

## **OPEN LETTER: WE CALL ON THE EU TO ABANDON TARGETS FOR BIOFUEL USE IN EUROPE**

**31 January 2007**

**To: The Council of the European Union, the European Commission, the European Parliament, and citizens in Europe**

We are extremely concerned by the plans as presented by the European Commission to adopt a mandatory target for biofuel use in transport. Implementing these measures means that the EU will risk breaching its international commitments to reduce greenhouse gas emissions and protect biodiversity and human rights; because, as set out below – the proposed targets will amongst other things promote crops with poor greenhouse gas balances, trigger deforestation and loss of biodiversity and exacerbate local land use conflicts.

### **BIOFUEL TARGETS WITHOUT MUCH STRONGER COMMITMENTS TO REDUCE CONSUMPTION ARE COUNTER-PRODUCTIVE**

Any targets relating to energy we believe, must therefore **first** be directed towards **reducing overall energy use, and improving energy efficiency**. Instead of addressing Europe's excessive consumption, the Commission proposes a biofuels target as a percentage of the EU's fast growing and of as yet unlimited transport fuel consumption.<sup>1</sup> This approach must be rejected as counterproductive. The fact that the European Commission's 'Energy Package'<sup>2</sup> only proposes targets for biofuels for transport but not for other alternative energies is indicative of a seriously flawed policy approach to addressing greenhouse gas emissions.

### **TARGETS WILL NEGATIVELY IMPACT THE GLOBAL SOUTH**

The EU is suggesting that much of the biofuel crop will have to be produced in the global South and exported to Europe.<sup>3</sup> Although presented as an opportunity for Southern economies, evidence suggests that monoculture crops for biofuel such as oil palm, soya, sugar cane and maize lead to increased destruction of biodiversity and rural livelihoods and further erosion of food security, with serious impacts on water, soil, and regional climate patterns.<sup>4</sup> Several statements already made by civil society organisations from the South express deep concern and call for a rejection of the EU biofuel plans.<sup>5</sup>

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<sup>1</sup> Annual emissions from EU transport are expected to grow by 77 million tonnes CO<sub>2</sub>eq between 2005 and 2020 – three times as much as from any other sector of the EU economy.

<sup>2</sup> COMMUNICATION FROM THE COMMISSION: An energy policy for Europe COM(2007)1  
[http://ec.europa.eu/energy/energy\\_policy/index\\_en.htm](http://ec.europa.eu/energy/energy_policy/index_en.htm)

<sup>3</sup> An EU strategy for biofuels, COM(2006) 34 sets out that "both domestic producers and importers should benefit from a growing EU market for biofuels".

<sup>4</sup> See among others: Polluting effects of Brazil's sugar-ethanol industry by Luiz Antonio Martinelli and Solange Filoso. Nature 445, 364 (25 January 2007); Kamerun: Biodiesel als Export- Schlager. Menschen und Wälder müssen Ölpalmen weichen, [http://www.afrika.info/aktuell\\_detail.php?N\\_ID=374&kp=news2007-01-11](http://www.afrika.info/aktuell_detail.php?N_ID=374&kp=news2007-01-11); World Rainforest Movement Bulletin 112, November 2006. [www.wrm.org.uy](http://www.wrm.org.uy); COLOMBIA: Biodiesel Push Blamed for Violations of Rights by Helda Martínez. <http://www.ipsnews.net/news.asp?idnews=35722>.

<sup>5</sup> (1) We want Food Sovereignty Not Biofuels, signed by Alert Against the Green Desert Network, Latin American Network against Monoculture Tree Plantations, Network for a GM free Latin America, OilWatch South America and World Rainforest Movement, January 2007. [wrm.org.uy/subjects/biofuels/EU\\_declaration.html](http://www.wrm.org.uy/subjects/biofuels/EU_declaration.html) (2) Statement from SawitWatch. (3) Statement to the UN Climate Convention negotiations in Nairobi, November 2006, demanding "...the Parties to the Framework Convention on Climate Change to immediately suspend all subsidies and other forms of inequitable support for the import and export of biofuels." [http://www.wrm.org.uy/actors/CCC/Nairobi/Disaster\\_Making.html](http://www.wrm.org.uy/actors/CCC/Nairobi/Disaster_Making.html)

