

HELEU ECH #BB

IUCN Input for the Public Consultation Energy Directorate-General, European Commissionwww.iucn.org/energy

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Proactively mitigating iLUC risks

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2. On the basis of the available evidence, do you think that EU action is needed to address indirect land use change?

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3. If action is to be taken, and if it is to have the effect of encouraging greater use of some categories of biofuel and/or less use of other categories of biofuel than would otherwise be the case, it would be necessary to identify these categories of biofuel on the basis of the analytical work. As such, do you think it is possible to draw sufficiently reliable conclusions on whether indirect land use change impacts of biofuels vary according to: feedstock type? Geographical location? Land management?