

Question 2.1

Please give your comments on the "possible way forward" described above. If you think the problem should be tackled in a different way, please say how.

It make's no sense and causes environmental damage to export biofuel stocks from one country to another when each country is below the required production/consumption threshold. Feedstocks should be used in the country of origin whenever possible and until a surplus exists in one country. The governments should support the use of locally produced fuels buy offering subsidies if necessary.

Land set aside for preservation of wildlife should not be sacrificed to meet fuel targets. Destroying or trading one aspect of the environment for another is illogical and counter-productive.

We should be funding development of proven alternative sources such as multiple small-scale algae farms to give high yields and low transport costs.

Harvest, produce and sell biodiesel locally in multiple small businesses rather than creating huge expensive carbuncles on the landscape with their associated oil/fuel transport and distribution costs and long build time.

Question 2.2

Do you think it is possible to link indirect land use effects to individual consignments of biofuel? If so, please say how.

Algal farming can be carried at the local level

Offer grants to small scale start up biodiesel producers such as individual famers or farmers co-operatives, entrepreneurs etc.

Question 1.4

Carbon stock differences between land uses would be taken into account under criterion 2. Should they also be taken into account under criterion 1? If so, what method should be used to determine how the land in question would have been used if it had not been used to produce raw material for biofuels?

Question 1.5

As described in the "possible way forward", criterion 3 focuses on land uses associated with exceptional biodiversity. Should the criterion be extended to apply to land that is adjacent to land uses associated with exceptional biodiversity? If so, why? How could this land be defined?

It should to allow the expansion of all wildlife esp. SSI and threatened wildlife and avoid interference through noise/pollution etc. We don't understand all the requirements of all species and need a buffer area. If it is not done, how can threatened species be expected to thrive and increase in numbers?

Question 1.6

How could the term "exceptional biodiversity" (in criterion 3) be defined in a way that is scientifically based, transparent and non-discriminatory?

This would need to be defined by consulting specialists such as ecologists, NOT the general public, local government or industrial bodies.

Should the legislation include measures to ensure that diesel containing 10% biodiesel (by volume) can be placed on the market, and is in fact placed on the market?

Yes, this must happen although this is too little, too late. Climate change is happening faster than scientists had at first believed. 10% biofuel could perhaps be better written as "90% polluting". Clearly this is not good enough if we are serious about making a difference.

There needs to be an injection of much larger funds for the serious development of biofuels and other renewable energy sources such as wave power in the short term, not the distance future.

Question 4.5:

Should the legislation ask the Commission to review, by a given date, whether it is possible to be confident that the 10% target can be achieved through:

- a) rules that allow 10% blending by volume of ethanol in ordinary petrol, plus**
- b) rules that allow 10% blending by volume of biodiesel in ordinary diesel, plus**
- c) the four options listed under 'other options for solving the problem';**

Yes

If so, what should the date be? Review at 6 month intervals

If the review were to conclude that the target is unlikely to be met, what action should the Commission take?

Increase funding to support feedstock production and the development of start up businesses/franchises at the micro production scale e.g. 800-2400 lph. These small businesses create jobs, break the dependence on the large petrochemical companies, can be set up quickly (in a few weeks) and make a significant change to total production within a short period.

Relax the specs on feedstocks to include higher iodine value oils such as soya & sunflower which currently are excluded from the EN14214 specification.

Allow the combustion of waste glycerine as a fuel to provide heat for biodiesel production or other industrial processes or local government buildings. This would provide another source of revenue for biodiesel producers and make the business more appealing to start ups. To avoid emissions problems, glycerine would need to be burned in approved high temp. burners.

Provide an affordable centralised biodiesel testing service for small scale producers. Currently tests are approx 800 GBP for full EN14214 testing via private oil testing labs making it unaffordable to small business. To ensure high quality fuel is marketed these businesses need extra financial assistance and/or facilities for QC testing. E.g a central govt testing facility offering 1 test per week per client for a nominal fee, additional tests at higher fees or a similar service. Currently too much fuel is not QC'd at all.

Question 4.6

More generally, what role should taxation play in the promotion of biofuels (considering different situations such as low blends, high blends and second-generation biofuels)?

Reduce or abolish fuel duty on biofuels to make the business attractive to start ups and to allow competitive pricing at the pumps. Currently it is prohibitively expensive to

make biodiesel (esp. with rapeseed which is the recommended feedstock) when 28.3p duty is also charged on top. Unless it is relaxed the smaller producers will be forced out of business and it is far more environmentally friendly to have multiple small producers sourcing oil locally and selling fuel locally than to transport vegetable oil in bulk, up and down countries or even overseas.

It is no good offering a limited volume of production at reduced taxation as once that threshold has been reached the business is faced with the same problem.

We need to encourage the public to buy biofuels by educating them of the benefits wrt emissions, health, environmental impact etc and so increase the demand. Too many people we encounter (including decision makers at local gvt level, vehicle mfrs & owners) have little or no understanding of the benefits. Increasing demand will put additional political pressure on the governments to reach targets and to provide the necessary funding and incentives for producers at all levels incl. farmers.

Environmentally unfriendly fuels and products should be taxed at higher rates to offset the lost fuel duty. i.e. charge the tax to the multi-billion dollar polluters, not those individuals trying to preserve the planet. That will encourage the petrochemical companies to invest seriously in biofuels instead of playing lip service to them and discourage them from investing to extract more fossil fuels from dwindling and environmentally sensitive reserves. It's time the governments collectively stood up to them.

Use fuel taxes to support the devt of local biofuel production such as investing/subsidising local farm energy crops, algal farms & biodiesel plants to fuel govt/council transport and maintenance vehicles. Local governments to lead by example - produce locally, sell locally.