

ORAL COMMENTS OF TIM SERCHINGER,
ON JULY, 2012 DRAFT OF EPA SAB BIOGENIC EMISSIONS REPORT
AUGUST 31
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My name is Tim Searchinger of Princeton University. Thank you for this opportunity. I wish to address the dissenting opinion, which I believe misrepresents the IPCC approach.

First, maintaining existing carbon stocks in a forest does not make bioenergy carbon free as suggested by the dissent. Global forests now generate a net carbon sink of around 1 gigaton of carbon per year. This sink exists mostly because higher concentrations of carbon in the atmosphere spur tree growth. If we eliminated this sink, climate change both now and in the future would be far worse. The basic flaw with both the original EPA proposal and the panel dissent, is the view that bioenergy can eliminate this sink and be carbon free so long as forest do not become a net carbon source. Ton for ton, the loss of a sink hurts the climate as much as the increase of a source.

Second, the dissent misunderstands the so-called IPCC approach, which does not view biogenic emissions as carbon neutral. Under the IPCC approach, when a ton of carbon is harvested from a forest, it counts as a one-ton emission in a country's land use account. When a power plant releases ton of carbon from coal, it counts as a one-ton emission in the energy account. But the IPCC asked, what happens when a power plant burns the same wood that has already been counted in the land use account. To prevent double counting, the IPCC properly answered that countries do not need to count the carbon a second time in the energy account.

If the EPA regulated wood harvest in the same way it regulates power plants then power plants could ignore the emissions from burning wood. But the EPA regulatory scheme applies only to energy emissions. In a legal sense emissions from tree harvest do not count. To count that carbon even once for regulatory purposes, EPA therefore must count that carbon when it goes up the smokestack. The panel report is fully consistent with the IPCC approach.

The dissent also suggests inaccurately that the IPCC supports only a national accounting approach for forests and bioenergy. What the dissent calls the IPCC approach does describe a national approach for the simple reason that it is contained in national reporting guidelines. Obviously, when countries try to limit emissions within their borders, they have to examine the emissions of individual sources (both forest harvests and power plants).

Third, the dissent misrepresents the anticipated baseline approach. When EPA regulates emissions from burning coal, it doesn't need to estimate an anticipated

future carbon air concentration with and without a coal plant, which depends on many other actors. Instead, EPA estimates the consequences of burning the fuel by calculating the carbon in the fuel. Similarly, to determine the carbon consequences of harvesting wood for bioenergy, EPA just needs to estimate the probable effect of the harvest itself on future forest carbon. It can do so using forest carbon growth models. That is what Massachusetts and more than a half dozen peer-reviewed papers have done, and what the UK has promised to do.

4. Finally, some factual context. If 100% of the annual US timber harvest were diverted to bioenergy, its absolute chemical energy could supply 3.5% of total U.S. energy. Diverting 100% of world timber harvests could meet 5% of world energy needs. Yet doubling tree harvest to produce that modest level of energy would be enough to eliminate the world's forest carbon sink. It explains the potential consequences of treating bioenergy emissions improperly as carbon free.

Thank you.