

Roundtable on Sustainable Biofuels

An initiative of the EPFL Energy Center

Ensuring that biofuels deliver on their promise of sustainability



West-African Consultation on Version Zero of a Global Standard for Sustainable Biofuels

Bamako, Mali, 26 November 2008

Version Zero is available in English, French, Spanish and Portuguese at <http://cgse.epfl.ch/page70341.html>

1. Executive summary:

In the course of its international multi-stakeholder consultation on the first draft (Version Zero) of a global standard for sustainable biofuel production, the **Roundtable on Sustainable Biofuels (RSB)** undertook a one-day consultation in Bamako, Mali to collect feedback, opinions and suggestions from participants in the COMPETE Workshop on Bioenergy Policies in West Africa.

General remarks on the RSB standard were:

- The standard cannot be efficiently implemented in Africa in absence of a **coherent and adapted framework, ensuring that the legislation, governmental policies, information and technologies at disposal converge** toward a sustainable biofuel production.
- The standard can in no case contradict existing laws, but it can go beyond.
- The standard is generic; it needs to be **interpreted in specific regional contexts**, and adapted to the reality of small farmers.
- Local authorities and communities can be relied upon for the implementation and consultation in Africa.
- Since Africa suffers much from **erosion, water scarcity, biodiversity losses, land rights dispute and food insecurity**, such a standard could bring much benefit, in addition to the opportunities to respond to the demand for certified products or gain carbon credits through the CDM.

Greenhouse gas emissions are a burning topic in Africa. Whereas some consider that **Africans are not responsible for the current climatic issues** and must be allowed to pursue economic development without obstacles related to GHG emissions, other participants consider that **GHGs will become an increasingly important issue** if economic development is enhanced, so it would be wiser to start optimizing carbon cycles now to avoid future problems.

Discussions of **environmental aspects in the RSB standard** included:

- The need to **involve local communities in the identification of HCV areas and ecosystem services.**
- The issue of requesting wastewater treatment in countries where no infrastructure or governmental incentives exist for sustainable water treatment.
- The need to prevent the use of GMOs that increase the dependency of developing countries toward developed countries and big companies.

Discussions of **social aspects** included:

- The actual problem related to food security is not the availability of land, but the availability of manpower. **Biofuel production is likely to displace jobs, rather than create new ones,** due to a lack of available labor.
- The need to consider small farmers as the priority and help them becoming more competitive.
- Through decentralized systems, the consultation of local authorities is sufficient for understanding the context.

The overarching discussions about **Jatropha curcas** can be summarized as the dilemma between growing jatropha in **arid regions in order to prevent desertification, soil erosion or cattle stampedes,** and producing **biofuels in sufficient amounts for national or international trade,** which requires arable land and inputs, and for which several plants would give a better yield than Jatropha. As agreed by many participants, both benefits cannot be reconciled and **the argument of a low-input crop growing on arid land cannot be used to justify large-scale biodiesel production out of jatropha.**

2. Background :

In August 2008, the Roundtable on Sustainable Biofuels (RSB) released the first draft of an international standard for sustainable biofuel production. This document, called “Version Zero” is based on a multi-stakeholder and international consultation, which was started in April 2007 and involved nearly 400 participants from 40 countries. The process was overseen by the RSB Steering Board, composed of experts from companies, producers, NGOs, governments and the academic sector.

Through March 2009, the RSB is organizing a new round of consultation on the Version Zero, in order to gather as much feedback as possible and refine the document accordingly to create a Version One. This feedback is particularly important in producing regions, where much economic development and potential social and environmental impacts are at stake. This is the reason why West Africa was chosen as a key region in which to hold a stakeholder consultation.

Since the RSB had the great honor to participate in COMPETE’s “International Workshop on Bioenergy Policies for Sustainable Development in Africa” (Bamako, Mali. 25-27 November 2008), it took this occasion to organize a full day of consultation with participants, where general questions, remarks, and specific points on environment or social aspects were thoroughly discussed.

The following questions/remarks and tentative answers try to reflect the main points that were discussed during this intense day of consultation. We invite readers to contact the RSB (rsb@epfl.ch) wherever some points are still missing or need clarification.

3. General questions/remarks on Version Zero and implementation of the standard:

3.1 General:

- Is the standard to be adopted by producing countries or incorporated into legal procedures?

RSB answer: *The first users of the standard will most likely be producers and blenders through voluntary certification schemes, but country governments may also be interested in using the standard as a framework for policy development, or even in using the criteria in legislation.*

- While all countries have their own regulation, what is the legitimacy of the RSB to impose procedures?

