

# Open Letter to the Secretariat of the International Maritime Organisation (IMO)

## Shipping industry's biofuels plan threatens rainforests, communities and climate

**17th February, 2025** - The UN's International Maritime Organization (IMO) will soon finalise its negotiations on key climate laws for international shipping, at a series of meetings in London on 17 - 21 February (ISWG-GHG-18), 31 March - 1 April (ISWG-GHG-19), and 7 - 12 April (MEPC 83). These discussions will determine which fuels and technologies will power this sector, in order to limit shipping's harmful environmental impacts and achieve its historic climate commitment.

Shipping consumes a massive 5% of global oil demand - more than any single country outside China and the US. However, some countries and companies are quietly planning to set rules that aim to replace most of this huge fossil fuel demand with biofuels. This risks causing even *more* climate and environmental damage than oil, not less.

The IMO's 176 member states must exclude biofuels from the industry's energy mix, due to their devastating impacts on climate, communities, forests and other ecosystems. These impacts include land and water grabbing, loss of food sovereignty, threats to food security, and widespread ecological harm. Instead, the IMO needs to prioritise real solutions for shipping, with clear policy incentives, including demand reduction and efficiency improvements.

In July 2023, the IMO adopted the Revised GHG Strategy committing to net-zero GHG emissions by around 2050. One of the key policies to achieve this target is the Global Fuel Standard (GFS), which aims to incentivise the use of clean energy on ships, which the IMO promised to finalise in April 2025. Allowing the use of biofuels under the GFS would jeopardize the very goals the IMO seeks to achieve.

### ***Brazil's proposal would promote the use of unsustainable biofuels.***

At the last round of IMO negotiations in October 2024, Brazil put forward biofuels as a long-term solution to power shipping. The country is the world's second-largest biofuel producer after the U.S., leading in sugarcane-based ethanol production and accounting for 39% of global soybean production by 2024 (USDA, 2024) - meaning that the cultivation of soy is making use of a land area comparable to the size of Sweden. Additionally, Brazil's palm oil production is also expanding, and has been linked to

water pollution and large-scale land grabbing, much of it illegal (Hanbury, 2024). Now Brazil is looking at shipping as its next customer for biofuels, but the social and environmental costs linked to this market expansion would be catastrophic.

There are mainly two technically and commercially proven types of biofuels that can be used in shipping: Biodiesel and Hydrotreated Vegetable Oil (HVO). Both can be made from food and animal-feed crops (including plant oils such as soy or palm oil) or animal fats, as well as from residue and waste. HVO production also requires significant quantities of hydrogen, most of which is presently made from fossil fuel. This makes HVO fuels more emissions-intensive than liquid fuel products from petroleum feedstock (Karras, 2021).

Food- and feed-based biofuels are connected to deforestation, food insecurity, land and water grabbing and pollution from pesticides, all of which Brazil is already facing. Neighboring countries are dealing with similar problems: recent studies show concern for the increased deforestation rates in Bolivia, Colombia, Ecuador, Peru, and Venezuela due to the expansion of cropland for soy, oil palm, cocoa, maize, rice, and cassava (Richens, 2024).

Studies have shown that the direct and indirect land use change impacts of biofuels from vegetable oils, especially from soy and palm oil exceed the life-cycle emissions of fossil diesel (Transport & Environment, 2016). Wastes and residues, including animal fats, are in limited supply and existing demand far exceeds their availability. Furthermore, many of those residues and wastes have high indirect greenhouse gas emissions, due to competition between biofuels and other uses (Malins, 2017).

Communities in many countries of the global South, including Colombia, Brazil, Paraguay, Argentina, Indonesia, Malaysia or Cameroon, are already facing the consequences of vast and rapidly expanding monoculture plantations of oil palm, soy and other crops in demand for biofuels. This has devastating impacts on small farmers and indigenous communities, including effects on health due to the intense use of pesticides. We do not want to witness what could happen in those countries if biofuel production should escalate to meet the demand of such a giant - international shipping.

Furthermore, the production of liquid biofuels risks exacerbating existing gender-based inequalities, and therefore contributing to the socio-economic marginalization of women, threatening their livelihoods and in particular their food security.

Used cooking oil (UCO), a feedstock that can be easily converted into HVO, has been promoted as a sustainable choice, including under Europe's Renewable Energy Directive, despite its limited availability. However, a report by the Dutch research consultancy CE Delft (CE Delft, 2020), highlights the fact that the price of UCO has for years been higher than that of virgin palm oil, which creates incentives for fraud in UCO export regions such as Southeast Asia connected to the mislabeling of palm oil

and UCO (OLAF, 2019; Michalopoulos, 2019). Such fraud remains difficult if not impossible to prevent as long as excessive demand keeps UCO prices high.

