

VERNOF, the Dutch association for the manufacturers of edible fats and oils, supports the principle of sustainable development and through its members and the Dutch Product Board MVO is closely involved with the RTRS and RSPO.



VERNOF would like to respond to the public consultation on ILUC and biofuels as follows.

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?

The analytical work put forward by the European Commission shows that the science relative to Indirect Land Use change is inconclusive for the time being. It is therefore not appropriate at this stage to take measures under the RED to deal with ILUC.

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

The EU is to support the establishment of global funds that can help developing countries manage land use properly.

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:

The RED already provides for an ambitious decarbonisation strategy for transport fuels. This strategy is not to be topped up with a potential ILUC factor as this would threaten phasing out a number of pathways for biofuel application and as such:

- Put remaining feedstock markets under increased pressure.
- Increase the risk of failing to meet the RED renewable energy targets.
- Threaten present investments in biofuel production and thus reduce confidence of the business community in public policies on renewable energy.
- Would endanger the development of ligno cellulosic-based biofuels as well. These new biofuels will only be successful when available in large volumes. They will thus also compete for land and be affected by a potential ILUC factor as well.

The RED triggers a discussion on sustainable agriculture and as many feed stocks as possible should be able to benefit from this.

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

Developing countries should be supported in protecting environmental interests and should also be supported in helping degraded lands become available for production of biofuel crops.

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