



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR ENERGY

The Director-General

12 OCT. 2015

Brussels,
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Mr Raffaello Garofalo
Secretary General of EBB

Mr Philippe Dusser
Secretary General of EOA

Ms Nathalie Lecocq
Secretary General of Fediol

c/o EBB - European Biodiesel Board
Boulevard Saint-Michel, 34
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By e-mail: rg@ebb-eu.org

Dear Mr Garofalo, Mr Dusser and Ms Lecocq,

Thank you for your letter of 2nd July 2015 in which you express concerns about the lack of scientific openness in GLOBIOM's ILUC modelling.

Herewith, I would like to refer to the letter sent to you on 16 September by Mr Ben Smulders, the Head of Cabinet of the First Vice-President of the European Commission responsible for Better Regulation, Interinstitutional Relations, Rule of Law and the Charter of Fundamental Rights.

The letter stated that the study on the land use change impact of biofuels consumed in the EU is part of the Commission's continued work on indirect land-use change caused by the use of food crop based biofuels in the EU, which the Commission is required to carry out by the Renewable Energy and the Fuel Quality Directives. Furthermore, the EU legislation (Directive (EU) 2015/1513) has recently re-iterated that the Commission should report "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 and bioliquids."

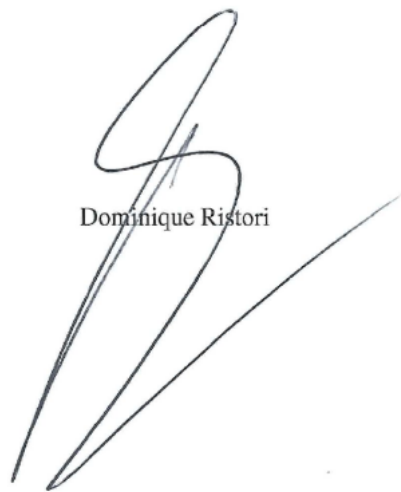
The Commission has no in-house model to carry out its own ILUC modelling work, therefore it has to rely on external institutions to provide it with the necessary scientific input for its work. The model used, GLOBIOM, is property of IIASA, and the Commission cannot comment on the contacts your organisation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

The contract between the Commission and the contractor indicates that stakeholders should be involved on a very specific sub-task: which is to establish 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. Not all of them could be taken up due to resource constraints.

A scientific peer review of the study – in addition to stakeholder involvement - would be desirable. This matter is still being discussed with the contractor and we hope to find a solution.



Yours sincerely,



Dominique Ristori