

Table of Contents

Introduction: The ILUC Myth Propagated Against African Agriculture	1
The Renewable Energy Directive – An Opportunity and Challenge for African Agriculture	2
ILUC: A Tool of pro-Poor Brussels Policymakers	3
The Food vs. Fuel Myth	3
Today's Biofuels are Tomorrow's Food	4
Palm Oil Development and Social Empowerment	5
The Case of Malaysian Investment in Africa's Agriculture Revolution	6
Palm Biomass – Setting the Stage for Next Generation Biofuels	6
Conclusion	8
References	q

The EU's Indirect Land Use Change Fable

Will Europe Control Africa Once Again?

Introduction: The ILUC Myth Propagated Against African Agriculture

Mired in the economic doldrums with little end in sight, European policymakers would appear to be pre-occupied with real challenges and troubling options. Impose strict fiscal policy that limits government expenditures, or risk increasing national debts at a time of instability. But amid this debate is an ever more gripping policy consideration that has captivated the attention and imagination of policymakers across the political spectrum – Indirect Land Use Change (ILUC).

An arbitrary concept referring to the unforeseen (and indirect) impact on agriculture expansion as a result of increased demand for agriculture products, ILUC has been a driving policy concept in the European biofuel debate since the passage of the Renewable Energy Directive. In other words, before a mandate was even in place in the European Union for biofuels, there has been a belief that ILUC will occur and can be measured. As Jim Lane at Biofuels Digest notes, this assumption relies on a math notably invented by US Secretary of State John Kerry, "fuzzy math".

Not surprisingly, the debate has centered on imported biofuels, particularly from South America, Southeast Asia and Africa, where ongoing development is commensurate with expanding agriculture production. Palm oil, a key agriculture commodity in the developing world and European import, has been singled out for criticism even as demand (and as a result, expansion) is driven by food demand in China, India and Africa. But this focus on imports belies the inherently protectionist and antagonistic nature of the ILUC concept, where the poor benefit from greater agriculture demand and opportunities to reduce hunger alongside bio-energy production – all through expansion of agriculture production.

By excluding African farmers (as well as South American and Southeast Asian farmers) from access to the European biofuels market, European policymakers will further compound poverty and hunger within populations. And sustainability will become ever more difficult to accomplish as the poor resort to whatever means are at their disposal for earning incomes and feeding families outside of a regulated and global marketplace.

The proposition of imposing an ILUC factor on biofuels would be scandalous under circumstances whereby the factor could be reliably assessed. But under current circumstances any consideration of ILUC is at best a guess, and at worst a politically motivated protectionist ploy. Experts both within and outside of Europe have proven incapable of identifying a reliable measure for ILUC, compounding the uncertainty identified by industry experts to the proposed policy.

But with select policymakers in Brussels and capitals throughout Europe committed to stifling global agriculture development no matter the cost to food security and reducing GHG emissions, ILUC has proven to be a powerful tool in their campaigns. But for African farmers and rural communities who recognize the long and short-term opportunities afforded through biofuel demand, the debate over ILUC is yet another obstacle in their path to self-sufficiency and sustainable living – an obstacle propagated by myth.

The Renewable Energy Directive – An Opportunity and Challenge for African Agriculture

More than 60 per cent of the world's unutilized land is found on the African continent.² And unfortunately, what land is cultivated is often low-yield, due to over cultivation without nutrient replacement and lack of technology. Even as grain production has increased in Sub-Saharan Africa at a rate of 4.1 per cent per year between 2000 and 2010, yields have remained low.³ According to the United States Department of Agriculture's Economic Research Service (ERS), "Given that [African] production growth was principally due to area expansion, investments to improve yields may be increasingly important to sustain growth."⁴

And the sector is attracting investment – a great deal of it – in an effort to capture the potentially lucrative USD 1 trillion African agriculture market.⁵ BRIC countries (Brazil, Russia, India and China) have been directing investments to the continent, as have companies and investment groups – providing vital capital and expertise. And the European Union (EU) is urging investment in the sector, calling on the private sector to offset a long-standing reduction in the EU's foreign assistance.⁶

Despite the EU's expressed commitment to agriculture investment, trade and domestic policies have long stood as the greatest barrier to African agriculture. Since the 1950s, the Common Agriculture Policy epitomized that obstacle to trade and investment as it distorted food prices and dis-incentivized exports. But with the introduction of the EU's flagship renewable energy policy, the Renewable Energy Directive (RED), interest in African agriculture has been renewed.

