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The European Commission 2015 Renewable Energy Progress report overlooks adverse impacts of the EU biofuels policy in developing countries

In June 2015, the European Commission released its 2015 report on Renewable Energy Progressⁱ and the related Commission's assessment on Biofuels Sustainabilityⁱⁱ. The Commission assessment on Biofuels Sustainability is an obligation under the Renewable Energy Directive (RED).ⁱⁱⁱ It looks at environmental, economic, social and development impacts of the use of biofuels in the transport sector in Europe. The section on social and development impacts focuses on food prices and land acquisitions, and is largely based on a consultancy study by Ecofys published in 2014.^{iv} In this exposé, we address both the background study by Ecofys and the Commission's assessment, particularly the sections on land rights, food prices and 'wider development issues'.^v

We find that both the Ecofys and Commission's examination of social impacts of the RED on developing countries is based on an extremely narrow analysis, leading to underestimation of negative impacts. Both reports are characterized by methodological flaws and gaps and there is inconsistency between them. The fact that the Commission report downplays some of the findings in the Ecofys background study further affects its credibility. Little has improved since the Commission published its biofuels baseline study in 2011 and its first progress report on impacts in 2013, which was criticized for similar flaws.^{vi}

The lack of proper assessment of impacts on land use rights, food prices and the right to food or 'wider development issues' shows that the EU still does not take its commitment to Policy Coherence for Sustainable Development seriously into account in its climate and energy policy (Art. 208 of the Lisbon Treaty). The EU should cover human rights and environmental impacts in developing countries much more consistently and rigorously in its assessments of the RED.

Key short-comings of the 2015 progress report:

Weak methodology

- To assess the amount of land use that can be linked to the demand created by EU biofuel policy, the EC and Ecofys background study have been using trade and consumption data that ignore the many investments that have not yet resulted in exports to the EU but may already have devastating impacts on people and environment.
- The focus on hectares of land overlooks the gravity of impacts on communities, in particular on their land use rights and related access to water and food. In addition, the Ecofys background study's estimation of the number of hectares of land grabbed to meet the EU biofuels demand is based on a flawed and largely unreferenced methodology.
- Neither the EC nor the Ecofys background study thoroughly explore the impact of EU biofuel consumption targets on indirect land use change patterns in developing countries, which are important to understand actual impacts of EU-induced biofuel demand.
- The impact of the EU biofuels policy on food prices is misrepresented in the EC report, while the consequences of higher or more volatile food prices on the right to food is not addressed.

- The Commission does not look at the impact of the EU biofuels policy on other human rights – such as the specific impacts on women’s rights, labour rights and on the right to an adequate standard of living.

Limited sources used

- Evidence suggesting adverse impacts on people in developing countries is ignored.
- The report makes no use of country level case studies and field research from the developing countries most targeted for large scale land acquisitions for biofuels where land rights abuses have been reported.
- The Commission misrepresents the conclusions of its own background study and fails to take into account other authoritative sources and research on this issue when assessing the impacts of the EU biofuels policy on food prices.

ActionAid therefore calls upon the European Commission to:

1. Redo its socio-economic impacts assessment in order to comply with its reporting obligations under RED. This requires revising methodologies used, and bringing in the appropriate development expertise, as well as drawing upon the wealth of research available on the subject of land and food security impacts taking into account ground-level realities. The EC must also take into consideration the effects of the EU biofuel markets on land use change and their implications on people and environment and address the issue of wider developmental aspects with a particular focus on gendered impacts and human rights.

In order to do so, the EC should take into account the newly adopted Guidelines on Impact Assessments as well as the related Toolbox. Impacts on the environment and on human rights in developing countries must be looked at into much more depth – right to food, access and control over natural resources such as land and water as per the CFS Voluntary Guidelines on land tenure, labour rights, right to decent standard of living, right to participation through free, prior and informed consent (FPIC).

2. Ensure the methodological flaws of the 2013 and 2015 progress reports under the RED are avoided in the framework of the forthcoming impact assessment of the Renewable Energy Package (new Renewable Energy Directive and bioenergy sustainability policy for 2020-2030). The EU needs to draw lessons from existing impacts of its biofuels policy in order to design a PCD-compliant climate and energy policy for after 2020.

