

Roundtable on Sustainable Biofuels (RSB)
Working group on ENVIRONMENT (WG ENV)

Background documents- Paper 5
Comment on Draft Environmental Principles

A. Overview:

This document aims to compile the edits to the original draft principles, as posted on the RSB's page on the bioenergy wiki and as received by the RSB Secretariat.

It is important to keep in mind that the bioenergy wiki serves as a discussion forum, but due to its freely open access, **the elements posted on it are individual opinions, and should not be taken as agreed or official.** It is the duty of the Working Groups to analyse each suggestion and decide whether or not the argumentation of the proposed edits is worth proposing them to the Steering Board.

The Working Group on Environment thus has to agree on any re-wording of these principles during the conference call on the 25th of July, in order to make a proposal to the Steering Board. The Steering Board will assess this proposal and the level of discussion and participation, as their mandate is to ensure that a wide variety of stakeholders' views are presented. After the Steering Board has approved any edits, this second draft of principles will be submitted to the Working Group for a second round of comments and revisions, with the goal of creating a final version of sustainability principles by the end of 2007.

B. Original draft principles on environmental issues (as suggested by the Steering Board) and justification:

In May 2007 the RSB Steering Board suggested nine principles of sustainable biofuels production, including five related to environmental sustainability. These draft principles aim to encompass all of the broad potential environmental concerns, with further details to be developed by the Working Groups as criteria under each principle. To draft these principles, the Steering Board drew heavily on other biofuel and agricultural reporting and certification systems (some of which are still in development), for instance the Low Carbon Vehicle Partnership in the UK, the Dutch Cramer Commission work, and the Roundtable on Sustainable Palm Oil.

Example (as described in "Sustainability reporting within the RTFO"):

Principle: Biomass production does not lead to soil degradation

Criteria: Application of best practices with respect to prevention and control of erosion, maintaining and improving soil nutrient balance, etc...

The five draft RSB principles related to environmental impacts are listed below.

3) Biomass production should not lead to the destruction or damaging of areas of high biodiversity.
4) Biomass production should not degrade or damage soils.
5) Biomass production should not contaminate or deplete water resources.
6) Biomass production should not lead to air pollution.
7) Use of GMOs should be transparent to buyers such that they can make their own decisions.

Although not final, these principles were considered exhaustive enough to cover every possible adverse major impact on the environment. Principles are by definition general and abstract in order to be adaptable to any geographical, climatic, ecological, socio-economic and cultural context. After having reached an agreement on these principles, criteria can be developed, as a transposition into concrete recommendations that still, however, apply to any of the above-mentioned contexts. We hope that Working Group members will draw on their expertise with other systems if particular concerns have been discussed in other multi-stakeholder fora, to ensure that the RSB continues to build on pre-existing consensus.

C. Review of the modifications, comments and suggestions added by the participants on the bioenergy wiki website (Environmental principles only):

General RSB comments:

Although it is great to see so many genuine concerns about specific issues, we have to keep our principles at a very general level so that they cover every of these specific issues. Hence, some of the changes made by reviewers on the wiki, although wise and relevant, somehow turn the principles into criteria, which is not the point of this exercise. Of course, these remarks will be kept for the moment we start work on the specific criteria.

In this section, 'Biomass' should actually be 'biofuel', as it covers environmental impacts throughout more of the chain (for instance, processing into fuel). We suggest rewording where necessary.

C.1 Principle on biodiversity

C.1.1 'Biodiversity' isn't the right term:

Comment from the Wiki: *Some areas with low biodiversity can still be valuable from a conservationist point of view. Some valuable and threatened biomes are even characterized by low biodiversity. Therefore it seems more appropriate to refer to High Conservation Value Areas, as do the Cramer Principles on an indicator level. This may also serve as an incentive*

to identify these areas, making it easier for companies to know which areas are off-limit for plantation development. I believe WWF is currently working on the identification of HCVA's.

Suggested text from the Wiki: “Biomass production should not lead to the destruction or degradation of areas of high conservation value, including areas of high biodiversity; habitats of rare, threatened or endangered species; or rare, threatened or endangered ecosystems.”

C.1.2 Environmental Services

A few people also suggested that the notion of **environmental services** (cf: HCV) shall also be mentioned.

RSB Comment: If we use the definition of HCV attached as paper 6 for this meeting, does this encompass environmental services, or should we explicitly mention them in the principle?

C.1.3 Indirect effects

Two suggestions were made for an additional principle:

“It should not be the cause either directly or indirectly for displacement of food crops as seen from a global systems perspective.”

“Biomass production should not displace crops or practices which then will drive conversion, deforestation.” (For example: soy replacing grazing, the soy is certified as sustainable, but deforestation continues because grazing was displaced).

RSB Comments: This is a very critical point, since the indirect effects are to be dealt with by our Working Group too, but do we want the main principles to cover direct effects only and find an additional tool/principle to cover the indirect ones, or do we want to include indirect effects within the subject-specific principles? Since leakage effect has an impact on every category (social, economic and environmental), we could also think of a separated category of principle specially dedicated to this aspect. For now, we recommend keeping the potential indirect and direct impacts within each principle, and that the Steering Board should discuss this matter in their next meeting in September.

