

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?

From our point of view by examining carefully all the studies relevant to ILUC we can't see that there is a clear answer to whether there is actually a relation between the production of biofuels and ILUC. Although, the studies seem to be analytical one can see that due to some "shadows" existing creates an atmosphere of debate which seems to be big enough in order these studies to be the basis for taking final decisions at this point.

Apart from some technical elements that we think that should be revised in these studies, also some new ones should be taken into account in order the studies be representative of the current situation. However, the main drawback that we have noticed in these studies is that nowhere we can see an assessment of how fossil fuels affect the GHG emissions calculations in comparison with biofuels. Thus, we believe that until this is done there will not be a good assessment of the biofuels ILUC.

Concluding, we would like to stress that although we believe a hard work has been done in order these studies to be issued there is still some more work to be done in order all of us will be sure that the results are strong and transparent and that can be used for taking serious decisions.

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

Continuing from our answer above we believe that until some more studies are completed no EU action is needed to address indirect land use. As we believe, actions should be taken after a proper comparison between the impacts of biofuels and fossil fuels has been completed based on studies.

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.

Once again we should state that no EU action is needed at this stage until extra studies are completed including the comparison analysed above. Regarding the distinction of biofuels ILUC on the basis of feedstock we believe that it will create some phenomena in the market that will affect the competitiveness between different feedstocks. The only distinction that can be made at this point is for feedstock coming from transforming forests into arable land.

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

We are proposing this, because we believe that the basic point that it hasn't yet examined thoroughly by the available studies is the impact of fossil fuels on the calculation of GHG emissions and how this is compared to the biofuels ILUC. When this will be concluded we believe that we will have the basis for taking further actions.

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