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Comments on Draft Guidance, “Federal Greenhouse Gas Accounting and Reporting”
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The Council on Environmental Quality

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The Biomass Thermal Energy Council (BTEC) and its membership appreciate the opportunity to submit comments on the Council on Environmental Quality’s (CEQ) proposed Draft Guidance, “Federal Greenhouse Gas Accounting and Reporting.” BTEC is a nationwide industry association dedicated to advancing the use of biomass for heat and other thermal energy applications. We represent the views of biomass feedstock producers, fuel refiners, appliance manufacturers, vendors, non-profits, and end users invested in the biomass thermal industry.

Biomass thermal energy is a growing industry. Roughly one million American businesses, citizens, and institutions use biomass to meet their space heating, cooling, process heat, or combined heat and power (CHP) needs. BTEC supports CEQ in recognizing the carbon neutral emissions characteristics of biomass fuels. CEQ’s interpretation of biomass emissions will encourage the adoption of clean-burning, high-efficiency appliances, improve resource use, and help in decreasing national greenhouse gas (GHG) emissions.

Acting under the direction of Executive Order (EO) 13514, CEQ has produced a framework of accounting and reporting processes involving GHG emissions for federal government entities and activities. Within this draft guidance is the explicit recognition that biogenic emissions—gases released from combustion of recently originated organic material—should be treated differently than fossil fuel-based emissions. As the draft guidance explains, the differentiation between biomass fuels and fossil fuels is based on their respective carbon cycles:

“This is because part or all of the carbon in these fuels comes from carbon that was fixed by biological sources in the recent past, so depending on the full emissions impact of biomass production and use, they may not represent a net increase in the atmospheric carbon (since the carbon was removed from the atmosphere while the plant was alive). This contrasts with carbon from fossil fuels, which was removed from the atmosphere millions of years ago, hence its combustion represents a net increase in

atmospheric carbon relative to what may have otherwise naturally occurred. The CO₂ from biogenic sources is assumed to be naturally recycled, since the carbon in the biofuel was in the atmosphere before the plant was grown and would have been released normally through decomposition after the plant died.”¹

BTEC has consistently supported the use of biomass fuels from a variety of sources, including residues, waste products, and energy crops from both woody and non-woody sources of biomass. Federal recognition of biomass’s carbon neutral characteristics will aid the development of diverse and sustainable feedstocks, displace fossil fuel use, and support localized economic growth. Increased demand for biomass fuels can assist in creating additional carbon stocks—going beyond carbon neutral to carbon beneficial—through improved management of existing forests, plantations, and neglected agricultural tracts. Furthermore, biomass consumers utilize local resources, keeping much needed jobs and reinvesting dollars in American communities.

In addition to CEQ’s interpretation of biogenic emissions, BTEC also supports CEQ’s recognition of biomass thermal renewable energy generation for federal entities, whether it is on-site or supplier provided.² Biomass thermal technologies such as biomass boilers, district energy systems, and CHP can reach efficiencies of 80-90%, generating more usable energy per unit of fuel than better known renewable energy pathways. Allowing biomass thermal units to decrease a federal entity’s applicable emissions scope supports the displacement of fossil fuels and related GHG emissions.

The federal government is embarking on reporting and accounting activities that will assist in decreasing its GHG emissions. CEQ’s correct recognition of biogenic emissions—as separate from fossil fuel emissions—will support that transition through the use and production of sustainable, renewable, locally produced biomass resources. Combined with highly efficient conversion technologies, biomass can move the nation towards a clean energy future.

Again, BTEC appreciates the opportunity to offer its input on the proposed draft guidance, and is available to offer supporting data and clarifying comments. If you have any questions, please contact:

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¹ Council on Environmental Quality, “Draft Federal Greenhouse Gas Accounting and Reporting Guidance,” <http://www.whitehouse.gov/administration/eop/ceq/sustainability/fed-ghg>, 2 July, 2010, pg. 16-17.

² Ibid, pg. 22.