

Please register and attribute.

Thx,

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From: [REDACTED] [mailto:angela.bowden@scopa.org.uk]
Sent: Monday, October 08, 2012 10:41 PM
To: [REDACTED] (CAB-OETTINGER)
Subject: Impact of draft EU proposals on Indirect Land Use Change (ILUC) on the UK biofuels sector

Dear [REDACTED]

The UK Seed Crushers and Oil Processors Association (SCOPA) has joined with other organisations in the UK biofuels chain to voice grave concern at the Commission ILUC proposals, which will devastate the UK biofuels industry. The attached paper has been drafted jointly by SCOPA, the Renewable Energy Association (REA), the National Farmers Union (NFU) and the Agricultural Industries Confederation (AIC). This outlines the damaging impacts of such a policy and draws the following conclusions and recommendations:

Impact of draft EU proposals on Indirect Land Use Change (ILUC) on the UK biofuels sector - Conclusions and recommendations

These proposals are ill-conceived and self-defeating. They will damage current and future investment, jobs and growth potential in the UK. They will increase GHG emissions by leaving the use of fossil fuels as the only viable alternative for the liquid fuel market. They threaten to de-rail the UK's renewable energy target of 15% by 2020 and the achievement of the UK's carbon budgets under the Climate Change Act.

We urge the European Commission to withdraw these proposals before they are formally adopted on 17 October. At the very least the following changes should be made to the proposals:

- *The limit of 5% for crop-based biofuels and the removal of all support from 2020.* A limit of no less than 8% should be imposed and this should be phased in, in accordance with a timetable beyond 2020 which is agreed with all stakeholders and takes into account a realistic development path for non-land using biofuels and the introduction of electrification in the road transport sector based on the availability of renewable energy.

- *The proposed ILUC factors.* These should be based on agreed science, and not on estimates which do not fully include co-product benefits and use flawed data. Once proven, they should also be phased in, in accordance with realistic “grandfathering” provisions to preserve investor confidence.
- *The date of 1 July 2012 for the application of a 60% GHG saving threshold.* This date should be re-set to take into account currently committed investment.
- Quadruple counting will do nothing to support the development of the advanced biofuels generation. The proposals should consider introducing a target for advanced biofuels.

We trust you will take our views into account in your consideration of these proposals.

Yours sincerely

[REDACTED]

Secretary General

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