

From: [REDACTED] (CAB-VON DER LEYEN)
Sent: jeudi 15 avril 2021 10:55
To: CAB VON DER LEYEN ARCHIVES
Cc: [REDACTED] (CAB-VON DER LEYEN); [REDACTED] (CAB-VON DER LEYEN)
Subject: Letter on taxonomy from Prime Ministers of Finland and Sweden
Attachments: 2021-04-15 FINAL FI SE letter to Com President.docx

Dears,

Please register.

[REDACTED]

From: [REDACTED] [@vnk.fi](mailto:[REDACTED]@vnk.fi) [REDACTED] [@vnk.fi](mailto:[REDACTED]@vnk.fi)>
Sent: Thursday, April 15, 2021 10:26 AM
To: SEIBERT Bjoern (CAB-VON DER LEYEN) [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu); [REDACTED] (CAB-VON DER LEYEN) [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: [REDACTED] (CAB-VON DER LEYEN) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] (CAB-VON DER LEYEN) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Subject: Letter on taxonomy from Prime Ministers of Finland and Sweden

Dear [REDACTED] [REDACTED]

Please find enclosed a joint letter on taxonomy from Prime Minister Sanna Marin and Prime Minister Stefan Löfven.

Best regards,

[REDACTED]

[REDACTED]

Prime Minister's Office, Helsinki

[REDACTED]
[@vnk.fi](mailto:[REDACTED]@vnk.fi)



Helsinki and Stockholm 15th April 2021

President of the European Commission
Ms Ursula von der Leyen
Brussels

Dear President von der Leyen, dear Ursula,

We welcome the Commission's efforts in drafting the technical screening criteria for taxonomy and want to continue a dialogue in order to contribute to an outcome that creates a stable investment and operating environment. Forestry continues to be among our key economic sectors. This is why we have put so much effort into sustainable forest management that supports a holistic approach, combining climate and biodiversity goals and the economy. To enable the multiuse of forests also in the future we continue to stress that existing tools should be fully utilised when designing the screening criteria.

Although we believe that the revised draft delegated act presented in the MSEG on 24 March is a step in the right direction, especially the revised description of the activity and the removal of the additionality requirement, most of the problems pointed out by Finland, Sweden and 10 other member states in their letter on Forestry of 5 February remain. For example, the criteria still do not stay true to the recast renewable energy directive (REDII) and still creates disproportionate administrative burdens.

We are still concerned that the taxonomy will not fulfil its purpose and may even be, in some cases, counterproductive. Increased administrative burdens without any real benefit for the climate would create adverse incentives for forest-owners and bioenergy investors. The requirements on Forestry are far more extensive and detailed than other complex activities in the taxonomy. We question this from the point of view of proportionality.

We are also concerned with the fact that the Commission has introduced divergencies in technical criteria in the proposed delegated act vis-a-vis existing EU legislation, creating double standards. The legal ground for the proposed delegated act empowers the Commission to adopt delegated acts that "supplement" the regulation. The Commission's power to adopt delegated acts cannot therefore change the essential elements of the law. Additionally, such proposals would be contrary to and go beyond the scope of the Regulation, which states that the technical screening criteria shall be in line with REDII.

Many of the concerns we have had in relation to the first draft of the delegated act remain. In view of this, we would want to see the following changes made to the revised draft delegated act:

Forestry

- Full alignment with REDII. To achieve this, further changes, not least to the climate benefit analysis and the Do no significant harm (DNSH) criteria are needed.
- Extending the use of REDII forest management criteria, in the context of taxonomy, to all forestry activities, does not mean status quo but an ambitious step further in their application.
- Less detailed provisions for the forest management plans.
- A realistic permanence requirement. We remain supportive of the proposal put forward by 12 member states on 5 February.
- The DNSH should not go beyond existing EU legislation. In relation to Forestry, we want the concept close-to-nature forestry to be deleted. A possible solution to the issue of close-to-nature forestry, and other concepts related to the strategy on biodiversity, would be to remove them from this version of the delegated act and include them in a future revision of the DA when the current ongoing work on definitions and criteria related to the implementation of the strategy on biodiversity has been completed and agreed on.

Bioenergy and hydropower

- On bioenergy, it is important to bring the criteria in line with RED II.
- Concerning hydropower the screening criteria should be designed in such a way that they do not go beyond the requirements for an individual hydropower plant set out in the Water Framework Directive (2000/60/EC) and in the Habitats Directive (92/43/EEC). The proposed criteria still go beyond existing legislation in terms of the requirements on certain types of power plants.

We trust that the Commission will give due consideration to these concerns when finalising the technical criteria. We look forward to continuing the dialogue with you on these matters.



Sanna Marin
Prime Minister of Finland



Stefan Löfven
Prime Minister of Sweden

cc Executive Vice-President Mr Frans Timmermans
Executive Vice-President Valdis Dombrovskis
European Commissioner Ms Mairead McGuinness