



# trade hot topics

## Biofuel Subsidies and Food Prices in the Context of WTO Agreements

Nichodemus Rudaheranwa\*

### Background

There has been an upsurge in world prices of major food items including grains, soya beans and oil seeds over the past decade or so, particularly between 2006 and 2008 when the prices of rice, soya bean, sunflower and wheat increased by more than 60 per cent (Figure 1). Prices of major cereals, though remaining high, have declined since mid-2008 partly due to improvements in supply of these food crops given better weather conditions, falling oil prices, the financial crisis and economic recession which weakened the global demand. However, high prices of food remain a major concern to net food importers and buyers<sup>1</sup>. Given their social and food security sensitivity, recent world food price upsurges have raised tensions around the world – with food riots and protests in countries like Cameroon, Côte d'Ivoire, Egypt, Haiti, Indonesia, Malaysia, Mozambique, Niger, Senegal, and Thailand, among others. Countries have responded to these food concerns with a range of policy measures targeting consumption, trade and production of food. These policy measures include tariff reductions to facilitate importation of food, export bans and taxes to divert supplies into domestic markets<sup>2</sup>. However, these measures are trade-restrictive and short-term in nature, and might not increase food supplies on a sustainable basis. Consequently, concerns relating

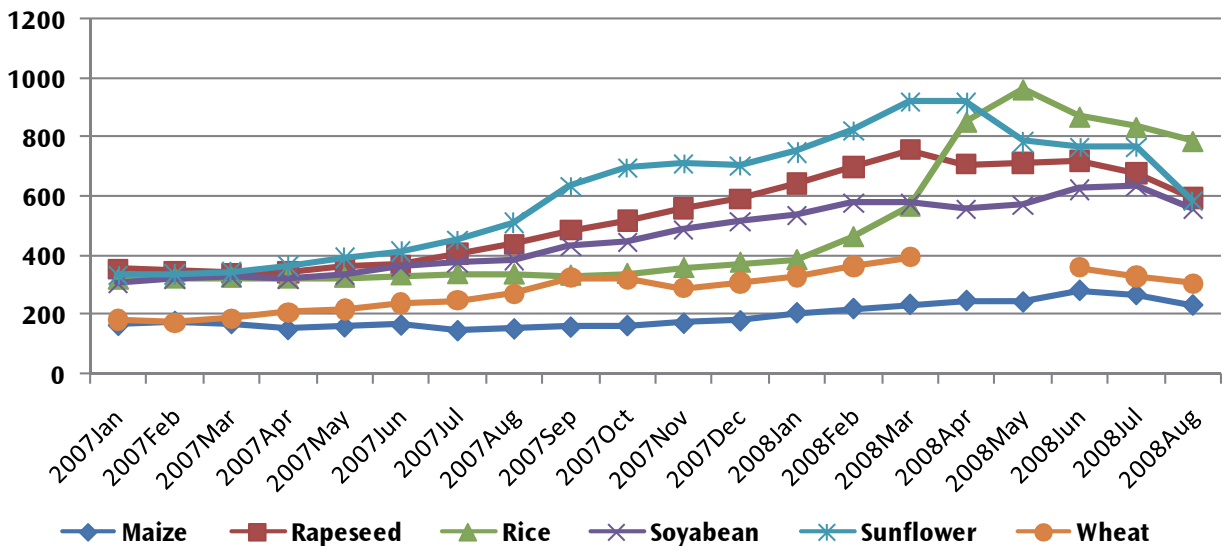
to food prices remain particularly in net-food importing developing countries.

A variety of factors including the use of food crops for the production of biofuels are thought to have jointly contributed to the recent rise in world food prices. The emergence of biofuels as a new source of demand for food crops, including maize, and resources, particularly land, into their production raises food security concerns especially among net food importers and buyers. In this context, the role of subsidies and mandates for biofuel production and use are of increasing food security concern in net-food importing developing countries. Given that subsidies and other farm support measures are subject to World Trade Organization (WTO) disciplines, this issue of the Commonwealth Trade Hot Topics focuses on the influence of biofuels-subsidy policies on food prices in the context of WTO rules. It is anticipated that this brief paper will contribute to the understanding of the role that WTO trade rules could play in redressing potential adverse impact of increased biofuel production on

<sup>1</sup> Given that the majority of the poor in many developing countries live in rural areas where agriculture is the main activity, one would anticipate that rising food prices would benefit the poor, but this is often not the case. First, most rural households are net consumers of food who have to pay high food prices; second, many small farmers lack resources required to increase production; and third, the poor tend to be landless agricultural labourers.

