

APRODEV Submission to consultation on Indirect Land Use Changes

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APRODEV

To
ENER.DDG1.C.1 and CLIMA C.2
European Commission
DG Energy - ENER.DDG1.C.1
'Regulatory policy & Promotion of renewable energy'
B-1049 Bruxelles

Brussels, 29 October 2010

This contribution comes in response to the multi-stakeholder meeting on ILUC on 26 October 2010, and one of the conclusions presented for the need to better understand what is currently going on in reality, i.e. on the ground, on change of land use.

This response relates to questions of methodology and analytical work (question 1) arguing that focus needs to be put on empirical evidence to identify and monitor impacts that are not captured by current models used.

This response also relates to how monitoring impacts should be done and what the parameters should be used (question 4).

We recommend that:

- Existing land (leasing) treaties are recorded, analysed and monitored; in particular scrutinised with regard to exclusive rights for the use land and water, and displacement of local populations.
- Work towards legal provisions that allow victims of ILUC to file complaints and be heard in courts of justice within the EU, in case EU based companies and/or financial institutions are involved.

For more detailed information and evidence regarding a land leasing contract in Sierra Leone, see <http://www.rechtaufnahme.ch/deutsch/symposium/material-fuer-medien/>, which has been made available by an APRODEV member agency, Bread for All.

Attached is a file with comprehensive information on this matter.