RSB answer: *The RSB cannot impose anything on countries or individuals. Whenever a producer voluntarily decides to get certified, be it because the country imposes certified biofuels or in order to export, it remains his own choice; certification can require more efforts than what legislation imposes, but in case of conflict with existing laws, these prevail above the standard.*

- Is the RSB standard of the same type as FSC, or organic products?

RSB answer: *Yes, in the sense that projects will be verified against the criteria to determine the level of compliance, but several criteria are really specific to biofuels.*

- How do the standards relate to national laws?

RSB answer: *The standard may go beyond laws, in terms of sustainability requirements, but in no case against any existing laws. The law must always prevail.*

- Did the RSB take into account past experience? In the past, standards failed to be correctly implemented. The bad experience of cotton should also be used to learn.

RSB answer: *Because of the fantastic work already achieved by other certification schemes (FSC, RSPO, 4C's, etc.), we couldn't but build on these past experiences and try to learn from these. This also includes recent problems faced by some of these initiatives in the implementation of the standard and the setting of a reliable verification chain.*

- Does the RSB standard apply to wood or charcoal?

RSB answer: *The first scope of the RSB standard is liquid biofuel for transports, but ultimately, there might not be restriction to broaden the standard to other forms of bioenergy, since most of the criteria are relevant to biomass production in general.*

3.2 Biofuel Standards in Africa:

- Is the standard oriented toward exports?

RSB answer: *Generally yes, because, unless the government decides to set a policy for sustainable biofuel development under a legal form or through financial incentives, there are no reasons for producers to try to comply with the standard, since it involves additional costs, which are unbearable unless they are compensated by the demand for certified products or premiums. However, there might be a market for locally produced sustainable biofuels, for instance in Europe or the US.*

- Is the standard suitable for Africa?

RSB answer: *As the standard aims to be generic and applicable worldwide, it is not necessarily ready to be implemented as such. An intermediary step will necessarily be the interpretation of these criteria within a given context (country, region). This might allow being much more specific and focusing on the main impacts.*

- What are the benefits for Africa of using the standards?

RSB answer: *Desertification, erosion, problems of water availability and quality, land rights, and food security are African realities, which the standards try to address. Certified biofuels may also offer opportunities for entering US or European markets, as well as perspectives for Clean Development Mechanism and carbon credits.*

3.3 Other comments:

- Several countries have a decentralized structure, where local authorities are key players to involve at all steps of the process, e.g. setting maps of important ecosystems or supporting social surveys. The implementation should be delegated to national committees.
- Some participants doubted that significant biofuel production/consumption targets could be achieved by small scale farmers alone.
- In national policies, economic liberalism has considerably modified the patterns of agricultural exploitation and rural development. Before that, villages were really central, with their own production-transformation-consumption local chain. Now, global influence is increasing and foreigners can buy land and take all benefits from cultivation out of the country. As this situation tends to be promoted by financial partners, farmers and authorities have no choice but to play that game. In the end, international policies have become more influential than national policies for farmers and rural areas.

3.4 Implementation:

- How can we move from uncertified to certified production?

RSB answer: Through a voluntary scheme, the RSB wishes to encourage continuous improvement instead of immediately requiring that best practices are adopted. Hence, once minimum requirements are met, producers would likely have to commit to continuous improvement, what would help them to progressively adapt their production chain. Governments or relevant institutions should also be involved, as it is the case, for example, to perform a national identification and mapping of HCV areas. More generally, the effect of such a voluntary standard will be limited if the national or regional framework and policies are not coherent.

- How to overcome possible trade-offs between national priorities and the standard?

RSB answer: In no case should the RSB standard be in contradiction with existing legislation. Yet, some conflicts might exist. As an international and participatory initiative, the RSB tries to set a standard which is equally fair to all countries and stakeholders. The current criteria received the consensus of many experts from different countries and sectors, which gives them a certain legitimacy to carry the aspects that are fair and beneficial for the biggest number of people. If a country should decide to go against this international consensus, in spite of its scientific and rational basis toward genuine sustainability, the consequence might be an inability to export toward the US or the EU, or to get the voluntary certification stamp. There are aspects on which the RSB can leave some flexibility, but not all of them, for instance, clearing primary forest or child labor.

- What is the timeline to consider the standard effective?

RSB answer: Version One of the standard will be released in June 2009, and will constitute the basis for the development of indicators. Certification schemes usually take a long time to make operational; it took about five years of work in the Roundtable for Sustainable Palm Oil before the first certified palm oil was traded.

- How do the standards apply to small farmers?

