



Submitted via email

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Dr. Holly Stallworth  
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Re: SAB Guidance to Panel Members: Comments from the SAB on the Biogenic Carbon Emission Panel's 2-8-16 Draft Report

Dear Dr. Stallworth and the Biogenic Carbon Emissions Panel,

The Biotechnology Innovation Organization (BIO) appreciates the opportunity to comment on the comments from the Science Advisory Board (SAB) on the Biogenic Carbon Emission Panel's 2-8-16 Draft Report re: SAB review of *Framework for Assessing Biogenic CO<sub>2</sub> Emissions from Station Sources* (2014).

BIO would like the Biogenic Carbon Emission Panel to take advantage of this opportunity to address the concerns outlined by the Science Advisory Board. It is imperative that the Biogenic Carbon Emission Panel supports their work through sound science as they work to finalize the *Framework for Assessing Biogenic CO<sub>2</sub> Emissions from Stationary Sources* (Framework) as it will have widespread policy implications once agreed upon.

#### Policy Context

BIO commends EPA for recognizing that biomass can play an important role in avoiding and reducing overall greenhouse gas emissions (GHGs). Given the significance of biomass to reducing GHGs, the final Framework issued by EPA should encourage and promote the use of biomass for the production of biofuels, renewable chemicals and products, and other forms of bioenergy, replacing less clean energy sources. Consistent with historic practice and international standards, the Framework should treat biogenic carbon emissions—emissions from the combustion of all renewable biomass, including forest products and waste as opposed to fossil fuel sources like coal—as carbon neutral.

BIO has closely monitored and contributed to the work of the Science Advisory Board (SAB) as it has worked to help finalize a biogenic carbon accounting framework. As our previous comments to EPA and the SAB have demonstrated, we believe that the final Framework should reflect the policy-neutral conclusion that biomass used for the production of biofuels and renewable chemicals and products, including renewable biomass feedstocks, does not result in lasting increases in CO<sub>2</sub> concentrations in the atmosphere, and therefore CO<sub>2</sub> emissions associated with their utilization should not be



treated as pollutants subject to regulation. Furthermore, the technical assessment included in the Framework should explicitly recognize and encourage the carbon benefits of renewable biomass as a feedstock for bioenergy production and should not set up renewable biomass to be subject to further unwarranted regulations. Other notable regulatory and scientific bodies have reached similar conclusions, and BIO believes that EPA should follow suit. For instance, according to the carbon accounting system of the Intergovernmental Panel on Climate Change (IPCC), biomass feedstocks should be accounted as carbon neutral in emissions – to avoid double counting of carbon emissions and loss of carbon sinks.<sup>1</sup> BIO agrees that the Framework should maintain the policy neutral approach as this is a “technical document that does not set regulatory policy nor does it provide a detailed discussion of specific policy and implementation options. Ultimately, the framework provides a methodological approach for considering, and a technical tool (the framework equation) for assessing, the extent to which there is a net atmospheric contribution of biogenic CO<sub>2</sub> emissions from the production, processing, and use of biogenic material at stationary sources.”<sup>2</sup> Keeping the Framework policy neutral will allow for a consistent application of how biogenic carbon emissions across programs and regulations are treated.

#### Temporal Scale for Biogenic Accounting

The SAB has requested that the Biogenic Carbon Emissions Panel take a more neutral tone versus prescribing a long or short temporal scale that acknowledges the trades-offs between shorter time frames and longer time frames. BIO supports these comments and asks, with respect to renewable biomass, including energy crops, that the Biogenic Carbon Emission Panel include shorter temporal scales in the discussion to most accurately reflect the time from harvest to replenishment of the renewable biomass. This shorter scale would most closely represent the carbon lifecycle reflecting minimal, if any, net carbon contribution to the atmosphere from the combustion of renewable biomass. Further, when determining criteria to be used in selecting the proper temporal scales for assessment, the Framework should include future yield improvement, improvement of land management techniques, and adoption of new or more efficient technology.

BIO respectfully urges the Biogenic Carbon Emission Panel to take a close look at all of the comments provided by the Science Advisory Board and to make the recommended changes as appropriate. We appreciate the opportunity to comment once again on the

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<sup>1</sup> Intergovernmental Panel on Climate Change (IPCC). 1996. Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories, Prepared by the National Greenhouse Gas Inventories Programme. Published: IGES, Japan. 3 Volumes. [Anything more recent than 1996?]

<sup>2</sup> Memorandum: Framework for Assessing Biogenic CO<sub>2</sub> Emissions from Stationary Sources and Charge Questions for SAB peer review (2-25-16)



Framework and encourage the Biogenic Carbon Emission Panel to incorporate appropriate consideration of the benefits of renewable biomass as a feedstock for the production of biofuels, renewable chemicals and products, and other forms of bioenergy. As such, the finalized Framework should ensure that for accounting purposes, regardless of policy, that biogenic carbon emissions are treated as carbon neutral.