

To whom it may concern,

In response to the public consultation on the biofuel obligation rate scheme and on behalf of the Green Party, I would make the below observations.

At a European Union level biofuels policy has changed substantially. Due to recognition of the negative impacts of unsustainable biofuel use, EU policy post-2020 no longer aims at ongoing displacement of liquid fossil fuels in transport with biofuels. In particular EU policy recognises the negative impact of most land-based biofuels on food security and biodiversity and no longer aims to incentivise a shift to these fuels.

Advanced biofuels, subject to strict sustainability criteria and robust analysis could usefully be incentivised.

In implementing the renewable energy target in transport, Ireland should rely on the following principles:

- No increase in and elimination of land-based biofuels.
- The use of biofuels based on crops (as opposed to wastes, etc.) has been demonstrated to lead to indirect land use change and negative impacts on food security and biodiversity. Therefore the biofuel obligation insofar as it is maintained should be designed to ensure that there is no increase above current levels of land-based biofuels and that the use of such biofuels is phased out.
- Prioritisation of the use of electricity in transport.
- The electrification of rail and the expansion of the rail network should be a primary focus.
- The electrification of the bus fleet and the taxi fleet should be a top priority. This is particularly the case as these diesel-using vehicles make a disproportionate contribution to air pollution due to both where they are used and their high usage rate. Their high usage rate means that transitioning to electricity is particularly cost-effective for taxis. The requirement to transition should be a condition of licensing for both taxis and buses.

While we recognise that EU policy is in a transitional phase, the general principles outlined above should inform biofuel use and policy moving forward.

