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27.10.2010

RE: Public Consultation on Indirect Land Use Change; Reply from an non-registered organisation

Dear Sir/Madam ,

Although we are relative newcomers to the biodiesel field here in ROMANIA, having commenced business in August 2009, we would like to register our opinion and position on the Renewable Energy Directive 2009/28 implementation and more specifically the issue of indirect land use change (ILUC) from biofuels, which is the focus of this public consultation.

From our perspective, it is very important to perform all the analytical work in this field well in advance and thoroughly before taking any policy measures that would impact large sectors of the economy involved in the biofuels supply chain. That time has not arrived. At present, the studies put forward by the Commission do not represent a sufficiently robust basis to do draw meaningful conclusions, which is why we would support Option A.

Moreover, the straight comparative impact on GHG emissions between biofuels and fossil fuels is still an open debate. ...so before we create punitive measures impacting biodiesel producers, we must have an " even playing field".

We are worried about any hastily-formed legislation impinging on our abilities to perform a necessary role in addressing climate change and improving the EU's energy security and in an already tough and competitive field. Here in Romania we've been fighting illicit and illegal biodiesel imports, leading to a difficult competitive environment, punitive tax regime and a host of other issues. Most importantly, we have 40 % of arable land, roughly 3.8 million hectares, un-worked. We can and should bring this land back into the "agriculture circuit" in an environmentally correct and balanced way, By supporting bioenergy

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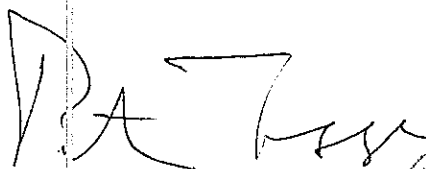
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development there is a unique chance for Romanian and EU policy makers alike to really make a large difference in the lives of many potential beneficiaries of such policies, whether they are involved in working the land, and rehabilitating the land. It's a great chance to "start fresh" and for that we need assistance, perhaps also extending to incentives for growing certain crops or following special agriculture practices.

If there are any ways we may lend a hand in furthering the open dialogue on this issue we will be happy to do so.

Sincerely,



Peter Tagge

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