



Fulfilling the promise of "Green energy"

To: Environment Ministers, Environment Council 26 June in Luxembourg

Brussels, 21 June 2006

Re: BirdLife International and EEB briefing in view of Ministers exchange of views on the EU Biomass and Biofuels Action Plan

Dear Minister,

BirdLife International and EEB recognise the positive role that bioenergy can play in reducing the EU dependence on fossil fuels and tackling climate change. However, extreme care should be taken in promoting bioenergy, and in particular biofuels, in order to ensure they are sustainably produced and truly help reducing greenhouse gas emissions. Furthermore, the promotion of bio-energy should take place in an appropriate context where first and foremost priority is given to energy efficiency, then the promotion of all renewable energy sources and as one of these sources, the use of bio-energy, with biofuels as only one of several forms of bio-energy.

The Commission Communications highlight clearly the potential negative impacts that the expansion of energy crops could have on biodiversity, inside and outside Europe. They also recognise that the greenhouse gas balance is extremely variable and depends on production methods.

BirdLife International and EEB underline the reality of potentially very negative impacts and urge you to ensure that bioenergy is sustainably produced and that it brings real and significant greenhouse gas savings as a core principle of EU bioenergy policy development. To this end, we urge you to ensure that the EU bioenergy policy:

- Include a strong **commitment to sustainable bioenergy production**, in particular through **a comprehensive certification scheme for biofuels**. This should cover both imports and local production and take into account the greenhouse gas balance over the whole production cycle and the environmental impacts of cultivation;
- Clearly indicate that **preference should be given to those bioenergy sectors that provide the highest greenhouse gas savings** in the most cost and environmentally effective way. Incentives should be as much as possible pegged to environmental performance in order to spur technological development and innovation.



- In the context of application of the Energy Crops Scheme, ensure that biodiversity assets currently **safeguarded through set aside are maintained** through the implementation of an alternative system with no large scale conversion of set aside to energy crops allowed before such system is in place.
- Ensure that bioenergy policies are set within a wider context of **energy efficiency** policies, and make them consistent with the EU's commitment to **halt biodiversity decline by 2010**.

We therefore appreciate that the Transport, Telecommunications and Energy Council in its conclusions from 8th June calls for "*integrated approach...which takes account of sustainability...as well as environmental issues including biodiversity conservation and life cycle analysis as far as possible*" to be one of the general principles of a biomass policy. We also welcome the Council's call to "*explore the issue of simple and cost-effective measures to guarantee that biofuels are produced in a sustainable way, inter alia certification, in respect of environmental, social and technical standards, and applying to internal production as well as imported biofuels*".

We believe that thus the Commission should as a matter of priority create an adequate platform for the expert work necessary to develop the details of how to design and implement a appropriate certification scheme. The Commission's internet consultation that is currently running is an important first step but in itself is not sufficient to come up with something workable in the relative small time span in which the Commission wants to prepare its proposal for the revised Biofuels Directive.

Yours Sincerely,

John Hontelez, Secretary General
Also on behalf of Birdlife International

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