January 2013

Biofuels and Food Security

CIDSE Inputs on the zero-draft of the HLPE Study

We welcome the opportunity to feed into this important and much awaited study of the High Level Panel of Experts (HLPE) appointed by the Committee on World Food Security (CFS). The discussion on biofuels is timely as many governments ponder how to meet energy needs whilst reducing dependence on oil. Generally the report is impartial and scientifically grounded. The message is abundantly clear and we welcome that the report cites other reports and findings which echo its ultimate conclusion that "**biofuels is provoking high and volatile food prices"** and therefore compromising food security**.** This message has been carried by many other reports yet there is a general resistance on the part of governments to fully accept this. It would have been useful for the report to note some of the reasons behind this resistance and how they could potentially be overcome.

We are also grateful for the niche analysis of the impact on women; this reinforces the efforts of the CFS on the important role of women as food producers and providers. On a similar note on coherence, we also welcome the recommendation to adhere to the broadly-owned CFS Responsible Agricultural Investment (rai) principles (and the inclusive consultation process) and to the voluntary guidelines as a precondition for participating in land deals involving biofuels production plans. That said, we feel this crucial issue of policy coherence could be further enhanced in the report, by recommending that government climate policies do not jeopardise the good work being undertaken by the CFS to support people's right to food.

We will try to outline some insights which we hope will be beneficial to the panel in further developing this important piece of work.

1. Is the V0´s appreciation of the current policy conjuncture adequate, particularly its interpretation of the changing significance of mandates and targets?

- The historical overview of the paper is certainly helpful in framing the context. The focus on the major players also gives a good basis for which to analyse what is at stake and gain appreciation for the complexity behind the policies of different nations and how they relate.
- Whilst the report is very helpful in outlining different nations' polices, it could have gone further in identifying some of the power politics behind the choices of states to continue to pursue these policies. The industry lobby is mentioned but more information on their position and how that is influencing policy could be useful in helping us understand how to address this problem.
- What is driving the changes of resistance to change in mandates and directives could be further explored.

- What are the impacts on smaller, poorer countries affected by the biofuels policies of their powerful regional neighbours (eg, Brazil, China and India) and how does that affect their food security strategies?
- Regarding institutional mandates, we strongly urge the HLPE to recall the mandate and commitment of the reformed CFS to support the progressive realisation of the right to adequate food. Whilst underlining this mandate of the CFS, the HLPE could stress that biofuels policy should in no way hinder this right, particularly where the world's poorest and most vulnerable people are concerned.
- We encourage the HLPE to recall in their report governments' responsibility to ensure that climate strategies and policy responses are coherent with the right to food, and also with people's access to and use of natural resources.

2. Does the V0´s interpretation of land constraints regarding "available" lands – from an integrated food security and carbon emissions perspective – take into account all the relevant scientific evidence and arguments?

The effort to note the detrimental impacts of biofuels on "available" land both at the ecological and social levels is noteworthy, but could be further developed, specifically:

- Although the report notes that biofuels are largely produced via monocropping methods, it can go further to critique the impact that this model of production has on soil health and biodiversity, which has serious consequences on food and nutritional security. Models of production as a general theme could be strengthened up front also as one of the negative sides.
- Once land is cleared and converted to biofuels production there is an irreversible loss which can take generations to be replaced – compromising pasture lands and bush areas which are an important part of the food security strategies of communities. Hence the intergenerational aspect of this loss should be noted.
- On a similar note, as farmers specialise in growing these crops they displace local varieties. This implies a loss of local seeds and skills on growing particular crops that are more adapted to that area, compromising resilience. This is especially important given climate change.
- The report does not go into the human rights violations, such as forced evictions and the criminalisation of land rights activists which is a major social consequence of biofuels.
- Environmental detriments brought about by the conversion of peat forests in Malaysia and Indonesia and the impact these conversions have on GHG emissions are not noted.
- Investments in land deals are largely intransparent. It would be useful for the report to raise the question on who is benefiting from these deals and who is not, as well as the impact these investments have on widening inequality and fomenting corruption.
- On certification schemes it would be important to add the downside of their high costs which creates a burden for farmers, especially the poorest. It is those who are better off which will benefit from these schemes.
- It would also be important to note that many of the promised infrastructure developments, in the land deals, are actually never made.
- The report could for instance cite some of the concerns raised by the HLPE report (2012) on climate change regarding carbon markets to reinforce this point.

3. The V0 provides a detailed and comprehensive discussion of the central role of biofuels for high and volatile food prices. Are there further discussions that need to be taken into account?

