



July 5th, 2022

Subject: Vote in Plenary about the Commission's Complementary Climate Delegated Act, Amending the EU Taxonomy

Dear Member of the European Parliament,

CIDSE, the Jesuit European Social Centre (JESC) and the Laudato Si' Movement, are calling on you to **reject the EU Taxonomy Complementary Climate Delegated Act** (hence, CCDA) in this week's vote at the European Parliament.

The inclusion of gas and nuclear energy would seriously compromise the integrity of the EU Taxonomy, by passing legislation without proper public or expert consultation, by disregarding the scientific consensus on climate change, and by increasing the risk of creating stranded assets or a carbon 'lock-in', further jeopardising an already fragile sustainable future.

Inspired by the Encyclical Letter [Laudato Si'](#) and guided by its Integral Ecology vision - whereby we are called to care for our Common Home and protect the present and future generations - our organisations have joined forces to raise a strong voice on this matter. Furthermore, climate and energy policies must include a social justice dimension. In the absence of socially just policies, the most vulnerable will suffer from adverse social effects. As Pope Francis has noted, a link exists between environmental and social challenges: "a true ecological approach always becomes a social approach; it must integrate questions of justice in debates on the environment, to hear both the cry of the earth and the cry of the poor" (LS 49). Limiting global temperature rise to 1.5°C and reversing nature loss are prerequisites to achieving sustainable development as both the climate and biodiversity crises are closely interlinked and require integrated policy responses. Therefore, the EU Taxonomy, as an implementing tool of the Green Deal, should align with the Paris Agreement, the Convention on Biological Diversity and the Agenda 2030 as guided by science and equity.

Here are our concerns:

- **Disregard for experts' opinions**: the criteria used to classify gas and nuclear energy as "green" **are not consistent** with the findings and recommendations of the EU Platform on Sustainable Finance and of the Technical Expert Group. **This represents a threat to the credibility of the taxonomy** and, more broadly, to the **EU's climate leadership**.
- **Inconsistency with the level 1 taxonomy regulation**: according to an assessment carried out by WWF and [ClientEarth](#) the following inconsistencies have been highlighted:
 - Six breaches of Article 10 (2) on the definition of transitional activities
 - Multiple breaches of the requirement to avoid stranded assets and inconsistent incentives for investing sustainably (Art 19 (1) (i))
 - Four breaches of the technological neutrality requirement (Art 19 (1) (a))
 - Breach of the requirement to use lifecycle emissions (Art 19 (1) (g))
 - Multiple breaches of the requirement to treat activities equally within a specific sector (Art 19 (1) (j))
 - Four breaches of the requirement for science-based criteria (Art 19 (1) (f))

In addition, the current text contains no sufficient provisions about the treatment of nuclear waste;



- Disregard for the required democratic process. The European Parliament has not been duly consulted by the European Commission before the publication. The Commission also refused the Parliament's demand to conduct an impact assessment on the effects of the CCDA and has not engaged in public consultations, while this was done for the [Climate Delegated Act](#) in 2020. This could lead to a breach of EU law, with possible legal consequences;
- Lack of policy coherence: the current text of the CCDA is inconsistent with the objectives of REPowerEU. REPowerEU is aimed at ending the EU's dependence on Russian fossil fuels. However, the CCDA would trigger additional gas consumption, clearly not helping with energy diversification, in stark opposition to the RePowerEU's goals;
- Negative effects on the most vulnerable households in Europe: labelling gas and nuclear power as "green" is misleading, does not take into consideration externalities, and will give investors *carte-blanche* to maintain a business-as-usual attitude. As we know, **fossil gas is nowadays the main cause of the energy crisis in Europe**, and its price is only expected to increase, becoming unaffordable for poorer households. As we are reminded in Laudato Si' para. 26: "*There is an urgent need to develop policies so that, in the next few years, the emission of carbon dioxide and other highly polluting gases can be drastically reduced, for example, substituting for fossil fuels and developing sources of renewable energy.[...]*"; the current text risks further exacerbating social inequalities and creating unfair competition against renewable energy sources on financial markets;
- An issue of climate and intergenerational justice: Nuclear power is a socially, environmentally, and economically unsustainable energy source because it cannot deliver a fair and long-term transition. Also, nuclear power technologies increase economic and systemic inequalities, and raise high concerns about the safety and environmental risks associated with nuclear energy generation and waste. Labelling gas as "green" ignores the **urgency of climate change**, it will foster new investments at a favourable rate, with a potential increase of production and corresponding increasing levels of GHG emissions. This will shift the burden of reducing GHG emissions to future generations and to other regions in the world. As outlined in the Lisbon Treaty (Article 208) and Agenda 2030 (SDG 17), EU policies should not harm partner countries' development objectives in the Global South, in particular through land-use change and unsustainable resource extraction. Decreasing our consumption would put less pressure on natural resource extraction from the Global South, freeing up resources for the development of the crucial renewable energy sector and infrastructure and energy access.
- A missed opportunity: as we are reminded in Laudato Si' para 165. "[...] *Politics and business have been slow to react in a way commensurate with the urgency of the challenges facing our world. [...]*" Labelling power and heating generated by gas and nuclear power plants as "green" by European leaders would be a **clear example of the slow reaction** humanity and the planet can no longer afford.

For the reasons above, and within our overall call for a truly ecological transition, **we ask you to reject the current text at the upcoming vote on Wednesday in Strasbourg.**

Many thanks in advance.

Sincerely,

for CIDSE

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Secretary general

for JESC

Peter Rožič SJ
Director

for Laudato Si' Movement

Laura Morosini
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ABOUT US

CIDSE is an international family of Catholic social justice organisations working for transformational change to end poverty and inequalities, challenging systemic injustice, inequity, destruction of nature and promoting just and environmentally sustainable alternatives.

JESC is a work of the Jesuit Conference of European Provincials expressing the commitment of the Society of Jesus to a Europe where human rights, freedom and solidarity are the foundation of integration. Its core mission is to reflect on the life, policies and practice of the European Union, seeking an engagement which authentically expresses Christian faith, remains close to the poor and marginalised, analyses social reality and advocates for justice in Europe.

LSM is a catholic movement created in 2015 to inspire and mobilize catholics to care for our Common home and achieve climate and ecological justice. LSM is driven by the Encyclical letter from Pope Francis Laudato Si'. LSM gathers more than 800 catholic organisations around the world.