [Technical report on Taxonomy](#).

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- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

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Supporting a transition to a net-zero emission economy can be done by thermal insulation and substitution of fossil energy sources. In the case of district heating, this can be done by usage of biomass and biomethane. Especially, the ratio of biomethane in the gas grid need to be increased. District heating via cogeneration from gas power plants also need to be fueled with rising shares of biomethane.

The cogeneration and usage of heat in biomass resp. biogas plants is state-of-the-art.

Rising shares of biomethane at the gas grid and consumption-related electricity production from biogas plants need to be forced.

Links to evidence:

1000 character(s) maximum

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- Do no significant harm criteria
- International applicability of activity criteria

Water, Waste and Sewerage remediation - Centralized wastewater treatment systems

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

I f y e s , w h y a n d h o w ?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Optimization for treatment/utilization of sewage sludge starts at the sources of wastewater. Monitoring of „non-household-like“ wastewater distributors and reduction of PTE (potential toxic elements) at the source results in significantly reduced PTE content in sewage sludge. Rules for „indirect distributor controlling“ are a valuable contribution to GHG reduction because they open treatment and utilization options with low energy consumption and carbon sequestration in soils. Nevertheless, there are countries with rules to fulfill highest quality standards and relevant laws for utilization of stabilized and/or composted sludge on land but other rules, like marketing strategies of retailers, hinder the utilization routes with lowest GHG emissions. Therefore the real utilization routes have to be part of the approving process. Monoincineration of wastewater sludge with additional need of fuels to evaporate water and extra energy consumption of fuels and chemicals just to recover Phosphorus from ashes is not a sustainable way to reduce GHG. It's just necessary if the wastewater and the resulting sludge is too contaminated for the use on land or if marketing driven restrictions do not allow the use of stabilized and/or composted sludge which fulfills legal requirements for use on land.

Links to evidence:

1000 character(s) maximum

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Please select the elements of the activity to which you would like to provide feedback:

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Water, Waste and Sewerage remediation - Separate collection and transport of non-hazardous waste in source segregated fractions

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- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

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Therefore, the Action Plan to finance sustainable growth is an important indicator for financing investors. The separate collection of waste plays a major role for optimum recycling. Therefore, the share of organic waste in residual waste bins should be minimized. The organic fraction needs to be collected separately and treated in composting resp. biogas plants in order to avoid methane losses. Moreover, decentralized compost resp. biogas plants help to decrease logistical efforts on both sides: the collection of organic waste and the distribution of compost and digestate as fertilizer. The major share of material for anaerobic digestion is not bio-waste. The co-digestion with manure, agricultural residues and/or energy crops is to be recommended. The biological process can be stabilized and periods with poor quality or little quantity of organic waste can be compensated. Digestate is a fertilizer, which not has to be treated. A distribution in nearby farmland should be favored. The preference of composting or anaerobic digestion is not a technical problem, but an economical. In both technics, a stable quantity of over 20,000 tpa is not a criterion for economic feasibility. In Austria, there are a lot of biogas resp. composting plants with an annual capacity of about 2,000 tpa. An example shows, that dry fermentation installations with a treatment capacity of 1.500 tpa in combination with a composting plant are viable. Therefore, the rule of thumb with 20,000 tpa abdicable, because dependent to local conditions.

The operation of an AD plant may lead to emissions, when highest standards, given by legislation or QAS (quality assurance standards, e.g. <https://www.compostnetwork.info/>), are not fulfilled.

The digestate from liquid fermentation systems is typically used on farmland as organic fertilizer, directly or after dewatering and a composting step. The digestate from dry fermentation systems is comparable with unmaturred compost and is to be treated in a composting plant for maturation anyway.

Links to evidence:

1000 character(s) maximum

Water, Waste and Sewerage remediation - Anaerobic digestion of bio-waste

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- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

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Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

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Therefore, the Action Plan to finance sustainable growth is an important indicator for financing investors. The separate collection of waste plays a major role for optimum recycling. Therefore, the share of organic waste in residual waste bins should be minimized. The organic fraction needs to be collected separately and treated in composting resp. biogas plants in order to avoid methane losses. Moreover, decentralized compost resp. biogas plants help to decrease logistical efforts on both sides: the collection of organic waste and the distribution of compost and digestate as fertilizer. The major share of material for anaerobic digestion is not bio-waste. The co-digestion with manure, agricultural residues and/or energy crops is to be recommended. The biological process can be stabilized and periods with poor quality or little quantity of organic waste can be compensated. Digestate is a fertilizer, which not has to be treated. A distribution in nearby farmland should be favored. The preference of composting or anaerobic digestion is not a technical problem, but an economical. In both technics, a stable quantity of over 20,000 tpa is not a criterion for economic feasibility. In Austria, there are a lot of biogas resp. composting plants with an annual capacity of about 2,000 tpa. An example shows, that dry fermentation installations with a treatment capacity of 1.500 tpa in combination with a composting plant are viable. Therefore, the rule of thumb with 20,000 tpa abdicable, because dependent to local conditions.

