



328/PRO/15

Brussels, July 2nd, 2015

Mr. Dominique RISTORI
Director General
Commission DG ENERGY

CC: Ms. Yvon Slingenberg, Cabinet of Energy and Climate Action Commissioner M. Cañete

Re: Biodiesel chain concerns about the lack of scientific openness in GLOBIOM's ILUC modelling funded by DG Energy

Dear Mr. Ristori,

Our industrial and agricultural associations represent the European production chain of biodiesel. We would like to attract your attention to our deep concerns about the lack of scientific openness of an ILUC modelling study – denominated GLOBIOM – which is being performed by the IIASA research Institute, within a consortium co-ordinated by Ecofys and funded by the Commission Directorate General for Energy.

We understand that the results of such a study could be published in the next months. However, considering that the results of this modelling exercise could be used as a basis for the EU's future biofuel policy, the lack of scientific transparency in GLOBIOM becomes highly problematic when we look back at the controversies that surrounded the ILUC debates. In spite of various written and verbal requests that we made to IIASA and Ecofys, the following points raise our concerns:

- although our associations provided data and information to Ecofys and to the IIASA experts, we have no information about whether this data or that of other sources will be used and retained. In fact, the full (and extremely large) set of statistical and quantitative data (from agriculture, industry etc.) on which the GLOBIOM exercise is running is so far unknown to the public and interested stakeholders (except from some very draft and partial excerpts which have been provided to us for very specific comments);
- the range of assumptions and scenarios that will be used by the model was announced in general terms but the effective data, the detailed quantitative figures and the equations used are unknown;
- in fact, despite a clear commitment from the GLOBIOM consortium to publish a document with key parameters and descriptions of main datasets, with a view to allow for comments on data and definitions, stakeholders have not been consulted on how the consortium progressed with data and definitions. Since the sensitivity of data used and definitions applied to the model have a significant impact on the end results, the biodiesel chain finds it unacceptable that the modelling was carried out without even a minimum of openness with regard to data and definitions, despite a clear commitment (page 3 of 20 February 2014 meeting minutes).
- an advisory board of experts that was set up by the Consortium, officially for consultation purposes, held one face-to-face meeting at the very beginning of the project for introduction

purposes and then only held a very limited number of short conference calls where attendance and representation was uneven. The experts on this advisory board were only in very general terms aware of the work done by IIASA. Although free to comment on the work and to propose changes to the dataset decisions, they had no direct access to the scientific activities, neither to the full data or the methodologies of the study as they were only informed by conference-calls;

- most importantly, although Ecofys considered IIASA could possibly allow partner research institutes/universities, to run the model for sensitivity analysis, IIASA clearly indicated on many occasions that the “GLOBIOM model” itself, with its full set of equations, figures, methodologies and assumptions would not be available for use or cross-checking by any researcher other than the very few employed on this subject by the IIASA. We enquired as to whether this is due to an economic issue linked to the defence of GLOBIOM intellectual property, but GLOBIOM categorically refused to make the model available, despite being offered adequate royalties for temporary access.

This creates a situation whereby the IIASA will publish a study - funded and supported by the European Commission - with findings which will not be peer reviewed prior to publication, but which are going to be presented to the public as the result of objective, scientific research likely to be promoted by the European Commission as basis for policy decisions.

In a letter dated January 20th 2015, following the concerns raised by one of our Associations, Ecofys indicated to us that: *“Unilateral access to the model will not be possible. Not just for the reasons of costs that we discussed earlier, but also because we feel that the debate on ILUC quantification is not served by unilateral reviews. However, IIASA is open to facilitating a real independent review of the model and our modelling exercise if credible guarantees of independence, and hence added value beyond this project, could be provided. Such an independent review can only take place after the modelling results have been published to avoid a delay in our study time planning”.*

According to this statement the GLOBIOM results would be published by the IIASA and the Commission *before* and not *after* a truly open peer review will be realised by other independent and recognised groups of experts. We believe that, given the strong impact that these study results will almost certainly have on long term biofuel policies, and the potential damage it could cause to our industries and the image of biofuels as already happened for the IFPRI study, the European Commission should ensure that such a review takes place before the final GLOBIOM ILUC model publication.

This is why we believe that it is crucial that the GLOBIOM model, the full data-set, equations, variables and assumptions employed should be made available to the academia or at least to two or three other scientific groups of experts well on time before publication.

A transparent scientific approach to the issue of land-use and biofuels would be particularly important in order to make the debate on post-2020 transport decarbonisation less emotional, by establishing a more rational and open perspective. This needs all studies, and particularly those published by the European Commission to be based on facts and figures whose scientific basis, assumptions and data are available to the scientific community and whose methodologies and work have been fully peer-reviewed by independent scientists.

Kind Regards,

Raffaello Garofalo
Secretary General of EBB

Philippe Dusser
Secretary General of EOA

Nathalie Lecocq
Secretary General of Fediol