

The College of European Commissioners

24 April 2012

RE: Biofuels and fossil fuels – Implementing the Fuel Quality and Renewable Energy Directives

Dear Commissioner Oettinger,

In the coming weeks, you will take two important decisions on assessing the carbon footprint of transport fuels. These decisions will determine whether the EU will be able to effectively shift the market to cleaner, more sustainable transport fuels, in line with its climate commitments.

We urge you to base these decisions on the best available science and agree on a robust methodology for both fossil fuels and biofuels. This means that the variation in the carbon intensity of fossil fuels should be reflected in a set of feedstock-based default values, including values for fuels produced from tar sands and oil shale, as proposed by the Commission in October 2011. For biofuels, the emissions from indirect land use change (ILUC) should be included for each feedstock.

The full and accurate accounting of the lifecycle emissions is critical for a meaningful comparison of climate impacts and for only channelling support to the least damaging fuels. This would also send a clear signal to companies that the EU is serious about the decarbonisation of transport.

FOSSIL FUELS

The Fuel Quality Directive requires a 6% reduction in the carbon intensity of road transport fuels between 2010 and 2020. Rules on how to calculate and report the carbon intensity of fossil fuels are still under discussion. In October 2011, the Commission presented a useful proposal including a set of carbon intensity default values for fuels produced from regular crude oil and a range of higher-carbon feedstock sources such as tar sands, oil shale, gas to liquid and, worst of all, coal to liquids. In February 2012, the EU's Fuel Quality Committee neither adopted nor rejected the draft law and so the proposal is being considered again by the Commission before being referred to the Environment Council.

We urge you to maintain both the science-based default values and robust reporting requirements, as originally proposed.

BIOFUELS

The Renewable Energy and Fuel Quality Directives also mandate the European Commission to review the impact of indirect land-use change on greenhouse gas emissions. All recent scientific research concludes that expanding the use of land-based biofuels, as presented in the national renewable energy action plans, will lead to significant knock-on ILUC effects, which could mean the destruction of vast areas of forests, savannahs and peatlands, thereby exacerbating the climate and biodiversity crises. It would also squeeze food supplies increasing the risk of food price volatility and food shortage.

Recent research carried out for the Commission by the Joint Research Centre and the International Food Policy Research Institute, concludes that pursuing the current national biofuel plans will generate additional carbon emissions from ILUC that could negate the carbon savings expected from the EU's green transport policy.

We therefore urge the Commission to recognize the significance and scale of the ILUC impacts caused by biofuels as well as the robustness of the science and ILUC modelling.

We support the call made by over two hundreds scientists and economists in December 2011 asking you to assign specific values for different crops used to produce biofuels to take account of indirect land-use change (ILUC).

These so-called "ILUC factors" must be introduced under both the Fuel Quality Directive and Renewable Energy Directive in order to ensure policy coherence and clarity for investors. If ILUC factors are not also incorporated in the Renewable Energy Directive, member states might end up mandating the production of biofuels that do not have any value under the Fuel Quality Directive.

Biofuels whose carbon footprint is worse or not significantly better than that of fossil fuels should not benefit from any kind of public support.










In the context of the EU's 2020 climate objectives and 2050 climate roadmap, we call upon the Commission to explore alternative approaches to decarbonising the transport sector in a way that is truly sustainable.

Yours sincerely,

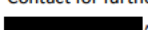


Managing Director, Greenpeace European Unit

On behalf of:

 – BirdLife International
 Climate Action Network (CAN) Europe
 CEE Bankwatch Network
 European Environmental Bureau
 Friends of the Earth Europe
 Health & Environment Alliance
 , Naturfreunde Internationale
 – The European Federation for Transport and Environment (T&E)
 – WWF European Policy Office

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