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Register ID: 3647455667-08

Brussels 29th of October 2010

## **CEPF response to „Indirect land use change impacts of biofuels” consultation**

The Confederation of European Forest Owners (CEPF) would like to thank for the opportunity to provide input to the stakeholder consultation on Indirect Land Use Change Impacts of biofuels.

The Confederation of European Forest Owners is the umbrella association of national forest owner organizations in the European Union. It represents 24 national forest owners associations in Europe with approximately 16 millions forest owners.

### **I General remarks**

CEPF would like to emphasize the importance of comprehensive assessment for use and production of biomass-based energy. The impacts of bioenergy and biofuels need to be evaluated in a comprehensive way including biofuels and other bio-based energy sources like solid energy feed stock from forest biomass as well as their use in transportation and in energy and heat production. Current studies show that many biofuels have better efficiency when used in stationary power plants for energy or heating or their combined production than for transportation means. These issues should be taken into account in order to find the best possible solution to reduce the greenhouse gas emissions and then to achieve the overall GHG reduction goals in the EU.

CEPF would also like to draw attention to the available potential biomass resources in the EU in form of forest biomass. The forests in EU are sustainably managed and the annual sustainable yield could be increased significantly without hampering biodiversity, food production or additional greenhouse gas emissions targets. The sustainability of land use for bioenergy production can be ensured and strengthened through existing forest certification schemes that should be brought to better awareness.

### **II. Consultation Questions**

**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?**

CEPF takes the view that present scientific knowledge about the means to calculate the CO<sub>2</sub>-emissions related to different biofuels and the possible emissions following from the indirect land use changes due the use of biofuels is not sufficient. (Croezen, H.J. et al. 2010.) Therefore it does



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not provide a good basis for determining how significant indirect land use change resulting from the production of biofuels is.

According to the literature review conducted for DG Energy (The impact of land use change on GHG emissions...2010) there is no consensus among scientists on many key aspects of methodology and data, there are still aspects that have not been covered by the studies and that these issues have a significant impact on the studies' results.

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

CEPF sees EU action needed to address indirect land use changes, but only under following conditions:

- The effects of the indirect land use change have to be calculated in a trustworthy way before any action can be taken.
- Regimes to prevent and measure ILUC should to be planned and implemented globally, not only on EU level, since indirect land use changes are globally occurring and effecting phenomena that cannot be prevented by imposing local or regional sustainability requirements for biofuel production (Croezen et al. 2010:52).

**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:**

- Feed stock type?

CEPF is of the opinion that it is not possible to draw sufficiently reliable conclusions on the varying of the indirect land use change impacts of biofuels according to *feedstock type* used. According to studies the emissions of the various biofuel raw materials fluctuate very much. The results of different studies (e.g. Howarth R.W. et al.2009, The Impact of land use change...2010) on how the land use change impacts of biofuels vary very strongly. In addition models used to assess the land use change and GHG emissions neglect many important factors. Therefore CEPF takes the position that the existing scientific knowledge does not provide sufficient basis to make conclusions.

- Geographical location?

It is obvious that the land use change impacts vary according to geographical location of the production. CEPF holds the view that it is possible to identify the areas where the land use changes related to increasing production of biofuels are less probably to have undesirable impacts than other areas. Due the lack of scientific knowledge it is nevertheless still not possible to identify all the impacts on sufficient level.

- Land management?



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The land management regimes can strongly affect the amount of land converted into another uses and thus the carbon emissions levels of different biofuel feed stock and e.g. possible losses in biodiversity. According Howarth et al. 2009 the small scale biofuel production is possible while maintaining biodiversity in a sustainable way. Mechanisms to monitor and calculate the land management practises are already used in agriculture and same mechanisms can be used to assess the land management (use of pesticides and fertilizers, cultivated area) in biofuel production.

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

Within the present scientific knowledge CEPF has to take the position that the only appropriate course of action is the alternative A: *Take no action for the time being, while monitoring impacts including trends in certain parameters and, if appropriate, proposing corrective action at a later date.*

The calculation methodology for GHG emissions related to possible changes in land use must be proofed to be realistic and taking all relevant aspect into account. Sustainability of the land use must be monitored for example through certification schemes.

The courses of action presented in alternative B: *Take action by encouraging greater use of some categories of biofuel* and in alternative C: *Take action by discouraging the use of some categories of biofuel* cannot be seen as appropriate. The scientific knowledge of the mechanism to taken into account when calculating the GHG and LUC impacts of increasing use of biofuels is not sufficient for taking any actions to encourage or discourage the use of some categories of biofuel. (The impact of land use change on GHG emissions...2010)

#### **References:**

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