And on the European Parliament and Member States to:

1. Scrutinize the EC progress report , acknowledging that it has failed to take social, environmental and human rights impacts seriously, and thereby didn’t comply with the obligation of Policy Coherence for Sustainable Development (art. 208 of the Lisbon Treaty) and with the Commission’s reporting obligation under RED.
2. Call upon the EC to seriously take into account the social and human rights impacts of the EU bioenergy policy in the framework of the future work on the RED post-2020 and on the sustainability of bioenergy after 2020.

Another missed opportunity to seriously look at social impacts of the EU biofuels policy in developing countries

1. Impact on land use rights severely underestimated

The EC Report does not assess in-depth how the increased demand for biofuels in Europe due to incentives provided by RED has impacted on global and European land patterns, such as land concentration and land conversion, as well as on the rights of people previously using that land.

a. Lack of consistency, narrow and flawed methodology. The Commission mentions that the total acreage of land required to produce the biofuels consumed in the EU in 2012, is estimated to amount to 7.8 Mha – of this 44% is outside the EU, i.e. 3.5 Mha. It is not clear how exactly they arrived at this figure. The Ecofys study estimates, via a very narrowly constructed sample analysis of the Land Matrix database, that the EU biofuels market could have attracted maximally some 500kha of land deals “of which part could be considered as land grabs or have significant concern.” This leads Ecofys to state that “maximally 10 % of the biofuels projects outside the EU have been developed with an interesting future European market in mind.”^{vii} Already in its previous report, Ecofys stated that only 10 % of land deals in the Global South may be linked to concrete exports to the EU without clear argumentation for this figure. Ecofys’s calculations are based on a series of unjustified assumptions. Any conclusions based on the Ecofys report concerning the scale of land acquisitions and land grabs driven by the EU biofuels policy are highly unreliable.

In addition, the EC assumes that in order to prove impacts on land rights and land use patterns in developing countries, a direct relationship of biofuel imports consumed in European markets by 2012 must occur. Such analysis makes it impossible to acknowledge and account for the many land acquisitions that have been made with the prospect of export to the EU market if production and export into the EU has not yet taken place. The EC Report also fails to acknowledge the irreversible impact land acquisition projects can have on land use patterns, land and water access, the environment and livelihoods, even if the initial investments never lead to biofuel exports to the EU market. The Ecofys study reads: “While Africa is often the focus of concerns around biofuels, hardly any EU consumed biofuels come from Africa”. Actually, there is abundant evidence of land acquisitions in Africa that are driven by EU biofuel market opportunities and that have translated into displacement or other impacts on local communities^{viii}. Research group GRAIN, e.g., listed 293 reported land deals around the world between 2002 and 2012, where the stated intention of the investors was the production of biofuels.^{ix} Among those, 85 cases involve EU companies and out of the 17 million hectares targeted in total, 7 million are in Africa. Tanzania alone has received many European biofuel investors. Many investments were made based on unrealistic expectations of productivity, or have faced problems with local communities. Therefore after acquiring the land and displacing communities many of these investments have been forced to stop their operations^x. Nonetheless the social impacts of their acquisitions remain. Basing an impact assessment of EU policy-driven demand only on export/import data is therefore highly problematic.^{xi}

b. Failure to look at impacts on people. Even more problematic is the fact that there is no further assessment of what such land conversion means in terms of impacts on smallholder farmers and other land users in Europe or in developing countries. Consideration of “acreage” in case of a land grab has little to do with the magnitude or gravity of human rights violations for affected communities. A small land deal that takes control of a major water source for the community can have a terrible impact. ActionAid has documented several cases of land grabs, most recently in Senegal and Tanzania, where the initial intent was to export crops to Europe for biofuels. In Senegal,

9,000 persons were affected by a land deal covering 20,000 ha.^{xii} In Tanzania, 1,300 persons were affected by a land deal covering an area the same size.^{xiii} Those two examples illustrate how the number of affected people can vary widely even if the size of the land grabbed is the same – and how looking at acreage without any further consideration is insufficient.

The report mentions that there has been “speculation” that growth of biofuels cultivation has contributed to land grabbing (p. 7). The use of this pejorative term illustrates the bias of the approach. Both the Commission’s report and the Ecofys background study have been drafted without field research or meetings with local communities affected by biofuels project.