<sup>2</sup> See Trostle (2008) for details.

Figure1: Monthly price indices for selected commodities



food-importing developing countries. The intention here is to identify key issues of policy relevance in the debate on biofuel production and the rising food commodity prices contextualised in the WTO trade rules.

#### Sources of food price hikes

Analysts have emphasised different explanations for the recent upsurge in world food prices<sup>3</sup> and have identified a number of contributing factors. They include high oil prices and environmental concerns which encouraged the expansion of biofuel production (detailed discussion below); underinvestment in agriculture in many developing countries; unfavourable weather conditions; and increased input costs to farmers. Rising population combined with recent growth in average incomes particularly in emerging developing countries both increased per capita food consumption and dietary diversification to include more meat (chicken, beef and pork) and dairy products. This in turn increased demand for meat and fuelled the demand for grains used in the production of meat, thereby indirectly contributing to recent surges in food prices. Economic growth particularly in emerging economies increased demand for energy thereby contributing to rising oil prices. This, in turn, had an impact on costs of agricultural production and contributed to rising food prices. Crude oil and other major food items are typically priced in US dollars on global markets and, consequently, the depreciation of the American dollar reduced the cost of importing and enabled some countries to increase food and oil imports. This in turn put pressure on the world price of crude oil and food items, especially those of which the USA is a major source.

All these factors in combination contributed to the declining supply and rising demand for food staples and translated into rising food prices. The contribution of each of these factors to the recent upsurge in food prices is acknowledged in the literature, but there is no consensus on the most significant contributing factor. To address all these factors is an exercise beyond the scope of this brief paper, instead the discussion here focuses on the role that multilateral trade agreements could play in disciplining trade-distorting subsidies and incentives that encourage the biofuel production. This is not to suggest in any way that other factors outlined above are not important in influencing food prices.

#### Biofuels and food prices

The production of fuels from agricultural crops has intensified the debate about the impact of biofuels<sup>4</sup> on the supply and rising prices of food. Proponents of biofuel production attribute the recent rise in food prices to factors other than biofuels, while consumers and users of grains for purposes other than biofuel production attribute the food price increases largely to biofuel production. In response to rising energy prices, biofuels policies and mandates encouraged production of biofuels which, in turn, increased the demand for feedstocks including corn/maize and conversion of land meant to produce competing food crops like wheat into

<sup>3</sup> For a detailed discussion see, for example, FAO (2009), World Bank (2009) and Farm Foundation (2008).

<sup>4</sup> Biofuels can be classified according to the source and type. They can be solid (e.g. fuelwood, charcoal, etc.), liquid (e.g. ethanol and biodiesel) or gaseous (e.g. biogas). However, of interest here are liquid biofuels (ethanol and biodiesel) for transport mostly produced using agricultural and food crops as feedstocks. Common feedstocks into the production of ethanol include sugarcane, wheat, maize and cassava, while those for biodiesel include rapeseed, soya beans and other vegetable oils.

Table 1: Biofuel mandates by major producers

Country	Mandate
USA	Mandatory target of 7.5 billion gallons of biofuels by 2012, rising to 36 billion by 2022
Brazil	Mandatory blend of 20-25 per cent anhydrous ethanol with petrol; mandatory minimum blend of 3 per cent biodiesel with diesel by July 2008 and 5 per cent by end of 2010
EU	Mandatory target of 10 per cent share of renewable (including biofuels) in transport fuels by 2020
China	15 per cent of transport energy needs from biofuels by 2020
Canada	5 per cent renewable content in petrol by 2010; 2 per cent renewable in diesel fuel and heating oil by 2012
India	Proposed blending mandates of 5-10 per cent of ethanol and 20 per cent of biodiesel

Source: Adapted from Harmer (2009)

the production of feedstocks.

Recent studies and reports indicate that the use of food crops in the production of biofuels, particularly in the USA and the European Union (EU), increased sharply around the time that food prices were increasing. According to the World Bank Report (2009), about two-thirds of the global increase in maize production between 2003 and 2007 went to the production of biofuels. Out of the increase of nearly 40 million tonnes of world maize use in 2007, almost 30 million tonnes were absorbed by ethanol production, largely in the USA which is a major exporter of maize. The biodiesel sector in the EU is estimated to have absorbed about 60 per cent of its member states' rapeseed oil output in 2007, (FAO, 2009). IFPRI (2007, 2008) and FAO (2009) indicate that biofuel production contributed 30 per cent of the recent increase in average prices of cereals, while about 70 per cent of the increase in global maize production went to ethanol production between 2004 and 2007.