RSB answer: The distinction between small and large farmers is a permanent concern in the development of this standard. So far, the RSB Working Groups agreed that the high level of requirements currently included tend to rather orient it toward large-scale producers. An adapted version is hence to be developed for small producers.

- The Environmental and Social Impact Assessment (ESIA) described in 2a includes many parameters. Who will bear the cost for such an evaluation?

RSB answer: A simplified ESIA will be proposed for small producers, with appropriate requirements.

3.5 Other comments:

- The language should be simplified and the requirements be made more operational.

- The content of the ESIA (Principle two) should be detailed through a synoptic table including the types of impacts for different classes of ecosystems and with reference to standardized procedures.

- The criteria should be translated for local people to understand these clearly and participate in the consultation.
- Overall, some participants feel that the standard should rather follow a bottom-up approach; there are too many restrictions from the beginning here, which can be discouraging.
- Local planning of biofuel production is needed to identify ecosystem services or social impacts.
- It is important to give farmers sufficient information and time to make decisions, as they might not have an immediate opinion on the risks and opportunities of particular crops and production systems.
- Suggestion to create a type of fund fed by producers, processors, traders and other stakeholders to help small producers comply with the standard or use premiums or subsidies as an incentive. In Zambia, 0.1 cent/L of fuel bought is used for road rehabilitation, as an example.
- Similarly to the first principle, all the data and documents used in the evaluation should also be certified, because of the high degree of data uncertainty.

4. Questions/remarks on Environment/GHG principles and criteria :

4.1 Greenhouse gases:

- Principle 3. "Climate change mitigation" involves broader aspects of climate change, such as radiative forcing to be taken into consideration (albedo, energy absorption...), in addition to GHG accounting.
- The GHG principle and criteria are considered "too scientific" for an easy application. Incentives should be in place to encourage GHG reductions. The idea of limiting GHG emissions does not meet consensus, since many consider it as an obstacle to economic development whereas Africa is only responsible for a very limited share of global GHG emissions. However, GHG issues are likely to progressively emerge as countries develop, especially because the majority of electrification projects in Africa plan to build coal-fired plants.
- 3e (indirect land use change) is beyond the producer's reach
- The promotion of wastes should be made more general in the standard.
- Promoting the use of idle/degraded land is more important in certain regions than others. For instance, some countries might have idle arable land and do not need to use degraded lands.

- One suggestion is made that “mitigation” should be replaced by “adaptation”, to highlight the fact that plants like jatropha are also planted to respond to climate change in certain places.

4.2 Conservation/Biodiversity:

- HCV must be identified with the help of local people, who also know about ecosystem values. Awareness-raising about the HCV concept is useful.
- How do international standards on biodiversity relate to national policies?

RSB answer: *In general, the standard cannot contradict existing laws, but unless national laws already cover all aspects of concern, the RSB can incent producers to go beyond existing laws on biodiversity.*

- Criterion 7a: maps and toolkits are identified, but who will provide support to small producers?
- Criterion 7b should be strengthened so that “where possible, the continuity of Ecosystem Services must be preserved in biofuel production.”

RSB answer: *the production standard on its own will not achieve the maximal success if it is not integrated in a broader framework, which involves the participation of governmental and non-governmental institutions. The contribution of these institutions could include technical support in terms of scientific and ecologic information, e.g. by conducting the identification of the HCV areas at the national level, as several countries have already done.*

- Principle 7. Connections among ecosystems should be considered, since several ecosystems might be interconnected and indirectly affected by the impacts occurring in one.

RSB answer: *Similarly to the principle on water, the criterion might indeed refer to the entire watershed to ensure that interconnected ecosystems are covered.*

4.3 Soil/Water management:

- Does soil health refer to pollution? What is the degree of soil pollution expected from biofuels?

RSB answer: *Health does indeed involve the absence of significant soil pollution; this term was chosen because of its positive tone. Biofuels have exactly the same pollution potential as any other agricultural product, which means that they could be intensively cultivated at the expense of ecosystems, soil and water resources, or cultivated in a sustainable way. There is no specific pollution that is created by biofuels compared to the rest of agriculture, it is only a question of choice of production methods.*

- 9d. Wastewater treatment is an important issue in Africa, where no framework exists to facilitate proper wastewater management. One important preliminary step is to push state governments to set a coherent legal structure and sensitize farmers about water issues and solutions to improve practices.

- Do the criteria on soil management refer to organic practices?