## **RISK OF INCREASED CLIMATE IMPACTS OF BIOFUELS**

Biofuel is arguably the least desirable alternative energy form for which the EU could set a target. Biofuels for transport are less effective than wind, solar or solid biomass energy schemes.<sup>6</sup> The production of biofuel crops uses scarce resources such as fresh water<sup>7</sup> and productive land<sup>8</sup> and in most crops used today, the greenhouse gas savings are marginal at best in comparison to fossil fuels. A thorough understanding of the emissions produced throughout the chain from land conversion to production, refining and use of biofuels is essential to ensure biofuel use will truly reduce greenhouse gas emissions. Not only is deforestation itself a major cause of CO<sub>2</sub> emissions, but biodiesel from South East Asian palm oil (where most world palm oil currently originates), can be expected to cause between two and eight times as much CO<sub>2</sub> emissions from damage to peat as the CO<sub>2</sub> emissions from the mineral diesel it replaces (by conservative estimates, and according to the most recent science).<sup>9</sup> These emissions make it less likely for the EU to meet their commitment of achieving the climate target of no more than 2°C change in average global temperature.<sup>10</sup> Furthermore, research already suggests that the carbon balance of some biofuel crops may actually be negative when taking the complete process into account.<sup>11</sup> Further study is thus needed *before* setting biofuel targets.

## **BIOFUELS WILL INCREASE PRESSURE ON WORLD FOOD SUPPLIES AND FURTHER ERODE FOOD SOVEREIGNTY**

Price increases for some biofuel crops that are also staple foods will exacerbate not only deforestation, but also put food security at risk.<sup>12</sup> Since biofuel targets in the EU would promote the production of biomass in the global South, the EU could be responsible for reducing the area of land devoted to food production, so eroding local and international food security and sovereignty and causing food shortages. Like EU targets, the US biofuel targets have been criticized for requiring an excessive proportion of the corn crop.<sup>13</sup> The combined additional pressure from these two economies on crops widely used as essential food crops seriously threatens food price increases in poorer countries. Already, US demand for biofuel from corn has increased the current world grain deficit,

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<sup>6</sup> For solar vs. biomass, see Pimentel et al, 2002. <http://dematerialism.net/Pimentel.pdf>, Table 2. Onshore wind can achieve over 3MW ha-1 of actual standing land, NET of wind variability, see British Wind Energy Association, <http://www.bwea.com/ref/faq.html>, equivalent to 38 hectares delivering over 1 bn kWh per year, i.e. far better than solar. For biomass re. biofuels: A biomass crop can be chosen for best overall energy yield, rather than oil or ethanol yield, and energy is not expended extracting or processing the biofuel element. See evidence to UK Commons EFRA Committee inquiry, [www.publications.parliament.uk/pa/cm/200506/cmselect/cmenvfru/965/96507.htm#a22](http://www.publications.parliament.uk/pa/cm/200506/cmselect/cmenvfru/965/96507.htm#a22) Note also that tropical energy crops with the highest energy outputs take up productive land (so displacing natural carbon stores or farmland) and have other ecological downsides or costs e.g. fertilizer use, water.

<sup>7</sup> Food, biofuels could worsen water shortages-report. <http://today.reuters.com/News/CrisesArticle.aspx?storyId=L18850725>.

<sup>8</sup> See 20; also the EC Well To Wheels Study 2006 notes: "expansion of arable area onto other land, notably pasture and forest, would be likely to release large amounts of carbon from the soil, negating any benefit of the energy crops for decades to come." - p.76, download at <http://ies.jrc.cec.eu.int/wtw.html>

<sup>9</sup> [www.wetlands.org/publication.aspx?ID=51a80e5f-4479-4200-9be0-66f1aa9f9ca9](http://www.wetlands.org/publication.aspx?ID=51a80e5f-4479-4200-9be0-66f1aa9f9ca9)

<sup>10</sup> [www.biofuelwatch.org.uk/peatfiresbackground.pdf](http://www.biofuelwatch.org.uk/peatfiresbackground.pdf)

<sup>11</sup> COMMUNICATION FROM THE COMMISSION: An energy policy for Europe COM(2007)1

[http://ec.europa.eu/energy/energy\\_policy/index\\_en.htm](http://ec.europa.eu/energy/energy_policy/index_en.htm)

<sup>12</sup> A Culinary and Cultural Staple in Crisis, Washington Post, January 26, 2007: <http://www.washingtonpost.com/wp-dyn/content/article/2007/01/26/AR2007012601896.html>

<sup>13</sup> In 2000, 6 percent of the U.S. corn crop was used for ethanol production. In 2006 the figure had risen to 20 percent, and the ethanol plants under construction would double capacity by 2010. The Washington Post: Blindness on Biofuels by Robert J. Samuelson Wednesday, January 24, 2007; Page A23

raising corn prices significantly.<sup>14</sup> In addition, The FAO in 2006 reported a historical low in the world's stocks-to-use ratio for grains and record levels of demand (surpassing global production) for oil crops due to biofuel production. World cereal reserves have also fallen to their lowest level in more than two decades.<sup>15</sup>

