

Brussels, 21 June 2012

Dear President Barroso,
Dear Commissioners,

We are writing to you with regard to the ongoing debate on how to address indirect land use change (ILUC) impacts of biofuels.

We appreciate your initiative to discuss the issue at the level of the College of Commissioners on 2 May, and for the general acknowledgement at that debate that robust action on ILUC in both relevant Directives is needed.

At the same time we would be extremely concerned if, after this positive debate, the Commission were to come with a proposal that would effectively maintain the status quo until 2018, at which date ILUC emissions would be taken into account through a technical procedure.

This decision would lead to continued conversion of carbon stocks in peatlands, forest and grasslands into crop fields worldwide, with a significant increase in greenhouse gas emissions. We believe such an outcome would not correspond with the conclusions of the college debate on 2 May 2012 to act in line with the precautionary principle.

Unless feedstock-specific ILUC factors are introduced in both the Renewable Energy and Fuel Quality Directives, high-ILUC biofuels will continue to expand and attract investments, this will further exacerbate a lock-in situation and make it increasingly difficult to change course in the future.

Now, a clear signal must be sent to the markets that the future of green transport does not include socially and environmentally unsustainable biofuels, but rather solutions such as renewable electricity in cars and energy-saving technologies – with high potential for job creation and economic benefits and without negative impacts on global food security.

Postponing action is no action. We therefore urge you to legislate now on the basis of the best available science to ensure that biofuels reduce greenhouse gas emissions. This requires including feedstock-specific ILUC factors in both Renewable Energy and Fuel Quality Directives – coming into force at the latest by 2014.

Yours sincerely,



██████████, Secretary General European Environmental Bureau,

Also on behalf of

[REDACTED], [REDACTED] Oxfam International's [REDACTED]

[REDACTED], [REDACTED] – BirdLife Europe

[REDACTED] – The European Federation for Transport and Environment (T&E)

[REDACTED] – WWF European Policy Office

[REDACTED], Greenpeace European Unit

[REDACTED] – ActionAid International

[REDACTED] - Friends of the Earth Europe