



National Associations refuse Commission's proposal on iLUC

We support the current target of 10 per cent of all transport energy to come from renewable sources. It is the right and most efficient way to reduce GHG-emissions in the transport sector, which is dragging behind other sectors.

The European Biofuel Industry is doing its share to achieve the target: It has spent unprecedented efforts to adapt its production on the sustainability criteria determined by the European Union. This has led to big investments in sustainable farming and processing practices and to genuine GHG-savings.

The current proposal of the EU Commission, which is triggered by the non-factual food vs. fuel debate and based on presumed indirect land use changes caused by the production of biofuels, has to be seen very critically. The Commission's proposal jeopardizes the progress in climate policy in the transport sector which is mainly achieved through biofuels.

The iLUC factors in the proposal are based on very uncertain science and need further research. In order to get a scientific sound result it is necessary to see the whole picture. This means that also the positive effects have to be taken into consideration. Those are especially

- the production of high quality protein feedstuff
- positive effect in crop rotation e.g. through preceding crop effect (esp. oilseeds like rape)
- increase of biodiversity in agriculture

Furthermore it has to be recognized that biofuels in the EU

- are produced under strict sustainability criteria,
- stimulate investments in sustainable agriculture,
- substitute fossil energy which is exploited with growing damage and dangers to the environment and human health,
- gave an option to use former set aside areas

It is highly desirable to address the problem of land use changes (like deforestation or the ploughing of peatland) and fight the undernourishment in many developing regions in the world. Bilateral agreements on forest protection and strengthening the agricultural production and infrastructure in countries affected by undernourishment would be much more efficient. Undernourishment and hunger are too important to be treated as a side issue of biofuel politics.



The proposal of the Commission will not help to solve those problems, instead there are numerous problems arising from it:

- 5% cap is a setback from already achieved biofuel share
- Lost trust in investment protection
- Demonizing 1st generation will undermine acceptance of 2nd generation and reduce the interest of potential investors
- Unclear when advanced biofuels will be feasible and multiple counting allows significant continued use of fossil fuels under the guise of renewable fuels
- The demonization of current biofuels is distracting from actual solutions to these problems and furthermore is constraining the fight against global warming.

Asociación de Productores de Energías Renovables Biocarburantes - Spain

Associação Portuguesa de Produtores de Biocombustíveis - Portugal

Krajowa Izba Biopaliw - Poland

Renewable Energy Association – United Kingdom

Verband der Deutschen Biokraftstoffindustrie - Germany