

**Günther H. Oettinger**  
Member of the European Commission

Brussels, 7. 09. 2011  
EG/ch (2011) ARES 978370

Mr Raffaello Garofalo  
Secretary General of EBB

By e-mail: al@ebb-eu.org

Dear Mr Garofalo,

Thank you for your letter of 29 June 2011 in which you express your views on the forthcoming Commission impact assessment and possible legislative proposal regarding indirect land use change related to biofuels and bioliquids. We have taken good note of the issues you express and we acknowledge that this is an important matter which must be assessed, and, if necessary, addressed, in an appropriate way.

In order to assess this issue, the Commission has undertaken extensive consultations over the last two years. We welcome that you have contributed to those consultations. We have also looked into a wide range of studies and commissioned our own studies. As you know, on the basis of these consultations and studies, the Commission has set out its preliminary conclusions on this matter in the report adopted on 22 December 2010<sup>1</sup>. The Commission recognises that a number of deficiencies and uncertainties associated with the modelling remain to be addressed and that indirect land-use change can have an impact on greenhouse gas emissions savings associated with biofuels. Furthermore, the Commission considers that, if action is required, indirect land-use change should be addressed under a precautionary approach.

Together with our colleagues in the Commission, to some of whom you have addressed similar letters, we have continued to conduct work in this area and are currently finalising our impact assessment on this matter in order to ensure that any potential policy decisions are based on the best available scientific evidence. This reply is also sent on behalf of Commissioners Karel De Gucht and Dacian Cioloş to whom you wrote.

Yours sincerely,

  
Günther H. Oettinger

<sup>1</sup> COM (2010) 811, available via [http://ec.europa.eu/energy/renewables/biofuels/land\\_use\\_change\\_en.htm](http://ec.europa.eu/energy/renewables/biofuels/land_use_change_en.htm)