

**Draft meeting summary**  
**24<sup>th</sup> Session of the Subgroup 6 (Fuel & Energy Cycle)**  
**of the IWG on Automotive Life Cycle Assessment**  
**(IWG on A-LCA)**

**Workshop on ILUC**

**26 november 2024 online**

## **Summary**

The meeting focused on discussing the inclusion of indirect land use change (ILUC) in A-LCA for biofuels. The chair presented options for addressing ILUC, including economic modeling, direct land use change measurements, and risk-based approaches. Various organizations' positions were discussed, including ICCT, JRC, and Ricardo. The group debated whether to follow IMO's approach, but Marco Raugei (Ricardo) cautioned against premature decisions without clear operationalization. Georg Bieker (ICCT) emphasized their prioritization of options, with ILUC inclusion as the top priority. The discussion touched on the challenges of mixing attributional and consequential LCA elements. Francois Cuenot suggested contacting IMO for clarification on their approach. The group agreed to seek more information from IMO before making a decision. Concerns were raised about potential resistance to consequential LCA discussions in the broader IWG. The meeting concluded with plans to share a draft document for review before the next meeting on December 5th, acknowledging the need for US EPA review and the challenges of reaching consensus on certain points.

## **Presentation of ILUC options by the chair (Noritsune Kawaharada)**

The chair presented various options for addressing indirect land use change (ILUC) in biofuel lifecycle assessments. These included economic modeling, direct land use change measurements, and risk-based approaches. He outlined the positions of different organizations such as ICCT, JRC, and Ricardo on these approaches.

## **Discussion on IMO's approach to ILUC**

Jane O'Malley pointed out the need for better understanding of IMO's intentions regarding direct land use change measurements. Georg Bieker (ICCT) suggested mentioning the EU's Renewable Energy Directive (RED) as an example of the direct land use change approach. The group discussed the potential of following IMO's risk-based approach, but Marco Raugei (Ricardo) cautioned against premature decisions without clear operationalization.

## **ICCT's prioritization of ILUC options**

Georg Bieker (ICCT) emphasized that their presented options should be considered as a list of priorities. ICCT's top priority is including indirect land use change emission values, followed

by direct land use change emissions accounting, and then the risk-based approach as a last resort.

### **Proposal to contact IMO for clarification**

Francois Cuenot(UNECE) offered to approach the IMO Secretariat to arrange a discussion and get answers to the questions raised during the meeting. The group agreed to this approach, planning to make a decision on whether to follow IMO's approach after this consultation.

### **Discussion on attributional vs consequential LCA**

Gustav Krantz raised the point that considering ILUC would essentially include elements of consequential LCA. This led to a discussion about the implications of mixing attributional and consequential LCA elements, with Marco Raugei suggesting that some consequential elements are inevitable when addressing ILUC for biofuels.

### **Concerns about broader IWG discussions**

Dietmar Hofer expressed concerns about starting a discussion on consequential LCA in the broader group, anticipating resistance and potential delays. He suggested keeping the mainstream approach attributional while acknowledging some consequential elements for biofuels.

### **Next steps and document review**

The chair outlined plans for the next meeting on December 5th and the process for reviewing and submitting draft documents. Jarod Kelly emphasized the need for US EPA to have sufficient time to review any contributions before submission to SG7.

### **Action Items**

- Francois Cuenot to contact the IMO Secretariat to arrange a discussion about their approach to ILUC.
- The chair to share the latest version of the draft document for review after the meeting.
- All members to review the draft document and provide comments before the next meeting on December 5th.
- US EPA (represented by Jarod Kelly) to review the draft document to ensure there's nothing they would disagree with.
- The chair to incorporate comments and proposals into the draft document, using square brackets for points without consensus.

### **Participants:**

- Noritsune Kawaharada
- Banita Fidyova
- Jane O'Malley
- Marco Raugei
- Caroline Mir

- Anne Bouter
- Dietmar Hofer
- Tetsuya Suzuki
- Reino Mezaki
- Jarod Kelly
- Martin Rauch
- Francois Cuenot