**GUIDELINE FOR TAXONOMY CONSULTATION**

The consultation refers to the environmental criteria we have been working on in the last months. The feedback through the consultation will be taken into account by the Platform on Sustainable Finance for its final report. The final report will form the basis for the Delegated Act on the remaining environmental objectives.

Platform draft criteria **✓** 🡪 **public consultation** 🡪 final report by Platform 🡪 draft delegated act 🡪 public consultation 🡪 final delegated act 🡪 scrutiny period for European Parliament and Council

**The consultation will run from 3 August to 24 September and can be accessed from this** [**link**](https://ec.europa.eu/info/publications/210803-sustainable-finance-platform-technical-screening-criteria-taxonomy-report_en)**.**

FIEC itself will not contribute to the public consultation as we directly drafted the criteria.

We need your feedback from the national perspective to support or improve the drafted criteria. Although you have given input to us in the last months, it is worth providing the evidence again. Providing it through the public consultation will give it more weight, will make it “official” and will help to counter NGOs.

Please also bear in mind that you had the opportunity to be involved in the drafting of the criteria in the last months. While your input is needed, completely disagreeing the criteria we presented would put FIEC’s credibility in the Platform at risk. Apart from the criteria on biodiversity, adaptation and those for flood protection, FIEC has been deeply involved or was leading the drafting process.

**For the feedback to be taken into account it must be evidence based. General comments or political statements cannot be considered.** Please consider that the EU Taxonomy criteria for substantial contribution aim for a high level of ambition. For example, simple compliance with legal obligation is considered not being sufficiently ambitious.

We invite you to comment on all the criteria for all the construction activities but in particular on the points mentioned below:

Use rate of 30% for recycled/re-used materials (RCM)

* Bear in mind that there were discussions whether one should have a 50% target
* Provide evidence that supports or contradicts the 30% such as national targets, requirements in national legislation, availability, demand for materials vs. supply of RCM, demand for materials vs. generation of waste, new constructions vs. renovations/demolitions
* Support the caveats/conditions for the use of RCM
  + Provide examples of standards etc. showing technical limits for the use of RCM (e.g. for structural elements)
  + Illustrate the lack of infrastructure which could require large transport distances; illustrate with studies where the use of RCM can result in larger CO2 emission than the use of virgin materials

Recycling/re-use rate of 90% for construction and/or demolition waste

* Provide evidence that supports or contradicts the 90% (rates at national level and rates at project/company level if available)/explain why we cannot go higher than 90%
* NGOs will propose a recycling rate for hazardous waste 🡪 please provide corresponding figures if there are any or express that there is no data available
* NGOs will propose a specific re-use rate for waste 🡪 please provide corresponding figures if there are any or express that there is no data available

Maintenance activities

* Support the inclusion of maintenance and illustrate the importance of maintenance for the circular economy, i.e. material savings, lifetime extension
* Provide evidence that supports or contradicts a 100% recycling/re-use for waste generated through the demolition of main road elements (e.g. 100% recyclability of asphalt or concrete)
* For bridges and tunnels: Can we add a criterion that defines the lifetime extension (by 10 years e.g.) to be achieved?