

October 2 2008

To: Coreper, the Council of Ministers, the European Commission, Claude Turmes (MEP)

CC: ITRE and ENVI

Re: EU agrofuel targets

Dear Madam, Sir,

In light of the upcoming negotiations between the Council, the European Commission and Claude Turmes (MEP) on the Renewable Energy Directive, the undersigned organisations are calling on you once again, with the utmost urgency, **to drop all agrofuel targets and to install a moratorium on the promotion of agrofuels and agro-energy.**

Despite overwhelming evidence of numerous negative impacts, and the strong opposition by social movements, citizens groups, scientists and parliamentarians world wide, the proposed **10% target for 2020** still stands following the European Parliament's Committee for Industry, Transport and Research (ITRE) vote on September 11. It is undeniable that agrofuels are worsening rather than mitigating climate change. They accelerate the expansion of industrial monocultures at the expense of biodiversity and carbon rich ecosystems and contrary to claims that they will reduce poverty, they are instead a major cause of displacement of rural communities and Indigenous Peoples. Adopting these targets will dramatically escalate these problems.

The ITRE vote also contained a **5% mandatory interim target for 2015** and a **review** of the 2020 target in **2014**. However, 2014 will be far too late to address the urgency of the crisis triggered by agrofuel expansion. For example, the FAO estimates that 75 million more people are going hungry today than last year, while UNEP expects all lowland forests in Sumatra and Borneo to have been destroyed by 2012, largely for palm oil.

The undersigned organisations strongly object to the provisions of the current draft legislation, including **sub-targets**, which mandate that a proportion will have to be met primarily from second-generation agrofuels and possibly from feedstocks grown on so-called 'degraded lands'. Second generation biofuels will create a large new market for cellulose, produced by monoculture tree plantations, including GE trees, which are no less damaging than other forms of industrial monocultures. They will also create a new market for 'agricultural and forest residues', removing these resources, which are essential for soil regeneration and biodiversity. These targets will create a large-scale demand for biomass feedstocks, which directly counters the urgent requirement to protect and restore forest and other ecosystems as the most effective means of countering climate change. Massive investment in infrastructure would be required including new roads, rails, shipping capacity, pipelines and redesign of engines and fuel delivery infrastructure. The more that is invested in making these adjustments, the more difficult and expensive it will be to respond to any future review should agrofuel targets be deemed unsustainable.

We are equally concerned about the definition of 'degraded lands' that may emerge from the upcoming negotiations. If a weak definition is adopted, particularly one that relies on a technical definition of degraded land via so-called "carbon benefits" over 10 years, vast areas of land could

be defined as 'degraded' while in reality they are valuable community lands, including pasturelands and also community forests, on which large numbers of people depend for their livelihoods and which are vital for biodiversity.¹ A wide definition would allow the sub-target to be met largely or even entirely from first-generation agrofuels grown on these lands. The **greenhouse gas standards** included in the draft directive will not in any way reflect the true climate impact of agrofuels and are **based on creative accountancy**, not on scientific knowledge.

The proposed 'sustainability standards' cannot address the impacts of the extra demand for wood and agricultural commodities created by the target, on top of the already unsustainable EU consumption of these products (including palm oil and soya). Nor have they - or the existing voluntary certification initiatives like the industry-NGO Round Tables - been in any way endorsed by social movements or the communities most directly affected.

As it stands, this directive will **not in any way adequately address negative indirect impacts**. Except for a very small additional value for indirect land-use change *emissions* (to be added to greenhouse gas assessments after 2012), other indirect impacts regarding for example biodiversity loss or land grabbing, are not addressed.

The same applies to agrofuels that will be used to meet the target as specified in the **Fuel Quality Directive**, which is now also re-entering negotiations. We therefore demand that **agrofuels are excluded from possible measures to bring down the CO2 emissions from fuels under the Fuel Quality Directive**. The entire obligation to meet this target should be on the oil industry and its operations.

We remind you of the many moratorium calls that have been made so far, including for the EU, Africa, the US and Via Campesina.

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Signed by:

Acción Ecológica Ecuador
African Biodiversity Network
Africa Europe Faith & Justice Network
Amigos de la Tierra España
Arbeitsgruppe Schweiz – Kolumbien (Switzerland)
Asamblea Patagónica contra el Saqueo y la Contaminación
ASEED Europe
Asociacion de Familias de Cacarica (CAVIDA, Colombia)
Associació Catalana d'Enginyeria Sense Fronteres
Biofuelwatch
Campaña "No te comas del Mundo" (Spanish state)
Campagna per la Riforma della Banca Mondiale (Italy)
CarbonTradeWatch
CENSAT Agua Viva, Colombia

1 www.gaiafoundation.org/documents/Agrofuels&MarginalMyth.pdf

Comision Intereclesial de Justicia y Paz (Colombia)
Consejo Comunitario de Curvarado (Colombia)
Corporate Europe Observatory
Ecologistas en Acción (Spanish State)
EcoNexus
FASE - Solidarity and Education (Brazil)
FIAN-Nederland (FoodFirst Information and Action Network)
FOCO: Foro Ciudadano de Participación por la Justicia y los Derechos Humanos
France Amerique Latine Association
Gaia Foundation
Global Forest Coalition
Global Justice Ecology Project
Grup de Bionegocis (Spanish State)
Grupo de Reflexion Rural Argentina
Instituto de Economía Ecológica y Ecología Política (IEEEP)
International Union of Food workers (IUF)
Latin American Solidarity Centre (Ireland)
Latin American Network against Monoculture Tree Plantations
Mani Tese (Italy)
Munlochy Vigil
Network for Ecofarming in Africa (NECOFA), Kenya
NOAH Friends of the Earth DK
Pacific Indigenous Peoples Environmental Coalition (PIPEC)
Pakistan Fisherfolk Forum (PFF)
Plataforma Trangènics Fora! (Spanish state)
RAPAL (Pesticides Action network -Latin America) Uruguay
RECOMA
Red de Alternativas a la Impunidad y a la Globalización del Mercado
Red de Semillas "Resembrando e Intercambiando"
Rede Social de Justiça e Direitos Humanos (Brazil)
Rettet den Regenwald
Robin Wood
Sobrevivencia Paraguay
STOP GE Trees Campaign
Student Trade Justice Campaign
The Soya Alliance
Timberwatch Coalition
Transnacional Institute
Xarxa de l'Observatori del Deute en la Globalització (Spanish state)
Verdi Ambiente e Società (Italy)
War on Want
Watch Indonesia
World Rainforest Movement