

European Commission  
DG Energy - ENER.DDG1.C.1  
'Regulatory policy & Promotion of renewable energy'  
Rue De Mot 24-26  
B-1049 Bruxelles  
Belgium

Rotterdam, 27 October, 2010

Re: Indirect land use  
Ref: MM10-001

Dear EU Commission,

As stated in your ILUC public consultancy question "Indirect land use change is a subject of great complexity". As Dutch association of biodiesel producers (VNBI) we fully agree with this analysis. Last year many versions, concepts and ideas about ILUC issues could be found in the media. As far as we are concerned the existence of ILUC is unclear at this very moment. For the EU itself we would like to recall recent history: in the EU until 4 years ago large pieces of agricultural land had to stay unused in order to prevent the overproduction of butter and meat, therefore land never has been an issue in Europe so far. In addition, vast areas of low productive or idle agri-land still can be found today, mostly in Eastern Europe.

Another key issue on ILUC is the fact that, if such a principle does exist, it has to exist for all non food production land. This means that also for crops producing paper, soaps, pharma, cosmetics etc an ILUC factor has to be taken into account. Either ILUC does exist or it does not. If it exists, it should not only hold for non food crop, but most likely also for new roads, housing projects etc. Every item taking away food production land might lead in the ILUC concept to change in land use locally or somewhere else.

Last important issue in these ILUC matter is international trade. If it might be decided that ILUC does exist, these ILUC factors most likely apply for any non food crop globally (palm, soy, jathropha etc). Therefore the EU has to communicate and explain the ILUC principle, and its consequences, to all international partners, certification bodies, standardization organizations etc.

Therefore the VNBI would like to ask the EU commission to postpone ILUC implementation at present until further evidence based insight in the existence of ILUC has been gained.

Best regards,  
VNBI

A large, stylized blue ink signature of R. Pechold is written over the text.

R. Pechold