



## Voting recommendations

**Voting recommendations for 7 July Environment Committee vote on the sustainability criteria for biofuels in the Renewable Energy Directive**  
*(Based on version 2008/0016(COD) from 12 June 2008)*

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On 7 July, the Environment Committee will vote on the European Commission's legislative proposal for a Directive on the promotion of the use of energy from renewable sources (COM (2008) 19 final). We welcome efforts to strengthen biofuel sustainability standards. However, we urge Members to heed the latest evidence and show strong political and environmental leadership by rejecting a fixed EU biofuel target.

### AMENDMENTS TO SUPPORT

#### **1. Dropping the 10% target for the renewable energy in transport**

The 10% target will require a significant quantity of biofuels. Evidence is growing that this can not be delivered in a sustainable way, but could instead lead to ecosystem damage, biodiversity loss, increased food prices, impacts on the world's most vulnerable peoples, and in some cases even increased greenhouse gas emissions due to land use change. So-called 'second generation' fuels from cellulosic material have not yet proven their ability to deliver and could at best contribute a relatively small share of sustainable biofuels to the target. The target should therefore be dropped.

→ Please support Am. 142

#### **2. Extension of the sustainability criteria for all biomass**

Many of the same issues of land-use impacts and sustainability arise with all biomass production. Applying sustainability criteria to all energy uses of biomass would avoid a two-tank policy of supplying sustainable biomass for the use of liquid biofuels and unsustainable biomass for the use in electricity and heating sectors.

→ Please support Am. 23 and all following amendments proposing to change "biofuels and bioliquids" to "energy from biomass"

#### **3. Significant GHG savings**

To ensure a real benefit to the climate, only biofuels offering a minimum 60% greenhouse gas savings, as compared to fossil fuels, should be accepted. This should be calculated using a full life-cycle analysis approach, based on the latest scientific data.

→ Please support the identical Ams 187 and 191

#### **4. Inclusion of indirect land use change**

Recent scientific studies have shown that any land-use change for the production of biofuels (unless it is from abandoned agriculture land) will result in high initial greenhouse gas emissions that will take many decades and sometimes even centuries to pay back. The research also reveals that almost all biofuels have resulted, directly or indirectly, in new lands being cleared, either for food or fuel. It is therefore essential that crops or plantations causing these kind of indirect impacts be excluded. The risk adder approach is a first step to tackling this issue and the proposed 120g/CO<sub>2</sub> figure is scientifically robust.

**→ Please support Ams 284, 290 and 292 (120g CO<sub>2</sub> risk adder)**

A committee of independent experts should be appointed to adjust the risk adder based on scientific studies. The committee should also have the mandate to propose the exclusion of products or crop-country combinations that result in significant greenhouse gas emissions.

**→ Please support Am. 231**

The Commission should closely monitor the effects of indirect land-use change and communicate the findings in regular reports.

**→ Please support Ams 274 and 270**

#### **5. Protection of high conservation value land**

The awareness of negative impacts of unsustainable bioenergy production on biodiversity is increasing. For example, the extension of palm oil plantations is already leading to the destruction of habitats such as the rainforests of Indonesia. Even in the EU, Natura 2000 permanent grasslands are being ploughed for additional biofuel production. In order to protect valuable ecosystems, all land of High Conservation Value should be protected from agricultural development.

**→ Please support Ams 17, 203 and 206**

In addition, it is important that existing EU environmental legislation, which protects biodiversity and the natural environment in the EU and is taken into account in all renewable energy developments.

**→ Please support Am. 118**

#### **6. Protection of high carbon stock land**

It is essential that biofuels are not made from raw material obtained from land with high carbon stocks. This includes *all* peatlands, as even degraded peatlands store significant carbon. A further destruction of these sites would cause large-scale releases of greenhouse gases. In addition, 'intermediate ecosystems' that are important for carbon storage should be protected, including permanent grassland and scrubland areas like the Brazilian Cerrado and the African savannah.

Finally, definitions of continuously forested areas should be consistent with those agreed internationally in the framework of the Food and Agriculture Organisation (FAO) and United Nations Convention on Biodiversity (CBD)

**→ Please support Ams 213, 214 and 215**

### **7. Baseline date for the protection of high biodiversity and high carbon stock areas**

The baseline date for the protection of high biodiversity and high carbon stock areas should be set as May 2003, before the adoption of the first European legislation for the support of biofuels. This is necessary in order to prevent the cultivation of biofuels in the areas that have been illegally logged or otherwise destroyed.

→ Please support Ams 201, 210 and 218

### **8. Measures for the protection of water, soil and air quality**

The increased production of biofuels should not lead to deterioration of water, soil and air quality. These rules have to be applied in the EU as well as in the third countries.

