

March 5, 2019

Contributions to the Public Consultation on the High and low Indirect Land-Use Change (ILUC) - risks biofuels, bioliquids and biomass fuels

On behalf of the Brazilian Sugarcane Industry Association (UNICA), I would like to thank the European Commission for the opportunity to provide comments on the draft delegated act supplementing Directive (EU) 2018/2001 as regards the determination of high indirect land-use change-risk feedstock for which a significant expansion of the production area into land with high carbon stock is observed and the certification of low indirect land use change-risk biofuels, bioliquids and biomass fuels. Our comments will concentrate on sugarcane exclusively.

We would like to **suggest the European Commission to be more transparent** and to clearly indicate the share of each crop expansion into land with high-carbon stock according to the formula indicated in Art 3 (b) of the delegated act, instead of the share of expansion into land referred to in Article 29 (4) (a) (b) (c). In fact, for sugarcane the productivity factor (PF) is 2.5 and therefore the result of the formula is different than for annual crops which PF is 1. In fact, **according to that formula, sugarcane's share of expansion in land with high-carbon stock is 2.1%** while according to the table published in the annex of the delegated act, that do not include PF, it is 5%. Once again, it is a matter of transparency.

In addition, we would like to **question the fact that the Commission did not use, for sugarcane, the well documented information that was submitted by UNICA** to the European Commission in December 2018. The Brazilian think tank, Agroicone, also sent a paper "RED II information paper: assessment of iLUC risk for sugarcane and soybean biofuels feedstock" that was used in the report on the status of production expansion of relevant food and feed crops worldwide for analyzing soybean, but not sugarcane.

In these documents, analysis based on PRODES and MapBiomass are provided. PRODES is an official program of the National Institute of Spatial Research (INPE) of the Brazilian Government. It is co-sponsored by the World Bank and GIZ, among others.

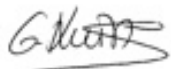
MapBiomass is an initiative of the Greenhouse Gas Emissions Estimation System (SEEG) from the Climate Observatory's and is produced by a collaborative network of co-creators made up of NGOs, universities and technology companies organized by biomes and cross-cutting themes. WRI Brazil is one of the institutional sponsors. The program provides maps of the Brazilian land use and vegetation cover, and maps of land use change from 1985 and 2017. All the references of these two programs were submitted to the European Commission.

According to these two sources, sugarcane expansion on land covered with forest and native vegetation is less than 1%.

We are confident the European Commission will improve the transparency of the delegated act and will use the most scientifically accurate data provided by PRODES and MapBiomass.

I remain at your disposal for any additional information you might need.

All the best,

A handwritten signature in black ink, appearing to read 'G. Kutas', with a horizontal line underneath.

Géraldine Kutas
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UNICA