The operation of an AD plant may lead to emissions, when highest standards, given by legislation or QAS (quality assurance standards, e.g. <https://www.compostnetwork.info/>), are not fulfilled.

The digestate from liquid fermentation systems is typically used on farmland as organic fertilizer, directly or after dewatering and a composting step. The digestate from dry fermentation systems is comparable with unmaturred compost and is to be treated in a composting plant for maturation anyway.

Links to evidence:

1000 character(s) maximum

Water, Waste and Sewerage remediation - Composting of bio-waste

*When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the *Technical report on Taxonomy*.*

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

I f y e s , w h y a n d h o w ?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Sustainable finance is a very important issue regarding to investments in sustainable projects and to increase sustainable production. Renewable energy and circular economy help reaching the EUs ambitions, decreasing dependency on energy and raw materials imports. Therefore, the improvement of infrastructure in the areas of renewable energy production and circular economy is the basic prerequisite for economic growth and wealth creation. Especially existing small and medium-sized enterprises and private persons, starting up small companies help to counteract the current structural change and contribute to the diversity and the economic potential of rural areas.

Therefore, the Action Plan to finance sustainable growth is an important indicator for financing investors. The separate collection of waste plays a major role for optimum recycling. Therefore, the share of organic waste in residual waste bins should be minimized. The organic fraction needs to be collected separately and treated in composting resp. biogas plants in order to avoid methane losses. Moreover, decentralized compost resp. biogas plants help to decrease logistical efforts on both sides: the collection of organic waste and the distribution of compost and digestate as fertilizer. The major share of material for anaerobic digestion is not bio-waste. The co-digestion with manure, agricultural residues and/or energy crops is to be recommended. The biological process can be stabilized and periods with poor quality or little quantity of organic waste can be compensated. Digestate is a fertilizer, which not has to be treated. A distribution in nearby farmland should be favored. The preference of composting or anaerobic digestion is not a technical problem, but an economical. In both technics, a stable quantity of over 20,000 tpa is not a criterion for economic feasibility. In Austria, there are a lot of biogas resp. composting plants with an annual capacity of about 2,000 tpa. An example shows, that dry fermentation installations with a treatment capacity of 1.500 tpa in combination with a composting plant are viable. Therefore, the rule of thumb with 20,000 tpa abdicable, because dependent to local conditions.

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Links to evidence:

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Transport - Infrastructure for low carbon transport

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

Please note that if you propose new boundaries, metrics or thresholds for an activity, you are requested to also provide additional information on the Do No Significant Harm

assessment that might be affected by your proposal.

Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Biomethane has a lot of advantages, in particular at CO₂, NO_x or PM. Therefore, the usage of biomethane at the transport sector needs to be boosted. The engine technology is well developed, but the expansion of CNG filling stations is required. In this sense, the allocation of biomethane to filling stations by 100% is a vital measure for low emissions at the transport sector.

Links to evidence:

1000 character(s) maximum

Transport - Passenger cars and commercial vehicles

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
- Metric for substantial contribution criteria
- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

I f y e s , w h y a n d h o w ?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Biomethane has a lot of advantages, in particular at CO₂, NO_x or PM. Therefore, the usage of biomethane at the transport sector needs to be boosted. The engine technology is well developed, but the expansion of CNG filling stations is required. In this sense, the allocation of biomethane to filling stations by 100% is a vital measure for low emissions at the transport sector.

Links to evidence:

1000 character(s) maximum

Transport - Freight transport services by road

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the [Technical report on Taxonomy](#).

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Please select the elements of the activity to which you would like to provide feedback:

- Boundary of the activity
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- Threshold for substantial contribution criteria
- Do no significant harm criteria
- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

If yes, why and how?

Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

Biomethane has a lot of advantages, in particular at CO₂, NO_x or PM. Therefore, the usage of biomethane at the transport sector needs to be boosted. The engine technology is well developed, but the expansion of CNG filling stations is required. In this sense, the allocation of biomethane to filling stations by 100% is a vital measure for low emissions at the transport sector.

