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Lord Adair Turner  
Chair of Committee on Climate Change  
7 Holbein Place  
London  
SW1W 8NR  
4 November 2012

Dear Lord Turner,

**Re Climate Change Committee Bioenergy Review**

On behalf of some of the UK's leading environment and development organisations, we welcome the very timely preparation of the bioenergy review by your Committee. Bioenergy is promoted as a major opportunity in the fight against climate change. However, given growing evidence of negative impacts, a balanced and independent assessment of the real potential of the UK adopting bioenergy to meet its international environment and development commitments is vital. We were therefore very pleased to be invited to a recent stakeholder meeting (28 October 2012) where the preliminary results of the review were presented.

However, on hearing these results, there are a number of fundamental issues that are of concern to us. As time is short and we are approaching publication of the review, we feel we need to draw your attention to these and ask that they are fully considered as part of the review if the results are to have any real validity.

- **An accurate assessment of actual and potential carbon savings** - a significant proportion of the scientific community has raised concerns around the carbon savings from bioenergy, in relation to carbon debt, indirect land use change (ILUC) and land-use, land-use change and forestry (LULUCF) accounting. A bioenergy review that fails to fully investigate these issues and include them in the quantified assessments of policy options has limited value for making critical policy decisions on the future role of bioenergy in tackling climate change in the UK and globally.

- Realistic assessments of the theoretical availability of land for bioenergy and its likely utilisation** - the review must be based on up to date and realistic estimates of so-called marginal land, taking into account that land considered by some as marginal is almost always used by significant numbers of vulnerable people eg for firewood, grazing animals, collection of wild foods (which comprise a large proportion of the food of the poorest, particularly in times of hardship). It is also important for carbon and/or biodiversity. Furthermore, the review must also allow for sufficient agricultural land to be used to feed a population of between 8 and 10 billion by 2050, which FAO estimates will lead to a 70 percent increase in demand, and factor in significant reductions in land productivity expected to result from climate change, urbanisation and soil erosion. As long as there are large scale demands for biomass, this will have a significant effect on food availability and price volatility. This will be the case for first generation biofuels but it will also be the case for second generation biofuels because of their demand for land.
- Governance to deliver sustainable bioenergy** – on current plans, the UK will import a large proportion of its bioenergy and other EU states are likely to follow suit. As in the case of liquid biofuels, supplies are likely to involve the large scale movement of ‘commoditised’ products. Information about origins and terms and conditions of production, and accountability for production methods will be lost in the process. However, this information is crucial if bioenergy is to result in emission savings. Past experience in biofuels and forestry demonstrates that the current model of mandates and sustainability standards is not sufficient to ensure carbon savings and sustainability outcomes.
- Biomass and CCS uncertainties** - the proposed use of large areas of overseas land to provide future biomass for the UK means our carbon reduction trajectory and our future energy security depends on that land actually becoming available for growing energy crops for export. There is currently no mechanism for ensuring that so-called marginal land is brought into production; instead productive agricultural land is used for energy crops, leading to indirect land use change with its associated negative carbon, wildlife and social impacts. Similarly, there appears to be a reliance on CCS to provide negative emissions in 30 years even though CCS is immature and as yet unproven for large scale operational use. Although the review allows 30 years for its development, both represent very large uncertainties upon which to build future policy.

The bioenergy review provides a critical opportunity for the Committee to advise the Government on the realistic potential of bioenergy in meeting both the UK’s climate, environment and development commitments. If it is to have credibility, the review must give full and balanced consideration to the range of social and environmental impacts in the UK and in other parts of the world, and draw conclusions accordingly.

Yours sincerely,



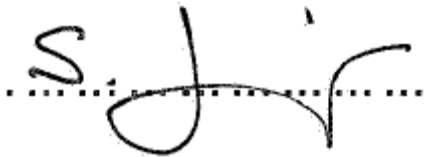
Richard Miller, Executive Director, ActionAid UK



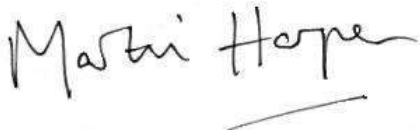
Andy Atkins, Executive Director, Friends of the Earth



Dr Doug Parr, Policy Director, Greenpeace



Steve Jennings, Acting Head of Policy and Campaigns



Martin Harper, Director of Conservation, RSPB



Robert Palgrave, Co-director, Biofuelwatch

Cc David Kennedy, Chief Executive, Committee on Climate Change