



American  
Forest & Paper  
Association



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# **EPA Science Advisory Board Teleconference Draft Report on EPA Accounting Framework for Biogenic CO<sub>2</sub> Emissions from Stationary Sources**

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# Introduction

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- U.S. forest products manufacturers meet over 65% of their energy needs through biomass, producing more energy from biomass than all the energy from solar, wind, and geothermal sources combined.
- We appreciate that the SAB panel acknowledges that, in addition to the need for scientific accuracy, the practical workability and policy dimensions of EPA's Accounting Framework are key considerations. Unwarranted burdens could disrupt the fiber market and seriously undermine the competitiveness of our industry.
- While we appreciate a number of refinements made to the SAB report, we remain concerned about some key issues and respectfully request that you carefully consider the dissenting opinion of Roger Sedjo.

# Use of Mill Residues and Byproducts for Energy

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- AF&PA appreciates that the SAB appropriately recognizes that spent pulping liquor and biomass residues in forest products mills have a unique profile and should be included in a biomass category separate from roundwood (e.g., sawlogs, veneer logs, pulpwood, etc.).
- The generation of spent pulping liquors and mill residues for energy is integral and incidental to manufacturing forest products (pulp, paper, and solid wood products) and results in fewer greenhouse gas emissions than alternatives. Accordingly, spent pulping liquors and mill residues should be exempt from regulation or assigned a BAF of 0.
- The paper and wood products industry is longstanding and in equilibrium, and its efficient use of biomass through sustainable forestry practices should be included in the baseline, regardless of which methodology is ultimately adopted.

# Logging Residues and Roundwood

- Regarding forest harvest residues, we urge that the SAB consider that: (1) some of these residues would have been burned at the harvest site; (2) the decay rate in many harvest areas (e.g. South) is relatively rapid compared to the relevant time horizon for carbon accounting (e.g. 100 years); and (3) excessive woody residue buildups on the forest floor could increase the risk of forest fires or impede regeneration.
- U.S. forests have a national growth/drain ratio of 1.7 and sequester over 800 million metric tons of CO<sub>2</sub> per year. Research indicates that strong demand for forest products provides incentives to keep forestland forested.
- In landscape terms for national or FIA regions, whenever G/D is above 1, forest biomass should be considered carbon neutral.

# Conclusion

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- Thank you for the opportunity to comment today.

