

4) Based on your responses to the above questions, what course of action do you think appropriate?

- A. Take no action for the time being, while monitoring impacts including trends in certain key parameters and, if appropriate, proposing corrective action at a later date*
- B. Take action by encouraging greater use of some categories of biofuel*
- C. Take action by discouraging the use of some categories of biofuel*
- D. Take some other form of action*
- D. Develop the methodology concerning ILUC-effects.

Decision in this matter was taken by Head of Department for Rural Development, Niclas Purfürst. Robert Paulsson at the Bioenergy Division was rapporteur.



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STATEMENT OF
 OPINION

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European Commission

Public consultation on indirect land use change and biofuels

1) Do you consider that the analytical work referred to above, and/or other analytical work in this field, provides a good basis for determining how significant indirect land use change resulting from the production of biofuels is?

We don't consider that the analysis in the work provided give enough information to determine how significant the impact from ILUC is. Though we think that it could be possible to do such a determination from the background material.

When doing such an evaluation there are a lot of choices in the models and scenarios that has to be made, reported and motivated. That includes doing both scientific and economic as well as political choices.

Sometimes the results are totally depending on the choice of scenario made when setting up the model. The purpose of the modelling can also decide which scenario is used. It depends if you want to show a worst-case, a best-case or the most likely scenario.

Risk evaluation is also crucial when setting up the scenario.

It is important to use a transparent methodology where all assumptions are clearly accounted for. It is also important to have a clear purpose for including indirect effects. Is it to be able to compare different biofuels with each other, to compare different land use strategies or to compare different energy alternatives with each other.

2) On the basis of the available evidence, do you think that EU action is needed to address indirect land use change?

We think it is important to include the ILUC-effects as soon as the methodology is agreed upon. But we also stress the fact to look at both direct and indirect land use effects of fossil fuels when comparisons are made between fossil energy and bio energy. What are the direct and indirect effects of land being exploited for fossil energy extraction, infrastructure and pollution?

3) If action is to be taken, and if it is to have the effect of encouraging greater use of some categories of biofuel and/or less use of other categories of biofuel than would otherwise be the case, it would be necessary to identify these categories of biofuel on the basis of the analytical work. As such, do you think it is possible to draw sufficiently reliable conclusions on whether indirect land use change impacts of biofuels vary according to:

see the answer to question nr 1.