

Comments by Jody M. Endres

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I write in response to comments made at the May 23, 2012 Science Advisory Board (SAB) teleconference regarding certification systems. I do not speak formally on behalf of the U.S. Council for Sustainable Biomass Production (CSBP), or any of its individual members. My comments included herein are completely my own. However, in my role as the Chair of the CSBP and its Field-testing Task Force, and as a member of the science-based Energy Biosciences Institute, I take issue with some comments made regarding the value of certification systems to biogenic accounting frameworks (BAF).

Comments were made that certification systems have little if no value to EPA's effort to account for biogenic carbon emissions because they are the result of "negotiations" among stakeholders, and suffer from the same problems associated with modeling. To the extent that Marilyn Buford implies that certification systems have little credibility because of the nature of stakeholder interactions, I would counter that:

1. The CSBP, and many other private standard setting efforts such as the Sustainability Index for Specialty Crops, have received substantial awards from USDA. If organizations like CSBP have so little value—to the extent that some on the SAB would like no mention at all of these efforts—implies USDA has wasted its money. What it really demonstrates is that those that sit on the SAB have very little knowledge of what has occurred in private standard setting.
2. Private standards enable public agencies to draw on the expertise and resources of the private sector, non-governmental organizations, and universities that may not otherwise be represented on the SAB.
3. Federal law—the National Technology Transfer and Advancement Act of 1996—requires that all federal agencies use voluntary consensus standards instead of government standards wherever possible and as coordinated by NIST. While private biomass standards like the CSBP are not American National Standards Institute standards, it is not fair to blanketly allege that organizations like CSBP do not observe good standard-setting practices. Indeed, CSBP is structured in a way that all types of stakeholders are represented on the Board of Directors. Many experts involved in BAF have advised the CSBP in its carbon-pathway development. This carbon-pathway development was informed by actual field-testing practice standards on the ground, balancing practicality with concern for accuracy. In no way was field-testing "corrupted" by the horse-trading that Ms. Buford asserts. To the contrary, the CSBP draft standards represent undeniably a ground-breaking effort to improve sustainability in agricultural (and some forestry) landscapes. Officials from USDA's NRCS participated actively in standards development to ensure consistency with existing government standards. Representatives from DOE have been particularly active as well. One would think that U.S. EPA would welcome USDA and DOE input on BAF development, as well as embrace standards that take into account the private sector's ability to execute BAFs.

To dismiss entirely the value of certification ignores that certification as an "alternative" has been adopted by the European Union in its Renewable Energy Directive. The California Air Resources Board also is considering certification for its Low Carbon Fuel Standard (LCFS). To the extent that certification at the field or refinery level allows the private sector to develop individualized pathways based on field-level practices that are tracked and verified, thus avoiding the egregious assumptions and data aggregation in models, it would be astounding to me that U.S. EPA would not want to consider that as an even an *alternative* to model-based prescriptions. California allows such individualized pathways, and has even argued in litigation surrounding the constitutionality of the LCFS that such alternative pathways allow market participants to lower their carbon score to participate in the lucrative California market. Field-level measurements of GHG emissions from biomass are actively being pursued by world-class institutions such as the Energy Biosciences Institute, which backs the argument that such granularity is preferable to nebulous modeling.

In sum, I would urge you, as a science-based group, to please seek out more accurate information regarding private standard-setting efforts, and to recognize some of the value of certification to BAF to increase accuracy.

Sincerely,

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