

**American Forest & Paper Association and American Wood Council**  
**Testimony to the EPA Science Advisory Board**  
**Biogenic Carbon Panel Public Teleconference**  
**May 29, 2015**

Good afternoon. My name is Linda Tsang, 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 some additional comments on EPA's revised draft Framework for Assessing Biogenic CO<sub>2</sub> Emissions from Stationary Sources.

The SAB's draft general conclusions raise some important issues. Although a future anticipated baseline may be the Panel's preferred approach to calculating BAFs, it is very important to our member companies that the Framework be workable in practice, predictable, transparent, and consistently applied in the regulatory context such as the Clean Air Act's New Source Review air permitting program. For our member companies, calculating a BAF will not be a scientific exercise, but part of an already complex air permitting process. Under the best of circumstances, the BAF calculation will be a relative signal among feedstocks with a high degree of uncertainty. Using the future anticipated baseline approach will only add to the uncertainty without significantly altering the relative signal.

A reference baseline approach that uses current and historical data from the U.S. Forest Service's Forest Inventory and Analysis program provides a more accurate and transparent way to assess whether there are any atmospheric impacts from the use of biomass for energy.

Carbon accounting should be based on broad regional scales over a long time period. Using a broad spatial scale based on long timeframes captures the investment response

and growth that is continuously taking place and improves the reliability of the data and therefore is more comprehensive and informative.

### **Conclusion**

In conclusion, no industry has more interest in protecting forest carbon stocks than the paper and wood products industry. We believe EPA's Framework must be not only scientifically sound, but also practical, clear, predictable, transparent, and cost-effective in the relevant policy context in which our member companies operate.

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