



Mr. Hans Van Steen
DG TREN Unit C.1.1
European Commission

03 November 2010

Dear Mr Van Steen,

We attach the response to the Commission consultation on the indirect effects of biofuels on behalf of Greenergy International Ltd.

Our contribution is from the perspective of one of the UK's largest petrol, diesel and biofuels suppliers and also the largest producer of biodiesel from waste. We are the UK mainland's strongest performer against all of the UK RTFO sustainability targets and have made an important contribution to the development of RED ready sustainability standards for biofuels. You will be aware that the Greenergy Sustainability Standard for Brazilian Sugarcane ethanol was the first voluntary scheme submitted to the EC and is likely to be one of the first schemes to be accepted in all Member States for RED compliance.

This commitment to verifying biofuel's sustainability is applied across our global supply chain. We have developed innovative technology to verify land use, and potential risks to biocarbon stock. In our paper attached, we discuss practical proposals to avoid and mitigate the potential indirect effects of biofuels' policy. They concur with a large proportion of industry, academic and policy opinion that more research is needed to understand ILUC and that it is best controlled by holistic international policy.

Greenergy remains committed to implementing the best science to biofuel's sustainability and encouraging discussion on ILUC avoidance and mitigation actions, including development of our own BioCarbon Tracker technology.

Yours sincerely,
Patrick Lynch

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Biofuel Sustainability Manager