

1. How should a biofuel sustainability system be designed?

The members of econsense advocate the development of a taxation system (to be elaborated with the involvement of all stakeholders) which assesses all biofuels according to sustainability criteria – and particularly their long-term CO₂ efficiency potential. The consistent configuration of the whole developmental structure should also incorporate other aspects such as the competing use of biomass for other applications.

Legislators should develop such a system, with the involvement of all stakeholders, which e. g. could incorporate either a sustainability evaluation with associated sustainability certification and the introduction of sustainability classes, or a sustainability label for areas under cultivation and a CO₂-based fuel taxation system.

Important is that such a certification or label would be agreed upon on a multilateral level, so that first of all the end result would not be a plethora of different certification systems. Furthermore, such a certification should only be used to give or deny access to national tax incentives, not to inhibit international trade. The latter would give rise to legal problems under current WTO law. This discrimination of like products through differing certification requirements would be a dangerous precedent that could backfire and harm European interests in completely different sectors.

To ensure that developments are steered in the required direction, an instrument is required which is transparent, comprehensible and defines clear criteria, and which also has the potential of acting as a model for European and global harmonisation.

2. How should overall effects on land use be monitored?

no comment

3. How should the use of second-generation biofuels be encouraged?

Biofuels combine high areal yields and the use of whole plants with an CO₂ efficiency which may rise up to 90 %. They do not compete with food production (e. g. by using straw to produce ethanol) and require no new infrastructures because they are capable of being mixed with fossil fuels. They are therefore a more sustainable solution than the first generation of conventional biofuels. Despite these improvements, the second generation biofuels are still not competitive.

The frameworks which apply today were originally introduced to have an initial positive effect on climate protection and supply security. However, they do not yet reflect the many new developments – quite the reverse: they are currently a hindrance and delay true competition between biofuels. They therefore need to be revised. Prolonging the tax benefits supporting the first generation biofuels with their lower CO₂ efficiency (in some cases even counteractive), leads to the misallocation of investment capital and the creation of new and obstinate subsidy structures.

Rewriting the framework will enable the market penetration of specific biofuels to be controlled specially in favour of sustainability factors, and will therefore precisely maximise their efficiency with respect to climate protection aspects. This will only be possible if the existing fuel options are evaluated differentially according to the aforementioned sustainability criteria. This will enable biofuels to be assessed reliably, and thus clearly and unequivocally reveal the options with the highest environmental, economic and social compatibility. This must form the only basis for the legislative promotion of products and processes.

4. What further action is needed to make it possible to achieve a 10% biofuel share?

The German Automotive Industry informed on the following (ref.: Bio-Task-Force of FAM AA 632, May 2007, draft report):

Vehicles with a direct-injection motor of the first generation and which have a aluminium component, are at risk of an ethanolate corrosion. This applies to appr. 250.000 vehicles with year of construction

2000-2006 as of which appr. 50 % of all vehicles in Germany.

A 10 % share of FAME (fatty acid methyl ester) in conventional diesel raises primarily the following three problems: oil rarefaction, elastomer tolerance, and energy density.

- All vehicles equipped with a diesel particle filter (DPF) are affected by the problem of oil rarefaction. In 2004-2006, the German Automotive Industry produced 2.55 mio. DPF equipped vehicles which have been placed on the EU market, of which 1.45 mio. have been licensed in Germany.
- All diesel cars (Germany: 10.8 mio.) are affected by the problem of elastomer tolerance. The only exception are Audi and VW cars with year of construction 1996-2003 amounting to appr. 2.9 diesel cars licensed in Germany.

All this has to be considered in requiring a 10 % biofuel share.