

Public consultation: Indirect land use change and biofuels

Zero-e welcomes the opportunity given by the European Commission to contribute to the public consultation on indirect land use change and biofuels. Zero-e answers the four questions selectively.

1) Do you consider that the analytical work referred to above, and/or other analytical work in this field, provides a good basis for determining how significant indirect land use change resulting from the production of biofuels is?

Although the research done is very valuable, one very important topic is not addressed. This is the indirect land use change caused by fossil fuels. We do see GHG and price comparisons, but until we know what the ILUC caused by these fuels is, we cannot truly estimate the impact of shifting from fossil fuels to biofuels.

2) On the basis of the available evidence, do you think that EU action is needed to address indirect land use change?

Yes, for both fossil fuels and biofuels.

3) If action is to be taken, and if it is to have the effect of encouraging greater use of some categories of biofuel and/or less use of other categories of biofuel than would otherwise be the case, it would be necessary to identify these categories of biofuel on the basis of the analytical work. As such, do you think it is possible to draw sufficiently reliable conclusions on whether indirect land use change impacts of biofuels vary according to:

- ✕ feedstock type?
- ✕ geographical location?
- ✕ land management?

The problem with the indirect effect is not that it is created, but exactly what indirect effect is created. Therefore focus should be on the effect itself not occurring, regardless whether that effect is an indirect effect of something else.

I do believe an educated guess can be made of what the indirect effect will be, based on historic data. I do not believe this indirect effect will inevitably occur, because markets are not dictated in that way. So if you want to draw a sufficiently reliable conclusion you will need to assess every situation separately.

4) Based on your responses to the above questions, what course of action do you think appropriate?

D. Take some other form of action: First of all the ILUC of fossil fuels have to be established. Also unwanted (indirect) effects are to be tackled as such. It should be avoided that converting land means losing carbon stock for instance. This also means that on a global scale attention should be given to how much crop land should be available, and how much land for animal husbandry for instance. This will mean global coordination. And better distribution of the output of this land. A much more holistic view to the whole problem of energy, GHG emissions, food, land use and so forth is needed in order to sustainably tackle this problem.