Council on Sustainable Biomass Production (CSBP)
Draft Sustainability Standard

Comments of the Biotechnology Industry Organization

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Comments of the Biotechnology Industry Organization (BIO) For the CSBP Draft Sustainability Standard

I. Introduction

BIO is pleased to submit comments to the Council on Sustainable Biomass Production to be used in the implementation of its draft sustainability standard. BIO recognizes the role of this standard in contributing to the growth of the biofuels industry. By committing to voluntary sustainability principles, biofuels producers are providing incentives to investors and consumers to purchase their distinctly sustainable products. Copied below are our comments listed in order by principle and criteria. We have also included general comments not covered by individual criteria. BIO commends the CSBP for tackling this monumental issue and looks forward to working with the CSBP to realize a more sustainable, low carbon future.

II. Comments on general scope of the document

a. The standard covers biomass only for biofuels and bioenergy (electricity). Biomass that goes toward bio-chemicals production from biorefineries is not covered. The next step for CSBP after the draft standard for biomass is for biorefineries. If a sustainability standard applies to biomass for biofuels and the next step is biorefineries, which will produce a range of products, the standard should apply to those other products as well starting now. Biomaterials should be included.

b. We support the sustainable development of biomass feedstocks and think that the efforts of the CSBP are in line with our desire to create a viable 2nd generation biofuels industry. One concern we have with the certification program is that the principles of the CSBP may penalize crop residues based on the agricultural practices used to produce the primary crop. To attribute the load of growing the primary crop to the residue is in direct contrast with the consequential LCA approach favored by most US authorities, and the ISO standard. Since many companies in the vanguard of 2nd generation biofuels would rely on crop residues as the feedstock, not having language that addresses this issue may discourage these companies' participation in the CSBP standard.

c. Some of our members are concerned with the position that energy crops will be more prevalent than other types of biomass being used for biofuels. Domestic standards as drafted could put domestic producers at a disadvantage to foreign producers.

d. If biomass feedstocks for energy use have certification requirement but biomass feedstocks for other uses don't – the added cost for energy use may limit availability.

e. Some of our members believe that this standard should not categorically exclude food crops. Ultimately, we want technologies that are economically viable, and to do so, some will need to transition through food feedstocks, until competitively priced ligno-cellulosic or other non-food carbohydrate sources become available.

III. Draft principles, criteria, and indicators

a. **Principle 1-Soil***: Biomass production shall maintain or improve soil quality by minimizing erosion, enhancing carbon sequestration, and promoting healthy biological systems and chemical and physical properties.*

i. We support the maintenance and improvement of soil health and erosion minimization. One concern we have is the lack of definition around requirements for the grower. What is the expected effort to collect this data (methods, frequency, and statistical validation)?

b. **Principle 2-Biological diversity***: Biomass production shall contribute to the conservation or enhancement of biological diversity, in particular native plants and wildlife.*

i. We also have concerns with expecting growers to assess vegetation cover types, wildlife habitats, past and current land and water conservation activities on enrolled acres, associated incidental areas, and across the landscape. We would suggest that outside experts do this analysis and guide the growers as to how to adhere to the requirements. We believe the grower will need significant support on this.

c. ***Principle 3*-Water***: Biomass and bioenergy production shall maintain or improve surface water, groundwater and aquatic ecosystems.*

i. No Comment

d. **Principle 4-Climate change and energy***: Cellulosic bioenergy shall reduce ghg emissions as compared to fossil fuels. Emissions shall be estimated via a consistent approach to life cycle assessment.*

i. Some of our members are concerned with the lack of a determination of which lifecycle analysis methodology will be used and the lack of even a preliminary analysis of the costs involved and what impact they could have on the supply chain.

ii. It seems there will be a heavy burden on the growers of biomass to supply the necessary data for the life cycle analysis (LCA). 'Averaging' i.e. calculating the average of multiple sources may protect confidentiality, but does not reduce the effort. Using 'default values' rather than averaging i.e. using generic defaults as surrogates could accomplish both confidentiality and solve the data collection effort issue for minor inputs where the small impact does not justify large efforts. On the other hand, depending on what data is aggregated, it could defeat the purpose of differentiating among growers regarding inputs and farming practices used to calculate GHG emissions. So this would need to be carefully considered.

iii. Given the language currently used in the standard, it is unclear to whom the program participant (grower) needs to provide data or if the grower will be expected to do their own GHG calculations themselves using the Tool. We believe the grower should not have to do the LCA. We believe that one standard organization should complete the LCA from the input data provided by the grower. This point is not clear in the current draft. Growers may need to understand and clearly see monetary market incentives for sustainability differentiation in order to fully support participation.

e. **Principle 5-Socio-economic well-being***: Biomass feedstock production shall take place within a framework that sustainably distributes overall socio-economic opportunity for and among all stakeholders, (including land owners, farm workers, suppliers, biorefiners, and local community) and ensures compliance or improves upon all applicable labor and human rights laws.*

i. No comment

f. **Principle 6-Legality***: Biomass production shall comply with applicable federal, provincial, state, and local laws, ordinances, and regulations.*
    i. No comment

g. **Principle 7-Transparency***: Production of certified biomass shall be transparent.*
    i. What about protection of intellectual property?

h. **Principle 8-Continuous improvement***: Biomass producers and fuel developers will continuously improve practices and outcomes based on the best available science, appropriate to the scale and intensity of the operation.*
    i. Program participants should have sufficient time to provide feedback related to any changes in the standard and there should be time for discussions and possible adjustments to the proposed changes.

i. **Principle 9-Integrated Resource Management planning***: Biomass production shall be based on an integrated resources management plan that shall be completed, implemented, monitored and updated to address objectives of the CSBP standard, appropriate to the scale and intensity of the operation.*
    i. The program participants are expected to assess crop production, soils, natural vegetation cover, biodiversity, and past and current land and water conservation activities. As with the biodiversity principle, we believe it may not be reasonable to require growers to conduct this type of assessment. It may be better for this to be handled by an outside party, for consistency and ease of implementation.

    ii. The requirements and comments related to the grower/landowner relationship are in need of grower review.