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# Teleconference of EPA Science Advisory Board Biogenic Carbon Emissions Panel

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BETTER PRACTICES  
BETTER PLANET 2020  
Continuing AF&PA's Commitment to Sustainability

# Overview

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- Use of biomass residues for energy is integral and incidental to manufacturing forest products (pulp, paper and solid wood products), results in fewer greenhouse gas emissions than alternatives, and should be exempt from regulation.
- Emissions from mill residues should be considered inherently carbon neutral and have a BAF of 0.
- Emissions from logging residues should not be discounted by a decay function and also should have a BAF of 0.
- The forest products industry is longstanding and in equilibrium, and its efficient use of wood biomass should be included in the baseline in perpetuity.

# Overview

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- Accounting burdens would disrupt the fiber supply market especially for small landowners and should be avoided.
- U.S. forests have national growth/drain ratio of 1.7 and sequester over 800 million metric tons of CO<sub>2</sub> per year. Research indicates that strong demand for forest products provides incentives to keep forestland forested.
- Where  $G/D > 1$ , biomass should be carbon neutral.

# Use of Mill Residues and Byproducts For Energy

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- SAB Report recommends a list of feedstock categories that would have their own BAF equation. Mill Residues are not included and deserve a separate category.
- Separate feedstock category needed for mill residues which include byproducts such as spent pulping liquor, bark, sawdust, wood slabs, and shavings
- SAB Report references mill residues in several sections but more explanation concerning their treatment is needed.
- Integral and incidental to manufacturing forest products

# Use of Mill Residues and Byproducts For Energy

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- Displaces use of fossil fuels
- Unsustainable not to beneficially use mill residues for energy
- Otherwise, could have immediate increase in CO2 emissions
  - E.g., incinerate spent pulping liquor without recovery of energy and chemicals??
- Environmentally and economically infeasible
- BAF for Mill Residues and Byproducts should be zero

# Use of Logging Residues for Energy

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- Discounting logging residues by decay function unnecessary
  - Decay rate of logging residues typically used by forest products industry is rapid (26-31%/yr. in South) compared to relevant time horizon for EPA's carbon accounting (e.g., 100 yrs.)
  - Impractical to account for the many factors affecting residue decay rates
  - For example, to reduce risk of forest fires and enhance future forest productivity, logging residues are often burned in piles or masticated and scattered to accelerate decomposition. (See May 2, 2012, submission to the SAB by William Stewart.)

# Conclusion

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- Emissions from forest products mill residues and byproducts are integral and incidental to the manufacturing process and should be exempt from regulation and not burdened with accounting protocols.
- Emissions from mill residues and byproducts should have a BAF of 0.
- Emissions from logging residues should not be discounted by decay function and also have a BAF of 0.
- Bioenergy associated with traditional forest products manufacturing should be included in the baseline.
- Thank you for your consideration.