The initial impact is said to have been confined to the maize and rapeseed market, but the price of wheat and soya bean rose as land was diverted away from these crops into maize and rapeseed production, both of which are major ingredients into biofuel production. The area under maize production in the USA alone expanded by up to 23 per cent between 2006 and 2007 in response to high prices of maize and rapid growth in demand for maize into the bio-ethanol production (Mitchell, 2008). This is believed to have reduced the area under soya bean production by 16 per cent, leading to reduction in the soya bean production and to increases in soya bean prices by 75 per cent between April 2007 and April 2008. In addition, imports of vegetable oils by the United States and the EU (two of the largest producers of biodiesel besides Argentina, Australia

and Brazil) increased substantially between 2004 and 2007. Vegetable oil imports into the EU-27 increased from 4.4 to 6.9 million tonnes over the same period, while those into the USA increased from 1.7 to 2.9 million tonnes. The largest imports of vegetable oils took place at the time when biodiesel production in the EU-27 increased from 0.45 billion gallons in 2004 to 1.9 billion gallons in 2007 – and from 0.03 billion gallons in the USA in 2004 to an estimated 0.44 billion gallons in 2007.

The rapid production of biofuels in the USA in 2003, the EU in 2005 and, indeed, in most other countries has been attributed to biofuels policies and legislation that mandate the use of biofuels<sup>5</sup> (Table 1). The US Energy Policy Act 2005<sup>6</sup> mandates 7.5 billion gallons of renewable fuels by 2012, which was raised by the Energy Independence and Security Act of 2007 to 36 billion gallons of renewable fuels targeted by 2022, of which 21 billion gallons are to be covered by biofuels. The US 2002 and 2007 Farm Bills include several provisions with incentives for feedstock production. The EU biofuels legislation consists of Directive 2003/30/EC for promoting production and use of biofuels, while Directive 2003/96/EC provides tax incentives for use of biofuels. Total support to production of biofuels associated with biofuels policies of the EU and its member states increased from 2.3 billion in 2005 to €3.7 billion in 2006 (Table 2) and was anticipated to treble by 2020 to achieve the 10 per cent target of renewable energy. These mandates indicate that the demand for biofuels will remain high for some time to come.

<sup>5</sup> See, for example, Harmer (2009), Mitchell (2008) and IFPRI (2007, 2008) for more details.

<sup>6</sup> Sections of the Energy Policy Act that promote the use of biofuels and provide funds to cover loan guarantees associated with demonstrating the feasibility of producing certain biofuels are in Title II (Renewable Energy), Title IX (Research and Development), and Title XV (Ethanol and Motor Fuels) of this Act.

Table 2: Support to ethanol and biodiesel in the EU in 2005 and 2006 (Euro millions)

Support element	Ethanol		Biodiesel	
	2005	2006	2005	2006
Price linked support	223	334	-	-
Volume linked support	559	909	1,306	2,131
Input linked support	34	39	-	-
Research and development	24	55	252	270
Import duty linked support	-49	-45	17	36
Total support	791	1,282	1,575	2,437

Source: Kutas et al. (2007)

Such policies and mandates provide incentives for more production of biofuels, which in turn increases demand for (and production of) feedstocks and diverts land away from the production of food staples. This reduces food supplies and contributes to high food prices. Consequently, there have been arguments that without these biofuels policies and mandates – particularly in the EU and the United States – the production of biofuels would have been lower and food price hikes would have been smaller. Consequently, there have been calls for the termination of biofuel subsidies and mandates that distort the market for biofuels in industrialised countries like the USA and member states of the European Union. Such a move would allow more efficient and low-cost biofuel producing countries to produce and export into countries and areas with such mandates (e.g. USA, EU), thereby helping to ease the pressure on world food prices.

