



Brussels, 27 September 2012

Dear Commissioner De Gucht,

We have recently become aware that a Commission (DG Energy and CLIMA) proposal on how to tackle the problem of indirect land use change (ILUC) from biofuels is currently in inter-service consultation.

We are pleased that a proposal from the Commission is imminent, and we would like to emphasize how much we applaud the Commission for finally recognizing that EU biofuels mandates are problematic. We're sure this issue has been raised to you many times in the context of global food prices. Science also shows that many biofuels lead to increases in GHG emissions compared to fossil fuels.

We urge you to don't water down or further delay ILUC reform. This issue has been debated for years and action is already very overdue.

We also urge you to work to enhance the proposal as much as possible during the inter-service consultation, to adequately take account of the environmental and social harm caused by biofuels and ILUC.

We call on you to strengthen the draft proposal, which has become public, in the following ways:

- Introduce ILUC factors in the Renewable Energy Directive (as well as the FQD) to ensure that no biofuels on the European market increase GHG emissions
- Lower the 5% cap on "biofuels from food" - don't increase it.
- Ensure there is a phase down of subsidies for "biofuels from food" immediately.
- Define "wastes and residues" and ensure there are sustainability criteria to take account of indirect effects of diverting waste streams and using second generation biofuels grown on land.

At this time, 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. After 21 months of delay, this reform can wait no longer.

We hope these considerations are helpful and we would be more than happy to discuss this issue further if that would be useful.

Yours Sincerely,

Jasmin Lauwaert,
Natuurpunt

On behalf of

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