



DET KONGELIGE
MILJØVERNDEPARTEMENT

Royal Ministry of the Environment

CBD Secretariat
413, Saint Jacques Street, suite 800
Montreal QC H2Y 1N9
Canada

Your ref

Our ref
201103344-/EMI

Date

Dear Executive Secretary,

Submission from Norway: Experiences and results from assessments of the impacts of biofuel production and use on biodiversity and impacts on biodiversity that affect related socioeconomic conditions.

We would like to take this opportunity to emphasize that some ambiguity remains in regards to the title of the document. Whereas decision X/37 is referred to as an separate topic “biofuels and biodiversity”, decision IX/2 is on “Agricultural biodiversity: biofuels and biodiversity” and puts biofuels under the agriculture programme of work. Norway would like to see a broader approach to the issue of biofuels, with a clearer emphasis on forests and peatlands.

The EU has stated the intention of including the proposed EU sustainability scheme for biofuels in both the proposed revised fuel quality directive and the proposed renewables directive. No final decision on the EEA relevance of the proposed directives has yet been made, and Norway has not yet finalised its position on these directives. Our national policy regarding biofuels is also yet to be finalised, and we will give this matter a thorough consideration, amongst other things, in light of the recent concerns over effects on food prices, food availability and net greenhouse gas savings. However, as the first comprehensive, international scheme for biofuels, the proposed EU sustainability scheme in and of itself will be of considerable significance and consequence. Norway has a fundamental interest in contributing to the establishment of sustainability criteria and schemes for biofuels that hinder negative environmental and social impacts from biofuels.

It is established Norwegian policy to give priority to measures which will have positive effects concerning climate change and at the same time positive or acceptable effects on

biodiversity and other important environmental values (win-win measures). This is in accordance with the decision on the last COP-meeting concerning the recommendation to increase positive and reduce negative impacts of climate-change mitigation and adaptation measures on biodiversity (Decision X/33/8(u)). Moreover, Norway's position is that the reduction of greenhouse gas emissions must be the primary function and purpose for policy to promote biofuels, that such reductions must be considered in a life cycle perspective and that the biofuels must be sustainably produced.

A White paper on Norwegian climate-change policy will be presented to the Norwegian parliament in spring 2012. In this White paper the effects of climate-change mitigation measures on biodiversity will be considered.

We have noted with concern scientific reports claiming that most of today's biofuels create a carbon debt through land use changes (directly or indirectly through displacement) that greatly offset the greenhouse gas savings of reducing the use of fossil fuels. We must ensure that such land use change effects, including displacement effects, are properly reflected in the life cycle analyses, default values and sustainability criteria for biofuels. We are also interested in the potential for use of cellulosic feedstock sourced from forest and grassland, under the strict proviso that such harvesting is sustainable and does not have adverse environmental or social effects, neither directly nor through displacement effects.

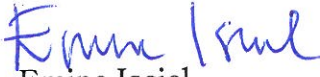
Please find attached some reports. The reports do not reflect official positions or policies of the Norwegian government, but is meant as an input to address CBD decision X/37.

<http://www.ssb.no/publikasjoner/pdf/dp637.pdf>

http://www.societalmetabolism.org/aes2010/Proceeds/DIGITAL%20PROCEEDINGS_files/PAPERS/O_186_Francesco_Cherubini.pdf

Yours sincerely,


Birthe Ivars
Deputy Director General


Emine Isci
Adviser