

## Introduction

In 2004, the P.N.Pettas S.A. built new facilities for Biodiesel production from vegetable oils. The company is informed on new technologies and tries to implement them, in order to be as environmental friendly as possible. The company's headquarters are in Patras, Greece.

This document presents the P.N.Pettas S.A. recommendations for public consultation to the European Commission on indirect land use change for the Renewable Energy Directive and Fuel Quality Directive.

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?

Any study on biofuels impact cannot exclude comparison with fossil fuels in order to determine the amount of greenhouse emissions saved. You need to launch new studies that will analyze the impact of fossil fuels (during the extraction of oil, oil spills etc.)

The models used deficient data and gives uncertain results for the impact of indirect land use change. So, you have to create accurate database and up to date from all the countries interfere. You need to run models without biofuels in order to know the impact of biofuels itself. You cannot exclude related sectors from research.

Prediction of crop yields increase by 2020 is not precise, because they do not count future's technological evolution and different treatment of growth. We think that these studies tried to approach the magnitude of indirect land use change, but overall failed to give us accurate, undeniable and clear scientific evidences about this factor.

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

We think that on the basis of the available evidence no action is needed for indirect land use change from EU.

Any decision of EU must depend on science and legal conformity. It is wrong to penalise industries due to indirect land use change factor, because it does not meet the above criteria (science and legality).

In the future, it is the best when new studies start to have comparison between biofuels and the overall pros and cons of fossil fuels (i.e. extraction, refining, oil spilling etc.), in order to take any actions.

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 can be taken right now from EU, because the results from studies are insufficient, mainly for two reasons:

- There is no comparison data with fossil fuels and its effects in the environment from all the perspectives
- The models do not give accurate results, but only speculations

Depending on those studies, EU cannot take correct decision, because the conclusions are not reliable and need further more monitoring regarding land management, feedstock type and geographical location.

Although, it is illegal to make distinctions for these parameters without having documentations of their impact in markets (i.e. there is no evidence for pressure on vegetable oil prices caused from biofuels)

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.

The most appropriate action would be option A, because these studies do not give certain answers for indirect land use change and the subject needs more research.

We think that must be established a Committee for monitoring impacts especially in comparison with fossil fuels.

Then this Committee must cover different sectors economical (i.e. global movement of population, urbanization etc.) and agricultural (i.e. intensive cultivation of crops, unproductive lands, ruin of rainforests etc.) in order to improve data collection and export useful conclusions of increased greenhouse gas emissions from biofuels.