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**FEDIOL Contribution to the HLPE e-Consultation on the V0 draft of the Report:  
Biofuels and Food Security**

**To the attention of the  
High Level Panel of Experts for Food Security and Nutrition (HLPE)  
cfs-hlpe@fao.org**

FEDIOL is the European Association representing oilseed crushers and vegetable oil refiners' associations in 16 European countries, who produce vegetable oils and protein meals for food, feed, energy and non-energy technical uses. As an integral part of food, feed and biofuel chains, FEDIOL members provide about 20.000 jobs in Europe, often in rural areas, and contribute with 24 bln euro turnover to value creation and wealth in Europe.

We appreciate the opportunity of providing comments to the draft 01 version of the report on biofuels and food security.

- The appreciation of the current mandate situation in Europe is misleading, because a recent proposal for capping the biofuel mandate at 5 % is taken for granted. In reality, the European Commission has submitted a proposal in October last year, which requires both the Parliament and the Council to come to an agreement on a whole set of changes to the biofuels policy that have been proposed.
- Instead of providing a detailed and comprehensive discussion of the role of biofuels for high and volatile food prices based on existing literature, it seems to base its conclusion on rather one-sided evidence according to which biofuels have not only a central, but also a dominant role. The fact that there are also numerous other scientists<sup>1</sup> who consider biofuels not to be the primary impact on commodity prices, does not appear in the report and does not lead to a contradictory debate.
- More generally, the evidence collected throughout the report shows on a number of items considerable variability, leaving a high degree of uncertainty of the impact or consequence considered. Despite this uncertainty, the report gives the false idea that it can reach clear conclusions. For example, the report recognises on the one hand that "we do not know what percentage of reductions in consumption the food insecure experience when crops are diverted to biofuels"

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(p.22). Yet, faced with such uncertainty, the report nonetheless reaches the conclusion that "these very rough figures provide reason to believe the effect is substantial and could be even extremely substantial."

- The report should give consideration to the positive contribution of biofuels production to the food chain, in terms of production of co-products, of investments in agriculture and in research. In certain regions, like Europe, which suffer from protein deficit for livestock production, biofuels production contributes to reducing this protein deficit and supports food production. With every tonne of rapeseed biofuel produced, 1,5 tonnes of meals supply the feed market and consequently the food market. The report does not expand on the positive effects of enhanced investments, increased production and of the regained research effort that has taken place following the biofuels development.
- In this context, the report seems to ignore and even to contradict past FAO assessments. When in 2005 FAO said: „The long-term downward trend in agricultural commodity prices threatens the food security of hundreds of millions of people in some of the world's poorest developing countries", it was precisely concerned of the lack of investment in agriculture, the insufficient positive signals given to farmers for enhancing production.
- Furthermore, the FAO BEFS (Bioenergy and Food Security) analysis of bioenergy policies also recognises the three distinct advantages of biofuels, i.e. positively affecting agricultural and rural incomes, poverty reduction and economic growth through creation of new markets, reducing energy dependency, and enhancing food security. The BEFS analysis also concludes that general conclusions cannot be made as to the impact of biofuels on food prices, economic growth, energy security, deforestation, land use and climate change <sup>2</sup>.
- We consider problematic to make use of case-study evidence, as mentioned in the policy recommendations, to support an overall judgement of some consequences attributed to biofuels production, which appear to us more specific to certain countries or situations and then also even to draw conclusions and policy recommendations.

As it stands, the report appears as essentially made fit for the purpose of demonstrating that biofuels, in any case, are detrimental to food production and that mandates should be dismantled. We hope the report to offer a more balanced vision on the co-existence of biofuels and food production, without making a partial use of existing scientific evidence, and to remain consistent with the overall FAO policy approach.

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<sup>2</sup> 'Bioenergy and Food Security: BEFS Analytical Framework', FAO, Rome, 2010.