

Biofuel issues in the new legislation on the promotion of renewable energy
Public consultation exercise, April – May 2007
Energy and Transport Directorate-General, European Commission
April 2007

The Climate Alliance of European Cities with Indigenous Rainforest peoples

In our comments we want restrict to the questions 1 and 2.

Climate Alliance supports the new EU target on increasing the use of renewable energy sources. However, in particular related to biomass and biofuels it is vital to make sure that the renewable energy is produced in a sustainable manner, limiting negative environmental and social effects.

We would also like to emphasise that promotion and increasing the use of renewable energy sources needs to be coupled with strong energy saving measures. We need to reduce our energy consumption level drastically in order to achieve a more sustainable energy system.

While we agree that there is a need to increase the share of biofuels, the social and environmental costs of biofuels should be taken into account. In addition it is important to realise that biofuel target does not – alone – solve the problem of reducing the harmful emissions of road transport. Other measures, such as increased energy efficiency of vehicles, are necessary.

It is clear that the EU has not enough land to provide the quantities of the EU demand for biofuels. The production of biofuels will therefore affect (more than other energy sources) mainly the development countries (food vs. energy production). The development of specific criteria about production and import of biofuels should integrate also the affected developed countries. They should have the opportunity to give their comments and propositions regarding the issue.

1. How should a biofuel sustainability system be designed?

The Climate Alliance agreed that a list of sustainability criteria should be developed. The proposed list has to be complemented and specified. We think that for the moment there is a complete lack of social criteria. Especially the situation of indigenous communities in the rainforest worldwide should be taken into account as well as the situation of the workers in the plantations (palm oil, sugar cane).

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

The effect on land use change is one of the key factors and problems. Also here it is important to look at the consequences that land change has for the local indigenous communities. In general also in this issue the social consequences should be taken into account by the developed criterias.