



American  
Forest & Paper  
Association



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# Teleconference of EPA Science Advisory Board Biogenic Carbon Emissions Panel

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January 27, 2012



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

# Overview

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- Framework must be scientifically sound and workable
- Emissions from logging residues and forest product mill residuals are properly classified as anyway emissions
- Baseline should include forest products bioenergy

# Framework: Workable, Cost-Effective

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- Framework must be scientifically sound, but also workable and cost-effective. Don't disrupt longstanding fiber market structures.
- SAB must focus on policy context:
  - Clean Air Act permits for stationary sources
  - Concerns about new biomass users
  - Consider marginality
- Consider workability for longstanding industries, small landowners

# Anyway Emissions

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- Affirm concept of “anyway” emissions in Framework
- Discounting by decay function unnecessarily complex
  - Residue decay rates not expected to have any substantial effect on global warming potential of CO<sub>2</sub> emissions from biomass energy
  - Impractical to account for the many factors affecting residue decay rates
- Clarify anyway emissions include forest product mill residues (e.g., black liquor, bark, pulping and recycling residuals, etc.), not just logging residues
  - See NCASI case study on pulp and paper mill



# Baseline

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- Bioenergy associated with traditional forest products manufacturing (e.g., logging residues and mill residues) has been generated for well over a century and should be included in the baseline.

# Conclusion

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- Framework must be scientifically sound, workable, cost-effective, and not disruptive to the market
- Emissions from logging residues and manufacturing byproducts (e.g., black liquor, bark, pulping and recycling residuals) are properly treated as “anyway” emissions
- Unworkable complexity if introduce decay function discount for anyway emissions
- Include bioenergy associated with traditional forest products manufacturing in the baseline
- Thank you for listening