



Dear Commissioner Dimas,

January 19, 2006

Following the European Commission's Action Plan on Biomass (2005/628) and in view of the forthcoming Communication on biofuels, we are writing to you to express our concerns over the sustainability of the EU's policy on biofuels and its likely environmental and social impacts.

Biofuels could deliver significant environmental benefits and play a part in a comprehensive EU-wide strategy to fight climate change. This potential will only be delivered, however, if the production of biofuels is sustainable in terms of its impact on biodiversity, water and soil, and if genuine emissions savings are made throughout the life-cycle of a product. As acknowledged in the Biomass Action Plan, the environmental risks posed by an inappropriately regulated biofuels market include:

- Failing to significantly contribute to the reduction of greenhouse gas emissions;
- Exacerbating biodiversity decline in the EU;
- Accelerating the destruction of biodiversity rich ecosystems in developing countries.

The only way biofuels could deliver on their potential as a renewable fuel and an asset for rural communities and biodiversity is if the production is able to meet environmental as well as social criteria. Biofuels that will count towards European and national targets should comply with minimum sustainability standards, covering both the carbon balance over the life-cycle of the biofuel and the local environmental and social impacts relating to its production.

The Biomass Action Plan recognises the need for such criteria, and we would like to urge the Commission to reaffirm its commitment to truly *sustainable* biofuels in the forthcoming Biofuels Communication. As a first and immediate step, we would like to recommend that the Commission establishes a broad stakeholder process, including NGO's from affected countries which closely examines all aspects of biofuels and will help ensure that EU biofuels policy will be truly sustainable and deliver on its potential. In parallel to this, start a full impact assessment from source to end-use of the climatic and other environmental and social impacts of all potential biofuels.

Without a system in place that can guarantee the sustainability of production, it makes little sense from an environmental perspective to promote biofuels and it is hard to imagine that civil society could give its support to a Biofuels policy.

We look forward to continuing working with you on this critical area and invite you to meet with us to discuss these concerns and recommendations in more detail,

Yours,

John Hontelez, secretary general EEB

On behalf of the signatory organisations

Contact persons from signatory organisations:

Clairie Papazoglou, Head of EU Policy, BirdLife International

John Hontelez, Secretary General, European Environmental Bureau

Tamás Marghescu, regional director for Europe, The World Conservation Union (IUCN)

Aat Peterse, Programme Manager, T&E European Federation for Transport and Environment

Paul de Clerck, Coordinator Corporate Campaign, Friends of the Earth Europe