



To: Science and Research Commissioner Janez Potočnik
Cc: Commission President José Manuel Barroso, Commission VicePresident Siim Kallas,
Environment Commissioner Stavros Dimas, Energy Commissioner Andris Piebalgs,
European Biofuels Technology Platform

Dear Commissioner Potočnik,

With this letter we would like to express our concern over, and opposition to, the draft Strategic Research Agenda (SRA) and Strategy Deployment Document (SDD) elaborated by the European Biofuels Technology Platform (EBFTP). While we are not opposed to further scientific research on alternative fuels we think that the assumptions on which the SRA and SDD are based are fundamentally flawed and the process for creating the strategy is undemocratic.

Flawed assumptions

The SRA and SDD are based upon achieving a highly ambitious target of 25% agrofuels for all road transport fuel needs for 2030. In light of major uncertainties that exist over whether these fuels are an effective way to mitigate greenhouse gas emissions and, even if they are, whether they can be produced sustainably, the assumption that Europe must reach a 25% target makes little sense.

In the time between the launch of the BIOFRAC Vision report and the publication of the draft SRA and SDD the debate around agrofuels has intensified. There is clear and growing evidence of the major negative social and environmental effects of large scale production of agrofuels. For this reason, as you may already be aware, the vast majority of civil society organisations who have positions on the issue oppose the EU's currently proposed target of 10% for 2020 and are calling for time to seriously assess the consequences.

As for their impact on climate change, it has become clear that far from being a solution, large scale agrofuel production can actually aggravate the problem. There is also scant evidence that second-generation agrofuels will provide an adequate solution. Yet they are touted as the way forward, without assessments of the risks associated with the technologies used for their development (such as biotechnology or synthetic biology), and of the new range of problems that will bring the massive switch to other feed-stocks – such as large scale tree plantations.

Undemocratic process

In the draft SRA preface, Repsol's Luis Cabra, chair of the Technology Platform steering committee, claims that the SRA and SDD are the product of the input of a wide range of stakeholders. This claim is highly misleading, as the membership of the EBFTP is dominated by industry and by research

centres with close ties to industry. The process of public consultation does not address this lack of civil society participation, as the fundamentals are not open to change. The EBFTP has stated that the goal of the SRA and SDD are to implement the Vision drafted by BIOFRAC, including the 25% target. For those who do not endorse that vision, there is no room for meaningful involvement.

The EBFTP is well aware of the growing public concern about agrofuels and has therefore acknowledged the issue of sustainability and of the need to manage public perceptions. But while acknowledging that without sustainability there is no way forward, neither the SRA, nor the SDD have come up with any credible proposal. To mention just one of several problems with the approach outlined, creating sustainability criteria does not address the issue of displacement (deforestation caused by moving crops for food to other land).

The Commission justifies its support of the Technology Platforms arguing that they bring together stakeholders, led by industry, to define medium to long-term research and technological development objectives whose achievement “will significantly improve the daily lives of the European citizen in many areas.”¹ In the case of agrofuels, current evidence suggests there is little gain for European (and other) citizens in terms of climate change mitigation, while the consequences for the daily lives of millions of people in producing countries could be devastating.

As the Commission is “not in any way bound by the views, results or recommendations arising from the activities of any of the technology platforms”² we strongly urge your directorate and other Commission departments not to follow the advice of the EBFTP and not to integrate their recommendations in the design of the agrofuel policy of the EU.

Be it the research priorities of the EU, the allocation of public funds, the harmonisation of EU regulations affecting agrofuels (such as the Fuel Quality Directive or the Biofuels Directive), the determination of targets or of incentives, the Commission should be guided by the common interest. Research priorities should be formed through discussion with a truly broad range of stakeholders, including people outside the EU affected by its policies.

A more robust research and development objective would focus on determining whether, and what kind of, alternative fuels can effectively reduce greenhouse gas emissions and how to produce such fuels, and on what scale, without undermining the integrity of other key ecological 'resources' (e.g. water, soils, biological diversity). The outcome of this kind of research could then be used to determine whether and to what extent such fuels can play a part in European efforts to mitigate climate change. In other words, the research and development should come before a target is set, not the other way round.

Looking forward to your response,

Belén Balanya (Corporate Europe Observatory)

On behalf of Confédération Paysanne Européenne
Corporate Europe Observatory
Ecologistas en Acción
Friends of the Earth Europe
Transnational Institute
World Development Movement

1 *European Technology Platforms. Knowledge for Growth*, European Commission, ftp://ftp.cordis.europa.eu/pub/technology-platforms/docs/tp_leaflet_en.pdf

2 http://cordis.europa.eu/technology-platforms/individual_en.html