#### Biofuel subsidies and WTO disciplines

Policy responses to recent upsurges in food prices have comprised a range of export-restraints and protective measures designed to reduce the welfare impact of such price hikes. These measures, however, exacerbated the supply and demand situation which increased importers' concerns about future availability of food and, in turn, increased food prices even more. The WTO provides mechanisms of using such measures in a manner that minimises their trade restrictive effects. Both Article XI of GATT 1994 and Article 12 of the Agreement on Agriculture (AoA) provide for export prohibitions or restrictions but also require that due consideration be given to members' food security concerns. On the other hand, the reduction of import duties to reduce domestic prices is consistent with market access objectives of the multilateral trade rules.

The increased use of feedstocks into biofuel production seems to be policy-driven notably by subsidies and mandates. Subsidies are one of

the issues currently being debated in the Doha Round of trade negotiations. The WTO disciplines governing the production and trade in biofuels are not clear and leave considerable ambiguity as to whether biofuel subsidies are WTO compatible, and whether they amount to cross-subsidisation under the WTO Agreement on Agriculture. Specifically, the classification of biofuels as agricultural, industrial or environmental goods and the nature of the subsidy involved remains a key issue as it would determine the relevant and applicable WTO trade rules. Biodiesel is considered as industrial goods (under Chapter 38) covered by the WTO Agreement on Subsidies and Countervailing Measures (SCM), while ethanol is an agricultural product under HS Chapter 22 and therefore subject to the SCM Agreement and Annex of WTO Agreement on Agriculture, which contains more specific disciplines on subsidies. While the WTO Agreement on Subsidies and Countervailing Measures does not outlaw all subsidies, it prohibits export subsidies and local content subsidies.

Given that feedstocks used in the production of biofuels are overwhelmingly agricultural crops (Harmer, 2009), subsidies for such crops can be an important subsidy to final biofuel products. This would encourage more biofuel production that would otherwise not have been commercially profitable once the price of fossil fuels rose beyond a certain threshold of about US\$75-80 per barrel of oil. In turn, this would increase the demand for feedstocks and encourage increased diversion of land from the production of food crops. From the food security point of view, disciplining trade-distorting biofuel subsidies is essential and the Doha

<sup>7</sup> Among other short term responses, they include increased import duties, export bans, restrictions and taxes; price controls and selling national stockpiles, etc.

<sup>8</sup> Developing countries have over time argued for reforms of subsidies and other forms of farm support in developed countries, since subsidised products on world markets depress prices, which reduces the ability of developing countries to produce and export competitively. Subsidies on biofuel production however impact on food security by increasing the demand for and diverting land from the production of food crops.

Round could to some extent contribute in this aspect.

It is important, however, to understand that addressing food security concerns of developing countries will require measures that go beyond of what is currently envisaged in the Doha Round. The July 2004 Framework makes a number of provisions favourable to developing countries including special safeguard mechanisms (SSM) dealing with effects of depressed import prices and import surges, but net food importing countries are equally concerned about surges in food prices. In the context of the WTO trade agreements, it might require some form of special arrangement similar to the Marrakesh Ministerial Decision on measures concerning possible negative effects of trade reforms on net food importing developing countries, to address effects of food price hikes including those due to biofuel policies. Food security in developing countries will not improve in the long run unless investment resources are directed into agriculture production – particularly the development of physical and institutional infrastructure, research and extension services, etc. Clearly, this will require not only WTO compatible biofuel subsidies and the creation of an enabling policy environment for public and private sector investment in agriculture production, but also international financial support and other forms of assistance over and above that envisaged under the Aid for Trade initiative.

## Conclusion

Recent soaring food prices for basic food items – particularly maize, wheat, rice, soya beans and oil seeds – have been attributed to a number of factors including biofuel production. The production of biofuels, which is projected to increase in the near future with greater potential to intensify the demand for feedstocks, is however largely policy-driven. The emerging biofuel market is a significant source of demand for agricultural commodities including food staples, with food-security implications for net-food importing developing countries. Under the WTO rules, there is considerable potential for disciplining trade-distorting biofuel subsidies. Policy measures so far in response to recent food price hikes are of short term in nature, and more policy actions ensuring agricultural productivity growth and improving developing country infrastructure are necessary for long-term and sustainable availability of agricultural food. In this context, consideration needs to be given for enabling net-food importing developing countries to make use of various WTO provisions, for example green box subsidies (allowed

under Annex II of the Agreement on Agriculture) including investment in infrastructure, training of farmers to improve productivity, agricultural research, and building of food reserves. In addition, these countries would require support in making full use of development box subsidies towards low-income and resource poor farmers (allowed under Article 6.2 of the Agreement on Agriculture) for payment of agricultural inputs – fertilisers, quality seeds, fuel, irrigation, and so on. These actions require financial support and other assistance over and above what is currently on offer through Aid for Trade.

