



INDIRECT LAND USE CHANGE IMPACTS OF BIOFUELS – CONSULTATION

Huileries de France response

INTRODUCTION

The French association *Huileries de France* represents the interests of the oilseed crushers and the vegetable oils and meals producers.

Huileries de France is following with a deep interest the discussion relative to the implementation of the sustainability criteria in the framework of the Renewable Energies Directive, as most of its members are vegetable oils producers as well as biodiesel producers.

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 present state of research does not provide an adequate level of certainty regarding the extent of Indirect Land Use Change. The executive summary, put forward by the DG Energy, highlights the weaknesses of the European Commission four studies.

First of all, there are numerous examples of high divergence between results from one model to another:

- There is a significant variation of the raw data in the different studies, in particular on carbon stocks (a scale variation from 1 to 5, according to the sources cited).
- According to the executive summary, studies have been unable to quantify the impacts of future yields on new inputs, technological developments and cropping intensity.
- Regarding the assessment of the co-products contribution in terms of land expansion, figures double from one study to another.

As a consequence, studies on feedstocks performance (biodiesel and ethanol) , have also proven to be contradictory in terms of limiting Land use Change; and only a number of models actually provide results in terms of greenhouse gas emissions linked to ILUC.

To conclude, the four studies are characterised by a lack of consensus. None of the findings seems reliable enough to serve as a basis for determining the significance of ILUC 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?

The European Union has already set up ambitious sustainability criteria for biofuels under the current legislation. They represent a significant effort for the industry on a short period of time. The Renewable Energies Directive includes durability criteria for biofuels (art. 17) including the forbidden use of important carbon stock lands (wetlands, forests...) and a GHG saving of 35%, then 60%, for all biofuels from new installations by 2018.

Since the currently available studies clearly show the lack of scientific knowledge about ILUC and the methods to quantify its impact, we think that the EU should not address the ILUC without further effort to build methods, and at a later stage, gather reliable data in order to support the decision-making process.

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:

As mentioned above, the European Commission studies did not bring proof that the choice of some categories of biofuel would result in a limited LUC compared to others. Again, results diverge considerably between models, making it impossible to objectively assert that the feedstock type would have an impact on ILUC.

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

The only course of action that should be followed today is to improve the available science relative to Indirect Land Use Change. Biofuels producers should not be put under an excessive legislative pressure based on the present high level of uncertainty in that area.



B. Take action by encouraging greater use of some categories of biofuel and

Huileries de France believes that no conclusive studies exist to differentiate between categories of biofuels. In addition to that, encouraging greater use of some biofuels categories could represent a major risk in terms of WTO compatibility.

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

D. Take some other form of action

Huileries de France takes part in the development of a progressive approach (“démarche de progrès de la filière”) encouraged by the whole chain of French oil-producing industry.

The aim is to reduce environmental impacts from agriculture to industrial activities by:

- Cutting down energy consumption
- Reducing GHG emissions
- Improving air and water quality
- Promoting biodiversity