



European Pure Plant Oil Organisation: PPO.EU

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Re.: Indirect Land use change impacts of biofuels-Consultation

To whom it may concern

We herewith wish to make use of your invitation to contribute to your consultation-inquiry regarding the subject ILUC.

As a European organisation involved in the cultivation, production and application of the European rapeseed plant for food and energy (biofuels) purposes, called **Pure Plant Oil (PPO)**, we do not feel directly addressed by the subject

However we would like to bring following points to your attention, directly linked to the subject, especially with regard to European self sufficiency in terms of food and fuel from only European sources and territories.

Preamble

P.P.O. EU. Org. is supporting farmers, scientific agricultural researchers, but also teaching/ training diesel engine-mechanics to convert diesel engines for the use of PPO as a cleaner and renewable alternative fuel to (fossil) diesel oil.

In the current CEN workshop-56, commissioned by the Eur. Union, to establish a European fuel standard, PPO is described as follows:

„As engine fuel PPO shows the potential to perform as the most comprehensive ecologic, economic and social benefits amongst all [biofuels](#).

European Rapeseed is the only source of PPO at present.

The basic idea to use PPO as a renewable agro-fuel, originates from the surpluses of rapeseed oil in the 90ties.

After crushing (cold-crushing process) rapeseed to a high protein component for cattle feedstock there was hardly any demand for Pure Plant Oil as an additional (by!) product.

Smart inventors however made it possible to use this oil as fuel for diesel engines.

As a result it provides the farmers some extra income, and has since then led to the construction of more than 800 smaller-and medium sized (cold-crushing) oil mills all over Europe, all established in rural areas close to farming operations.

Rapeseed cultivation takes place in a (3-4 year) crop-rotation process, often preceding cultivations of cereals/grain.

As an additional feature it leaves some 8 tons/hectare of carbon stock behind in the soil after harvesting. It significantly improves the soil structure even adding nitrogen for successive crops. None or minor artificial fertilizers are required, since generally organic fertilizers will do the job.

Under all circumstances Pure Plant Oil derived from European rapeseed crops does not effect indirect land use change.

Just the opposite, the European cultivation of rapeseed ensures a steady flow of high- protein fodder to the European agricultural sector, and generates as a by product Pure Plant Oil.

ILUC

It is to be expected that European imports of soy beans for the purpose of bio fuels, as well as imports of palm oil and soybean oil will definitely continue to seize land elsewhere on the planet.

Multinational Oil companies, food-and feedstock companies, are now sourcing and securing vast areas of arable and virgin (forest) land abroad to meet the European demand of bio fuels.

One of the main reasons for this phenomenon is clearly caused by some European governments forced to follow the directives of European Commission to reduce CO2 emissions.

In an attempt to do so, without jeopardizing their income from fossil fuels (taxes!) the major oil companies were chosen to be the prime candidates/ vehicles imposed to implement and comply to mandatory governmental CO2 reduction, this in order to meet the annual CO2 reduction targets as set by the European Union!

The oil companies not really eager and unfamiliar with the technical consequences made then the choice to start blending biodiesel with diesel oil and ethanol with petrol.

At the same time however these governments were ignoring and neglecting available options started by new European players (SME's) for the production, supply and distribution of European based bio fuels.

As a result the oil companies, to a greater extend, ignored also European produced bio fuels, and started to buy cheaper, (often export subsidized), bio fuels from USA. Brazil, Argentina and South-East Asia.

The fact that imported bio fuels can be bought at a cheaper price, superseded as a result European derived bio fuels.

By doing so, European governments have ignored and neglected the new European (SME) players.

By measures where European produced bio fuels got taxed, governments made it virtually impossible to develop, which has led to bankruptcies, shut downs, and dismantling of European existing bio fuel production plants.

Since European governments had found this (easy) way, using the oil companies as a vehicle to comply with their own mandatory annual transport fuel CO2 reduction, they did not care at all about the origin of bio fuels or other matters relating to indirect land use change.

Up to now the main objective is to blend bio fuels with fossil fuels in minor percentages to meet CO2 reduction targets regardless the possibilities which Europe has to offer by much higher blends (E-85) or 100 % bio fuels like PPO and biodiesel having a much bigger effect on CO2 reduction.

Not changing the pattern, the above aspects will undoubtedly implicate continued seizure of land elsewhere on the planet, at the cost of European agricultural potential, employment, innovations and aspects of self sufficiency and environmental issues.

We therefore plead to reinstate the original EU/German model for bio fuels admitting again concentrations up to 100% European produced pure bio fuels, which tax exempt, certainly will avoid and reduce ILUC concerns.

At the same time it will contribute to an own new European renewable transport fuel sector, which in view of the uncertainties of security supply from abroad, and a strong commitment of the European agricultural sector, will form a steady and undisputed future basis to meet the targets as per RED 2009/28/EG.

Hein Aberson
President