



19 April, 2021

Executive Vice-President Timmermans
Commissioner McGuinness
Commissioner Simson

Chef du Cabinet Samson
Chef du Cabinet Power
Chef du Cabinet Grassi

Deputy Chef du Cabinet Nelen
Deputy Chef du Cabinet De Basaldua
Deputy Chef du Cabinet Kadarik

Dear Executive Vice-President, Commissioners, Chefs du Cabinet and Deputy Chefs du Cabinets

Urgent correction required to renewable geothermal energy in the upcoming Taxonomy proposal Delegated Act Annex 1 on Climate Change Mitigation

We welcome your efforts to establish a fair and equitable Taxonomy proposal.

However, in the latest draft, geothermal energy is the only renewable energy singled out for a Life Cycle Assessment putting it at a significant disadvantage to all other renewable technologies and relegating it to a status almost as bad as a fossil fuel.

Evidently, this is a clerical error as geothermal energy is a renewable energy technology recognised in the Renewable Energy Directive. The draft proposal in March 2021 granted geothermal energy the same technical screening criteria on "*Substantial contribution to climate change mitigation*" and status awarded to all other renewable energy solutions. We urge you to correct this error prior to the launch of the proposal so that we can support you in seeking its approval.

To facilitate matters, we have highlighted the specific changes and the sections in which they must be made:

- **Electricity:** Section 4.6 (page 79) – Insert "*The activity generates electricity from geothermal energy*".
- **Cogeneration:** Section 4.18 (page 100) – Insert "*The activity consists in the cogeneration of electricity and heat/cool from geothermal energy*".
- **Heating and cooling:** Section 4.22 (page 106) – Insert "*The activity produces heat/cool using geothermal energy*".

The table below outlines the history of changes and the clerical error between the draft in March and the current edition.

Consultation on the DA, November 2020	Draft EC proposal (March 2021)	Draft EC proposal (19/04/2021)
Life-cycle GHG emissions from the generation of electricity from geothermal energy are lower than 100gCO ₂ e/kWh. Life-cycle GHG emission savings are calculated using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party.	The activity generates electricity from geothermal energy. /// The activity produces heat/cool using geothermal energy	Life-cycle GHG emissions from the generation of electricity from geothermal energy are lower than 100gCO ₂ e/kWh. Life-cycle GHG emission savings are calculated using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party.

We thank you in advance for correcting this error and look forward to working with you to ensure a successful Green Deal and Taxonomy proposal.

Yours sincerely



European Geothermal Energy Council