



May 22, 2012

EPA Scientific Advisory Board (SAB), Biogenic Carbon Emissions Panel
Dr. Holly Stallworth
Designated Federal Officer (DFO)
SAB Staff Office

Re: Comments on EPA's Draft Accounting Framework and the SAB's March 9th Draft Report

Dear Science Advisory Board, Biogenic Carbon Emissions Panel Members:

The American Forest & Paper Association (AF&PA) appreciates the opportunity to comment on the SAB's May 9, 2012 Draft Report on EPA's Draft Accounting Framework. Thank you for considering our comments and data as you work toward finalizing the Draft Report.

The American Forest & Paper Association is the national trade association of the forest products industry, representing pulp, paper, packaging and wood products manufacturers, and forest landowners. Our companies make products essential for everyday life from renewable and recyclable resources that sustain the environment. The forest products industry accounts for approximately 5 percent of the total U.S. manufacturing GDP. Industry companies produce about \$190 billion in products annually and employ nearly 900,000 men and women, exceeding employment levels in the automotive, chemicals and plastics industries. The industry meets a payroll of approximately \$50 billion and is among the top 10 manufacturing sector employers in 47 states. Our industry also generates additional jobs throughout the supply chain and in local businesses, which further sustains communities and families.

The forest products industry is the leading producer and user of renewable biomass energy and produces more energy from biomass than all the energy produced in the United States from solar, wind, and geothermal sources combined. The industry meets over 65% of its energy needs through the use of renewable biomass, largely through the use of the highly efficient combined heat and power processes.

AF&PA wishes to highlight the unique use of wood residues and byproducts to generate energy in forest products mills:

- Unlike power plants and other biomass energy facilities, the creation and use of biomass energy in forest products mills is integral and incidental to the manufacture of products such as pulp, paper, packaging and wood products. All pulp mills, integrated paper mills and wood products mills convert biomass residues and byproducts to energy for manufacturing bio-based products. To the extent feasible, the wood biomass entering the mills is used to create these higher value products, and the use of the residues and byproducts for energy is the most sustainable use of those materials. Indeed, it would be unsustainable not to use the residues and byproducts for energy. For example, if a pulp and paper mill were impeded from using its spent pulping liquor for energy, the most likely alternative would be to incinerate it without the recovery of energy or pulping chemicals. This would result in a significant and immediate increase in CO₂ emissions.¹ Accordingly, forest product mill residues and byproducts should be assigned a BAF of 0.
- The May 9, 2012 SAB Draft recommends separate BAF equations for each feedstock category. In addition to the identified categories, the SAB should recommend that mill residues, integral and incidental to manufacturing forest products, be identified as a feedstock category (e.g., spent pulping liquor, bark, sawmill residues, pulp and paper residuals, etc.).
- The forest products industry has been operating in the U.S. for well more than a century and is in equilibrium, and its efficient use of biomass should be included in the baseline.
- Emissions from logging residues should not be discounted by decay function and also should have a BAF of 0. As Dr. William Stewart of the University of California, Berkeley points out in his May 1, 2012, submission to the SAB, carbon storage and decay rates are extremely difficult to quantify and highly uncertain. Dr. Stewart notes that, "The global carbon storage benefits of leaving forest management residues are ephemeral, extremely difficult to calculate, and may be negative if leaving the residues in the forest would reduce the future productivity of forests managed to produce solid wood for building products."² Dr. Stewart also points out that forest residues can increase the risk of fire and that forest owners, in practice, often take steps to accelerate residue decomposition, including burning them in piles or masticating and scattering them in order to promote decay. The SAB's report should recognize these realities.
- Research indicates that the demand for forest products provides incentives to keep forestland forested. Where the growth to drain ratio is greater than or equal to 1.0, biomass should be carbon neutral.

¹ National Council for Air and Stream Improvement, Inc. (NCASI). 2011. *Greenhouse gas and non-renewable energy benefits of black liquor recovery*. Technical Bulletin No. 984. Research Triangle Park, N.C.: National Council for Air and Stream Improvement, Inc.

² Stewart, Bill. Comments on the May 9, 2012 Deliberative Draft of the SAB's Biogenic Carbon Emission Panel. University of California, Berkeley. Department of Environmental Science, Policy, and Management. May 1, 2012. p. 1.

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- It is crucial that EPA's Accounting Framework be not only scientifically sound but also cost-effective and practical, including for small landowners. We appreciate the SAB's recognition of the "tradeoffs between scientific accuracy and ease of implementation."

We appreciate your consideration of our comments. If you have any questions, please contact me at (202) 463-2700 or at paul_noe@afandpa.org.

Sincerely,

Paul R. Noe
Vice President, Public Policy
American Forest & Paper Association