

**SAB Biogenic Carbon Emissions Panel**  
**March 26, 2015**  
**Oral Comments, M. Van Brunt**

Thank you for the opportunity to speak to you again, and thank you for the excellent and interesting discussion over the past couple of days. I commend the Panel and the EPA for their diligent work on this important issue.

I would like to provide some additional comment on two items. First, I support Dr. Skog's proposal to account for cumulative radiative forcing. This addresses one of our key concerns, which is the potential temporal mismatch between the emissions evaluation period and the averaging timeframe inherent in the global warming potential. This is important for us as waste management methods are invariably compared against landfilling. For a ton of waste placed in a landfill today, methane will be emitted over time, for up to 100 years or more. However, a short evaluation timeframe, such as 20 or 50 years, would effectively cut-off emissions from the landfill after that point in time, even though they will occur. If we are truly interested in the climate impact at year 20 or 50, then assessing the climate impact using a cumulative radiative forcing approach over that time period would ensure the potency of methane, a short lived gas, is properly recognized over the same timeframe. Conversely, using a 100 year GWP would artificially dilute its apparent impact when looking at a climate impact over a shorter time frame. Dr. Skog's proposal would address this issue.

Second, in addition to our primary business, Covanta operates two energy from waste facilities in Maine, and we operate facilities in California. We are also members of the Biomass Power Association. In that capacity, I would like to comment on the concept of uncertainty and the concept of "pay as you go emissions or crediting." Regulatory uncertainty is difficult to manage, particularly when it is a regulatory uncertainty that impacts a potential benefit, in this case in the form of a GHG reduction acknowledgement, that may take 20 to 30 years to be realized. Some may point to the Renewable Fuel Standard or Renewable Energy Credits or Certificates as industry's acceptance of this regulatory uncertainty. However, in both of those programs, the payoff is realized today. Yes, there is a risk that those programs may cease to exist in the future, but that is very different than accepting a risk that a future delayed benefit may never actually be realized. Therefore, it is very important that the policy signal match to the extent possible with the management decision.

Thank you for your attention, and thank you for the opportunity to make additional comments.