

American Forest & Paper Association and American Wood Council
Testimony to the EPA Science Advisory Board
Biogenic Carbon Panel Public Teleconference
September 9, 2015

Good morning. My name is Linda Tsang, and I am speaking on behalf of the American Forest & Paper Association (AF&PA) and the American Wood Council (AWC). AF&PA represents the U.S. pulp, paper, and packaging manufacturing industry. AWC represents over 75 percent of North American wood products manufacturing.

We appreciate this opportunity to provide some additional comments on the Panel's review of EPA's revised draft Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources.

The Science Advisory Board's (SAB's) most recent draft report raises some important issues. The draft report states that BAFs should be calculated to either incentivize or penalize specific production strategies and processing practices in a given region. We believe the use of BAFs in this manner is a policy choice – not a scientific question – that is beyond the scope of the Framework. EPA's stated purpose of the Framework is to develop methods to assess biogenic CO₂ emissions from stationary sources based on biomass feedstock types. BAFs represent factors to assess these emissions -- not a tool to incentivize or penalize specific production practices, demand, or use of specific feedstocks.

AF&PA and AWC also are concerned that the new carbon accounting approach being considered by the SAB, which focuses on forest carbon pools, does not adequately address forest products manufacturing residuals, which constitute the primary source of energy used by the paper and wood products industry. We support the recommendation to properly account for methane emissions associated with the disposal of wastes in landfills when assessing alternative fates. However, the draft report does not adequately account for the likely alternative fates of woody residuals

that are not sold to other manufacturers to make paper and wood products or combusted for energy at paper mills or wood products facilities. The likely alternative fate of these residuals is disposal in industrial landfills where methane emissions are unlikely to be flared or recovered for energy.

Finally, the Framework should retain the reference baseline approach as an accurate and transparent method to assess whether there are any atmospheric effects from the use of biomass for energy, which also is the pragmatic approach to implement in a regulatory context. If the Framework includes an anticipated future baseline option, such approach should account for the differences in carbon stocks at a single point at the end of a time period that sufficiently captures all terrestrial effects on a regional scale. The Framework should not be limited to a more complex methodology that requires the accumulating of annual differences in carbon stocks over time. The Panel's draft report raises several concerns regarding the Forest and Agriculture Sector Optimization Model (FASOM) model, which indicates that any type of complex modeling, including the alternative cumulative carbon stock approach proposed by the Panel, is inherently uncertain, difficult to implement, and subject to major changes when new information becomes available.

Conclusion

Thank you for the opportunity to speak today. We hope that the SAB will provide stakeholders further opportunity to comment on its draft report, and we look forward to working with the Panel as it continues its important work.