



SOUTHERN GROUP OF STATE FORESTERS

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Minister Henk Kamp
Minister of Economic Affairs
PO Box 20401
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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



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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 Forests¹ 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.

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

