

## **Biofuelwatch summary of comments on the Report on the Implications for European Sites**

- The assessment of European sites is based on predictions with insufficient consideration given to uncertainties
- The lack of evidence that "precautionary/conservative assumptions" mitigates the uncertainties of the modeling predictions
- Natural England's assessment does not appear to demonstrate the precaution that Natural England itself considers to be necessary
- The way Biofuelwatch is quoted in the report may be misunderstood.
- Insufficient consideration of the potential impacts of amines and their breakdown products on the European sites, with no in-combination assessment because background levels of amines and their breakdown products have not been established
- The re-classification of the grassland from acid grassland to calcareous grassland appears to be a non-precautionary assumption