



RSB Public Consultation on Indirect Impacts

FEEDBACK FORM

To submit your feedback, you can use this feedback form, or send us an email, or you can send us a marked-up pdf document. Please send your comments to: victoria.junquera@epfl.ch before **May 15, 2012**.

(1) Does the background paper adequately describe indirect impacts of biofuel production? If no, please explain.

One area of particular interest is the reference to lower ILUC when using "waste". Given that I work toward much broader recognition of the LCA value of waste conversion for resource recovery as an alternative to methods of disposal, I feel this topic needs to be presented more thoroughly, with (at a minimum) reference to key documents and to RSB elements addressing the issue.

(2) Does the background paper include all possible options to address indirect impacts in the RSB Standard? Are there options (or variants) that have not been considered?

I feel the option coverage is more than adequate.

(3) Are the options and the issues presented in a neutral and objective manner?

The work is admirably even-handed.

(4) Do you think the RSB Standard should address indirect impacts?

Yes, specifically with recognition of the value of waste conversion when compared to use of virgin materials.

(5) Which option(s) to address indirect impacts do you suggest? The answer can be a combination of options, or a different option (or variant) if you would like to suggest one.

I prefer an expansion of Option 2, wherein the concept of the LIIB model is left "open" for further integrated pathway development and comparison.

(6) Do you have additional comments?

Sustainability standards should remain primarily incentives, leaving enforcement and disincentives to regulatory control.

Submitted by:

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