But there is little indication that the growth in agriculture investment is directly tied to biofuel demand. Despite inflammatory claims by activists and some politicians, there is little evidence of an agriculture shift from food to fuel on the African continent. In fact, biofuel production is estimated to only account for 0.05 per cent of agriculture output from the continent.⁸

Whether directly or indirectly, the RED has proven to offer a tremendous long-term opportunity for African agriculture – driving much needed investment to the continent and connecting African producers with the knowledge and technology necessary to achieve competitive yields and meet local demand for food and energy. This investment reflects an unprecedented opportunity to overcome the dual challenges of food insecurity and poverty.

Palm oil in particular has attracted interest in Sub-Saharan Africa, with billions of dollars being invested in small farmer and large-scale cultivation. Companies like Olam International and Sime Darby (both from South East Asia) are investing in small farmer cooperatives, bringing

experience and technology to revitalize a neglected sector. 910 And palm oil is ideal for this purpose, as a high labor, efficient crop with versatile market interest. And governments throughout Africa are also engaging small farmer cooperatives in South East Asia to learn how best to harness the poverty alleviating benefits of oil palm cultivation. 11

However, the rising interest in Africa's agriculture, and palm oil in particular, has resulted in an aggressive backlash from non-governmental organizations (NGOs) (i.e. Environmental NGOs) and EU policymakers. The RED already impedes imports of competitive biofuel feedstocks such as palm oil through distortive sustainability assessments. ¹² And amid scurrilous misrepresentations of agriculture investment, NGOs and policymakers are seeking to introduce mechanisms that would discourage this investment.

Despite their claims of altruism, these activists and their political allies are prioritizing political goals over the interests of African communities and farmers. From slick campaigns replete with glossy reports and ridiculous campaign stunts, the real victims are kept out of sight – the African people. In some instances, craven opportunism is driving these efforts to suppress African development in favor of protecting Western markets from imports.

Consider for instance a report in 2010 by Avoided Deforestation Partners, an American non-profit. The report, "Farms Here, Forests There" explains how enacting protectionist policies in the West will suppress development in the developing world and enrich Western farmers. ¹³ The needs and interests of African producers are dismissed out of hand.

Unfortunately, such efforts against African farmers are a consistent feature in European and American policy circles, directly contributing to the long-term neglect of African agriculture for which a reversal is only now emerging, with the support of some high level officials such as European Commissioner for Agriculture Development Dacian Ciolos, who recently encouraged investment in Africa's agriculture sector.¹⁴

Policies like the RED reflect both an opportunity and a challenge for African agriculture. On the one hand, RED and similar policies the world over have created a new and lucrative market for crops like palm oil and soybeans. They are also encouraging investment in underperforming sectors with tremendous opportunity for growth. On the other, efforts to shut African farmers out of these markets, on top of ongoing trade distortive policies like the Common Agriculture Policy, risks leaving African producers behind once again.

It is passed time that European policymakers stop pandering to wealthy and well connected domestic agriculture interests and stand up the for the needs not only of their own consumers, but of communities throughout the world. While IPPA applauds Dacian Ciolos on his call for greater investment in Africa's agriculture sector, such declarations require more than just words – they require the action of Commissioners, Members of the European Parliament and Member States for real action, rather than pitiful aid dollars.

ILUC: A Tool of pro-Poor Brussels Policymakers

Despite these challenges to the narrative advocated by proponents of an ILUC factor being introduced under the RED, advocates of stricter (and arbitrary) controls of biofuels have advanced a new proposal in the European Parliament to impose such a factor.

In a proposal submitted by ILUC rapporteur MEP Corinne Lepage to the RED and it's sister legislation, the Fuel Quality Directive (FQD), MEP Lepage proceeds to lay out a framework for inserting ILUC calculations that would significantly distort the biofuel market in favor of European producers. Meanwhile, the proposal would further undermine the ability of Member States to achieve their legally binding GHG reduction targets as laid out by the original RED and FQD. The end result will be to protect European biofuel producers while shutting African farmers out of the European market.

For instance, MEP Lepage's proposal would exclude any biofuels produced on land converted since January 2008, whether converted for food or energy purposes (though as discussed later in this report, such distinctions are almost impossible to make in the global trade of agriculture commodities). But by excluding commodities from land converted after January 2008, MEP Lepage is claiming that no under-developed country has a right to expand agriculture regardless of its potential for said expansion and domestic needs.