The EU Delegations have reported that the “biofuels/food security/land use nexus” has been one of the main issues raised in third countries as problematic from a PCD point of view.^{xiv} It would have been logical to look at a couple of those countries where EU delegations have raised concerns on the impact of the EU biofuels policy to conduct field research.

c. Ignoring Indirect Land Use Change and its impacts. The lack of information on Indirect Land Use Change, as acknowledged by the Commission in its Technical assessment of the EU biofuel sustainability, means indirect impacts on people due to land conversion are not accounted for.

A recent report commissioned by the European Parliament finds that there will be significant land-use change as a result of increasing biofuels demand in the EU, and that most of the land use change will take place outside the EU. This report also mentions that ILUC models reasonably find that most indirect land use change due to EU biofuels policy occurs outside the EU because the common agricultural policy has the effect of restraining crop area change inside the EU.^{xv} This means that the EU biofuels policy is putting additional pressure on land in developing countries. In terms of impacts on land use in Europe itself, another study recently commissioned by the European Parliament concludes that expanding biofuel cultivations is among the key drivers of land concentration and land grabs in Europe.^{xvi} Those two studies – whose findings are diverging from the Commission’s progress report - are not mentioned in the Commission’s report. The EC reporting will only have to cover ILUC after the entry into force of the RED reform adopted in 2015; however, it is important to emphasize that measuring impact in terms of land rights cannot be done without taking into account the consequences of indirect land use change.

d. Limited data and information sources. There is a wealth of research on the impacts of biofuels mandates and targets that is neither considered by the Commission nor by Ecofys in their reports. The Land Matrix reports that agrofuel production “remains the second most important driver” of large-scale land acquisitions.^{xvii} The European Commission itself commissioned a report published in February 2013, based on both desk research and field visits in two developing countries, which notably concluded that “A clear link can be established between the EU bioenergy policy and the strong interest of European companies to acquire agricultural land in developing countries, especially in Africa. This also entails that the development of conventional biofuel production has an impact on access to natural resources, such as land and water and often leads to an increase in land concentration to the detriment of smallholder farming practices”. This report concludes that “the potential of using crops for biofuel production is an important consideration in investment strategies”.^{xviii} Those sources are not mentioned in the Commission report.

2. Impacts on food prices downplayed

a. Misrepresentation in the background report of the impacts of EU biofuels policy on food prices.

The Commission's progress report completely ignores the issue of the impact of EU biofuels consumption on food prices. The accompanying Technical assessment of the EU biofuel sustainability does address the issue but misrepresents the Ecofys report on which it is based, minimizing impacts. For example the Commission states that *"the role of EU biodiesel production has also been quite modest in pushing up other food prices, such as prices of oilseeds and vegetable oils"*^{xxix} whereas the Ecofys report concludes: *"The impact of EU-27 biofuels was however quite substantial for price increases of non-cereal food commodities, notably through its demand for vegetable oil in the production of biodiesel."*^{xxx} This conclusion is based on modelling showing price increases in 2008 and 2010-2012 of 10-20% due to EU-27 biofuel production.^{xxxi}

The Commission Technical assessment moreover contends that higher food crop prices, that they claim are marginal, will benefit farmers: "Ultimately, high food prices increase the cost of food for consumers, but they also increase income for farmers, who represent an important portion of the population in less developed countries." Comprehensive research actually shows that most farmers, particularly the poorest, do not benefit from new market opportunities, whilst many are even net consumers facing higher expenses to ensure food security. Price increases and particularly the volatility that comes with the linking of food and fuel markets directly drive millions of people into hunger.^{xxii} Beyond impact of rising food prices, the increased focus on export cash crops for biofuels and the resulting competition for land and water initially used for local food crops, affect both local food availability (access to food) and food prices.

b. Limited sources of information. The authority of the Commission's report in relation to food prices and food security is further undermined by the fact that a whole body of knowledge on the impact of EU biofuel policies on agricultural commodity prices has been ignored, including research funded by the Commission or carried out by the Joint Research Center (JRC), the Commission's in-house science service. Research on the drivers of price volatility on food markets, which has driven millions into poverty in 2008 and 2009-10 and caused political turmoil in the developing world, states: "There exists general consent that biofuel policies exert a substantial influence on price volatility since in most countries the relevant policies are implemented in a way which makes the resulting additional demand for agricultural raw materials rather price inelastic."^{xxiii}

