

**Department for Transport  
Consultation on  
The Draft Renewable Fuels Transport Obligation  
Order**



**Friends of  
the Earth  
Scotland**

**A response from Friends of the Earth Scotland**

15 May 2007

**Introduction**

Friends of the Earth Scotland is a registered charity founded in 1978 and an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability.

Friends of the Earth Scotland welcome the opportunity to comment on the proposals, and ask that the following points be considered before finalising the order.

**Key concerns**

We welcome the opportunity to comment on the Renewable Transport Fuel Obligations Order (RTFO Order). Please note that Friends of the Earth (England, Wales and Northern Ireland), our sister organisation, is providing a more detailed response to your questions. Friends of the Earth Scotland's principal fear relates to the wider environmental impacts of adopting the RTFO Order, without appropriate safeguards; an issue not directly addressed by the consultation but of critical concern both to us, and to the perceived credibility of the policy. These concerns have an immediate bearing on the issues raised in question eight on voluntary standards and agreements.

In certain cases the manufacture of biofuels, especially so-called "first generation" biofuels, can deliver small carbon benefits, or even net increases in emissions; for example where crops are grown intensively using fossil fuel derived fertilisers and pesticides or in inappropriate locations where the clearance and drainage of carbon-rich forests and soils is required to establish plantations. The release of carbon stored in forests or soils, or the destruction of important biodiversity are already serious environmental problems and contributors to climate change. Therefore, the RTFO Order must be based on the current scientific evidence, considering the full environmental and life cycle impacts of different sources of bio-fuels. The issue of the net level of carbon savings is of critical importance; this varies markedly between different fuels.

Given these variables mandatory standards and certification procedures are an essential part of any sensible and environmentally responsible policy. Even where significant net carbon savings can be certified, first generation crops can displace other valuable land-uses with negative social or environmental results, such as the loss of essential food production. Certification can go some way to ensuring that biofuel production itself does not replace food production (including knock-on effects, such as the diversion of materials from silage or green manures) or damage areas protected for biodiversity. In addition to demonstrable significant substantial net carbon benefit, a full life-

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cycle analysis and wide ranging environmental impact assessment must be components of UK biofuel certification under the RTFO.

All certified bio-fuels used in UK under the RTFO Order should be subject to strict and compulsory rules introduced at the start of the scheme, with independent checks on both fuels and the companies concerned. This must include:

- a substantial net benefit for the climate through a minimum requirement of at least 50% savings across their entire life-cycle from land clearance to processing and delivery
- independent and transparent auditing procedures;
- no direct or indirect destruction of valuable natural ecosystems or protected habitats, nor damage to important ecosystem functions such as nutrient supply and prevention of erosion;
- no displacement of food production where food security is at risk, and
- full certification and traceability of feed-stuffs.

In this regard, any delay in establishing strict and compulsory standards should not be countenanced. Furthermore, the level of RFTF (question 21 & 22) should be set to reflect the anticipated levels of production of those crops, which can be certified as coming from sustainable sources, rather than an arbitrary level identified in advance of such an analysis. A minimum carbon emission reduction standard of 50% savings would not automatically exclude any particular feedstock, is readily achievable using current technology and would eliminate only the worst performing technologies.

Unless such high mandatory standards and transparent certification systems are imposed and demonstrably able to deliver adequate certified production, we cannot support an increase in the RTFO target. There are much simpler measures to reduce greenhouse gas emissions from UK transport, such as enforcing speed limits, extending congestion charging, or halting airport expansion - without risking negative social and environmental impacts in developing countries.

## **Conclusion**

Friends of the Earth Scotland is concerned with the proposal, which far from delivering an environmental benefit, could have serious negative environmental impacts unless the safeguards we have set out are put in place.

We trust that you are able to take these comments into account.

For further information please contact:

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