Consider for instance the comparison in forest cover between MEP Lepage's home country of France and Liberia. France enjoys a robust 29 per cent forest cover, exceeding the forest covers of Belgium (22 per cent) and Netherlands (11 per cent). In contrast, however, France has been over-developed when compared to Liberia, which enjoys forest cover of more than 45 per cent. And this pales in comparison to Gabon's 85 per cent forest cover. ¹⁵ But according to MEP Lepage's proposal, agriculture expansion in Gabon and Liberia are not sustainable enough to be able to contribute to Europe's biofuel demand.

Nor will limiting expansion in the developing world assuage critics of the biofuels policy such as MEP Lepage. As noted by environmental consultancy Ecofys in an analysis of the European Commission's Impact Assessment of ILUC, the Commission underestimated the role of European biofuel producers by almost 20 per cent.¹⁶

Experts continue to sound the alarm on the premature application of ILUC. The European Biodiesel Board has called ILUC a "young science" and "too immature". 17
Economic consultancy Copenhagen Economics states that, "ILUC estimates are not advisable to use as a basis for regulatory action at this stage. 18 The European Center for International Political Economy (ECIPE) recently wrote that "[ILUC] cannot be used for the simple reason that it is impossible to make reliable, transparent, evidence-based assessments on ILUC emissions for a particular crop," and that introduction of ILUC would "would flaunt WTO rules." 19

And MEP Lepage's proposal contains a counter-productive proposal against a key sector in both Gabon and Liberia – the palm oil sector. Included in the proposal is a provision excluding the promotion of palm by-products for biofuel generation. In other words, even should Gabonese and Liberian palm oil producers expand to meet food demand, they are unable to export biomass for fuel purposes to the EU under RED. MEP Lepage's justification? "The production of oil palm co-products should not be encouraged." 20

As the proposal is considered and amended by other Members of the European Parliament, one can only hope that MEP Lepage's misguided revisions to the RED will be removed and a strong defense of free trade is made in the European Parliament. African farmers have benefited from the interest by investors by the export market opportunities of the agriculture sector on the continent. It would be a shame for this interest to be impeded at a time when African communities stand to finally achieve their potential as food producers for the world market.

The Food vs. Fuel Myth

Critics of biofuels policies such as MEP Lepage allege that the demand for agrofuels is displacing food crops and competing with demand for food. They point to large-scale agriculture investments, particularly in Africa, since the introduction of biofuels policies as evidence of this competition for land and food. These allegations are accompanied by multi-million dollar corporate lobbying campaigns and scare-mongering with claims of "land grabs."

Environmental groups such as Greenpeace and Friends of the Earth have taken to characterizing any large scale agriculture investment in the developing world as being driven by biofuel demand – regardless of the originator of this investment or the expressed purpose (or lack thereof) of the development.

These groups have singled out palm oil development for criticism. Greenpeace claims that:

"The production of biofuels puts pressure on agricultural land, which may lead either directly or indirectly to the destruction of natural ecosystems such as tropical forests. This can also imperil food security and people's livelihoods."²¹

Greenpeace identifies more than 2 million hectares of development from foreign investors throughout Africa exclusively for the production of palm oil. However, while alleging that biofuels are driving this development, they are only able to identify 135,000 hectares that are being developed exclusively for biofuels.²² And much of the land being developed is previously cultivated land – underutilized and requiring significant investment to improve yields and productivity.

The cultivation of palm oil is not being driven by a single industrial sector but the global rise in demand for palm oil as a whole. Whether for food or energy needs, African producers of palm oil are trying to benefit from this rise in demand, and raising themselves out of poverty as a result. According to the World Bank, agriculture development is three times more effective at reducing poverty than any other sector – palm oil just happens to be one of the most desirable (and effective) crops available.²³ And palm oil demand both within Africa and globally is increasing by 3.7 million tonnes in FY2013.²⁴

Yet despite this rising demand, palm oil prices are at four year lows – down by 23 per cent year on year.²⁵ This is not the picture of a battle between food and fuel demand.

