

## Joint statement: **ensure consistency between REDII sustainability criteria and the sustainable finance taxonomy**

**Bioenergy Europe, ePURE and the European Biogas Association**, representing the voice of sustainable bioenergy in Europe, would like to express their general support on the proposal for a sustainable finance taxonomy which will be key to foster investments in renewable energy, such as bioenergy.

We would like to call your attention on the importance of ensuring consistency of the sustainable finance taxonomy with existing legislation such as the RED II and its sustainability and greenhouse gas emission saving criteria.

According to Article 6 of the Commission proposal on the establishment of a framework to facilitate sustainable investment<sup>1</sup>, “*generating, storing or using renewable energy*” is considered to be a substantial contribution to climate change mitigation. It should be therefore ensured that bioenergy considered sustainable and thus renewable under Article 29 of the Renewable Energy Directive is considered sustainable and renewable under the sustainable finance taxonomy as well.

The sustainable finance taxonomy, essentially developed by delegated acts, has to follow the EU hierarchy of norms. Delegated acts (and recommendations from the Technical Expert Group) are not the appropriate place to modify essential elements of primary legislative acts. This is why, when developing the metrics, existing provisions in legal acts should be prior to initiatives of private sector organisations (e.g. on greenhouse gas calculation methods).

A coherent policy framework is key to achieve the main objective of the sustainable finance package which is to facilitate investments in sustainable economic activities, such as bioenergy. Inconsistencies between the Renewable Energy Directive and the sustainable finance taxonomy could on the contrary lead to investor uncertainty and blockages in the implementation of the sustainability criteria for bioenergy which could ultimately put at risk the EU’s ability to reach the renewable energy target.

**The undersigning organisations therefore call upon the members of the Technical Expert Group to ensure consistency between the Renewable Energy Directive and their recommendations on bioenergy for the sustainable finance taxonomy.**

**Bioenergy Europe**

**European Biogas Association (EBA)**

**ePURE (European Renewable Ethanol)**

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<sup>1</sup> Proposal for a regulation of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment (COM(2018) 353 final)