

EuropaBio response to the EC consultation on 'Indirect land use change impacts of biofuels'

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?

NO – We need to have sound science before policy.

The academic work on modeling of the land use change impact of biofuels is still very much in its infancy. It is highly theoretical and hypothetical. The great variations to date in results both in land use change and GHG emissions does not suggest that a satisfactory scientific understanding of, and methodology for, land use modeling exists. Consequently, the work under review raises more questions than that it provides clear and indisputable answers.

The question if the science/modeling to date is right is very relevant. After all the results from the scientific work will have a decisive impact on policy decisions and on the future development of biofuels.

To have science-based policies, it is essential for the science to be conducted in an academically rigorous way, yielding results that are sound, reproducible and beyond reasonable doubt.

In the analysis work carried so far, these prerequisites of sound science are not achieved:

In DG ENERGY's review of current literature and studies on ILUC (comparing the data and methodological choices of 22 studies, when these were made available), it concludes (p. 6): *"consensus is far from being reached among scientists on many key aspects of methodology and data; there are still aspects that no studies have addressed; and these issues have a significant impact on the studies' results."*

DG ENERGY goes on to state that *"Studies that look at the relative impact of different types of biofuels give widely varying results."*

These conclusions underline that at this stage, current models cannot deliver consistent and reliable results, fail to address critical issues for land management (such as productivity improvement, or use of bioproducts as high quality feed or as alternatives to fossil resources), and do not differentiate between types of biofuels or their provenance.

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

Based on the answer to question 1, there is currently no reliable assessment or verification of the ILUC impacts of biofuels on a local or global level. **Therefore EuropaBio believes that today there is no sufficient scientific ground for the EU to act on ILUC and effectively address its potential impact.**

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:

Different biofuels from different origins would obviously have varying GHG emissions and land use patterns. However current ILUC modelling work is not specific enough to differentiate those impacts (cf question 1) and to derive sufficiently reliable conclusions to be the basis of policy actions.

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

- A. Take no action for the time being, while monitoring impacts including trends in certain key parameters and, if appropriate, proposing corrective action at a later date*
- B. Take action by encouraging greater use of some categories of biofuel*
- C. Take action by discouraging the use of some categories of biofuel*
- D. Take some other form of action*

EuropaBio believes that Option A “Take no action for the time being, while monitoring impacts including trends in certain key parameters and, if appropriate, proposing corrective action at a later date” is the only reasonable and scientifically based option at this moment.

However, EuropaBio believes that taking measures to improve land use management at global level would come a long way to address potential indirect effects (of bioenergy or other policies) and that it would contribute to improve durably sustainable agriculture and forestry practices.

Therefore **Option D “Take some other actions”** should be considered for land use management.

- 1. Quantifying and addressing the main drivers of land use change** (where policies can have a major impact in the short-term)

There are many drivers for land use changes, directly or indirectly that have no relation to biofuels production (such as illegal tropical wood logging, urbanisation, deforestation for subsistence farming, pastoral activities and wood gathering). If the debate on land use change continues to focus on biofuels exclusively (using only 3% gross of global cropland) we risk ignoring the obvious land use change causes: timber harvesting, increased meat consumption and soy meal production, poor subsistence farming techniques.¹

One of the striking outcomes of the ILUC public consultation in 2009 was that the majority of the stakeholders concluded that the best guarantee to address ILUC and preventing unwanted land use changes is having International agreements on protecting carbon-rich habitats.

¹ Food and Agricultural Organization of the United Nations, “Climate Change, biofuels and land” <http://ftp.fao.org/nr/HCLinfo/Land-Infosheet-En-pdf>. This paper shows that based on FAO modelling work, by 2030, projected growth in biofuel demand will require 35 million hectares of land. Based on the current global arable land area of ~1.5 billion hectares, this projection equates to around 2.3% of the current global arable land area. In this context, direct measures on other sectors and on land protection outside the biofuels space are very important since it will be impossible to control or even materially slow down global land use change by focusing mainly on biofuels which only uses 2.3% of that (arable) land.

UN and FAO are already working in this sense through REDD and LULUCF² framework, which quantify land use change per country and causes of change.

EuropaBio supports the demand of organisations like EcoFys, E4Tech, WWF and Conservation International to promote the use of responsible cultivation areas, which would help protect carbon- and biodiversity-rich areas from unsustainable exploitation or change of use.

2. Improve land productivity for all forest and agriculture applications

Structural ways to improve land use is through applying modern farming techniques and land optimization (for example: yield improvements, some intensification of cattle farming).

EuropaBio believes that improving the productivity of agriculture, understanding the direct causes of land use change and addressing those is a more effective way to avoid irresponsible land use outside the EU than applying an ILUC factor on biofuel production.

3. Implement RED sustainability criteria

Finally, the most effective first step to minimize land use change emissions from biofuel production is to ensure that the sustainability criteria laid out in the Renewable Energy Directive (RED) are a success and embraced by producers both inside and outside of the EU. The sustainability criteria contain important elements that protect high carbon-stock areas, encourage the production of better greenhouse gas (GHG) performing biofuels, and promote the implementation of social standards in countries outside the EU.

Member States are in the process of transposing the RED and the economic operators along the entire value chain are working hard to put the instruments in place to be able to comply with the sustainability requirements. The first certification schemes are already in place and auditing of crops is taking place.

From a perspective of investment security, policy stability is a prerequisite. Changing the RED by adding an ILUC factor to GHG emissions for the majority of currently used biofuel pathways immediately after it has entered into force effectively will neither deliver this policy stability nor its expected impact on transport decarbonisation.

4. Encourage the development of biofuels pathways delivering high GHG savings and land use efficiency

Advanced biofuels using wastes, agriculture or forest residues and high productivity energy crops increase the output (of biofuels, energy, by-products, feed, etc) from a hectare of land and thus contribute to reduce the pressure on land use.

Current RED measures to encourage the development of lignocellulosic and waste biofuels (e.g. “double counting”) are not sufficient to create a market driver and lead to sufficient investment. To encourage the rapid development of advanced biofuels and their introduction into the market, policies should consider having a consistent strategy for the funding of research and demonstration plants, as well as meaningful a specific mandate/ quota for biofuels with high GHG savings and high land use efficiency.

Additionally, other barriers should be lifted: the waste directive (2008/98/EG) should allow and clearly defines the use of waste, agricultural and forestry residues for the production of biofuels as material recycling and not just energy recovery.

² http://unfccc.int/methods_science/redd/items/4531.php and http://unfccc.int/methods_and_science/lulucf/items/3060.php

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