



Brussels, 19 December 2013

Re: Biofuels and indirect land use change debate: reaching conclusion.

Dear Minister,

We are writing to you to stress the urgency of reaching an ambitious agreement in the EU Council on the issue of biofuels' adverse impacts on land use, climate change and hunger (the legislative proposal on indirect land-use change -ILUC) within your Presidency of the EU.

Agreement is urgent, in order to be able to correct the acknowledged failures of EU biofuels policy – to prevent competition with food production and generating increased emissions.

After months of intense discussions, the Lithuanian EU Presidency on 12 December put to Member States a compromise deal that suggested a 50% increase in the use of food based biofuels (cap of 7%) compared to the current consumption level, a range for ILUC factors for reporting purposes only and a weakening of the 20% binding renewable energy target with the use of multipliers. This considerably weakened the European Commission's proposal and the position adopted by the European Parliament. It was rejected by five member states because of its notable lack of ambition – representing an increase in the environmental and social damages linked with large scale consumption of land-based biofuels, induced by European policy.

An exit from this deadlock in the Council can and must be pursued by the Greek EU Presidency, by pursuing a more ambitious agreement. This means:

- **A meaningful level of cap for first generation biofuels.**  
An increase of food-based biofuels from 5% to 7% is equivalent to food for almost 69 million people at a time when we are trying to fight hunger. Moreover, such an increase would lead to additional deforestation and land conversion, which risk releasing one-off net emissions of up to 400 million tons of CO<sub>2</sub> in the atmosphere, the equivalent of up to 9 million new cars on European roads by 2020. **The agreement should set the level of the cap no higher than the 5% proposed by the Commission and should include all land-based biofuels.**
- **Correct carbon accounting including ILUC**  
The [broad scientific consensus](http://www.ucsusa.org/assets/documents/global_warming/International-Scientists-and-Economists-Statement-on-Biofuels-and-Land-Use.pdf)<sup>1</sup> is that ILUC is a reality. The indirect deforestation, peatland drainage and land conversion caused by expansion of biofuels undermines their climate performance; and this should be addressed to consistently account for all greenhouse gas impacts of biofuels in a uniform way - based on the ILUC values identified by the European Commission's studies.

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<sup>1</sup> International Scientists and Economists Statement on Biofuels and Land Use;  
[http://www.ucsusa.org/assets/documents/global\\_warming/International-Scientists-and-Economists-Statement-on-Biofuels-and-Land-Use.pdf](http://www.ucsusa.org/assets/documents/global_warming/International-Scientists-and-Economists-Statement-on-Biofuels-and-Land-Use.pdf)

**The agreement must prevent public funding for fuels that do not result in significant savings in carbon compared with the fossil fuels they are meant to replace. The best way to do this is a timely introduction of ILUC factors within the sustainability criteria.**

- **Appropriate support of advanced biofuels.**

The extension of multiple counting of advanced biofuels toward the 20% binding renewable energy target would harm the deployment of low carbon renewable technologies, such as wind or photovoltaic, that have proven their capability to reduce GHG emissions in a cost efficient manner, and as such must be rejected.

**The agreement must provide the appropriate support for the uptake of advanced biofuels whilst ensuring they are sustainable and do not lead to undesirable displacement effects; and maintain the integrity of the 20% renewable energy target.**

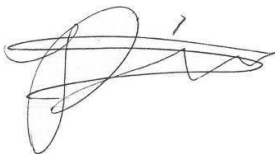
The cost of inaction is too high; the *status quo* must and can be avoided.

We ask the Greek presidency urgently to improve the Council's common position and avoid further delays. Failure to reach agreement would prevent new investments in innovative technologies from taking place, and would result in increased emissions from the EU transport sector, [exacerbating hunger in the world](#)<sup>2</sup>, and increases to the currently €6 billion a year spent on supporting fuels that actually make climate change worse. Europe needs innovative and sustainable solutions for truly green transport, and this reform is key if this is to happen.

We finally ask you to continue the discussion on this dossier in the Environment Council which is better suited to deal with the sustainability issues at the core of this debate.

We stand ready to support you to achieve agreement.

Yours sincerely,



Jos Dings  
Director  
Transport & Environment

**On behalf of**

BirdLife Europe, ClientEarth, European Environmental Bureau, Friends of the Earth Europe, Brot für die Welt, Oxfam

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<sup>2</sup> Note on the impacts of the EU biofuels policy on the right to food;  
[http://www.srfood.org/images/stories/pdf/otherdocuments/20130423\\_biofuelsstatement\\_en.pdf](http://www.srfood.org/images/stories/pdf/otherdocuments/20130423_biofuelsstatement_en.pdf)