## References

- Harmer, T. (2009). Biofuels subsidies and the law of the WTO, ICTSD Global Platform on Climate Change, Trade Policies and Sustainable Energy, Issue Paper No. 20.
- Headey, D and Fan, S (2008). *The impact of surging food prices on Commonwealth developing countries*. IFPRI, Washington DC.
- Kutas, G, Lindberg, C and Steenblik, R (2007). Biofuels: At what cost? Government *Support for Ethanol and Biodiesel in the European Union*. A report for the International Institute for Sustainable Development, Geneva, Switzerland.
- World Bank (2009). *Commodities at the crossroads*. Global Economic Prospects 2009 Report, World Bank, Washington DC.
- Polaski, S (2008). Food prices, poverty and small scale farmers: *Getting the global trade regime right*. Carnegie Endowment for International Peace.
- Trostle, R (2008). *Global agriculture supply and demand: Factors contributing to the recent increase in food commodity prices*. A report from the Economic Research Service.
- Farm Foundation (2008). *What is driving food prices?* Issue Report.
- Mitchell, D (2008). A note on rising food prices, World Bank Policy Research Working Paper No. 4682.
- IFPRI (2008). Biofuels and grain prices: Impacts and policy responses.
- IFPRI (2007). The world food situation - New driving forces and required actions.
- FAO (2009). The state of agricultural commodity markets: High food prices and the food crisis - experiences and lessons learned. [www.fao.org](http://www.fao.org).

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- Srinivasan, T N (2009). LDCs, Landlocked Developing Countries and Small States in the Global Economic System. London: Commonwealth Secretariat.
- Stevens, C et al. (2009). The CARIFORUM and Pacific ACP Economic Partnership Agreements: Challenges Ahead?, Economic Paper No. 87, London: Commonwealth Secretariat.
- Winters, L A et al. (2009). An EU-India Free Trade Agreement: Reflections on the Implications for Excluded Countries. London: Commonwealth Secretariat.
- Cali, Massimiliano and te Velde, Dirk Willem (2008). 'Towards a Quantitative Assessment of Aid for Trade'. Economic Paper, London: Commonwealth Secretariat.
- Grynberg, Roman and Newton, Samantha (eds) (2008). Commodity Prices and Development. Oxford University Press.
- Milner, Chris (2008). Trading on Commonwealth Ties: A Review of the Structure of Commonwealth Trade and the Scope for Developing Linkages and Trade in the Commonwealth. London: Commonwealth Secretariat.
- Turner, L (2008). 'Quantifying Aid for Trade: A Case Study of Tanzania'. Economic Paper, London: Commonwealth Secretariat.
- Qalo, Veniana (ed) (2008). Bilateralism and Development: Emerging Trade Patterns. London: Cameron May.
- Grynberg, Roman and Bilal, Sanoussi (eds) (2007). Navigating New Waters: A Reader on ACP-EU Trade Negotiations. London: Commonwealth Secretariat.
- Mbirimi, Ivan (ed) (2007). After Hong Kong: Some Key Trade Issues for Developing Countries. London: Commonwealth Secretariat.
- Razzaque, Mohammad A and Laurent, Edwin (eds) (2007). Global Rice and Agricultural Trade Liberalisation: Poverty and Welfare Implications for South Asia. London: Commonwealth Secretariat.
- Grynberg, Roman (ed) (2006). WTO at the Margins: Small States and the Multilateral Trading System. Cambridge: Cambridge University Press.
- Stiglitz, Joseph E (2004). An Agenda for the Development Round of Trade Negotiations in the Aftermath of Cancun. London: Commonwealth Secretariat.
- Winters, L A and Pedro, M G Martins (2004). Beautiful But Costly: Business in Small Remote Economies. London: Commonwealth Secretariat.

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For further information or copies, please contact:  
Miss Jo-Ann Sneddon, Economic Affairs Division,  
Commonwealth Secretariat, Pall Mall, London SW1Y 5HX, UK  
Tel: +44 (0) 20 7747 6249 Fax: +44 (0) 20 7747 6235  
Email: [j.sneddon@commonwealth.int](mailto:j.sneddon@commonwealth.int)



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