

From: [REDACTED]
Subject: RE: Delegated acts - Taxonomy - IOGP Position Paper
Date: mardi 8 décembre 2020 12:41:41
Attachments: [IOGP position paper on the Delegated acts implementing the Taxonomy Regulation - 7 December 2020.pdf](#)

Thanks for your comments.

From: [REDACTED]@iogp.org>
Sent: Tuesday, December 8, 2020 12:38 PM
To: [REDACTED]
Subject: Delegated acts - Taxonomy - IOGP Position Paper

Dear [REDACTED],

On behalf of the International Association of Oil & Gas Producers (IOGP), I would like to share with you our comments to the first Delegated Regulation (on Climate Change Mitigation and Adaptation) stemming from the EU Taxonomy Regulation.

The International Association of Oil & Gas Producers' (IOGP) member companies account for approximately 90% of oil and gas produced in Europe. IOGP supports the goals of the Paris Agreement and the EU's objective of climate neutrality by 2050 supported by adequate policies. One of them is a well-designed and inclusive sustainable finance framework.

We welcome the EU's efforts to establish a set of coherent and consistent policy tools that will stimulate private investments required for projects and technologies aimed at reducing greenhouse gas (GHG) emissions and support the transition to a sustainable future. Access to finance is critical for those investments and thus to maintain European competitiveness.

IOGP congratulates the European Commission for the progress made in establishing a taxonomy for sustainable investments and appreciates the opportunity to provide this input which is attached to this email.

However, we are concerned by the lack of own dedicated technical screening criteria for the transitional activities. The technical screening criteria for transitional activities should indeed be realistic and avoid excluding investments in necessary transition solutions. For example, natural gas should have a dedicated threshold, above the current 100gCO₂e/kWh, to reflect its role to facilitate an affordable and fair energy transition by enabling a shift away from coal in power generation and heating. Furthermore, the Delegated Regulation should seek to be consistent with Article 19.1(a) of the Taxonomy Regulation, which highlights that the technical screening criteria should respect the principle of technological neutrality.

We hope you find this information useful and you will take it into due consideration for any possible changes.

We would be happy to discuss our proposal with you and your colleagues as appropriate and if additional clarifications are needed.

Stay safe and healthy!

Yours sincerely,

[REDACTED]
