

Answers to the Commission consultation about :
Indirect land use change - ILUC - impacts of biofuel.

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From Swedish Wood-fuel Association / Sven Hogfors, Executive of the board
S-105 33 Stockholm, Sweden.

Question 1)

The analytical work presented so far is ambitious and on the right track but not at a very mature stage. Different calculations of an "ILUC-factor" end up in very different figures, sometime up to several hundred % differences.

Question 2)

There is a continues need for EU to follow and encourage further work on ILUC impacts and to inform the community broadly about the present state of the art.
There is now no reason to undertake any attempts of political steering activity and there is also not yet any convincing evidence that steering activity would be meaningful and give desired results on land use.

Question 3)

Yes, we think it is possible to draw some valid conclusions on differences in impact on land use change from different biofuels - but we don't think it is a motivated base for political action other than broad information about impacts.

Question 4)

As mentioned under 2): Follow and encourage further work on ILUC and inform broadly about present state of the art.

D : Take action by encouraging information about ILUC impact of different biofuels if these are well known and possible to influence directly.