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25<sup>th</sup>/01/2017

Dear sir/ madam,

**RE: NEGATIVE IMPACTS OF THE BIOFUEL POLICY OF THE EUROPEAN UNION (EU) ON THE ENVIRONMENT AND COMMUNITY LIVELIHOODS IN UGANDA.**

The National Association of Professional Environmentalists (NAPE), the official representative of Friends of the Earth Africa in Uganda, is located in Uganda, where oil palm growing is being carried out. NAPE's work is focused on lobbying and advocating for the sustainable use of natural resources in the area of water, energy, forests, wetlands, wildlife reserves. Through our programmes to battle land grabbing and deforestation, we undertake the following activities:

- Empowering communities through trainings and meetings so that they can advocate for themselves and fight for their own rights and property entitlements;
- Dialogue meetings with stakeholders and government officials so that important issues are discussed and resolved;
- Research and documentation so that hidden issues are brought to light and become part of local, regional, national, and international dialogues;
- Building coalitions with national and international organisations that are equally committed to stopping human rights abuses and land grabbing, especially the type that steals from poor & marginalized communities.

The current situation in Uganda with palm oil plantations has not been good since it has envisaged Over 3600 hectares of pristine forest were cleared to make way for at least 7000 hectares of palm oil plantations. This is in addition to unprecedented forest degradation through logging to heat the vegetable palm boilers since BIDCO has not connected hydro electric power and has not established woodlots. This has exacerbated climate variations. Associated impacts due to the above operations include; lake sedimentation due to erosion, water pollution due to use of fertilizers in oil palm plantations coupled with the disrespect for lake buffers as required by the law, food scarcity due to commercialized mono-cropping of oil palm, which in some areas replaced agricultural land and

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community recreational areas. This has also led to alterations of ecosystem functions, rights abuses preceded by land grabbing and climate change impacts.

The EU biofuel policies have impacted on

**Food insecurity;** Biofuels are associated with significant costs that most acutely impact the poor. First, as energy production competes with food for harvests and land, the production of food declines and the price of food goes up being responsible in part for the food crisis. Anyhow million people could feed from it. It is highly questionable to use food to produce energy, whereas elevated carbon emissions have negative effects that will play out over decades and centuries, rising food prices and reduced food production will mean people go hungry, starve and die. To some extent, biofuel policies trade food in the stomach for fuel in the tank. They benefit energy consumers and hurt consumers of food, particularly the poor who devote a large share of their incomes to food.

**Loss of biodiversity;** Fraiture, Giordano and Liao (2008) estimates that an additional 30 million hectares of cropland will be needed to meet food and biofuel demand in 2030. The reduction in natural land will lead to biodiversity loss, which some believe could be more costly at present than global climate change.

**Increase of green house gases;** Far from being carbon neutral, biofuels require energy for the cultivation of feedstock, transportation to refineries, conversion to ethanol in refineries, and transportation to market. Patzek and Pimentel (2005) produced the first life cycle accounting of carbon emissions for biofuel. In doing so, they established the playing field on which biofuels would compete. Their analysis, however, did not account for the cost of scaling up biofuel production, which includes emissions from land conversion and foregone carbon sequestration by natural habitat.

**Deforestation;** 8.8 million of hectares of additional land are needed to fulfill the biofuel targets of the EU. Two thirds (5,9 million hectares) are situated outside the EU, among these 2.1 million hectares of land converted to oil palm plantations in Southeast Asia, half of which occurs at the expense of tropical forest and peatland. In Uganda with the expansions of oil palm plantations, communities have sold off their land but they have not ressettled elsewhere, which implies that when time comes and the oil palm is to be planted, the people will have no alternative of where to stay but to encroach on the forests for settlement and livelihoods.

**Climate change,** Biofuel from vegetable oils or worse than fossil fuel. Palm oil produces three times more climate relevant emissions, soy oil two times.

Another problem is the increasing use of palm oil for biofuel production in the EU. 3,35 million tons of palm oil - the cheapest feedstock – were used for biofuel in 2015. Multinational oil companies like Eni (Italy), Total (France) and Neste Oil (Finland) constructed or are constructing huge refineries for so called Hydro treated Vegetable Oils (HVO), a new type of biofuel. For HVO, biofuel palm oil is the main feedstock.

The proposal of the EU Commission to “reduce” the target for conventional food based biofuel from 7% in 2020 to 3.8% in 2030 is minimal since the actual (real) biofuel quota in the market is 4.9%,

NAPE demands the following from European Parliament.

1. The companies should stop the excessive use of agrochemicals in the plantations as these chemicals have devastating impacts on communities and marine life
2. The companies should respect the national laws and policies before implementation of projects
3. The observance of community rights is key. During the establishment of oil palm plantations in Kalangala community land was grabbed. This should be reversed as these projects should much more benefit communities but not the companies.
4. In this era of climate change it's disastrous to destroy natural forests for oil palm and subsequent biofuel production. Therefore the companies should stop further destruction of the existing forests and also rehabilitate the ones they have cut down if climate change is to be tackled.

It's from the above that we urge the EU to abandon blending mandates for biofuel and cancel the billions of Euro it pays for biofuel production annually through public subsidies, tax releases, etc.

Yours truly,

Signature



**Frank Muramuzi**  
**EXECUTIVE DIRECTOR**