### **MORE HUMAN RIGHTS VIOLATIONS RELATED TO MONOCULTURE EXPANSION**

Serious human rights abuses have been reported from sugar cane, palm oil and soy plantations in Brazil, Argentina, Paraguay, Colombia and South-East Asia. These include slavery, very poor working conditions and low wages, violent land conflicts, death and health crises due to the use of agrochemicals and deforestation.<sup>16</sup>

### **TARGETS WILL FUEL GM EXPANSION**

The genetic engineering sector of the biotechnology industry is promoting biofuels to gain access to a new market. The GM varieties of several crops now used as biofuel crops (eg: maize, soya, oilseed rape) have met strong resistance to their use as food, especially in Europe. The industry hopes that by promoting them as biofuels, these crops will gain acceptance. However, the problems associated with GM, including contamination, would not be addressed. The introduction of GM crops in the South has had a massive impact on farming methods, human rights and the environment.<sup>17</sup> An EU target will give support to the GM industry to expand still further. The industry also plans to use GM to alter, break down or remove the lignin and cellulose of plants to facilitate and increase biofuel yields<sup>18</sup>, with consequences that cannot be predicted.

### **INCENTIVES AND SUBSIDIES**

If the EU applies incentives and subsidies to biofuels, these will further intensify all the pressures that we foresee from the targets. They will also distort markets and further undermine food production. They should not be applied while there is still so much argument about the real contribution biofuels can make to energy use and climate. Finally, incentives for biofuels contradict the pro-poor strategies of the Millennium Development Goals and disregard the 2010 Target agreed on at the World Summit for Sustainable Development in Johannesburg by adding a severe additional driver of biodiversity loss.

### **NO CREDIBLE CERTIFICATION PROCESS AVAILABLE AT THIS POINT**

Sustainability certification is being proposed as a way of addressing many of the problems outlined above. However, the European Commission energy package does not provide clarity on whether a certification scheme for biofuels will be introduced, and if so, whether it would be voluntary or mandatory. Previous certification initiatives suggest

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<sup>14</sup> "Higher prices for corn (which is fed to poultry, hogs and cattle) raise retail meat prices. Ironically, fuel subsidies may boost food costs" The Washington Post: Blindness on Biofuels by Robert J. Samuelson Wednesday, January 24, 2007; Page A23

<sup>15</sup> USDA. Grain: World Markets and Trade. Circular Series FG 11-06. November 2006. FAO Food Outlook N°. 2. Global Market Analysis. December 2006.

<sup>16</sup> <http://tech.groups.yahoo.com/group/biofuelwatch/message/239>, <http://www.grr.org.ar>

<sup>17</sup> April 2005: Report "Argentina: A Case Study on the Impact of Genetically Engineered Soya - How producing RR soya is destroying the food security and sovereignty of Argentina" EcoNexus (UK) and Grupo de Reflexion Rural (Argentina).

<sup>18</sup> For example: Plant genetic engineering to improve biomass characteristics for biofuels by Mariam Sticklen [www.sciencedirect.com](http://www.sciencedirect.com) Current Opinion in Biotechnology 2006, 17:315-319

that certification processes by themselves cannot address most of the environmental and social ‘problems’, particularly in countries with poor human rights records or weak enforcement of environmental and labour legislation. The Round Table on Responsible Soy (RSS), a voluntary certification process led by some large environmental NGO's and industry, has run into great controversy with civil society organisations and small farmers' movements in Latin America and is widely perceived as acting against their interests. The Round Table on Sustainable Palm Oil (RSPO) has yet to agree on procedures for verifying adherence to its standards and some of the RSPO industry members continue to destroy large areas of rainforest and openly bid for concessions which contravene RSPO principles, such as Wilmar International’s bid for Bugala Island, Uganda, or PT SMART’s plans for palm oil expansion in Indonesia. At present, no credible certification process leading to strong and mandatory standards, with full involvement of affected groups in producer countries, is available.

Setting targets for biofuels before fully addressing the problems it can cause should be strongly rejected.

**We therefore call on the Member States to reject the biofuel target for transport and halt all other incentives for biofuel production which could encourage in any way the use of biofuels linked to the problems described above. Instead, the focus should be on drastic reduction of energy use and support for genuinely sustainable renewables.**

### **Signatories:**

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