- Whilst the section on prices is quite robust we feel that it can be strengthened by grounding it in the realities of the trade regime in which it operates. The importance of trade to this issue cannot be understated. We must analyse biofuels within a context of free trade.
- In this respect, the report could also further develop the importance of relocalisation of economies (including energy economies) and resources for local use in its recommendations. We must ask ourselves if biofuels produced in developing countries are even addressing the energy needs of the local population. The report does not imply this to be the case. In fact, biofuels are perpetuating a postcolonial relationship of resource extraction between the North and the South, which is supported by the trade regime, which has economic implications for poor countries
- What about the bundles of grains that are traded as commodities in derivatives markets, commodity index funds? They do not disaggregate by grain and so the increased in the price of corn will impact this bundle.
- Question of access to food must be noted as well. As farmers turn to specialised production for fuel crops they become increasingly dependent on international market prices and the vagaries of the market. We know this from cash crop economies and the booms and busts which have affected farmers the world over. Hence, if the price of jatropha for instance goes down, farmers will have no income and no food to eat because they have invested their land and labour on producing that crop. There is an opportunity cost to farmers' land, labour and income which gets aggravated under such a regime.

4. The V0 endorses initiatives which give priority to broad bioenergy strategies for local use in energy poor regions of the world where the potential social gains are large from even small quantities of energy and the impact on land use competition small. Which are the most far-reaching examples of such policies or experiences in practice?

- Indeed the report could further develop alternatives and best practices. What we do know is that the issue of scale is significant. Small-scale solutions to meet local energy needs work much better than large scale, quick fixes. The experience of biogas proves the point, in many communities at the very local level – including the household or village level, biogas projects can have successful results; but when implemented at larger scales the results are not as favourable. A case study for this is the Ermera District in East Timor. It would be useful for the report to outline what have been the factors of success in some of the best practices in regards to this broader bioenergy strategy. What has been working for who and how?
- Indeed there is a need to view the broader bioenergy strategies. The report clearly states that biofuels is not a good option for food security for a variety of reasons. This may lead States to then consider hydro as an answer, again the issue of scale comes into play. The struggles of millions of people all over the world against large-scale dam projects, currently exemplified by the struggles of the people in the Xingu

River against the Belomonte Dam, and the destruction they bring should be noted. This is particularly important as to ensure that States do not turn to such models for a solution.

- What are needed are energy decent plans and the report could deliver this message more strongly as well as provide best practice of how this is being done.
- The chapter on technologies is very interesting and raises some excellent points. It would however be interesting to discuss some of the challenges in appropriate technology adaptation, such as, for instance, the lessons learned from the years of improved cook stoves research. What are the factors of success in small-scale technology adaptation?

Do these proposals adequately reflect the analyses developed in the V0 draft?

The recommendations could be further developed:

- For instance the report calls for improvements in fuel efficiency and a transition to collective transport. Indeed, support for better collective transport is of paramount importance in developing countries and this could have been developed further, perhaps citing examples of best practices where this is being done.
- On a similar note the proposals for efficiently, whilst necessary, are limiting and do not address the need to curb our insatiable appetite for energy. Energy decent plans should be considered by states as a priority, not just ways to keep energy consumption at our current high levels; this is most notably important for developed countries.
- Identifying and distinguishing solutions between rural and urban areas would also strengthen the report.
- We urge you to (i) strengthen the recommendation on the need for independent assessments of the social and environmental impact of biofuel policies as indispensible elements of policy development, and (ii) highlight that the impacts of indirect land-use change (ILUC) are factored into any assessments of the environmental impacts of biofuels.
- The use of palm oil in the food industry is cited as the main driver of deforestation, which although surprising, makes sense. The issue of the food industry's use of additives such as palm oil, which causes major health concerns, is then no longer cited in the document. Recommendations could be developed to link this point with the issue of nutrition, which features so prominently in the report.
- There is generally a lack of alternative viable solutions cited. We urge you to try to collect some examples of best practices (solar) which will give direction and motivation to governments to change their policies. In sum, if not fossil fuels and biofuels, then what? At what scale? How?
- Regarding alternative viable solutions, and particularly in response to the converging energy and climate crises, we urge the report to call on policy makers to go beyond the search for replacing one fuel with another, and instead push for fundamental changes to global transport systems which are currently structurally unsustainable.
- A recommendation for policy coherence between energy, food, and climate legislation could be highlighted in the report, to ensure that governments' proposals for biofuels and related legislation adhere to and respect the progressive realisation towards the right to food, as falling under the mandate of the CFS.

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