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MILJØVERNDEPARTEMENT**

Royal Ministry of the Environment

**Addendum : to the Norwegian response to the EU consultation on biofuels and indirect land use change (displacement effects) - 29 October 2010**

As clarification to Norway's response to the consultation, we would like to expand on our recommendation on setting up a more specific ILUC factor or bonus system for biofuels with little or no displacement risk. Such a system should be based on a principle to avoid double counting of emission reductions. When setting up the system, necessary heed must therefore be given to emission reductions or practices addressed by existing bonus factors, by reductions in other emission factors or by the current system in other ways. It may in this context also be appropriate to consider the need for adjustments in the current system, for example adjustments in the current standard bonus values for biofuels based on feedstocks from degraded or contaminated land.