Agriculture development and market demand is not static, and investment in African agriculture is not being driven by any one company, sector or export market interest. Rather, global demand for food, consumer goods and energy are all together driving demand. And just as importantly, local demand and employment needs are dictating domestic policy decisions. Biofuels are largely irrelevant, as reflected by the miniscule 5 per cent of African agriculture output being purchased for energy needs. What is important is that development is occurring and reducing poverty and hunger as a result. In fact, any capital invested into agriculture production for the production of fuel, particularly biodiesel, directly contributes to increased food security.²⁶

Today's Biofuels are Tomorrow's Food

Modern commercial production of palm oil was originally developed to meet the growing demand for soaps during the Industrial Revolution in Europe.²⁷ Plantations were established in Nigeria and Zaire to meet this demand. While palm oil had long served an important role as a

food staple in African communities, European consumers and businesses had yet to realize its benefits.

Current palm oil consumption is principally driven by food demand – 74 per cent by some estimates.²⁸ It is an ideal replacement for animal fats and partially hydrogenated vegetable oils (containing trans fats), and is a vital component for processed foods. Consumer goods producers also rely on palm oil and its derivatives for a variety of goods consumers use everyday.

And with rising demand for biofuels, biofuel processors are increasingly looking to palm oil as an ideal first generation biodiesel feedstock. The lowest cost vegetable oil source available on the international market, palm oil has both the price and supply characteristics ideal for fuel use.

But ongoing pressure to remove incentives for first generation biofuels has led European policymakers to seek a cap on the use of first generation biofuels to only 5 per cent the share of transportation biofuels – including palm oil.²⁹ Claims of "indirect land use change" driving "unsustainable" conversion of land for agriculture abound in the European salons.

But this knee-jerk reaction by short-sighted European politicians and their environmental NGOs friends to limit imports, particularly palm oil, reflects a rather unintelligent view of what it means to achieve a diversified and sustainable energy policy. Meanwhile, the claim of "indirect land use change" is itself a direct attack against efforts to develop the agricultural land needed to feed and employ Africa's communities. It smacks of modern day colonial style policies that seek to stifle and retard African growth and prosperity.

One example of the shortsightedness of the proposed EU policy revision is palm oil's potential as a source for biomass for next generation biofuels – those biofuels for which the EU is attempting to increase demand. But by reducing incentives for investment in palm oil cultivation, EU policymakers are invariably reducing a significant future source of biomass.

Meanwhile, investing in first generation biofuels today should be recognized as investing in food for tomorrow. Crops such as soybeans and palm oil, which can serve as both food and fuel, are in high demand, and will only become more critical as the world's population increases.

Palm oil demand is expected to almost double by 2021, from 52.1 million tonnes in 2011 to more than 100 million tonnes (43 per cent of all vegetable oils consumed).³⁰ Investing in the expansion of oil palm plantation today means establishing the supply for food demand tomorrow. But this can only be accomplished by expanding palm oil cultivation in Africa, one of the last regions with sufficient land available for cultivation.

Palm Oil Development and Social Empowerment

Since the 1960s when Malaysia and Indonesia looked to palm oil as a tool for development and poverty alleviation, palm oil has been synonymous with social advancement. In Malaysia alone the poverty rate was reduced from almost 50 per cent to just 4 per cent, a rate that many developed countries would envy.³¹³²

In Nigeria, palm oil is an important source of employment, with more than 1.8 million people working in the sector.³³ Olam International is targeting 15,000 jobs per 100,000 hectares developed, with an emphasis on smallholders.³⁴ PZ Cussons Nigeria Plcover in partnership with Wilmar Limited are investing to develop a 50,000 hectares of plantations and create 12,000 direct jobs and over 33,000 indirect jobs at various skill levels in the next few years.³⁵

Long-term employment in the sector requires access to markets, however. Palm oil production cannot occur in absence of demand, both global and domestic. European biofuels demand is one part of many required to support the sector. And Europe needs African producers.

By some estimates, the RED has resulted in more than € 14 billion of investment and directly created more than 100,000 jobs in Europe alone.³⁶ European biodiesel producers contributed more than 8.6 million tonnes to the more than 10.5 million tonnes of biodiesel consumed in 2011.³⁷ Meanwhile, European bioethanol consumption reached 2.85 million tonnes. Despite the strong historical growth of biofuel production, the EU saw the lowest level of growth in 2011 – only 3 per cent compared to 10.7 per cent and 24.6 per cent in 2010 and 2009, respectively.³⁸

This reflects an opportunity for African palm oil producers to offset the shortfalls in supply. And African palm oil producers both current and potential are eager for the opportunity. According to a 2010 survey published by the Initiative for Public Policy Analysis , Nigerian palm oil producers describe themselves as "comfortable", and average wages more than 5 times the national minimum wage. ³⁹ And governments and communities throughout Africa are eager and willing to attract investments.

