



**Natural Resources Defense Council Comments on the EPA
Accounting Framework for Biogenic Carbon Dioxide Emissions
from Stationary Sources**

Delivered before the Environmental Protection Agency

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Thank you for the opportunity to comment on the September, 2011 Accounting Framework for Biogenic CO2 Emissions from Stationary Sources.

NRDC supports the scientific analysis EPA has done to date in determining that biogenic carbon *matters* and recognizes that with the release of this framework, the agency has begun the process of redressing the accounting errors that have previously led it and others to ignore the carbon dioxide released from burning biomass.

However, the approach described in the framework is deeply flawed and cannot achieve EPA's objective of "accurately reflecting the carbon outcome" of biomass use by stationary sources. We believe EPA should abandon this approach in favor of an accounting system that accurately assesses the climate impact of burning biomass, or allow the Panel to develop such a system. Failure to do so should be expected to exacerbate climate change, both directly and through disastrous example-setting for other nations.

EPA's "Accounting Framework" endorses an approach that evaluates carbon emissions from bioenergy production against a single reference point baseline set according to regional, land-based carbon stocks. By doing so, it ignores the most significant factors in how bioenergy producers actually affect carbon emissions: the biomass feedstocks they choose, how the lands from which this biomass is sourced are managed, and the conversion technology used. Instead, a stationary source's biogenic carbon impact is determined by factors outside its control, from weather to the economy to the land use decisions of scores of independent entities. This would not only produce arbitrary results, but invites widespread free-riding and abuse.

A plant that burns whole trees from a given region would have *zero* "net biogenic emissions" as long as total tree harvesting in the region does not exceed annual forest growth. In other words, plants could continue to burn biomass until a region's forest sink is completely eliminated, and that energy production would still be considered carbon free. Yet eliminating a carbon sink has the same impact on atmospheric carbon as the creation of an equivalent-sized smokestack.

The proposed framework also includes non-managed and even restricted lands in its baseline. This means a bioenergy facility could “free ride” off of the carbon storage on non-working lands, masking its own biogenic carbon emissions.

By ignoring individual project performance, EPA’s approach *rewards* regions that have disproportionately contributed to atmospheric carbon pollution through past over-cutting, leading to current net re-growth.

The proposed approach cannot tell us what would have happened to carbon in the air or on the land absent bioenergy—and so cannot accurately reflect the carbon impact of bioenergy production. By ignoring foregone carbon sequestration and storage, EPA fails to ensure that claimed carbon reductions from bioenergy are in fact *additional*. Indeed, in each case study in the Accounting Framework, the forest carbon accumulation being credited would occur anyway. Thus, bioenergy cannot get credit for it without increasing net emissions relative to the actual baseline “no action” path.

Moreover, EPA’s proposed approach ignores the fact that re-growth may not occur at predicted levels—or at all.

Regulations that ignore the carbon released when biomass is burned distort the marketplace towards highly unsustainable sources of biomass like whole trees. But implementing a regulatory approach—under the guise of science—that will result in burning more bad biomass, forest clearing, higher carbon emissions, and displacement of forest products to other countries with poor logging practices is dangerous and unacceptable.

We must find every way we can to promote alternative energy sources that maximize climate benefits, and that includes not giving woody biomass more credit than it deserves. Only when bioenergy results in additional carbon sequestration—for example, through better forest management that increases biomass growth, can discounting some or all of bioenergy’s carbon be justified.

NRDC believes EPA should abandon the “Accounting Framework” in favor of a system that rigorously assesses the climate impact of biomass-burning. That system must use a baseline that reflects what would have happened in the absence of bioenergy production, assess biogenic emissions and

reductions consistently, regardless of the region in which they occur, and account for leaked emissions. We look forward to working with EPA and this Panel in any way we can to develop such a legitimate accounting system.