C.1.4 Previous deforestation

User comment: *“The history of deforestation and land-use change in highly industrialised countries has to be taken into account. In many parts in Europe and North America, crops are grown on land that used to consist of forests. A baseline of this 'historic deforestation burden' will have to be created, the economic benefits and outcomes of this deforestation calculated on a per capita basis, and then, against this baseline, a ratio of 'allowed deforestation' will be agreed on by industrialised countries and developing countries.”*

RSB Comments: The concept of historical consideration is important, since Northern countries have often already replaced their forest with agricultural lands. Is it fair to say that Southern countries have no right to do so? However, for now, stakeholders will likely want to focus on preventing further deforestation, for both climate change and biodiversity reasons.

RSB suggested re-wording to take into account the above comments on the biodiversity principle:

“Biofuel production should not directly or indirectly lead to the destruction or degradation of areas of High Conservation Value (HCV), including areas of high biodiversity; habitats of rare, threatened or endangered species, rare, threatened or endangered ecosystems; and areas providing basic environmental services.”

C.2 Principle on soil (no edits):

RSB Suggestion: Biofuel production should not degrade or damage soils.”

C.3 Principle on water (no edits):

RSB Suggestion: Biofuel production should not contaminate or deplete water resources.”

C.4 Principle on air (no edits):

RSB Suggestion: Biofuel production should not lead to air pollution.”

RSB Question for discussion: Shall *directly and indirectly* be specified in these three principles as well?

C.5 Principle on GMOs:

This point requires discussion, since several suggestions were made.

The original draft was:

“The use of GMOs for biofuels production should be made transparent, so that buyers can make their own decisions.”

RSB Comment: The reason for proposing this neutral draft principle was to avoid having to come to consensus on any value judgments regarding GMOs, given that whether or not their use is sustainable is a matter of heated global debate. The RSB represents an exciting opportunity to reach global agreement on key issues related to biofuels sustainability, and we risk losing the opportunity to ensure these other aspects of sustainability by getting stalled in a discussion around GMOs in which we cannot reach consensus. By simply requiring the information to be shared with the buyers (which, it should be noted, is already a quite controversial position, as it is not the practice in many countries and is also largely absent from other sustainability schemes), we thought that buyers could take their own decisions based on their best judgment.

However, could the RSB adopt a more concrete position and avoid the buyer having to carry the burden of the debate? Is there a best practice in managing the potential risk of GMO use that we could promote? Are we missing an opportunity to create consensus in this area?

Other stakeholder comments include:

“These principles should be developed so as to be adopted internationally, without imposing practices of one country or region on other countries. The current form of the specific GMO principle is inappropriate in that light, as the intent is to require that GMO product use for biofuels require that the GMO product be labelled. While this may be practice in Europe, it is not in the United States. Thus, this principle breaks what I consider to be a foundational principle for the function of the Roundtable. My recommendation is to eliminate the specific GMO principle, and to simply incorporate this under the first principle, which speaks to biomass production complying with all local and national laws. There should be no reason to specifically refer to GMOs, since this is merely one of many technologies that may be used in biomass production. For example, the use of any agricultural chemical would also require compliance with laws, and land use practices would similarly require compliance, and yet these are not singled out.”

RSB Comment: In the same direction, it is relevant to say that GMOs are not the only aspect of biological engineering that could be discussed. **Hence, it was proposed to replace the term “GMOs” by “biotechnologies”** so that we can cover a broader area of technologies and anticipate future innovations.

RSB Suggested wording:

Whenever biotechnologies are used in biofuel production, their use must comply with best practices, the principle of precaution, and with international rules and norms, as there is no scientific certainty about their effects in the long term.

C.6 Additional principles proposed:

“Equipment used in the Bio production must be from a least polluting source and used in conjunction with most energy efficient systems available.” Another user deleted this without comment.

“Biomass production should minimize toxic loading to the environment“. Another user deleted this without comment.

RSB Comments: These concepts are perhaps too specific for a principle. Furthermore, are they already covered by the principles on GHG and ecological contamination (soil, water air)?

“Biomass production should be used as a collateral tool for reconstruction of damages done by fossil fuels use in and ecosystem services.” User deleted without comments.

RSB Comment: This seems to be more a principle related to the overall purpose biofuels, and not whether a specific biofuel is sustainable or not. In this first phase, we have to concentrate on defining the sustainability of biofuels’ production and processing.

D. Tentative synthesis of revised principles to be submitted to the Steering Board:

(to be discussed during the meeting)

- 3) Biofuel production should not directly or indirectly lead to the destruction or degradation of areas of High Conservation Value (HCV), including areas of high biodiversity; habitats of rare, threatened or endangered species, rare, threatened or endangered ecosystems and areas providing basic environmental services.
- 4) Biofuel production should not directly or indirectly degrade or damage soils.
- 5) Biofuel production should not directly or indirectly contaminate or deplete water resources.
- 6) Biofuel production should not directly or indirectly lead to air pollution.
- 7) Whenever biotechnologies are used in biofuel production, their use must comply with current best practices and international rules and norms, as there is no scientific certainty about their effects in the long term.