



# Sustainable Aviation Fuel Users Group

**Global Policy Statement  
Indirect Land Use Change (ILUC)**

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SAFUG (Sustainable Aviation Fuel Users Group) welcomes the recent discussion about ILUC (Indirect Land Use Change) associated with biofuels. SAFUG acknowledges that all effects should be considered, both direct and indirect. However, accounting for ILUC must not be broad-brush, but should allow for specific sustainability standards and project-level mitigation.

## **SAFUG**

SAFUG members, now covering 32% of world commercial aviation fuel demand, have an opportunity to deliver significant environmental and social benefits as we seek to lower the carbon intensity of our fuels overall. We do this by supporting the development, certification, and commercial use of lower carbon renewable fuels, derived from sustainable sources. Towards this end, SAFUG members made a public pledge regarding the promotion of robust standards for sustainable aviation fuels.<sup>1</sup>

SAFUG acknowledges there have been lots of first generation mistakes (primarily in terms of ground fuels), and the ILUC issue is absolutely critical to avoid unintended consequences. SAFUG fully supports the drive to do something about it.

The aviation sector is actively involved in a number of advanced fuel projects that utilize non-food crops and wastes/residues and is strongly in support of these technologies as a means to produce high quality drop in fuels that mitigate ILUC risk.

Overall, SAFUG encourages policy makers to focus on sustainability standards and a project-level approach to the examination of ILUC impacts, not broad-brush feedstock categories.

## **Global Principles for Addressing Indirect Land Use Change in Government Policy**

1. To promote a readily available supply of these fuels, government policies should only incentivize the development and use of fuels that meet strong sustainability criteria, which actively protect against ILUC and other social and environmental risks.
2. Any feedstock has the potential to have deleterious impacts on the environment, including ILUC, depending on where the production is set up and the performance of the farming practices. As the feedstock type in itself does not necessarily determine the sustainability profile of a fuel, the emphasis should be first and foremost on the independently certified sustainability profile of the fuel in question and not simply the feedstock type.
3. Because of the potential negative impact, Indirect Land Use Change (ILUC) must be addressed in government policies promoting the production of sustainable fuels, and decision makers should consider mechanisms to lower the contribution of high ILUC risk biofuels and create incentives for sustainable fuels that have been certified as low risk of ILUC.
4. Any legislation addressing ILUC should consider the possibility of project-level mitigation approaches, including, but not limited to, the Low Indirect Impact Biofuels (LIIB) methodology currently under development by Ecofys, EPFL, and the World Wildlife Fund (WWF)<sup>2</sup>. We encourage government leaders and policymakers to support the development and

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<sup>1</sup> See "Our Commitment to Sustainable Options" <http://www.safug.org/safug-pledge/>

<sup>2</sup> See <http://www.ecofys.com/files/files/12-09-03-liib-methodology-version-0-july-2012.pdf>

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adoption of such standards as one practical and cost-effective way to stimulate production of sustainable fuels that have low risk of ILUC, as well as to look for the right opportunities to incorporate such methodology into existing certification protocols. Given the evolving understanding of ILUC, any legislation addressing ILUC should include sufficient flexibility for future solutions and should not unreasonably hinder the progress of existing sustainable fuel development efforts.

5. Some feedstock types, e.g. residual municipal waste, waste liquids and gases, have no negative ILUC impacts. However, regulatory schemes that privilege certain crop-derived feedstocks without sustainability criteria, including ILUC, could cause negative environmental outcomes and should be discouraged.

6. Consequently, any regulatory scheme to address ILUC and other sustainability measures should be applied equitably and consistently to all feedstocks and processes, regardless of end use and country of origin.

Sincerely,



#### Members



#### Affiliates

