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## **Renewable Transport Fuel Obligations Order 2007**

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### **Who we are and what we do.....**

The Game Conservancy Trust is a UK conservation and research charity with over 20,000 supporters. We also receive funds for our research through donations, through charitable trusts, as well as research contracts from Government agencies such as the Environment Agency, Scottish Natural Heritage and Defra.

Our response is submitted on behalf of the Trust and has been prepared by our policy staff. It does not necessarily reflect any views of our supporters who we have not canvassed. As a charity we look to our charitable objects (see [www.gct.org.uk](http://www.gct.org.uk)) rather than represent the views of our supporters.

### **The nature of our response.....**

To raise our concern that any changes in land use as a result of the production of biofuels may have an adverse effect on wildlife conservation.

### **In General**

- We believe wholeheartedly that the government must act to cut drastically the UK's emissions of greenhouse gases.
- Renewable fuels obligations are an indirect way of tackling this, and, perversely, they could do more harm than good if non-renewable energy is used to produce biofuel and knock-on effects release further CO<sub>2</sub>.

### **Response to Questions**

Q 1 - 7: No comment

Q 8: This is the heart of our concern. We agree with the aspirations expressed but we remain to be convinced that the proposed certification scheme will properly assess either the greenhouse gas savings or the wider sustainability criteria.

Even within the UK the sustainability criteria will be difficult to measure. For example, take a field planted with oilseed rape to produce biofuel. Obviously one must subtract the energy (CO<sub>2</sub>) demands of growing and processing the crop into fuel, but one must also take into account the alternate use of the land;

- If the land would otherwise have been left as permanent set-aside the extra cultivations to grow the biofuel will lead to a release of CO<sub>2</sub> from the soil which

should be factored in. Biodiversity on such land will also be much reduced if it is brought back into production. The net environmental impact as a whole, including the effect on flora and fauna, must be taken into account.

- If the land was formerly grass there would be a further loss of CO<sub>2</sub> from a soil which would otherwise be accumulating CO<sub>2</sub> - as it does on grassland.
- If the land was originally cultivated to produce a food crop then one would also need to add any additional CO<sub>2</sub> costs of growing this food elsewhere. If these food crops are grown abroad this would be difficult, if not impossible, to trace.

Outside the UK the knock-on effects of changes in land-use will certainly be more difficult to follow and we suspect a certification system will be unable to prevent further destruction of rain forest in the tropics.

Q 9: We do not believe any administrator will be able to verify or otherwise any of the knock-on effects specified above.

Q 10 – 12: No comment.

Q13 -25: We remain unconvinced that the RTFO will be an effective way of reducing total greenhouse gas emissions mainly because the consequent knock-on effects of developing biofuels will not be properly taken into account. Tackling CO<sub>2</sub> directly by taxation, quota, capping, and supported by trading, is a more sensible approach.

**Dr Stephen Tapper**  
**17 May 2007**