

>>Carbon from transport and biofuels

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>>This is a brief not prepared on behalf of GreenSpeed to the latest
>>consultation on the use of biofuels particularly in the use for
>>transport of goods and people. We note that the recent
>>consultation of the more general principles of biofuel use will be
>>taken into account, but the questions now being asked show that the
>>reservations expressed by stakeholders/consultees in respect of
>>biofuel limits have not been grappled with and appear to have been
>>overridden.

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>>The fact that these further questions need to be asked and raise
>>issues of the utmost gravity for land use; biodiversity and food
>>supply show very clearly that it would be premature to have any
>>targets for the use of biofuels until sustainable supply has been
>>fully explored and secured.

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>>The EC should start by going to first principles, which will require
>>the adoption of a framework which embraces the principle of
>>Contraction and Convergence. Only then will it be possible to have
>>reasonable idea of carbon targets for member states and the EU as a
>>whole. Then it might be possible to make estimates of the level of
>>carbon from different sectors, although the principle of
>>subsidiarity might require this to be for individual states to
>>decide.

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>>The primary and driving force behind the use of biofuels appears to
>>be the reduction of GHGs. In this case the EC should not be
>>encouraging their use until SEA has been carried out on the
>>alternatives. SEA will require a rigorous analysis of the
>>environmental impacts of and comparison between alternative
>>programmes as well as their synergies and uncertainties/risks.

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Given the very marginal benefits of biofuels from the most
sustainable sources, and the dreadful consequences of supply from
land which is biodiverse or producing food, it is difficult to see
how 5% to 20% use of biofuels would start to compare with the carbon
saving which would occur instantly from lower speed limits across
Europe. Further, the use of fuels to mimic petrol and diesel will
have limited if any knock-on effects or synergies. Lower speed
limits would trigger a power-shift, modal shifts and shorter car and
lorry journeys all reducing GHGs at little or no public cost and
with no delay.

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>>It is not possible for consultations on separate and barely related
>>aspects of energy supply and GHG emissions to provide reliable
>>evidence of the relative benefits of alternative measures. Only
>>with a properly structured SEA can evidence be produced on which to
>>develop policies of the necessary precision and force to deal with
>>the issue of climate change. Carrying out these consultations may
>>'tick the boxes' but decision-makers need to know the relative
>>merits of possible programmes which can only be achieved through SEA.

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>>It is also an exercise in futility to embark on any programme
>>incorporating 'targets' unless and until the exercise in Contraction
>>and Convergence has been carried out to ensure that these fit into
>>the global framework for carbon allowances.

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I am sorry that this does not address the specific questions but as is so
often the case there is greater importance in getting the questions right
rather than continuing with processes based on false premises.