For instance, in 2010, the Government of Liberia signed a USD 1.3 billion agreement with Golden Veroleum for a palm oil project that will employ more than 35,000 people. 40 Similarly, in Gabon, Olam International, a Singapore based plantation operator, is engaged in a small famer palm oil project. 41

Moreover, the International Fund for Agriculture Development (IFAD) has been involved in the development of oil palm plantations for small farmers in Uganda in collaboration with the private sector since 1998, and recently recommitted to a second phase of development to benefit more than 136,000 households.⁴² Production of palm oil in Uganda is expected to save the country between USD 60-80 million a year in imports.⁴³

A USD 633 million joint venture by UK-based PZ Cussons and Singapore-based Wilmar in Nigeria is expected to generate more than 20,000 jobs and revitalize the country's oil palm sector. 44 There are on-going investments in palm oil sector in Cameroon, Ghana, Ivory Coast, Liberia and other African countries which will in turn create jobs and alleviate poverty.

Despite these examples of tremendous success and prosperity for palm oil producers, opponents continue to claim that the industry's expansion is harming communities. Environmental campaigners have promoted a model of "Free, Prior and Informed Consent" (FPIC), an altruistic concept until one witnesses its application.

In Indonesia, a number of communities have been beset by disputes over land tenure and the right of development – often with the support of international NGOs intent on promoting their cause. One high profile case in Indonesia's Mesuji District is reflective of the complexity the FPIC debate and the complicity of international NGOs in promoting fraud.⁴⁵ Unfortunately, local communities end up being caught in between companies who have a right to develop and NGOs whose interest is not the well being of communities, but their self-promotion.

Despite these challenges, the development projects above and many more stand to benefit local communities through greater market access to Europe, both through higher value palm oil and the ability to compete directly with European producers.

And palm oil is an important gender equalizer in Africa, with women entrepreneurs and farmers prospering alongside men in the production and processing of palm oil. While men traditionally cultivated palm oil, women processed it.⁴⁶ Today, women entrepreneurs can be found throughout Africa processing palm oil for local markets and small businesses.

And amid these private sector initiatives, African governments are also looking to replicate poverty alleviation schemes in South East Asia. One example is Sierra Leone's engagement of the Malaysian Federal Land Development Authority (FELDA), the world's largest oil palm plantation operator, to replicate their small farmer development, and is also looking at opportunities for partnerships in Cameroon and Liberia. 4748

With policymakers both within Africa and throughout the world considering how best to reduce poverty in Africa palm oil is consistently highlighted as an important tool to this end. At the Clinton Global Initiative in 2012 participants drew attention to a female entrepreneur in Liberia who runs an oil palm smallholding, and declared herself proud of the opportunity to cultivate her own land.⁴⁹

These opportunities and others require the opportunity afforded through open trade and access to markets that European policymakers are seeking to deny by excluding imports of palm oil – for whatever purpose. European consumers may differentiate between palm oil used for their biscuits, sweets or fuel, but for African producers of the commodity, it means one thing – an opportunity for a better life.

The Case of Malaysian Investment in Africa's Agriculture Revolution

The African continent is attracting significant interest from agriculture powerhouse and investors, including from the United States, the United Kingdom, and even Malaysia, which was most recently named the third largest source of foreign direct investment on the continent. While still a developing country, Malaysia offers a unique illustration of the interest from emerging economies in exporting poverty alleviation projects to less developed economies. Its success in agriculture makes it an ideal partner for various African nations looking to harness the tremendous potential of domestic agriculture sectors.

With over 50 years of experience harnessing the economic power of palm oil, country such as Malaysia promotes agriculture as a tool for poverty alleviation and economic empowerment. It provides a unique lesson in development, wealth-creation and poverty alleviation for other developing countries in Africa. The country's Federal Land Development Authority (FELDA) is the largest plantation operator, organizing more than 112,000 settlers throughout Peninsular Malaysia. FELDA is also assisting other small farmers with understanding best practices in settler programmes. It has also been working with settlers in Sierra Leone to assist in replicating the organization's model.

Meanwhile, companies such as Sime Darby, one of the original plantation operators in the country, actively engage with independent small farmers throughout the country, reflecting the central role that small farmers play in the country's palm oil sector.

And recent development projects in Africa reflect a similar commitment as Malaysian palm oil companies look to expand. With limited land available due to environmental commitments, Africa is attracting Malaysian plantation operators due to the ideal climate, land and the large number of workers.

