

VERBAL - Comments to Science Advisory Board

Biogenic Carbon Emissions Panel

Submitted: October 25th, 2011

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Thank you for the opportunity today to comment on the EPA's proposed framework.

The Environmental Paper Network is a non-profit coalition of independent environmental organizations working together to initiate change and environmental improvement in the pulp and paper industry. You can learn more and find a list of members at EnvironmentalPaper.org. Our network strongly supports EPA's effort to develop a methodology for properly quantifying biogenic carbon emissions from stationary sources. By moving beyond the assumption that bioenergy is inherently carbon-neutral, EPA has taken a critically important first step.

As a policy, we don't join sign on letters, but I can say with confidence that our members are aligned with the concerns of the conservationist joint letter that was submitted to you.

The EPN is here today because, as you likely know, the forest products industry is the largest user of bioenergy in the US. And our fundamental concern is that the proposed framework will not achieve EPA's stated objective of "accurately reflect[ing] the carbon outcome" of biomass use by stationary sources.

We feel there are fundamental issues that need to be addressed to meet the stated objective, these include but are not limited to the following four points:

Firstly, it must address the Biomass Carbon Belch

Carbon dioxide released from burning trees and wood is equal to carbon dioxide from other sources. The impact to atmospheric CO₂ levels is immediate. And the carbon released into the atmosphere from using trees for energy will not be replaced for many decades, even under a perfectly efficient and statistically unlikely scenario. Under a framework such as the one proposed we are paying out full benefits in the form of complete CO₂ emissions allowance, up front, good as cash, and based on a century long bet, to those who have limited if any control over the payback currency.

Secondly, it must address the Opportunity Cost of Burning Trees

If the forest was not harvested, in general, that forest would not only hold that carbon, but would accumulate additional carbon. In any framework that is adopted, this loss of potential storage must be accounted for. In the proposed framework it is not. This results in a burn/grow/cut/ cycle that keeps the storage capacity of the forest at virtually zero, and losing out on the capability of these forests to aid in the global solution.

Thirdly, the potential for Abuse and Detachment of Responsibility

Under this framework, we are asking the entire society to give a polluter the credit for what others actually do, without responsibility to the polluter. The landowners and the stationary emitters are not the same people/entities, especially now following massive land divestment by the paper

companies. There's too much detachment of responsibility for the impact and the mitigation of the proposed framework to be viable.

And Fourth, it should address Leakage.

CO₂ emissions from biomass energy do not only occur from the smokestack but the proposed framework does not take advantage of existing models of how to calculate this "leakage."

All of these issues are well documented in the published scientific literature. But in addition, we have submitted a new paper in draft form for your consideration as you approach your study of the EPA framework.

This draft paper was prepared by a collaborative research project at EPN called the *Working Group on Forest Carbon Accounting in Products*. The working group set out to design a methodology for more accurate forest carbon accounting in products, based on the latest scientific research, and reviewed by experts in the field. Our working group is looking at the questions of how to determine the full climate impact of using wood for products and energy in a life cycle assessment. The paper I have submitted is significantly revised and updated from previously circulated drafts.

We feel it provides critical illumination to any policy framework and insight into specific methods that can be developed to accurately account for emissions. This "activity-based" approach is more demonstrable, verifiable, comparable, and informative on the direct impacts of a stationary source.

We encourage the panel to address this paper, and our concerns regarding EPA's framework in order to:

- More accurately capture the true cost of behavior, and the carbon debt from the biomass belch effect
- Be easier for regulators to manage and less speculative
- Be informed by more rapidly available data instead of time-lagged extrapolations of forest growth data, and will
- Incentivize efficiency (as current framework clearly does not)

Thank you very much for the opportunity to speak today, and for your consideration of my written comments and our draft paper. The Environmental Paper Network and our members are eager to work with you to develop the best, most accurate methodology for determining a stationary source's net emissions of biogenic carbon.