



for a living planet®

WWF Deutschland

Tel.: 030/308742-0

Direkt: -22

Fax: 030/308742-50

luebbeke@wwf.de

www.wwf.de

Große Präsidentenstr. 10
10178 Berlin

Recommendations by WWF Germany for the formulation of the sustainability ordinance of the Biofuel Quota Act

The Biofuel Quota Act came into force on 1 January 2007. The Act introduces a quota for the minimum addition of biofuels to petrol and diesel in Germany. In order to avoid risks and hazards in the production and use of biofuels and to improve biofuels environmentally, sustainability standards should be established in an ordinance.

The WWF supports a responsible formulation of this sustainability ordinance. The decisive aspects here are climate protection, biodiversity and aspects of land use.

The WWF recommends a clear definition of the term “biofuel” by the legislature. The quality of the fuels fluctuates considerably with regard to their environmental and social effects, so that a distinction needs to be made between biofuels which are to be accepted and unacceptable biofuels, which may be counted against the quota. In the short to medium term, only fuel produced from biomass which achieves a reduction of at least 51% in greenhouse gases compared to fossil fuels should be considered as biofuel. This definition can make an important contribution towards ensuring the acceptance of biofuels in the long-term.

WWF Germany recommends that the federal government takes the following aspects into consideration when implementing the ordinance:

1. Sustainability criteria for bioenergy – not only for biofuels:

1. The sustainability criteria should not only be introduced for biomass which is used in the production of biofuels, but should also relate to the total production of biomass. This includes both the energetic utilisation as well as the material exploitation. Already today biogenic raw materials such as palm, rapeseed or soybean oil are used for material as well as mobile and stationary applications. The separation of the raw materials according to the type of use does not appear meaningful against this background and would be difficult to accomplish.
2. For the formulation of German bioenergy policy it is necessary to establish sustainability standards. This does not only apply to the ordinance of the Biofuel Quota Act, but also to the Renewable Energies Act and the prospective Renewable Heat Source Act.
3. This regulation has to be internationally adaptable – especially within the EU.



2. Credit biofuels according to their reduction potential of greenhouse gases:

The use of bioenergy carries considerable potential for reducing the emission of climate-relevant gases – however only if minimum standards safeguard the entire life cycle from production through to use. The WWF proposes a two-stage procedure for the implementation of a greenhouse gas standard:

1. In the short term, this method could be put into practice through the determination of the potential for reduction of individual fuels on the basis of the available balance data (“default” or “target” data). For this the federal government should provide a matrix, which allocates target values for the release of greenhouse gases to different raw materials (according to their countries of origin). At the same time the guidelines of the Clean Development Mechanism (CDM) Methods Panel should be taken into account.
2. Within a period of three years at the latest, both the methodology for balancing greenhouse gases and the availability of data on greenhouse gas emissions from biofuels should be considerably refined and differentiated. As a result greenhouse gas emissions are to be recorded from the entire life cycle including changes in land-use (release of carbon from soil, through deforestation, or fixation etc.). A method of balancing is to be set as a basis for the determination of the reduction of greenhouse gas emissions, which will have to be co-ordinated at least within the EU.

Not all biofuels contribute to a relevant degree to the reduction of greenhouse gas emissions. In order to provide incentives for the use of biofuels with a high potential for reduction, the WWF recommends taking the CO² balance of the respective blended biofuel into consideration in the blending quota. To do this only that share of a biofuel should be countable against the quota which corresponds to its share of CO² reduction in comparison with fossil energy sources.

3. Avoid negative changes in land use

The demand for farmland will rise in the coming decades as a result of the increase in the world’s population as well as changes in consumption habits. The increased use of biomass – whether as a raw material, fuel or for the generation of electricity and heat – can put further pressure on the demand for farmland. There is a risk of environmentally valuable areas being increasingly used for cultivation.

Therefore it is important to ensure that the production of biomass takes place exclusively on farmland or fallow land, the use of which is neither environmentally nor socially disturbing. In countries which either do not have a or which do not effectively enforce a land use policy, biomass production should take place exclusively on land, which can be proven not to be in competition with other uses such as nature conservation and protection of species, raw material use and food production. Only through such focussing can so-called “leakage effects” be avoided.

In order to implement these demands, a system for the use-specific registration and classification of land areas is required, which allows for a comparison by reference size or reference year. What is more an evaluation of the environmental significance of the potentially remaining area needs to be carried out. Modern satellite controlled recording systems make it possible to inspect the production in line with this standard.



These regulations require a European, better still an internationally co-ordinated, strategy in order to be able to view them as a medium to long-term policy goal. The WWF calls upon the federal government to conclude bilateral contracts with producer countries, in order to ensure that no tropical forest areas are cleared or other environmentally valuable regions are used for the imported bio raw materials (to fulfil the biofuel quota). Countries that can demonstrate a functioning land-use policy should be selected for this. The relevant demands on land use policy and the production of biomass are to be formulated in bilateral agreements drawn up between producer countries and importers with checks of the proofs of compliance by the appropriate authority. The legislature should formulate standard requirements as well as proof procedures - in co-ordination with a European approach - towards potential contract parties.

4. Sustainable production of biomass

The production of biomass should not have negative environmental effects on soil, water and the atmosphere, nor cause an overall deterioration of the starting position. To ensure this, standards relating to the production of biomass need to be introduced, in which the application of fertilizers and pesticides, cultivation and harvesting practices as well as requirements for rotations of crops are formulated. Due to the fact that the biofuel quota will be fulfilled both with domestic as well as with imported raw materials, we should aim to use the existing requirements already embodied in law as well as voluntary certification systems.

The standards of good technical practice are a basis for the biofuels produced in Germany. Improvements are to be striven for, where there are fears of negative effects on biodiversity, e.g. in the field of narrowing crop rotation – fewer and fewer changes in cash crops – and the intensification of grassland areas.

Reference to the “Cross Compliance” regulations is to be made throughout Europe. The strengths and weaknesses of this system are to be evaluated particularly with regard to bioenergy production. Improvements are to be sought in 2008 within the scope of EU agricultural policy “health checks” and introduced into legislation.

Concerning biomass produced outside Europe for biofuel use in Europe, only biofuel which is produced from certified bio raw materials is to be counted against the quota. The list of accredited voluntary certification systems for raw materials such as sugar beet, soybean, palm oil is to be compiled by the legislature.

Outlook

Concerted action in Europe

The WWF calls upon the federal government to speak out for a system of standards for bioenergy that is valid throughout Europe. The federal government should use the existing activities of other member states, such as Great Britain and the Netherlands. In the long-term the federal government should promote a system that is anchored internationally, in order to ensure the sustainability of the production, trade and use of biomass.

Evaluate and incorporate the socio-economic dimension of biomass production and use

In future it will be necessary to consider the socio-economic dimension of the production, trade and use of biomass. There is a lack of clear analysis in the current debate concerning the effects of biomass production on developing and emerging markets. For this reason the establishment or implementation of standards on individual aspects (competing uses, rural development, participation in prosperity, effects on poverty) appears very difficult in the short term.



The WWF calls upon the federal government to determine, by when and how these issues are to be approached and decided within the discussion on standards.

The best climate protection is the avoidance of greenhouse gases – including those produced by biofuels

The climate-damaging emissions in the transport sector must be reduced. Biofuels can only make a meaningful contribution to this – even if their production is sustainable – if the effective implementation of efficiency measures is ensured. At the same time noncompliance with these efficiency measures must be sanctioned.