

American Forest & Paper Association and American Wood Council
Testimony to the EPA Science Advisory Board
Biogenic Carbon Panel Public Teleconference
August 6, 2015

Members of the Biogenic Carbon Panel. My name is Paul Noe, and I am speaking on behalf of the American Forest & Paper Association and the American Wood Council. 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 comments on the Panel's review of EPA's revised draft Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources.

AF&PA and AWC are concerned that the new carbon accounting approach being considered by the SAB, which focuses on pools of forest carbon, does not adequately address forest products manufacturing residuals, which constitute the primary source of energy used by the paper and wood products industry, which is the largest industrial producer and user of bioenergy in the United States. If forest products manufacturing residuals were not used for energy, many would probably be disposed of in industrial landfills and subsequently emit methane, a greenhouse gas that is 25 times more potent than CO₂.

In a seminal 2009 article published in Science magazine entitled, "Fixing a Critical Climate Accounting Error," Tim Searchinger et al. note that "biomass should receive credit to the extent that its use results in additional carbon . . . from the use of residues or biowastes."

We request that the SAB explicitly recognize the carbon neutrality of forest products manufacturing residuals. We refer the Panel to a technical paper prepared by the

National Council for Air and Stream Improvement (NCASI) entitled, “Biomass Manufacturing Residuals For Energy Production In Forest Products Facilities.”

We believe that any accounting approach must account for methane, such as the methane that would result from the disposal of forest products manufacturing residuals, and we recommend you use a dynamic approach to account for the significant and near-term climate forcing impacts of methane.

Finally, we are concerned that the SAB’s new approach is dependent on modeling assumptions and predictions that create significant uncertainty. We reiterate the need to carefully consider “the tradeoffs between simplicity, scientific rigor and policy effectiveness,” as noted in the draft Executive Summary for your report. As we and others have noted before, a commentary published in *Nature Climate Change*, entitled “Uncertainty in Projecting GHG Emissions From Bioenergy,” shows that reference point baselines based on actual data have been more accurate predictors of future forest inventories than complex modeling. We believe that any Framework must be easy to understand, practical to implement, and accurately reflect what is actually occurring.

Thank you for the opportunity to speak today and your consideration of our comments. We look forward to working with the Panel as it continues its important work.