



Initial brief on EU Renewable Energy Directive

Climate change is the greatest long-term threat to humans and wildlife. Strong EU policies are essential to ensure that average global temperature increase stays within 2°C in order to avoid catastrophic climate change.

The Renewable Energy Directive is key to strong EU action. Without a meaningful Directive the EU will fail in a significant part of its commitment to a post-Kyoto global deal on climate change. It is essential – and achievable – that the Renewable Energy Directive does not cause wider ecosystem damage and contribute to climate change itself.

BirdLife principles for the Renewable Energy Directive:

- We strongly support the 20% renewable energy target, and see this as an essential component in the fight against climate change;
- Measures must not harm ecosystems and contribute to the current global biodiversity crisis;
- Environmental safeguards must be put in place for all renewable energy developments;
- Appropriate targets and strong sustainability standards should be set for biofuel production.

1. Environmental safeguards are needed for renewable energy

There is sufficient potential to have clean and green renewable energy without damaging wildlife or ecosystems. However, there are currently insufficient environmental safeguards in the Directive. Renewable energy capacity must be built quickly and efficiently with safeguards that eliminate damaging conflicts between industry, NGOs and EU institutions. It would be regrettable if this Directive worked against existing environmental legislation.

The Directive should include a clause for meaningful Strategic Environmental Assessment as a prerequisite for the National Action Plans, as the European Parliament's September 2007 Resolution on the Roadmap for Renewable Energy in Europe requested (P6 TA(2007)0406). Best practice with existing legislation such as the Birds, Habitats and Water Framework Directives should also be highlighted in the text.

2. Scrap the damaging 10% biofuels target

Article 3 currently sets a target that 10% of transport energy consumption should be delivered through 'renewable sources'. In practical terms, this is targeted largely at biofuels. BirdLife is calling for this target to be dropped until it can be demonstrated that it is possible for it to be met sustainably, without damaging wildlife and ecosystems and providing meaningful greenhouse gas savings.

There is convincing evidence – from amongst others the European Commission's Joint Research Centre and the OECD – that this target will lead to unsustainable production of biofuels causing ecosystem damage, massive biodiversity loss, increased food costs, and social impacts.

Furthermore, under realistic worst case scenarios, this target risks causing an overall increase of greenhouse gas emissions through the destruction of critical carbon stores (e.g. tropical forests and permanent grasslands) to make way for biofuel crops, but also through carbon-intensive production

processes. We do not believe that the European Council's strict condition can be met that the 10% target should be set "*subject to production being sustainable*".

Any further production of biofuels should instead be determined by its ability to make greenhouse gas savings through a Life Cycle Analysis approach (including all the impacts on land-use change) and meet strict sustainability criteria. This approach has already been considered and agreed by the European Parliament's Environment Committee for the Fuel Quality Directive, which also legislates for biofuels.

Better solutions to transport emission problems

There is much evidence to suggest that other measures would be far more effective than a mandatory biofuels target at addressing transport emissions e.g. improving vehicle efficiency or simply enforcing speed limits. BirdLife strongly supports strong efficiency standards in the CO2 in Cars Directive.

3. Biofuels must save a minimum of 60% greenhouse gases compared to fossil fuels

It is important that only biofuels that offer substantial reductions in greenhouse gases are accepted towards any target. Currently the threshold is set at savings of 35% compared to fossil fuels, which is severely inadequate. In the Fuel Quality Directive, the European Parliament's Environment Committee has proposed a higher level of 50%. We propose that in order to make a sufficient contribution only biofuels offering a minimum 60% greenhouse gas savings compared to fossil fuels, should be accepted and that this percentage is calculated using the latest scientific data which must be reviewed regularly and updated.

4. Sustainability standards are woefully inadequate

Many recent reports have highlighted the case against unsustainable bioenergy production and its impact on biodiversity. Palm oil production, which is increasing for production of biodiesel, has inflicted ravages on habitats such as the rainforests of Indonesia. Natura 2000 sites (protected under EU nature conservation rules) are coming under pressure from biofuel production. In the Eiffel region of Germany, Natura 2000 permanent grasslands have been destroyed for bioenergy production with the claim that this is being 'done for the environment'.

Ecosystem and biodiversity protection

In order to protect valuable biodiversity, land of High Conservation Value and Key Biodiversity Areas (defined by the Forest Stewardship Council and IUCN respectively) should be protected from development. We welcome the inclusion of wetlands and forests in the Directive text, but key 'intermediate ecosystems' that are important for carbon storage are omitted e.g. between forest and grassland, such as scrubland areas including the Brazilian Cerrado and African savannah.

Biofuels must not damage land with high carbon stocks

It is essential that biofuels are not made from raw material obtained from land with high carbon stocks. The proposal fails to include degraded peatlands or permanent grasslands that store significant carbon stocks across the globe. Increased destruction of these sites would cause further large-scale releases of greenhouse gases.

Existing global standards undermined with 2008 baseline dates for land use change

The Commission proposes to approve biofuels that are grown on newly destroyed carbon stock land by setting the baseline dates for biofuel standards at January 2008. This is a considerable weakening of the cut off date of 1990 designed to protect against deforestation under the Kyoto Protocol Clean Development Mechanism. We feel this date should be upheld if such cut-off dates agreed by international negotiation are not to be rendered meaningless.

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