

## Aotearoa New Zealand Sustainable Finance Taxonomy (NZ Taxonomy) Energy criteria public consultation survey questions – June 2026

\*: Denotes a required field.

*Red text:* Provides functionality explanations and will not be text in the survey.

1. **Full name\***

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2. **Email address\***

You may be contacted in relation to your submission, or to receive updates on this consultation and process.

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3. **Do you represent your organisation's collective view or your personal view?\*** *(single-choice)*

I represent my organisation's collective view

I represent my personal view

4. *(If representing organisation's collective view)* **Organisation\***

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5. *(If representing organisation's collective view)* **Position held**

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6. **Which component(s) of the Taxonomy would you like to comment on? Please select all that apply.\*** *(multiple-choice)*

Climate change mitigation Substantial Contribution (SC) criteria

Climate change adaptation and resilience (A&R) Whitelist

Activity-specific Do No Significant Harm (DNSH) criteria

Guidance on the role of fossil gas generation activities in a credibly transitioning portfolio

7. **Please select the area(s) that best match your expertise:\*** *(multiple-choice)*

Finance (including sustainable finance)

Insurance

Energy

Environmental NGO

Academia

- Legal
- Government
- Other (please specify) \_\_\_\_\_

## Energy sector climate change mitigation Substantial Contribution (SC) criteria

*The climate change mitigation Substantial Contribution (SC) criteria set out the thresholds and requirements an economic activity or measure must meet to be considered as making a substantial contribution to the climate change mitigation objective.*

*In this consultation, we are seeking feedback on the criteria, particularly regarding their suitability for achieving the purpose of the NZ Taxonomy, as well as their credibility, usability and interoperability.*

12. **Are there any activities that do not substantially contribute to climate change mitigation which should be removed?** *(single-choice)*

Yes (please specify which activities and explain why they should be removed)

\_\_\_\_\_

No

13. **Are there any additional activities that should be considered for inclusion?** Note: Please consider whether these activities are in line with the agreed [methodological approach](#) for activity inclusion and classification *(single-choice)*

Yes (please specify which activities and provide supporting evidence for their inclusion)

\_\_\_\_\_

No

14. **Please provide specific feedback you have on any activities' criteria. When responding, please specify the activity you are commenting on using the following format: Activity #16 storage of energy > Green Criterion #A.** *(open comment box)*

You may want to give consideration to whether the criteria are clear, usable, assessing credible substantial contribution, appropriately drawing on existing frameworks, and whether any additional ineligible cases/protections should be included, etc.

Please provide reference to any supporting evidence for suggested changes.

## Energy sector Whitelist for climate change adaptation and resilience (A&R) criteria

*The climate change adaptation and resilience (A&R) Energy-sector Whitelist provides a list of low-risk, pre-approved climate change A&R measures that can be applied to an activity to substantially increase its adaptive capacity and resiliency.*

*Measures included on the Whitelist are automatically deemed eligible for NZ Taxonomy Green-alignment and do not require a full assessment against the Process-Based Approach (PBA) or the Do No Significant Harm (DNSH) criteria.*

*For more information on the NZ Taxonomy's two-pronged approach to climate change A&R – including what the Whitelist is, what it is not, and how it differs from the PBA – please review the introduction to these criteria [here](#).*

*In this consultation, we are seeking feedback on the suitability of the proposed whitelisted measures for NZ's Energy sector, as well as any additional measures that should be considered.*

15. **Are there any measures on the Whitelist that pose risks of maladaptation/significant environmental harm, which should therefore be removed? (single-choice)**

Yes (please specify which measures and explain why they should be removed)

\_\_\_\_\_

No

16. **Are there any additional measures that substantially contribute to climate change A&R, with minimal risk of maladaptation/significant environmental, that are missing from the Whitelist and should be added? (single-choice)**

Yes (please specify which measures and provide supporting evidence for their inclusion)

\_\_\_\_\_

No

17. **Please provide any further feedback you have on the Energy sector climate change A&R Whitelist. (open comment box)**

You may want to give consideration to whether the measures, as drafted, are clear and usable. The technical groups are also interested in ways to ensure Whitelist measures do substantially contribute to climate change A&R. Suggestions to strengthen how the NZ Taxonomy ensures this in the context of a Whitelist, are welcome.

## Energy sector activity-specific Do No Significant Harm (DNSH) criteria

*These criteria ensure that activities making a substantial contribution to an environmental objective (e.g., climate change mitigation) do not pose significant harm to other environmental objectives.*

*They function as a risk management tool, ensuring activities aligned with the NZ Taxonomy do not create unintended or adverse environmental consequences. While Substantial Contribution (SC) criteria aim to achieve positive environmental outcomes, Do No Significant Harm (DNSH) criteria are not intended to deliver net-positive impacts – their role is to prevent harm.*

*The activity-specific DNSH provide specific protections relevant to Energy sector activities.*

*Read more on what DNSH is (and is not) [here](#).*

**18. Please provide any feedback you have on any of the activity-specific DNSH criteria.**

**When responding, please specify the relevant activity and environmental objective using the following format: Activity #16, storage of energy > Environmental Objective #1, climate change mitigation. (open comment box)**

You may wish to give consideration to: i) Whether the protections proposed for the activity are sufficient and appropriately targeted; ii) whether the criteria, as drafted, are clear and practical to apply; iii) whether there are any relevant industry commitments, standards, or established frameworks that could be recognised as proxies for meeting particular criteria to help reduce compliance burden.

**19. Are there any other activities contained in the SC criteria that require additional activity-specific DNSH criteria to be developed for – i.e., activities that may pose risks of significant environmental harm not currently addressed by the activity-specific DNSH criteria? (single-choice)**

Yes (please specify the activity, associated risks, and propose criteria to address them)

No

**20. Please provide any other feedback on the proposed activity-specific DNSH framework, with supporting evidence where possible. (open comment box)**

## Guidance on the role of fossil gas generation activities in a credibly transitioning portfolio

*While the NZ Taxonomy is a framework for assessing environmental performance, issues of security are of particular relevance to the Energy sector. As such, the technical groups have considered including guidance for sustainable finance investments in entities that are providing system firming and peaking services, as a supporting document.*

*This document provides guidance on the role of fossil gas in the context of a credibly transitioning Energy portfolio. It outlines the key considerations in including fossil gas for firming (rather than baseload) purposes in a primarily renewable portfolio. It does not form part of the NZ Taxonomy criteria and gas firming is not considered a NZ Taxonomy-aligned activity.*

21. **Do you agree with including guidance of this nature in the Energy sector report for the NZ Taxonomy?** *(single-choice)*

Yes (please explain) \_\_\_\_\_

No (please explain) \_\_\_\_\_

22. **If this guidance is included, please provide any comments or suggested revisions to the draft.** *(open comment box)*

You may want to give consideration to the purpose of the guidance, the appropriate scope, and any additional clarity or information needed to make the guidance useful.



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If you have any questions about the survey or the consultation, please contact [taxonomy@sustainablefinance.nz](mailto:taxonomy@sustainablefinance.nz).