Palm oil is the cheapest virgin feedstock for HVO production, and is notorious for its links to deforestation. Its derivatives such as palm oil mill effluent (POME) and palm fatty acids (PFAD) are falsely labelled as “residues” of palm oil production process thus are incentivised under the same Directive (instead of being classified as “by-products”). This can open the door to displacement from their current uses and increasing the use of unsustainable palm oil elsewhere.

***Sustainable solutions for shipping are technically available and feasible.***

Sustainable solutions for the decarbonization of the shipping sector already exist. These include improved energy efficiency through stricter standards and innovative ship designs, and the adoption of advanced propulsion technologies like wind assistance. Reducing the volume of goods transported by sea is also a vital step to reduce the environmental impact of global trade.

The decisions reached at the IMO’s MEPC 83 meeting in April will determine whether international shipping achieves the genuine decarbonization it has promised to achieve, or makes matters worse by driving the uptake of biofuels.

***We therefore call on the IMO’s 176 Member States to oppose the promotion of biofuels in international shipping and commit to a future powered by clean energy. The design of the Global Fuel Standard should be based on stringent life cycle assessment guidelines that exclude the use of biofuels while protecting the climate, the environment, and the livelihood of people.***

**Signatories**











Organisation	Country	Logo
Global Justice Ecology Project	International	
Biofuelwatch	International	











Global Forest Coalition	International	
Stay Grounded	International	
EcoNexus	International	EcoNexus
Palm Oil Watch International	International	
Earthjustice	International and USA	
Proyecto Lemu	Argentina	
Australian Forests and Climate Alliance	Australia	
Fern	Belgium/EU	
WILOO	Belgium (Ostend)	
CCIMCAT	Bolivia	
FASE (Federation of Organisations for Social and	Brazil	

Educational Assistance)		
National Farmers Union	Canada	
Zero Waste BC	Canada	
Red de Acción por los Derechos Ambientales RADA	Chile (Temuco)	
We Prophecy	Colombia/USA	
Green Squad	Croatia	
Czech River Coalition	Czech Republic	
Council for Sustainable Transport	Denmark	
Maiouri Nature Guyane	France / French Guiana	
Rettet den Regenwald	Germany	
AbibiNsroma Foundation	Ghana	

Instituto para el Futuro Común Amerindio IFCA	Honduras	
Aceh Wetland Foundation	Indonesia	
Trend Asia	Indonesia	
Yayasan Insan Hutan Indonesia (YIHUI)	Indonesia	
Jaringan Advokasi Tambang Sulawesi Tengah (JATAM SULTENG)	Indonesia	
WALHI Bengkulu	Indonesia	
APEL Green Aceh	Indonesia	
Save Our Borneo	Indonesia (Borneo)	
Koalisi Perempuan Jaga Lingkungan (Korjuang)	Indonesia	

WALHI Sumatera Utara	Indonesia	
Forest Watch Indonesia	Indonesia	
Forum Penyelamatan Danau Laut Tawar	Indonesia	
Landelijk Netwerk Bossen- en Bomenbescherming.nl	Netherlands	
One Planet Port	Netherlands	
Leefmilieu	Netherlands	
Comité Schone Lucht	Netherlands	
Corporate Accountability and Public Participation Africa (CAPPA)	Nigeria	
Heñói	Paraguay (Asunción)	
Action Communautaires des Femmes Autochtones du Congo ACFAC	République du Congo	

Salva la Selva	Spain	
health-and-forest.org	Switzerland	
Friends of the Earth - England, Wales and Northern Ireland	UK (England, Wales and Northern Ireland)	
Campaign against Climate Change	UK	
Farnborough Noise Group	UK	
Earth Thrive	UK / Serbia	
Standing Trees	USA	
The Bioscience Resource Project	USA	
Pivot Point	USA	
Dogwood Alliance	USA	

Forest Keeper	USA	
Mighty Earth	USA	
Inland Ocean Coalition	USA	
Partnership for Policy Integrity	USA	
John Muir Project	USA	
Oregon Physicians for Social Responsibility	USA	
Friends of the Earth US	USA	
Interfaith Climate Action Network of Contra Costa Co.	USA (Contra Costa County, California)	
Sunflower Alliance	USA (SF Bay Area, California)	
Rodeo Citizens Association	USA (Contra Costa County, SF Bay Area, California)	

Southern Oregon Climate Action Now	USA (Jacksonville, Oregon)	
Coastal Plain Conservation Group	USA (North Carolina)	
Plastic Ocean Project, Inc.	USA (North Carolina)	
Climate Reality Project Portland Chapter	USA (Oregon)	
Public association "Ekolog"	Uzbekistan	

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