

TO: DG FISMA

Copy: DG ENV and DG ENER, Norwegian Ministry of Finance, Norwegian Ministry of Energy,
Norwegian Ministry of Climate and Environment

Oslo, 14 April 2026

Input to draft EU taxonomy climate delegated act

On behalf of Renewables Norway we submit our feedback on the [draft changes](#) in the EU taxonomy delegated act. We organise the hydropower producers in Norway. Hydropower constitutes the backbone of Norway's electricity system, and the EU taxonomy plays a vital role in enabling sustainable financing and guiding investments toward environmentally sound activities.

In the press release from the Commission regarding The Environmental Omnibus package dated Dec 10, 2025 we read that the proposed changes will *"contribute to reducing the administrative burden for businesses, while keeping the EU's ambitious objectives to protect the environment and human health. It will accelerate and streamline permitting processes for all projects, in particular in strategic sectors"*. Renewables Norway support these objectives and will underline the need for clarification in the taxonomy requirements and need for alignment with existing legislation. It is imperative that the taxonomy, as a central instrument to underpin Europe's green transition, gives equal treatment to renewable energy technologies.

We welcome the Commission's initiative to simplify the Taxonomy Delegated Act. However, we are concerned that the draft DNSH-3 criteria applicable to hydropower does not deliver the intended alignment with the Water Framework Directive (WFD). The draft does not take into account the less stringent objectives in the WFD and introduces additional requirements which are not aligned with the WFD. Less stringent objectives (LSO) are an integral part of the WFD, in line with the objectives of good ecological status and good ecological potential. LSOs can only be used if stringent conditions are met. Even where LSOs are allowed, the objectives must represent the highest achievable status and the deviation from good status must be as small as possible.

We fully agree with the assessment in preamble 24 : *"Given that Directive 2000/60/EC of the European Parliament and of the Council provides robust safeguards for hydropower activities, the 'Do No Significant Harm' criteria for sustainable use and protection of water and marine resources for energy generation from hydropower should be simplified and aligned with those safeguards."* This is in line with our input in the call for evidence in 2025. We would however like to point to that the DNSH-3 criteria for hydropower in annex II is not in line with the intention in the statement in the preamble. We suggest that the DNSH-3 criteria for hydropower is simplified by a direct reference to the WFD, with no further amendments. This will avoid adding requirements which differ from the existing legislation. Direct pointers should be favoured over text replication so that the requirements will be updated automatically. Based on this, we suggest keeping the first paragraph in the current DNSH-3 criteria for hydropower: *"The activity complies with the provisions of Directive 2000/60/EC, in particular with all the requirements laid down in Article 4 of the Directive."*

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Full alignment with the existing legislation is necessary to bring real simplification. The best way to ensure that activities are considered DNSH-compliant is when they comply with existing legislation. When recognised standards already exist, these should be accepted as evidence of compliance with the DNSH principle. For hydropower, the WFD provides such robust safeguards.

Kind regards,

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Director Hydropower