The IMO should not encourage crop-based biofuels for ships
Joint Statement

The International Maritime Organization (IMO) is negotiating regulatory measures to enable the shipping industry to become net zero by 2050. We fully support the IMO ambition to reach the greenhouse gas (GHG) reduction targets it has set for itself in its 2023 GHG Strategy. This is a bold endeavour considering that 99% of vessels are powered with fuels of fossil origin and account for 3% of global emissions.

To lessen their climate impact, ships will have to reduce their fuel consumption through energy efficiency measures and switch to sustainable alternative fuels, such as synthetic e-fuels and biofuels. While some biofuels may be produced sustainably delivering significant GHG reduction, there are scalability limitations. Today, the majority of biofuels are produced from food crop-based feedstocks, which come with direct and indirect deforestation, and many other sustainability issues ranging from water scarcity to food security.

Unless legally-binding safeguards are introduced, there is a risk that a large amount of fossil fuels will be replaced with unsustainable biofuels. When the EU decided to encourage the use of biofuels in 2009, the consumption of palm oil-based biofuels doubled between 2010 and 2020, reaching close to a third of EU biofuels use. Scientific evidence later demonstrated that 45% of palm oil expansion happened at the expense of carbon rich ecosystems like forests or peatlands over that same period.[1] Similar findings have been uncovered for other crop-based feedstock such as soy.[2]

Overwhelming evidence on the negative impacts have prompted countries such as France, Norway, the Netherlands, and others to restrict or stop palm and soy-based biofuels in domestic use. Europe has also decided to exclude the use of feed- and food-based biofuels from its flagship shipping fuels regulation (FuelEU).

In line with the recommendations from the UN Environment Programme,[3] we call on the IMO and Member States to discourage the use of crop-based biofuels by ships and to consider the following recommendations:

- Exclude crop-based biofuels from the eligibility list for compliance with existing and future MARPOL ANNEX VI regulations. This can be operationalised by, for example, assigning them well-to-wake GHG values of the least favourable fossil fuel pathways;
- Ensure that crop-based biofuels do not benefit from economic incentives directed towards promoting zero and near-zero emission fuels as part of the technical and economic measures that IMO is currently developing.

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[1] EU (2020): Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the status of production expansion of relevant food and feed crops worldwide.
https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1558977620744&uri=CELEX:52019DC0142

[2] Déforestation associée à l'importation de soja sur les marchés français et européen: État des lieux (2020): https://www.deforestationimportee.ecologie.gouv.fr/IMG/pdf/cst-foret_rapport-deforestation-associee-importation-de-soja.pdf

[3] United Nations Environment Programme (2024): Global Resources Outlook 2024: Bend the Trend – Pathways to a liveable planet as resource use spikes. International Resource Panel. Nairobi.
https://wedocs.unep.org/20.500.11822/44901

The IMO should take note of the biofuels policy experiences, and avoid similar mistakes to ensure a sustainable future for international shipping. Otherwise, we risk deploying a cure worse than the disease to address shipping's climate impact.

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