Sustainable EU taxonomy should be based in environmental science and exclude SHPPs

An EU Sustainable Taxonomy must be produced that is based on scientific evidence, supports fully sustainable economic activities, accelerates the shift from unsustainable to sustainable activities, truly reduces the risk of greenwashing, and is aligned with the European Green Deal's ambitions. The EU Sustainable Economy must exclude small hydro and reject the idea that all forest biomass may be burned as feedstock.

The global climate strikes have consistently made a simple demand: listen to the science. We agree. Just as experts and evidence have been key assets in addressing the COVID-19 pandemic, so too must they, and not sectoral interests, determine our policies to fight the climate crisis. WWF Central and Eastern Europe, along with a coalition of NGOs, think-tanks, experts and scientists, representing millions of citizens in Europe and the global South stress our strong support for an EU Sustainable Taxonomy rooted in climate and environmental science. This is why we would like to voice substantial concerns that the European Commission's draft Delegated Act on the EU Sustainable Taxonomy (DA) has ignored or weakened the recommendations of the Commission's Technical Expert Group's (TEG) scientific advice for several activities, including recommendations on hydropower. Specifically, the draft DA does not follow the TEG recommendation that "construction of small hydropower (<10MW) should be avoided." An excessive number of hydropower plants, including many small ones, already heavily disrupt freshwater ecosystems, and the benefit of new hydropower in transitioning to carbon neutrality is negligible. "With the falling price of wind and solar, governments should explore other alternative renewable energy sources to fulfil energy needs in Central and Eastern Europe beyond damming rivers," says Irene Lucius, Regional Conservation Director, WWF Central and Eastern Europe. Moreover, 33% of all planned hydropower in the EU is in protected areas. For example, there are two hydropower projects threatening Natura 2000 sites in Romania: one in Defileul Jiului National Park and the other in Răstolița.

"One of the primary drivers of the decline of freshwater biodiversity in the Danube basin are dams and other water infrastructure that impact the natural habitats of freshwater species like Danube sturgeons, Danube salmon and other fish, otters, and thousands of other species in the region." – Irene Lucius, WWF-CEE

Populations of freshwater vertebrates (mammals, wetland birds, reptiles, amphibians, and fish) have seen an 83% decline between 1970 and 2014 globally. Mega-fish such as Beluga sturgeon (Huso huso), that used to reach record lengths of 7m are particularly vulnerable. Of the six sturgeon species previously present in the Danube Basin, two are already considered extinct.

Furthermore, the draft delegated act on the EU Sustainable Taxonomy has chosen to accept

that all forest biomass – wood sourced directly from forests – may be burned as feedstock. As it stands, the draft DA also accepts that almost any activity that is aligned with the flawed Renewable Energy Directive is counted as sustainable, including the use of dedicated cropland. This is completely unscientific. It contradicts all recent authoritative scientific research and the European Commission's own impact assessment on bioenergy. That impact assessment stated that the idea that forest biomass can mitigate climate change is extremely problematic, and acknowledged that demand for forest biomass is hindering EU forests' ability to act as a carbon sink and threatening the integrity of biodiversity-rich forests in Central and Eastern Europe. The Commission should reverse its decision to classify the burning of all forest biomass for energy as sustainable, and exclude from eligibility all bioenergy feedstocks that increase emissions compared to fossil fuels, including purpose-grown crops.
Source: wwfcee.org