The High Level Panel of Experts of the Committee on World Food Security has found that "Everything else being equal, the introduction of a rigid biofuel demand does affect food commodity prices (...) In the last few years (since 2004) of short-term commodity food price increase, biofuels did play an important role."^{xxiv}

Looking to the future, in a recent report for the European Parliament, JRC states "we estimate that replacing 7% of 2020 EU road fuel with first generation biodiesel and a further 3% with first-generation bioethanol would increase world vegetable oil prices by roughly 18% and world cereal prices by roughly 2%".^{xxv}

The Commission does reference one recent authoritative scientific article published in Science^{xxvi} but fails to capture its implications adequately. This study looks at the models used in the US and the EU to calculate emissions from indirect land use change and greenhouse gas savings of biofuels. It finds that EU biofuel policy relies on reduced food consumption to secure emission savings, assuming that about 20 percent to 50 percent of the net calories diverted to make ethanol are not replaced. As less food is available, broad global price increases follow which affect the world's poorest

disproportionately.^{xxvii} The reduction in their food consumption can be measured both in terms of quantity and overall food quality due to the replacement of oils and vegetables by corn and wheat, which are of lesser nutritional value. According to the lead author, “Without these reductions in food quantity and quality, the [European] model would estimate that wheat ethanol generates 46% higher emissions than gasoline and corn ethanol 68% higher emissions.”^{xxviii}

3. Lack of attention to impact on “wider development issues” and human rights^{xxix}

The Commission’s report does not look at the impact of the EU biofuels policy on other human rights – such as the specific impacts on women rights (CEDAW), the impacts on labour rights (ILO standards) and on an adequate standard of living (ICESCR, Art. 11). This is spite of the fact that under Art. 17 of the RED, the Commission has an obligation to report on the impact of EU biofuel policy on “wider development issues”.

The background Ecofys study includes few general elements in that regard, stressing that the impact of biofuels on job creation, income for local communities, infrastructures or capacity building vary depending on the project at stake and local context. The potential of biofuels project to displace smallholder farmers or increase marginalization of women, is mentioned. In terms of job creation in developing countries, the study stresses that “Especially the jobs in the agricultural part of the value chain are usually low income and low schooling jobs. In many countries and sectors mechanization is seen as an alternative, reducing environmental and health situation in agricultural practices. However this also reduces the amount of jobs available in the sector, giving a precarious balance between low quality jobs and unemployment.”^{xxx} Those nuanced elements in terms of potential social impact in developing countries are not reflected at all in the Commission’s report.

The report **fails to analyze how the RED and related market potential have impacted government priorities in developing countries**, partly stimulated by donor priorities and investments in support of biofuel developments for exports or its indirect influence on land speculation and land grabbing in developing countries. This includes research, policy development and regulation initiatives, partly financed by the EU and/or member states as well as direct or indirect subsidies to businesses investing in biofuels feedstock with wide implications for agricultural development.^{xxxi}

The Ecofys study concludes that “Overall wider development issues could bring additional positive or negative impacts from biofuel production to local communities in developing countries. Inclusion of reviews of possible impacts, requirements for mitigation activities, and stimulation of positive impacts could be advised to biofuels production developers. Proper inclusion of these elements in voluntary schemes would be an appropriate manner”.

This conclusion is weak, not based on existing evidence of the failure of voluntary schemes to prevent negative impacts and much below the prescriptions of international law. Biofuels production developers have an obligation to respect human rights in the countries where they operate, as per the UN Guiding Principles on business and human rights. They have an obligation to avoid and address adverse human rights impacts of the company’s activities, including on local communities. Companies are required to conduct human rights impact assessments of their investments and to have appropriate policies and grievance mechanisms in place. States have an obligation to prevent such negative impacts by the companies on which they have jurisdiction. The voluntary schemes are not sufficient to meet those obligations. In addition, the EU sustainability schemes for biofuels have been criticized for their ineffectiveness due notably to the lack of supervision and monitoring mechanism.^{xxxii} Last but not least, the RED sustainability criteria do not include any social criteria.

It should also be noted that various experts and UN agencies - such as the Food and Agriculture Organisation^{xxxiii} and UNCTAD^{xxxiv} - have concluded that the mainstream biofuels industry, which is based on large-scale commercial agro-industrial systems, operates at the expense of small-scale food producers, farmers and landless rural poor.