Sime Darby's investments in Liberia and Cameroon are focused on small farmer operations, bringing together local farmers in the region to train and cultivate land.

Projects currently being driven in Africa by Malaysian palm oil companies include:

- Wah Seong Berhad, a Malaysian diversified investment holding company, has recently announced a potential investment of USD 744 million in a 180,000 hectare palm oil industrial operation in Congo.⁵¹
- Sime Darby is developing over 220,000 hectares of plantations in Liberia that is expected to generate more than 35,000 jobs, and the company is developing more than 44,000 hectares exclusively for small farmers.⁵²

FELDA is exploring expansion opportunities in Ghana, Cameroon and Gabon in an effort to emulate the settler scheme models employed in Malaysia. Speaking at an event, FELDA Group President Datuk Sabri Ahmad stated:

"We have 50 years' experience in social engineering, giving opportunities to landless farmers and jobless people. It has been successful. We can help the Africans because this is a food programme that helps eradicate poverty and improve the quality of life among planters."

Palm Biomass – Setting the Stage for Next Generation Biofuels

In Malaysia and Indonesia, the oil palm tree yields approximately 4 tonnes per hectare per year of palm oil, and approximately .5 tonnes/ha/year of palm kernel oil. This wealth of oil, which exceeds the next most high yielding vegetable oil, rapeseed, by almost 6 times, ignores another by-product of oil palm cultivation – biomass.

Oil palm plantations produce more than 20 tonnes of biomass per hectare/year, much of which has been utilized for conventional purposes of fertilization and to fuel boilers.⁵³ But recent efforts to increase the value of palm oil production has led to the development of biofuels from palm biomass – the next generation biofuel.

European biofuel producers are already interested, with a test shipment of palm biomass shipped to Italy for testing in 2012.⁵⁴ While the technology and supply chains are still in their infancy it reflects a breakthrough not just for European aspirants to low-carbon fuel, but also to palm oil producers seeking to further increase their incomes and standard of living.

Domestic consumption of palm biomass for energy purposes presents an opportunity for increasing the sustainability of daily life for African communities – particularly in palm oil producing regions. Current reliance on charcoal and paraffin for fuel and heat are currently associated with health problems – particularly for women and children. Biofuels derived from palm biomass would serve to replace these unhealthy and unsustainable fuel sources.⁵⁵

But this opportunity can only be achieved if oil palm development is encouraged in Africa. Without oil palm development, African producers will fail to benefit from what could prove to be one of the greatest agricultural achievements since the "Green Revolution," losing out an important food and energy source.

Conclusion

African agriculture land is abundant. 60 per cent of the world's unutilized land is on the continent.⁵⁶ Lack of investment, as well as a combination of poor agriculture practices and poor planning have directly contributed to this.⁵⁷

Meanwhile, trade distortive policies such as the European Union's agriculture subsidy programme, the Common Agriculture Policy (CAP) and the Renewable Energy Directive (RED) have undermined the ability of African communities to compete in the global market – artificially depressing agriculture prices and restricting access to Europe's markets. 58 Unfortunately, the recent debate over Indirect Land Use Change (ILUC) and MEP Lepage's proposed revision to the RED to include the factor reflect yet another unfortunate set back to European trade liberalization – one that other policymakers should stand against in defense of Africa's small farmers.

Despite these challenges, African producers are attracting investments at unprecedented rates, while receiving the endorsements of international aid agencies such as the World Bank and the International Fund for Agriculture Development. And companies from South East Asia, the Americas and even Europe are looking to the continent to invest in the emerging agriculture sector – to the benefit of African producers and global food security.

Rather than seeking to further restrict these developments through arbitrary and capricious policy proposals such as the "Indirect Land Use Change" factor, European policymakers should support the right and the ability of African producers to agriculture development. No less than the European Commissioner for Agriculture Development, Dacia Ciolos, endorses such an extension of policy. Meanwhile, European nations' commitments to the UN's Millennium Development Goals makes reflects their own recognition of the need for African farmers to provide for themselves and raise the entire community out of hunger and poverty.

Concerns of rising food prices due to biofuels are misplaced, and the reaction will prove detrimental if it leads to reduced investment and development – especially on the African continent where such development needs to be encouraged. It is past time that African farmers and communities benefit from the opportunities afforded from access to international agriculture and biofuel markets, and well past time for the European Union to reform policy to support the right for all farmers to compete equally.

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