



Brussels, 22 September 2011

**To: The President of the European Commission José Manuel Barroso**  
CC: Commissioner Hedegaard, Commissioner Oettinger, Commissioner Potocnik, Director General of DG Communications Jean-Pierre Vandersteen

**RE: Addressing indirect impacts of biofuels**

Dear President Barroso,

We are writing to seek assurance that the Commission is giving due consideration to science in its energy policy, after several instances in which the best available science was dismissed.

This year has presented your Commission with the challenge of tackling the deepest economic crisis since the creation of the European Union. Fortunately, there are encouraging signs that your 2020 vision for encouraging green jobs and innovation is bearing fruit. Europe's offshore wind industry, for example, reported solid year-on-year growth of 4.5 percent in the first half of 2011.

However, we are concerned that not all renewable sectors are contributing equally to green growth or to climate protection. Investment in biofuels, for example, has been stalled by uncertainty over the future regulatory landscape and considerable doubts about the green credentials of biofuels.

The main obstacle preventing the development of truly carbon-neutral biofuels is a protracted discussion within the Commission about how to resolve the issue of indirect land use change (ILUC). When the Renewable Energy Directive was agreed in 2008, the Commission was tasked with resolving this issue by the end of 2010, taking account of the best available science.

Since then, the Commission has sponsored a substantial research effort – no less than five world-class studies into the indirect impacts of land-using biofuels. All those studies concur that the indirect impacts of these biofuels are significant, and could not only negate the expected carbon savings, but even lead to an increase in emissions and exacerbate environmental and social problems around the world. Large-scale land acquisitions and increased food insecurity in developing countries are of particular concern.

During your keynote speech at the launch of the IPCC's special report on renewable energy in June, you quoted from the 'Village Green Preservation Society' by the Kinks, and how we should strive to preserve the planet we have inherited. Sadly, the latest impact assessment shows the EU's plan to greatly increase the use of land-using biofuels will do quite the opposite; it will lead to massive destruction of forests, wetlands and grasslands with negative impacts on biodiversity, water and carbon stocks.

Tough decisions will have to be made to avoid that damage, and we see no reason for further delay. The Commission has collated the best available science, and we urge you to take action now to repair EU biofuels policy so it contributes to sustainable and carbon-neutral economic growth. As scientific consensus stands, specific ILUC factors for different types of biofuels are the only credible solution and we urge you to put this into the upcoming legislative proposal.

Just ahead of your appointment for a second term in office, you promised the European Parliament "a fundamental review of the way European institutions access and use scientific advice".

Unfortunately, the Commission's comments at the midday briefing on Sept 14 have given us cause for concern about that commitment to science-led policy-making. The Commission rebutted, without cause, a valuable contribution from the 19 scientific advisers of the European Environment Agency, who said that the EU must take care to avoid "double-counting" the carbon stored by biofuel crops.

We ask you to kindly reassure us that the Commission will continue to be guided by science on the best route to decarbonisation and will act immediately to resolve this issue in a scientifically credible manner.

Yours sincerely,

Jeremy Wates, Secretary General, European Environmental Bureau



On behalf of:

Angelo Caserta, Director, StichtingBirdLife Europe

Jos Dings, Director, Transport & Environment

JorgoRiss, Director, Greenpeace European Unit

Jane Madgwick, CEO, Wetlands International

Laura Sullivan, European Policy and Campaigns Manager, ActionAid International

Natalia Alonso, Head of EU Advocacy Office, Oxfam International

Janet Meissner Pritchard, Climate & Forests Programme Leader, ClientEarth