

BFP srl

PUBLIC CONSULTATION ON ILUC

Introduction

BioFuels Partners (BFP) is a consultancy firm with an established and diversified world-wide experience in the biofuels sector: its mission is to provide strategic and operative assistance to investors and operators in the fulfilment of industrial investments or commercial development projects.

In the following document we supply the answers to the public consultation organized by the European Commission on Indirect Land Use Change (ILUC) following RED.

A) 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?

BFP considers that public policies should not or cannot be based on the Indirect Land Use Change concept since we consider ILUC to be still quite debatable and not yet demonstrated: we consider the studies conducted up to now not able yet to provide a clear and undebatable answer on the ILUC topic.

We consider that the analytical work referred to above does not provide a good base for determining how significant indirect land use change is for the production of biofuels.

We assess the models as being inadequate and furthermore a comparative approach should be carried out as a matter of priority on the assessment of fossil direct and indirect impacts.

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

Further EU action is not needed to address ILUC.

A more urgent task should be scientific work aiming at developing a model considering the impact of fossil fuels + transportation + refining etc, only such an approach would enable to compare biofuels vs fossil fuel impacts.

C) 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.

No action should be taken at the time being, it would just add more formalities/paper work/additional burden to producers and to all actors of the value chain. Sufficient sustainability requirements are already provided for in the Renewable Energy Directive.

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

- 1. 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.***
- 2. Take action by encouraging greater use of some categories of biofuels.***

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

4. Take some other form of action.

No action should be taken for the time being, so answer A is the more appropriate.

Answer B is already taken care off in the RED since for example residues, waste, ligno-cellulosic material etc is already considered as counting double with respect to the RED mandatory targets