→ Please support Ams 220 and 229

### **9. Inclusion of social safeguards**

Social sustainability criteria are important to ensure that the production of feedstock for biofuels on the EU market does not lead to violations of human rights, land use conflicts and displacement of peoples.

→ Please support Ams 219, 230 and 271

### **10. Special support measures for the 'second generation' biofuels**

Much greater efficiency could be achieved through the promotion of so-called 'second generation biofuels' from cellulosic material and extra incentives for developing and producing these could be helpful. However, these incentives should be expressed financially, rather than in terms of their contribution towards the target, as the latter would water down the 20% renewables target.

→ Please support Ams 262 and 272

### **10. Review clause**

In order to be able to address any unsustainable outcomes, the Commission should have to take immediate corrective action. Also, should any target be adopted, the option to revise this downwards should be included.

→ Please support Ams 276 and 277

### **11. Effective implementation of the criteria**

Approval procedures for certification schemes or bilateral or multilateral agreements should be implemented through regulatory procedure with scrutiny to allow for the control of the European Parliament.

In cases where the sustainability criteria have not been implemented adequately, the scheme's or agreement's authorisation should be withdrawn.

→ Please support Ams 238 and 239

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## **AMENDMENTS TO REJECT**

### **12. Making the 20% renewable energy target indicative**

The 20% renewable energy target is already weaker than the 25% target previously voted on by the European Parliament. The binding renewable energy target is essential for the fast and

sustainable attainment of the EU's climate objectives and the development of a clean energy system.

The abandonment of the 10% sub-target for renewable energy in the transport sector can not serve as an argument to weaken the 20% renewable energy target. In fact, the dropping of the sub-target would allow Member States to use the amount of sustainable biomass where it is most efficient, i.e. mostly in the electricity and heating sector, and not in transport.

→ Please reject Ams 74, 81, 88 and 121

### 13. Inclusion of peat

Peat is an important global carbon store and provides a number of other crucial environmental services such as water storage and habitats for wildlife. It is not a "slowly renewable fuel" as it accumulates over very long time periods and releases more greenhouse gas emissions than coal when it is burned, drained and degraded. A recent life-cycle study shows that the climate change impact of peat diesel is 200% of that of conventional diesel.

→ Please reject Ams 125, 150, 151 and 304

### 14. Double counting of more efficient biofuels

It is essential that biofuels deliver significant greenhouse gas savings. 60% savings should be a minimum threshold for all biofuels. Allowing any double counting under the renewable energy Directive would weaken the 20% target and reduce its climate benefits.

→ Please reject Am. 261

### 15. Weakening of the greenhouse gas standards through a raised fossil fuel comparator

Raising the fossil fuel comparator figure from 83.3gCO<sub>2eq</sub>/MJ to 91 gCO<sub>2eq</sub>/MJ would effectively lower the greenhouse gas savings requirements for biofuels.

→ Please reject Am. 302

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**SUPPORT THE FOLLOWING AMENDMENTS**

<b>ISSUE</b>	<b>AMENDMENTS</b>	<b>COMMENTS</b>
<b>Dropping the 10% target for the renewable energy in transport</b>	Am. 142	
<b>Extension of the sustainability criteria for all biomass</b>	Am. 23	The extension of criteria to all biomass should be done consistently throughout the Directive
<b>Significant GHG savings</b>	Am.191 and 187	60% GHG savings
<b>Inclusion of indirect land use change</b>	Am. 284, 290 and 292 Am. 231 Am. 274 and 270	120g CO2 risk adder Establishment of a committee of independent experts Monitoring of indirect land use change
<b>Protection of high conservation value land</b>	Am. 17, 118, 203 and 206	
<b>Protection of high carbon stock land</b>	Am. 213, 214 and 215	
<b>Baseline date for the protection of high biodiversity and high carbon stock areas</b>	Am. 201, 210 and 218	Set as May 2003
<b>Measures for the protection of water, soil and air quality</b>	Am. 220 and 229	
<b>Inclusion of social standards</b>	Am. 219, 230 and 271	
<b>Special support measures for the 'second generation' biofuels</b>	Am. 262 and 272	
<b>Review clause</b>	Am. 276 and 277	
<b>Effective implementation of the criteria</b>	Am. 238 and 239	

**REJECT THE FOLLOWING AMENDMENTS**

<b>ISSUE</b>	<b>AMENDMENTS</b>
<b>Making the 20% renewable energy target indicative</b>	Am. 74, 81, 88 and 121
<b>Inclusion of peat</b>	Am. 125, 150, 151 and 304
<b>Double counting of more efficient biofuels</b>	Am. 261
<b>Weakening of the greenhouse gas standards through a raised fossil fuel comparator</b>	Am. 302