



EEB comments on the public consultation on the Vision Report of the Biofuels Research Advisory Council (BIOFRAC)

20-04-2006, Brussels

The European Environmental Bureau would like to underline that meeting environmental policy objectives is and should be one of the main drivers for any biofuels policy and the inclusion of environmental stakeholders in any platform or discussion forum is therefore crucial. We see the complete omission of environmental stakeholders in this high level advisory group as a serious imbalance and for this reason we cannot, as an environmental NGO, subscribe at this point to the main findings of this vision paper. We call on the Commission to address this imbalance in the composition of the Steering Group for the Biofuels Technology Platform and to seriously consider the contributions provided by various environmental stakeholders in this consultation and amend the report accordingly.

Pending the start of a more comprehensive and inclusive debate we have at this point two general and preliminary comments on this paper:

- First of all, biofuels research should be placed in the right context. This means that research and investments into biofuels should not draw away resources or attention to what should be the highest priority in the transport sector: efforts to curb growth in consumption going hand in hand with fuel and energy efficiency and the development and deployment of the appropriate technologies to this end.
- Promoting bio-energy in general will increase the pressure on agricultural and forest production systems and drive even more land conversion in tropical countries, with disastrous consequences for biodiversity. Addressing this pressure and ensuring sustainability will require a little more than 'sustainable land use strategies'. For the EU a 'de facto' compulsory certification system will need to be developed which will be in line with global principles and could even drive the development of global principles if not yet existent.