

**EUROPEAN COMMISSION**

Office of the First Vice-President Mr Frans Timmermans

Head of Cabinet

Brussels, **16 SEP. 2015**  
Ares (2015) 2942498

Dear Mr Garofalo, Mr Dusser and Ms Lecocq,

The First Vice-President of the European Commission responsible for Better Regulation, Interinstitutional Relations, Rule of Law and the Charter of Fundamental Rights, Mr Frans Timmermans, has asked me to thank you for your e-mail of 10 July 2015 in which you express your concerns about the lack of scientific openness in GLOBIOM's ILUC modelling.

This study is part of the Commission's continued work to assess indirect land-use change caused by the use of food crop based biofuels in the EU, which the Commission is called upon to carry out by the Renewable Energy and the Fuel Quality Directives. Furthermore, the EU legislator recently re-iterated (2012/0288 COD) that the Commission should review "on the basis of the best latest available scientific evidence, the effectiveness of the measures introduced by [the ILUC-] Directive in limiting indirect land-use change greenhouse gas emissions associated with the production of biofuels."

The Commission has no in-house model to carry out own ILUC modelling work, it has to rely on external institutions to provide it with the necessary scientific input for its work. The model used, GLOBIOM, is the property of IIASA and I am not entitled to comment on the contacts your groups may have had with IIASA on access to the model.

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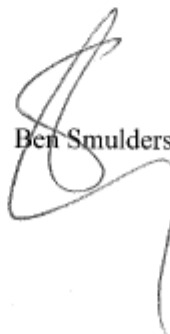
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The offer which forms the basis for the contract between the Commission and the contractor indicates that stakeholders should be involved for a very specific sub-task: for establishing a list of desired model improvements. We are grateful for the constructive input which was received, including from the groups you represent. The final decision on which model improvements would be actually implemented was taken by the Commission and the contractor together. Not all improvements could be taken up due to resource constraints.

The results obtained depend directly on the assumptions made and, in order to preserve overall consistency, will not be changed manually.

The Commission agrees that a scientific peer review – not to be confused with stakeholder involvement - of the study would be desirable. Unfortunately, it seems that if the model structure cannot fully be disclosed, such a review cannot meet the quality standards set by academic rules. The Directorate-General for Energy is discussing this matter with the contractor in order to find a solution.

Yours sincerely,



Ben Smulders