ActionAid had expressed serious concerns in relation to the 1st progress report under RED, issued in 2013 by the European Commission, as well as at the previous Ecofys background study on which that report was built.^{xxxv} Unfortunately, most of the concerns we raised two years ago have not been taken into account in the last Ecofys study and Commission's progress report.

ⁱ EC (2015), EU on track to meeting 20% renewable energy target European Commission, 16 June 2015

<https://ec.europa.eu/energy/en/news/eu-track-meeting-20-renewable-energy-target>

ⁱⁱ EC (2015), Technical assessment of the EU biofuel sustainability and feasibility of 10% renewable energy target in transport. European Commission.

https://ec.europa.eu/energy/sites/ener/files/documents/SWD_2015_117_F1_OTHER_STAFF_WORKING_PAPER_EN_V5_P1_814939.PDF

ⁱⁱⁱ Reporting obligations set out in Articles 17 and 23 of Directive 2009/28/EC require the Commission to report biennially to the European Parliament and the Council on the progress achieved in Renewable Energy development in the EU and Member States, and on the EU biofuel sustainability. In addition, this progress report was supposed to review in particular the impact of the implementation of the target on the availability of foodstuffs at affordable prices.

^{iv} Ecofys (2014), Renewable Energy Progress and Biofuels Sustainability

<https://ec.europa.eu/energy/sites/ener/files/documents/Final%20report%20-November%202014.pdf>

^v This exposé is notably based on Kropiwnicka, M.A. (2015), The European Commission's 2015 Renewable Energy Progress and Biofuels Sustainability Reports: underestimating impacts on developing countries' land and livelihoods

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^{vi} ActionAid (2013) Exposé: European Commission fails to respect Lisbon Treaty

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^{vii} Ecofys (2014). "Renewable Energy Progress and Biofuels Sustainability, p. 229.

<https://ec.europa.eu/energy/sites/ener/files/documents/Final%20report%20-November%202014.pdf>

^{viii} Schoneveld G.C. (2013) The Governance of Large-Scale Farmland Investments in Sub-Saharan Africa; A Comparative Analysis of the Challenges for Sustainability. PhD thesis Utrecht University. Eburon Delft

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^{ix} GRAIN (2013), Land grabbing for biofuels must stop

<https://www.grain.org/article/entries/4653-land-grabbing-for-biofuels-must-stop>

^x EC (2013) "Assessing the impact of biofuels production on developing countries from the point of view of Policy Coherence for Development, European Commission

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<http://www.fairpolitics.nl/doc/Impact%20Study%20DEF.pdf>

^{xi} This was already argued by ActionAid in a critique on the first Ecofys baseline as part of ActionAid (2012). Fuel for thought: Addressing the social impacts of EU biofuels policies

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^{xii} ActionAid (2014). No land, no future. ActionAid

http://www.actionaid.org/sites/files/actionaid/no_land_no_future.pdf

^{xiii} ActionAid (2015) Take Action- Stop EcoEnergy's land grab

<http://www.actionaid.org/publications/take-action-stop-ecoenergys-land-grab>

^{xiv} EC (2015) Policy Coherence for Development 2015 EU Report", p. 17

https://ec.europa.eu/europeaid/sites/devco/files/policy-coherence-for-development-2015-eu-report_en.pdf

^{xv} EP (2015) The impact of biofuels on transport and the environment, and their connection with agricultural development in Europe, European Parliament, February 2015

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^{xvi} EP (2015) Extent of farmland grabbing in the EU. European Parliament, May 2015.

http://www.europarl.europa.eu/RegData/etudes/STUD/2015/540369/IPOL_STU%282015%29540369_EN.pdf

^{xvii} Land Matrix (2014) Newsletter, October 2014, p. 6 http://www.landmatrix.org/media/filer_public/b2/48/b24869d1-ff17-4cb2-8bc3-5c55ef6a3e0c/lm_newsletter_3-4.pdf

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^{xix} EC (2015), Technical assessment of the EU biofuel sustainability and feasibility of 10% renewable energy target in transport. European Commission. European Commission, p.6

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^{xx} Ecofys, (2014), Renewable Energy Progress and Biofuels Sustainability

<https://ec.europa.eu/energy/sites/ener/files/documents/Final%20report%20-November%202014.pdf>, p. 226.

^{xxi} Ecofys, Ibid., p.350.

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^{xxix} Renewable Energy Directive, article 17 (7)

^{xxx} Ecofys (2014), p. 234.

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