



SOUTHERN GROUP OF STATE FORESTERS

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Minister Henk Kamp  
Minister of Economic Affairs  
PO Box 20401  
2500 EK The Hague  
The Netherlands

Re: Comments on Government of Netherlands Sustainability Criteria and Guidelines for Biomass

Minister Kamp,

The Southern Group of State Foresters (SGSF) is pleased to offer these comments on the ongoing discussions regarding the Netherlands sustainability criteria and guidelines for biomass, particularly wood pellets. We appreciate the interest on the part of the Government of the Netherlands in hearing from international stakeholders in this discussion, particularly with respect to the notion of sustainability and how sustainability concerns are already being addressed in different areas of the world.

SGSF represents the interests of the State Foresters from across a 13-State area of the southern United States. Of the 3.2 million short tons of wood pellets exported from the United States in 2013, 99% came from States within our region. 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 proposed sustainability guidelines on the forests and forest owners within our region. Our position on the Netherlands biomass sustainability criteria is well aligned with that of the US Government, as well as our positions on other efforts to develop sustainability criteria (UK Woodfuel guidance) in which we have been involved.

It is our understanding that discussions in the Netherlands are centering around the issue of the level at which sustainability should be tracked, with some stakeholders advocating for tracking at the forest-level for certain classes of landowners based on the number of hectares owned. While this methodology may be appropriate in areas of the world with weak governance and forest monitoring, this is certainly not the case in the United



SOUTHERN GROUP OF STATE FORESTERS

States. Proposed certification and tracking systems that attempt to assess sustainability at the individual operator level are impractical and expensive for landowners of all sizes of forests, and thus may actually be detrimental to fostering landowner participation in sustainable forest management. With regard to biomass sourcing, we support the continuation of the current system of domestic forest sustainability monitoring at the regional level. As a member of the Montreal Process and endorser of the subsequent Santiago Declaration, the United States supports the Criteria and Indicators for the Conservation and Sustainable Management of Forests<sup>1</sup> and thus already has a system in place for tracking forest sustainability as outlined below.

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 a 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 bring three items to your attention:

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.

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<sup>1</sup> Text of the Santiago Declaration and the Criteria and Indicators can be found at:  
<http://www.fs.fed.us/global/pub/links/santiago.htm>





SOUTHERN GROUP OF STATE FORESTERS

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<sup>2</sup>. 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<sup>3</sup>**, 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 these effects can be mitigated at the local level through management considerations and use of BMPs (Technical Report, pg.250).

As a final point, SGSF would like to echo a position supported by the US Government and which is critically important to this discussion. 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

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<sup>2</sup> Southern Group of State Foresters (SGSF) – Water Resources Committee. 2012. Implementation of Forestry Best Management Practices: 2012 Southern Region Report.

<http://www.southernforests.org/resources/publications/SGSF%20BMP%20Report%202012.pdf>

<sup>3</sup> Wear, David N. and Greis, John G., eds. 2013. The Southern Forest Futures Project Technical Report (GTR-SRS-178) and Summary Report (GTR-SRS-168). Asheville, NC: US Department of Agriculture Forest Service, Southern Research Station. 542 p. (technical report) and 54p. (summary report). <http://www.srs.fs.usda.gov/futures/>



SOUTHERN GROUP OF STATE FORESTERS

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 Netherlands, 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, regardless of the size of the forest in question. 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 Government of the Netherlands for allowing us to provide feedback into the process of crafting the guidance, particularly with respect to sharing how forest sustainability is currently being monitored in the U.S. 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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George Geissler  
State Forester, Oklahoma  
Chair, Southern Group of State Foresters