

Brussels, 27 April 2012

Dear President Barroso,  
Dear Commissioners,

### **Biofuels and carbon footprint**

Europe's use of biofuels to fuel its vehicles risks driving land grabs and deforestation, increasing food prices, exacerbating poverty and hunger, and accelerating climate change. We are seriously concerned that the Commission has not yet taken action to ensure that Europe's green transport policy discourages those biofuels that cause higher greenhouse gas emissions than fossil fuels<sup>1</sup>.

Scientists have made it clear that urgent action is needed, warning about the high levels of emissions that result from indirect land use change (ILUC). According to the results of the Commission's own studies, the carbon footprint of biodiesel can be worse than that of fossil fuels once these indirect side-effects are taken into account<sup>2</sup>.

Land that would otherwise be used to feed people and livestock now satisfies the EU's growing hunger for biofuels. New lands must be ploughed up elsewhere for food and feed, destroying vital ecosystems and carbon stores like forests and peat land, a process that releases millions of tons of emissions and accelerates climate change. This reality undermines the environmental benefits that EU biofuels policy promises.

Without effective policy measures, subsidised biofuels consumed in Europe are highly unlikely to reduce the rising contribution of Europe's transport sector to global climate change, and threaten to undermine the otherwise positive outcomes of renewable energy and fuel quality policies.

Moreover, increasing the use of biofuels can also squeeze food supplies, amplifying the risk of food crises (and exacerbating land-grabbing conflicts across the world). Industrial biofuels production requires large amounts of land and other natural resources such as water, which should be used to meet the basic needs of local populations, not to sustain extraction of energy for foreign markets.

The Commission is about to meet to decide on its legislative proposal on how to deal with the issue of ILUC. **We call on you, as an immediate first step to prevent the use of the most climate-damaging biofuels, to introduce a proposal for feedstock-specific ILUC emission factors when calculating carbon footprints in both the Renewable Energy and Fuel Quality Directives.**

On behalf of all signatories,

Yours sincerely,



Natalia Alonso  
Head of the Oxfam International EU Advocacy Office

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<sup>1</sup> Within the article 19.6 of the Renewable Energy Directive (2009/28/EC), the Commission was due to submit a report on ILUC by 31 December 2010 accompanied if appropriate by a proposal, based on the best available science, containing a concrete methodology.

<sup>2</sup> IFPRI study "Assessing the Land Use Change Consequences of European Biofuel Policies", October 2011  
<http://www.ifpri.org/sites/default/files/publications/biofuelsreportec2011.pdf>

## **EU AND INTERNATIONAL**

ActionAid  
BirdLife Europe  
Can Europe  
CDM Watch  
CEEweb for Biodiversity  
CIDSE - together for global justice  
ClientEarth  
European Environmental Bureau  
Friends of the Earth Europe  
Greenpeace  
Naturefriends International  
Oxfam  
Transport & Environment  
Wetlands International  
WWF EPO

## **AUSTRIA**

BirdLife Austria  
EU-Umweltbuero  
SOL – People for Solidarity, Ecology and Lifestyle  
VCÖ - Mobilität mit Zukunft.

## **BELGIUM**

Associations 21  
Bond Beter Leefmilieu Vlaanderen - BBLV  
Centre tricontinental (CETRI)  
Inter-Environnement Wallonie  
NATAGORA  
Natuurpunt  
SOS FAIM Belgique

## **BULGARIA**

Bulgarian Society for the Protection of Birds/  
BirdLife Bulgaria

## **CYPRUS**

BirdLife Cyprus  
Friends of the Earth Cyprus

## **CZECH REPUBLIC**

Czech Society for Ornithology  
Glopolis

## **DENMARK**

Danish Society for Nature Conservation  
The Danish Ecological Council  
Verdens Skove (Forests of the World)

## **FRANCE**

Comité français pour la solidarité internationale  
FNAUT  
France Nature Environnement (FNE)  
Réseau Action Climat-France

## **FINLAND**

BirdLife Finland  
Finnish NGDO Platform to the EU Kehys  
NGO Platform KEPA

## **GERMANY**

Berggorilla & Regenwald Direkthilfe  
INKOTA-netzwerk  
Brot für die Welt  
MISEREOR  
Pro REGENWALD  
Pro Wildlife  
Rettet den Regenwald/Rainforest Rescue

## **GREECE**

ELLINIKI ETAIRIA - Society for the Environment & Cultural Heritage  
Hellenic Ornithological Society/ BirdLife Greece

## **GUATEMALA**

Promoción y el Desarrollo de la Comunidad (CEIBA)

## **HUNGARY**

MTVSZ/Friends of the Earth Hungary

## **INDONESIA**

KePPaK PEREMPUAN  
Lentera Rakyat  
WALHI - Friends of the Earth Indonesia

## **LUXEMBOURG**

Caritas Luxembourg  
Catholic Church Luxembourg  
Cercle de Coopération des ONG de  
développement  
Fondation Bridderlech Deelen  
Justice et Paix / Justitia et Pax  
Mouvement Ecologique – Friends of the Earth  
Luxembourg  
Natur&ëmwelt (LNVL)  
SOS Faim Luxembourg

## **Mauritius**

Maudesco Friends of the Earth

## **NETHERLANDS**

Natuur & Milieu  
Nederlands cultuurlandschap

## **PAPUA NEW GUINEA**

Center for Environmental Law And  
Community Rights Inc./Friends of the Earth-  
Papua New Guinea.

## **PHILIPPINES**

Ecological Society of the Philippines

## **POLAND**

Animal Conservation and Wildlife Society  
(ACWF)  
ISD - Instytut Na Rzecz Ekorozwoju - Institute  
for Sustainable Development

## **PORTUGAL**

Oikos – cooperação e desenvolvimento  
Quercus

## **ROMANIA**

AGORA - Working Group for Sustainable  
Development  
Fundatia ADEPT Transilvania  
Re.Generation  
TERRA Mileniul III Foundation

## **SIERRA LEONE**

Friends of the Earth- Sierra Leone

## **SLOVAKIA**

Centre for sustainable alternatives  
Slovakia-Southern Africa Society  
SOS/BirdLife

## **SLOVENIA**

DOPPS-BirdLife  
Focus - Association for Sustainable  
Development  
Institute for Sustainable Development

## **SPAIN**

Amigos de la Tierra España.  
Ecologistas en Acción  
Salva la Selva  
SEO/BirdLife

## **UK**

Campaign against Climate Change  
Christian Ecology Link  
Compassion in World Farming  
Down to Earth Indonesia  
Elephant Family  
Friends of the Earth England, Wales and  
Northern Ireland  
GreenSpeed  
Occupy London Energy, Equity & Environment  
Working Group  
Orangutan Foundation  
Real Bread Campaign  
Sumatran Orangutan Society  
York and Ryedale Friends of the Earth

## **USA**

Clean Air Task Force  
Environmental Working Group  
Friends of the Earth USA  
National Wildlife Federation  
Natural Resources Defense Council  
Rainforest Action Network (RAN)