

NOAH-Friends of the Earth Denmark

@ 1 How should a biofuel sustainability system be designed?

As stated above we do not support the use of a biofuel sustainability system is desirable at all, but we just want to make this comment: If biofuels **are** chosen as a (major) source of energy for the transport sector in the EU, it is absolutely essential that a thorough set of sustainability criteria are applied. The criteria must encompass economic, social and environmental sustainability; equity at any given historic moment and intergenerational equity as well.

Acknowledging the vast difference between rich and poor countries and acknowledging that biomass is by nature a very local resource that should also be treated as such, it must be clear that the problem for the hyper inflated transport sector in rich countries like the EU should not be solved by importing biomass from poor countries.¹

This is even more important as rainforests, peatlands and other vulnerable ecosystems are being destroyed to make way for plantations of palm oil trees etc. We suspect that any control regime set up by the EU would be bypassed too easily. If not directly then indirectly by displacing other (previous) crops into vulnerable areas.

This leads to the criteria we find indispensable:

No import of biomass to or export of biomass from the EU.

_ The feedstock for biofuel is a local or regional resource that should not be transported across

Europe just because of market considerations.

_ Transport of biomass/biofuels between regions and certainly between continents will decrease

the doubtful energy gain in biofuels.

Imports and exports should only be permitted between *regions* where local people have been fully consulted and are in agreement and if human rights are respected. No country or region in the world

should permanently exploit land in other countries or regions as a consequence of net imports of

agricultural products, biomass or biofuels. Particularly imports and exports of biomass and biofuels

between continents are unacceptable. The EU should therefore ban import and exports of biomass and

biofuels to/from EU.

So the sentence "It should avoid any discrimination" must be deleted. It expresses a valuation of market

concerns over environment. The hierarchy of values must be reconsidered in a way that environmental,

biodiversity and social values come on top.

To ban imports and exports must be seen as a sustainability concern, not as a barrier to trade.

¹ We support the observations from Sahabat Alam Malaysia (Friends of the Earth Malaysia) that the Consultation Paper has serious flaws and biases.

http://ec.europa.eu/energy/res/consultation/doc/2007_06_04_biofuels/non_og/foe_malaysia_en.pdf
(p. 1)