RSB answer: *Organic soil management is one type of practice that could make production comply with these criteria. The RSB is keen to promote alternative practices to show that large-scale sustainable production can also remain economically viable.*

4.4 Technologies and GMOs:

- GMO analysis requires much scientific skills and infrastructures, which might not always be available in a given production region. Consequently, the analysis may hence depend on foreign institutions with a limited knowledge of the context.
- The most important requirement is that the use of GMOs doesn't create dependency from developing countries toward developed countries.
- Legislation on GMOs is progressively being set in several developing countries and the compliance with these laws must be the priority.

RSB answer: *For the entire standard, no criterion can contradict existing laws. Criteria can go beyond existing legislation but not against.*

- Informing producers about technologies and seeds in order for them to make the right choice is crucial.
- In the African context, the use of "economic efficiency" might be interpreted as favoring big scale production, whereas the term "equity efficiency" might be more appropriate, i.e. maximizing the development and distribution of benefits.
- How will the RSB concretely deal with degraded lands?

RSB answer: *The RSB expects to refer to the ongoing work held by the WWF and other initiatives on the definition of marginal lands in order to incorporate this into the standard. More generally, the RSB is keen to include references to existing credible sources or initiatives.*

5. Questions/remarks on Social Principles and Criteria :

5.1 Rural Development:

- In Mali, any new large-scale project must fit into the annual socio-economic development plan established by local authorities, in order to receive authorization.
- The development of new projects may be motivated by other purposes than local development, such as personal profit or electoral benefit. Political will is an important factor to develop projects in the right way.

- Whereas small farmers used to represent the majority in Africa, the boom in bioenergy tends to give more recognition to large farmers; small ones have become secondary and do not receive support. Small farmers should be the priority of action, especially because, in many countries, they have been achieving the green revolution.
- In spite of this situation, the current economic system cannot be modified and people have to become more competitive, for example by gathering into cooperatives and unions. Policies established by governments must look for empowering local populations through competitive arrangements.
- In principle 5, something should be said to reduce the producer's dependency on investors, be it financial or technical dependency.

RSB answer: *This aspect is partially treated under Principle 11, but certainly needs more emphasis. The "Groupe Energies Renouvelables, Environnement et Solidarités (GERES)" is currently working on these aspects.*

- The word "indigenous" might be considered pejorative when translated into French.

5.2 Community Consultation:

- The RSB should undertake more consultation in various countries and under various conditions.
- In African countries, decentralization allows companies and possible certifying agencies to interact directly with local authorities, which can be considered as legitimate for represent people's opinions. However, if time and means allow it, it is recommended to try to consult individuals (e.g. women's groups), but always after legal authorities in order to avoid shortcutting the normal hierarchy. The mayor is the first level of authority to talk to, carrying both legal and traditional legitimacy. Small farmers must also be consulted to understand their traditional framework and reality.
- In the case of private big-scale projects, it is hard to have an influence on community consultation and benefit-sharing. Since the project's site is up to the owner, financial incentives and the business case could help orienting the production the right way.

5.3 Food security:

- Whereas 6a strengthens the principle, 6b is considered to make it weaker, because it requires the instantaneous picture of food security, but does not require an assessment over the long term. In reality, the food situation may be very good one year, but within a few years, poor harvests or climatic events may rapidly give way to food shortage. The increase in population

should also be integrated while evaluating land availability to anticipate the growing demand for food over decades.

- The main issue related to food security in Africa is not land, but manpower! A large consensus among participants from all countries represented is that the main threat to food security is the lack of manpower at different steps of food production. Overall, biofuel production is unlikely to create new jobs, but rather displace the existing agricultural labors. This aspect should also be included in the criteria on food security. One option to mitigate this issue is to practice intercropping and crop rotation. It is also pointed out that mechanization will free much working time.
- The non-use of food crops for biofuels should be mentioned in the guidance under principle 6.

5.4 Human rights:

- Criterion 4c seems very much similar to the UN Convention on Children Rights; this reference would perhaps make more sense than the ILO's.

6. Specific Questions/Remarks on Jatropha:

- Some participants consider that jatropha is not always developed for the best reasons and in the most appropriate sites. When grown on semi-arid land, the plant yields little oil and a limited number of seeds, which contradicts the perspective of commercial biofuel production but prevents desertification and soil erosion; if biofuels are to be produced on fertile land with inputs, jatropha is far from being the best option, compared to palm for example. A choice is hence needed at some point.

RSB answer: *A specific working group on jatropha is to be shortly set under the auspices of the RSB. Much discussion on jatropha was held in New Delhi during the RSB's South-Asian outreach in June 2008; details available at <http://cqse.epfl.ch/page71636.html>*

- More research should also be undertaken to study the possible toxicity from jatropha through the water that is drained into the soil. The use of all jatropha byproducts would reduce this risk.

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