



The Rt Hon Ruth Kelly MP
Secretary of State for Transport
Department for Transport
Great Minster House
76 Marsham Street
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24 March 2008

Dear Ms Kelly

In recent months, you will have seen the growing body of scientific opinion which indicates that biofuels produced from crops are likely to contribute to greenhouse gas emissions at precisely the time when we have to be cutting them. This is the case both directly through the destruction of important habitats to plant such crops, and indirectly through land use change or 'leakage' effects. Indeed, in the last few weeks, you have had many personal representations from our members and the public alike about the fact that the current policy of the Department for Transport on biofuels will have serious environmental and social consequences.

We are writing to you today to highlight our continued concerns with regard to the upcoming introduction of the Renewable Transport Fuel Obligation (RTFO) which will ultimately require fuel suppliers to replace 5% of the transport fuel sold in the UK with biofuels. We are also extremely concerned about the even greater threats from the proposed extension of biofuel targets in European legislation to at least 10% of transport fuel energy by 2020.

Given the evidence that already exists, we believe that the introduction of biofuels targets will, in the absence of robust and enforceable sustainability standards and a clear understanding of the indirect impacts of large-scale production of biofuels, have a devastating impact on vulnerable peoples' livelihoods, the climate and biodiversity, e.g:

- Food price inflation and increasing incidence of land conflicts and human rights abuses;
- Risks to biodiversity, including tropical forests, savannah and grasslands, as a result of further expansion of agricultural areas. This can be either directly for biofuel feedstocks or as a result of existing food crops being diverted into biofuel production.

Whilst the recent announcement of a scientific review into the impacts of biofuels is a positive step, we are calling for the RTFO to be postponed and for the UK Government to reject any further increases in European and UK biofuels targets until credible frameworks exist to measure, assess and adequately mitigate against these effects.

We are particularly concerned that there will be no minimum greenhouse gas or sustainability standards in place when the RTFO is introduced in April. If the RTFO introduces sustainability standards only in 2011, in excess of 3 billion litres of biofuel will have been sold in the UK, with absolutely no assurances that it has not caused significant environmental and social harm. Combined with the absence of any framework to account for or manage indirect land use change, there is thus a very real risk that the RTFO will actually contribute to climate change and deepen poverty.

In the future we hope that new biofuel technology will be able to address some of these problems. In the meantime, alternative, lower risk, more reliable and lower cost options exist to reduce greenhouse gas emissions in both the transport and agriculture sectors. The Treasury-commissioned King Review of low carbon cars published this week recommends that to deliver meaningful emissions reductions the policy focus should be shifted away from biofuels towards engine efficiency. Much more could be done to support these engine efficiency measures which should be prioritised. These include more efficient vehicles and strong UK action under the CO₂ and Passenger Cars Regulation, enforcing speed limits and traffic reduction in the transport sector, utilising wastes and slurries to create bioenergy and reducing nitrogen fertiliser use in the agriculture sector. Policies such as these should be the priority, rather than targets for biofuels which could have serious unintended consequences.

Yours sincerely



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cc: The Rt Hon Hilary Benn MP
The Rt Hon Douglas Alexander MP