The further development of biomethane to Bio-LNG is rather necessary to secure the reduction of emissions at the road and water transport sector.

Links to evidence:

1000 character(s) maximum

Transport - Interurban scheduled road transport

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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- Threshold for substantial contribution criteria
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3. Should the threshold be different?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

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Links to evidence:

1000 character(s) maximum

Transport - Inland passenger water transport

When responding to these questions please refer to the requirements for technical screening criteria as outlined in Article 14 of the [proposed Taxonomy regulation](#) and the principles for developing criteria as used by TEG and explained in the Technical report on Taxonomy.

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- International applicability of activity criteria

3. Should the threshold be different?

- Yes
- No

If yes, why and how?
Please provide a brief rationale for the proposed change as well as links to published journals or articles as evidence.

Explanation:

3000 character(s) maximum

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The further development of biomethane to Bio-LNG is rather necessary to secure the reduction of emissions at the road and water transport sector.

Links to evidence:

1000 character(s) maximum

Transport - Inland freight water transport

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Threshold for substantial contribution criteria

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1. Do you consider that the qualitative criteria for adaptation apply equally to all sectors?

- Yes
- No
- Don't know / no opinion / not relevant

Please explain your answer:

2000 character(s) maximum

2. Should the qualitative criteria be different?

- Yes
- No
- Don't know / no opinion / not relevant

3. Are the illustrative templates provided in the Technical report useful for indicating the potential application of the criteria?

- Yes
- No
- Don't know / no opinion / not relevant

Please explain what other information would be useful:

3000 character(s) maximum

4. Would any additional data or tools would improve the usability of the Adaptation qualitative screening criteria?

- Yes
- No
- Don't know / no opinion / not relevant

Are there areas of potential harm that TEG should consider for DNSH criteria for the activities that make a substantial contribution to adaptation objectives?

- Yes
- No
- Don't know / no opinion / not relevant

1. Do you expect to use the Taxonomy in your business activities in the short term (1-3 years) or long term (4 years or more)?

- Yes
- No
- Don't know / no opinion / not relevant

2. Can the Taxonomy be made more useful for disclosures related to your specific financial product? This question covers only financial products where disclosure obligations are foreseen by the Taxonomy proposal.

- Yes
- No
- Don't know / no opinion / not relevant

3. Can the Taxonomy be made more useful for your investment decisions in different asset classes?

- Yes
- No
- Don't know/no opinion/not relevant

4. Is it sufficiently clear when the entire activities of a company or other entity should be considered as Taxonomy eligible (revenues or turnover) and when only expenditures by companies or other entities should be considered Taxonomy eligible?

- Yes
- No
- Don't know / no opinion / not relevant

5. What practical tools or measures could be developed to facilitate the implementation of the taxonomy by financial actors?

Please specify what these tools would be used for and provide sufficient explanation on how they can help to implement the taxonomy:

2000 character(s) maximum

6. What practical tools or measures could be developed to help non-financial companies assess what share of their economic activities is taxonomy-eligible?

3000 character(s) maximum

1. What economic activities that can make a substantial contribution to the climate change mitigation objective should next be considered for the Taxonomy?

3000 character(s) maximum

2. Should any of the economic activities included in the Technical report be reconsidered as regards their inclusion in the taxonomy?

- Yes
- No
- Don't know / no opinion / not relevant

3. For what economic activities should an illustrative template for substantial contribution to climate change adaptation be developed next?

3000 character(s) maximum

Useful links

[More on EU taxonomy \(https://ec.europa.eu/info/publications/sustainable-finance-teg-taxonomy_en\)](https://ec.europa.eu/info/publications/sustainable-finance-teg-taxonomy_en)

[Technical report on EU taxonomy \(https://ec.europa.eu/info/files/190618-sustainable-finance-teg-report-taxonomy_en\)](https://ec.europa.eu/info/files/190618-sustainable-finance-teg-report-taxonomy_en)

[Supplementary report on using the taxonomy \(https://ec.europa.eu/info/files/190618-sustainable-finance-teg-repo-using-the-taxonomy_en_en\)](https://ec.europa.eu/info/files/190618-sustainable-finance-teg-repo-using-the-taxonomy_en_en)

[Specific privacy statement \(https://ec.europa.eu/info/files/190705-sustainable-finance-teg-report-taxonomy-privac-statement_en\)](https://ec.europa.eu/info/files/190705-sustainable-finance-teg-report-taxonomy-privac-statement_en)

Contact

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