

Commissioner Günther Oettinger
European Commission
200 rue de la Loi
1049 Brussels

cc. Commissioner Connie Hedegaard
[REDACTED], Head of Spokespersons' service
[REDACTED], Spokesperson Energy

Brussels, 3 August 2011

Re: Interview of Ms. [REDACTED], spokesperson for Energy, on biofuels

Dear Commissioner Oettinger,

I am writing to express my surprise and concern about statements made by your spokesperson Ms [REDACTED] in an interview on biofuels published by the Italian online newspaper *Giornalettismo.com* on 28 July 2011.¹

In this interview, Ms [REDACTED] makes calumnious allegations against Greenpeace, accusing us to work on the issue of biofuels and the related phenomenon of indirect land use change (ILUC) for the sake of publicity and financial gain. In addition, she implies that Greenpeace does not care about the environmental effect of the policy that it advocates. (*"In questo modo [by publicly campaigning on ILUC] si ottiene visibilità presso i media, e ciò è comprensibile dal momento che porta soldi, ma il risultato è far morire un settore che può essere veramente benefico per l'ambiente e per l'energia."*). Finally, she claims that there is no evidence that biofuels have ILUC impacts (e.g. *"Per quanto invece riguarda l'ILUC, non c'è un'unica prova che quest'effetto realmente esista. ... Ripeto, non c'è una prova, non si conosce l'entità del fenomeno."*).

We have obtained a copy of the recorded interview from *Giornalettismo* which confirms Ms [REDACTED]'s statements in the published article. Your spokesperson's allegations against Greenpeace clearly breach the principles of fairness and objectivity that bind all public servants working in the EU institutions. Her baseless insinuations are unworthy of the European Commission and we expect an official apology.

I would also like to ask you to please clarify whether Ms [REDACTED]'s denial of the ILUC effects of biofuels reflects the official position of the Commission.

As you know, the calculation of the ILUC effects of biofuels is a fundamental requirement of the Renewable Energy Directive for the achievement of the goals of EU renewable energy policy. Without taking the ILUC effect into account, it is impossible to claim that any biofuel that requires the use of land has a low carbon footprint or is environmentally sustainable. This is why the Commission has received a clear mandate from the Council and the European Parliament *"to analyze, on the basis of best available scientific evidence, in particular, the inclusion of a factor for indirect land-use changes in the calculation of greenhouse gas emissions."*ⁱⁱ

ILUC effects are recognized by experts. The European Commission itself commissioned studies by the International Food Policy Research Institute (IFPRI) and the Joint Research Center (JRC) on this issue. Both studies were the subject of a public consultation last year. They show that the biofuels policy of the EU will have ILUC effects by 2020 and that the environmental impacts could be significant, resulting in more greenhouse-gas emissions and biodiversity loss, unless appropriate action is immediately taken. The modelling on the ILUC effect developed by the IFPRI has reached sufficient levels of accuracy to estimate the average ILUC emissions of biofuel feedstock production. If taken into account to calculate the total emissions of biofuels, these estimates show that certain categories of biofuels could have a carbon footprint that is no better, and in some cases worse, than fossil fuels.

I am surprised that your spokesperson omitted this important information. Her resulting interview thus lacks objectivity. Given that the European Commission is currently assessing various policy options on how to address the ILUC effects of biofuels, I would appreciate assurance that you and the Commission at large do acknowledge the scientific findings on ILUC and the reality of the threat that ILUC presents.

Regarding the position of Greenpeace on biofuels, our organisation has always made clear that it supports the development of these technologies in accordance with the precautionary principle, as long as their carbon footprint is significantly lower than fossil fuels and their methods of production are sustainable i.e. no malign environmental and social impacts such as biodiversity loss, intensification of unsustainable agricultural practices, or food insecurity.

Regarding the issue of ILUC, we have expressed support for the introduction of a legislative proposal requiring energy suppliers to reflect emissions from ILUC for different biofuel crops in the total carbon footprint calculation of biofuels. This corresponds to one of the four policy options put forward for consultation and currently assessed by the Commission itself to address the ILUC effects of biofuels. This policy option is supported by the vast majority of environmental NGOs who participated in the public consultation last year. Such measures are already in place in the US, in the state of California. The introduction of similar measures by the European Commission would only follow the mandate of the EU Renewable Energy Directive.

I understand that the Commissioner for Climate Action shares responsibility with you on this file. It is also my understanding that the management of Commission spokespersons rests with the Spokespersons' Service. I therefore copy Commissioner Connie Hedegaard and Mr Koen Doens in this letter.

I look forward to hearing from you.



Director, Greenpeace European Unit

Attached: Greenpeace factsheet, "*Fuelling the flame – Biodiesel tested: How Europe's biofuels policy threatens the climate*"

¹ <http://www.giornalettismo.com/archives/135219/biofuels-per-ora-sono-lunica-soluzione>

² EC Directive on the promotion of the use of energy from renewable sources, 23 April 2009.