



## ***Work Package 3***

### ***Sustainability Analysis of Alternative Land Use***

# **COMPETE QUESTIONNAIRE ON SUSTAINABILITY STANDARDS IN THE EU**

#### ***WP3 Coordination:***

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COMPETE is co-funded by the European Commission in the 6<sup>th</sup> Framework Programme – Specific Measures in Support of International Cooperation (INCO-CT-2006-032448).

**Work Package 3:  
Sustainability Analysis of Alternative Land Use**

**COMPETE QUESTIONNAIRE  
ON SUSTAINABILITY STANDARDS IN THE EU**

Dear COMPETE partners,

The Biofuels Directive is part of the European Union's response to the need to comply with the Kyoto Protocol and concerns over energy security. The Biofuels Directive set indicative targets for biofuels in the European Union for the year 2010 (Directive 2003/30/EC).

The Directive outlined how the introduction of biofuels into the European transport sector should conform to technical standards as well as that they **should be produced in a sustainable way**.

For biofuels to be deemed environmentally compatible, it is necessary to demonstrate that they are produced on an environmentally sustainable basis, and that they contribute positively to climate change mitigation (COM, 2006).

Currently, sustainability initiatives for biofuels exist in the United Kingdom, The Netherlands and Germany as well as on EU level.

The following main documents addressing sustainability issues for bioenergy/biofuels are currently under discussion:

1. United Kingdom: 'Draft Environmental Standards for Biofuels', July 2006 ('The ECCM report' (previous to the current LowCVP document))
2. The Netherlands: 'Criteria for Sustainable Biomass Production', July 2006 ('The Cramer Report')
3. Germany: 'Sustainability Standards for Bioenergy', September 2006 ('The Öko Institute's report')

These reports will be made available at the COMPETE website under the section 'Sustainability'.

Furthermore, two other documents from the Low Carbon Vehicle Partnership (LowCVP) of the UK Department for Transport will be made available at the COMPETE website. Both can be downloaded from the following links:

1. RTFO Carbon and Sustainability Reporting Requirements (8 page summary of the UK reporting principles and process; RTFO stands for UK's 'Renewable Transport Fuel Obligation'):  
<http://www.lowcvp.org.uk/assets/reports/Summary%20of%20RTFO%20C&S%20reporting%20requirements.pdf>
2. Sustainability Reporting within the RTFO, May 2007, commissioned by UK Department for Transport, prepared by ECOFYS:  
<http://www.dft.gov.uk/consultations/open/rtforeporting/sustainabilityreportingv2>

**Currently, the UK Department for Transport is performing a public consultation on the planned 'Sustainability Reporting within the RTFO'.**

**Within the COMPETE project we should take the opportunity to present our opinion on the planned Sustainability Scheme based on the views of our African COMPETE Partners.**

**Within the COMPETE WP3 the following questions on the document 'Sustainability Reporting within the RTFO' by ECOFYS shall be addressed:**

1. **Is the general scope of the reporting requirement set out in chapter 2 appropriate?**
2. **Is the meta-standard approach suggested in chapter 3 appropriate?**
3. **Are the Environmental and Social principles set out in chapter 3 correct?**
4. **Will the standards reflect the "reality" of production of biofuels in Africa?**
5. **Will the standards be seen as barriers to trade or as a form to promote sustainability in the producer's country?<sup>1</sup>**
6. **Is the approach to the chain of custody set out in chapter 5 a sensible one?**
7. **Is the exclusion of by-product reporting as suggested in Annex A appropriate?**
8. **Are the by-products suggested in Annex A correct?**
9. **Is the exemption for mechanised farming suggested in Annex A appropriate?**

**We would like to thank all COMPETE partners for sending us their views on the on the document 'Sustainability Reporting within the RTFO' until 10 September 2007.**

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<sup>1</sup> Please note that the RTFO is a UK organisation and the report developed by ECOFYS was set in the COMPETE web site. The methodology of this report was developed according to WTO rules and does not imply a barrier for trading. At COMPETE we need to analyse the indicators and provide recommendations.