

22 November 2007

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Cleaner Fuels & Vehicles  
Department for Transport  
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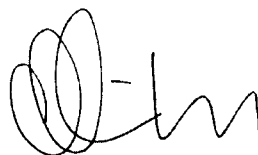
Dear Mr Parkin,

**RE: DfT consultation on European Commission Proposal to amend EU Fuel Quality Directive**

I am writing to let you have the Food and Drink Federation's (FDF) comments on the Government's public consultation on European Commission (EC) proposal to amend the EU Fuel Quality Directive. FDF wishes to make a broad but important point in the context of this consultation. Hence my reply is by letter rather than completion of your questionnaire.

FDF supports the role that renewable energy from agricultural sources can play in tackling climate change and fuel security. At the same time, ready accessibility to agricultural raw materials is essential for UK food and drink manufacturers, as purchasers of over two-thirds of domestic agricultural output, to meet consumer demand for food. As such, it is also an FDF priority to ensure that EU and national policies, formulated to increase renewable energy, are managed in a way which avoids distorting the availability of agricultural raw materials for food and animal feed.

FDF is concerned that the EC's proposal to amend the Fuel Quality Directive to include a mandatory greenhouse gas (GHG) reduction target of 10% in fuel lifecycle emissions per unit of fuel energy between 2010 and 2020 will give rise to serious market distortion. The consultation document recognises that in order to meet this target, biofuels uptake would have to grow to about 20-26% (by volume) of transport fuel across the EU by 2020. Based on a growing body of research, such as that published by OECD in September which shows that even a 10% mandatory target for biofuels threatens to cause food shortages and damage to biodiversity, this would be disastrous. This new ambition would amount to a doubling of that target. FDF therefore strongly urges the Government to reject this latest proposal and to ensure that the European Commission, in taking forward its mandate from the March Council, plays close attention to the growing body of research which is questioning the sustainability of a 10% mandatory target for biofuels.



**Callton Young**  
**Director of Sustainability and Competitiveness**