



Unintended Consequences of the EPA Tailoring Rule

Treatment of Biomass Emissions the Same as Fossil Fuel Emissions

Nationally prominent lifecycle analysts, Dr. Bruce Lippke and Dr. Elaine Oneil, recently published a paper discussing the unintended consequences of regulating biomass energy greenhouse gas emissions (GHG) the same as fossil fuel emissions in the EPA's Greenhouse Gas Tailoring Rule.¹ Here are some of the key findings:

The Tailoring Rule encourages fossil fuel use – “. . . new investment in bioenergy development will be discouraged and existing biofuel facilities may be motivated to shut down or use more fossil fuels.”

The Tailoring Rule threatens U.S. jobs – The forest products sector is operating in a depressed market where profit margins are thin or non-existent. The authors state, “Introducing substantial regulatory uncertainty and significant compliance costs to respond to the EPA Tailoring Rule can be expected to reduce U.S. forest sector competitiveness even more in a time when it is already subject to extraordinary market and economic forces. The expected result will be a decrease in U.S. production and an increase in forest product imports or fossil intensive substitutes.”

The Tailoring Rule ultimately increases GHG emissions from National Forests -- “The EPA proposal will penalize the collection of forest residuals and thinnings on federal lands resulting in increased use of fossil fuels while also increasing the risk of carbon emitting unnatural disasters.” The authors discuss recent studies in the Northwest that document significant GHG mitigation through forest management of Federal lands.

The Tailoring Rule ignores the hard science behind carbon neutrality – The authors conclude that carbon neutrality is demonstrated through historical data rather than based on assumptions: “Concerns over whether carbon neutrality is a valid assumption are answered directly by demonstrating the impact of producing each product on all related carbon pools, not just by assumption.” In other words, for over 50 years, U.S. forests have grown more trees than die from natural causes or are harvested for wood products, including energy. This extra forest growth is carbon removed from the atmosphere, and the trend is increasing.

The Tailoring Rule discounts the benefits of biomass over coal – According to peer-reviewed life-cycle analysis data from the National Renewable Energy Laboratory, biomass energy generates only 4% of the greenhouse gas (GHG) emissions of bituminous coal, a benefit that will be forfeited under the Tailoring Rule.

¹ Dr. Lippke and Dr. Elaine Oneil are both with the University of Washington. The paper is based on existing research, much of it conducted by the Consortium for Research on Renewable Industrial Materials (CORRIM), an independent non-profit corporation of 17 research institutions. The paper was commissioned by NAFO and is in the process of being submitted for peer review and publication. The full paper, including its references, is available at www.corrim.org/pubs.