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Re: Comments on Draft Woodfuel Guidance for the UK Timber Standard Category B Bespoke Evidence

To Whom it May Concern,

The Southern Group of State Foresters (SGSF) is pleased to offer these comments on the draft Woodfuel Guidance for the UK Timber Standard Category B Bespoke Evidence (draft guidance). We appreciate the efforts the UK Department of Energy & Climate Change (DECC) has made throughout the process of developing this guidance to involve stakeholders in the United States, in particular the SGSF and the US Forest Service (USFS). In particular, we appreciate the accommodation made in extending the comment period to October 1, 2014 for us to more fully digest the draft guidance and provide more substantive comments.

SGSF represents the interests of the State Foresters from across a 13-State area of the southern United States1. Of the 3.2 million short tons of wood pellets exported from the United States in 2013, 99% came from States within our region2. The SGSF mission is to provide leadership in sustaining the economic, environmental, and social benefits of the South’s forests, and thus we are very interested in the potential impacts of the draft guidance on the forests and forest owners within our region.

We agree with the DECC that a framework such as that proposed for Category B bespoke evidence in which wood pellet production and associated forest management sustainability can be tracked at the regional level is essential as the market grows. Many proposed certification and tracking systems that attempt to assess sustainability at the individual operator level are impractical and expensive for many smaller private and public-sector landowners, and thus may actually be detrimental to fostering landowner participation in sustainable forest management. However, in reviewing the guidance, we believe that the development of a new definition or definitions of sustainability, as appears to be proposed in Requirements S1 to S4, is unnecessary for this effort. As a member of the Montreal Process and endorser of the subsequent Santiago Declaration, the United States supports the Criteria and Indicators for the

1 The SGSF member States are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas and Virginia
Conservation and Sustainable Management of Forests. These Criteria and Indicators appear to be well aligned with the vision of sustainability laid out by DECC in the draft guidance.

The United States, and in particular the South, has a strong system of monitoring, reporting and regulating the sustainability of its forest landscapes. Through Federal, State and Tribal investments in forest inventory monitoring, harvest tracking, public lands conservation, and State-driven efforts at Best Management Practices and State Forest Action Plans, monitoring is ongoing regarding the impacts of all harvesting activities, including bioenergy harvesting, as well as processes for addressing any sustainability challenges if they emerge. Monitoring data and reports from the national Forest Inventory and Analysis program and other efforts are subject to ongoing quality assessment and are publicly available, allowing robust public dialogue and policy responses to advance the sustainability of US forest management.

There is wealth of scientific literature available on the current sustainability of the forest resource in the South, as well as the potential stressors on that sustainability in the future. This literature covers a breadth of topics and geographic scales, but it all paints the same picture of robust regional sustainability. In particular, SGSF would like to highlight three items in these comments:

1. **The Forest Inventory and Analysis (FIA) program**, conducted regionally by the USFS Southern Research Station to improve the understanding of the southern forest ecosystem, provides the backbone of data used to monitor trends in forests and forest products across the South. Data analysis is consistently being done by USFS analysts as well as State and private entities to monitor sustainability of forest resources, forest use, and forest health. Dozens of southern region FIA publications can be found at the SRS website (http://srsfia2.fs.fed.us/) which when taken together show current regional sustainability.

2. **Forestry Best Management Practices (BMPs)** exist in every southern State to minimize impacts to water quality and other resources from silvicultural activities. SGSF and its members track BMP implementation rates on a State-by-State basis, as well as rolled up at the regional level. The most recent synthesis report in 2012 indicates that BMP implementation across the South is very high at 92%, and that implementation has been steadily increasing over the past two decades. This ongoing process of BMP monitoring is something that SGSF is committed to in showing implementation of sustainable harvest practices, and will continue to use to track sustainability into the future.

3. **The Southern Forest Futures Report**, as well as associated subregional outlooks, examine the future of southern forests in response to a variety of factors, both natural and anthropogenic. Regarding forest biomass-based energy, the report finds that “While woody biomass harvest is expected to increase with higher prices, forest inventories would not necessarily decline because of increased plantations of fast growing species, afforestation of agricultural or pasturelands, and intensive management of forest lands” (Technical Report, pg. 213). While the report recognizes the potential for high demand for woody biomass energy to affect harvest levels and create impacts to ecosystem services such as water and wildlife, research findings indicate that

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3 Text of the Santiago Declaration and the Criteria and Indicators can be found at: http://www.fs.fed.us/global/pub/links/santiago.htm
these effects can be mitigated at the local level through management considerations and use of BMPs (Technical Report, pg. 250).

SGSF is pleased to see reference to both BMPs and FIA data within the case studies presented in the draft guidance, recognizing the importance of these resources in tracking sustainability. As a point of clarification, within the South, collaboratively developed BMP protocols already exist and are being implemented by every State and would not need to be “drawn up by multi-stakeholder groups” (Draft Guidance, pg. 37).

As a final point, SGSF would like to echo comments being submitted in response to the draft guidance, by the USFS. Sustainability judgments are often local decisions. Imposing thresholds and trade-offs externally likely imposes subjective value judgments on the local population, which may have different priorities or opinions related to the tradeoffs. In some cases this can undermine local efforts to improve sustainability if it focuses resources on areas of low concern/priority. This may be the case with US biomass harvest restrictions, if arbitrary rules reduce available markets and the economic viability of investing in forestland compared to alternative agriculture or urban land uses.

These new proposed sustainability certification requirements on U.S. biomass production are in most cases trying to solve a problem that doesn’t appear to be substantive relative to other sustainability threats (e.g. land conversion, invasive pests, natural disturbances, etc.) to southern forests. By unnecessarily imposing additional costs on production, such requirements may further weaken the competitiveness of the forest sector compared to alternative land uses that likely provide less environmental and social benefits, and thus be counterproductive to sustainable forest management.

In summation, the predicted growth of wood pellet production in the United States, including exports to the United Kingdom, will certainly influence forest management decisions being made by forest owners in the South. However, a new system to certify the sustainability of each and every one of those decisions is not necessary. The South has a strong system of monitoring forest sustainability, including using FIA data and BMPs. We recognize that as the bioenergy sector scales up, it may be necessary to invest further in these monitoring systems to better track sustainability. If sustainability concerns are demonstrated in the data, corrective action can be taken.

SGSF would like to again thank the DECC for engaging southern stakeholders in the process of crafting this guidance, and for providing us the opportunity to offer comment. We look forward to continuing this dialogue and partnership in supporting sustainable growth of the wood pellet industry in the South.

Sincerely,

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Chair, Southern Group of State Foresters