



Brussels, 15 October 2012

To: Commission President Barroso

CC: Catherine Day, Connie Hedegaard, Gunter Oettinger, Michael Karnitschnig,

Dear President Barroso

Friends of the Earth Europe, ActionAid and Oxfam International are writing to you on the urgent matter of the Commission's proposals to address the social and environmental impacts of indirect land use change (ILUC) caused by EU biofuels targets, due to be announced on Wednesday 17 October.

We understand that the content of this proposal is still under discussion. To this end, we would like to bring a few important issues to your attention: the original Directive called for ILUC factors to be developed on the basis of the best available science: the best available science indicates that the majority of the biofuels used in Europe may accelerate climate change more than the fossil fuels they replace. Added to this biofuels crops expansion is pushing communities off 37 million hectares of land in developing countries, putting livelihoods at risk, and is pushing up food prices and volatility and threatening to increase hunger levels globally.

We understand that there is a lot of pressure from specific interests to water down the proposals that were announced publically to be on the table by Commissioners Oettinger and Hedegaard on 17 September 2012. They said:

*"It is wrong to believe that we are pushing food-based biofuels. In our upcoming proposal for new legislation, we do exactly the contrary: we limit them to the current consumption level, that is 5 percent up to 2020. [...] We are pushing biofuels that help us cutting substantial CO2-emissions, do not compete with food and are sustainable and green at the same time."*

We trust that you will base your decision on the weight of consensus amongst independent studies and inter-governmental institutions that biofuels are contributing to alarming spikes in food prices as well as increasing greenhouse gas emissions. The recommendation by ten international organisations, including the World Bank, FAO, IMF, OECD that "G20 governments remove provisions of current national policies that subsidize (or mandate) biofuels production or consumption" still needs to be acted upon.

Oxfam, ActionAid, and Friends of the Earth Europe welcome the two key measures proposed to address the impacts of expanding agriculture to meet biofuels demand, namely a 5% cap on the use of food crops for biofuels, and the introduction of ILUC factors in the Fuel Quality Directive (FQD).

These measures are absolutely essential as a first step to address the unintended consequences of biofuels on hunger and the environment, but need to be strengthened:

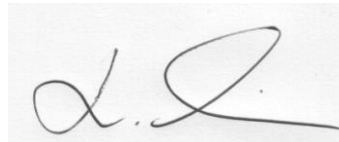
- The 5% cap must explicitly apply to all biofuels from crops that compete for land and water resources , and the 5% cap must be complemented with a trajectory to reduce it to 0%. Without this the risk of EU biofuels policy aggravating hunger will persist. Even at 3.5% biofuel demand, the land used to produce biofuels for the EU in 2008 could have fed 127 million people for the entire year.
- ILUC accounting for greenhouse gas (GHG) emissions proposed for the FQD should also be introduced consistently in the Renewable Energy Directive (RED) sustainability criteria (article 17, article 19(1)). Without this, biofuels with a worse GHG footprint than fossil fuels will continue to be sold on the EU market. This does not fit with a policy that aims to reduce climate changing emissions.

On the occasion of a World Food Day (16 October) set against another food price spike – the third in five years – it is time for reform. The Commission must send a clear signal to markets that the future of green transport lies not in socially and environmentally unsustainable industrial biofuels, but rather in solutions such as energy-saving technologies and renewable electricity in cars, which have high potential for job creation and economic benefits and without negative impacts on global food security.

Yours sincerely,



Magda Stoczkiewicz,  
Director, Friends of the  
Earth Europe



Laura Sullivan, Head of  
European Advocacy,  
ActionAid International



Natalia Alonso, Head of EU  
Advocacy Office, Oxfam  
International