

## PUBLIC CONSULTATION ON ILUC OXEM SPA RESPONSE

### Introduction

Oxem SpA is an Italian biodiesel producer (European Biodiesel Board's member) based in Mezzana Bigli (PV) Italy with an installed capacity of 200ktons refining and transesterification: the production started early 2009.

This document aims to presents Oxem's response to the public consultation organized by the European Commission on Indirect Land Use Change (ILUC) following RED.

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?

Oxem considers that public policies should not or cannot be based on the Indirect Land Use Change concept since we also consider it to be still quite debatable and not yet demonstrated: the studies conducted for the Commission services do not yet bring the necessary clarity clear and not provide an un disputable answer on the ILUC topic.

Furthermore Oxem is of the view that the models as being inadequate and a comparative approach should be carried out on the assessment of fossil direct and indirect impacts.

We therefore consider that the analytical work referred to above, and/or other analytical work in this field, does not provide a good base for determining how significant indirect land use change is for the production of biofuels.

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

We consider that there should be no further action by the EU aimed at addressing ILUC issues. Probably a more urgent task should be scientific work aiming at developing a robust methodology assessing the greenhouse gas impact of crude oil extraction, transport and refining.. Only such a approach would enable to compare biofuels vs fossil fuel impacts.

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:

- feedstock type?
- geographical location?
- land management?

If so, please say which, and indicate the evidence used to reach your conclusion.

We think that no action should be taken at the time being, it would only add more formalities/paper work/additional burden to producers and to all actors of the value chain à refer also to answers above

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 biofuels.

C. Take action by discouraging the use of some categories of biofuel.

D. Take some other form of action.

As stated above, we think that no action should be taken for the time being, so answer A is the more appropriate, as for answer B it is already taken care off under the RED (ie residues, waste, lingo-cellulosic material etc à double counting feedstock).