

PPRC Position Summary 2014

“ALL ABOUT AMERICAN JOBS”

Securing existing manufacturing based jobs and insuring a competitive playing field for American industry within a global market.

The following issues may positively or negatively affect American manufacturing jobs, depending on Interpretation and Implementation.

*Carbon Neutrality & Biomass/Renewable energy
Cumulative Regulatory Burden
&
Clean Water and Truck Weights*

Carbon Neutrality

The carbon neutrality of biomass harvested from sustainably managed forests has been recognized repeatedly by an abundance of studies, agencies, institutions, legislation and rules around the world, including the guidance of the Intergovernmental Panel on Climate Change and the reporting protocols of the United Nations Framework Convention on Climate Change.

Paper and wood products manufacturers use biomass residues from sustainable forestry operations to produce energy, displacing fossil fuel use and providing significant carbon reduction benefits to the environment. The PPRC urges policymakers to continue to recognize our industry's use of biomass for energy as carbon neutral.

Cumulative Regulatory Burden

USE POTENTIAL AIR REGULATIONS AFFECTING FOREST INDUSTRIES (Show Train wreck)

The Pulp and Paper Industry has made \$52 billion in investments to improve performance and environmental impacts since 2001. Recently-finalized Boiler Mact regulations will impose an additional investment burden of between \$2.5 and \$3 billion.

Clean Water

The Clean Water Act of 1972 works and doesn't need to be expanded through jurisdictional regulations.

Biomass /Renewable Energy

When Pulp & Paper mills use the whole log, half of the mass goes to the generation of energy and co-generation, this makes our industry 50 to 70% efficient in energy conversion.

- Lignin, bark, limbs and fines are used for producing energy
- Fibers from the tree are used in manufacturing high valued paper products.

Therefore, the Free Market, not government mandates and incentives should determine the highest value use of wood.

Using trees to produce forest products and the associated renewable energy provides **9 times more jobs** per ton of wood consumed than using the same wood in the energy sector. **(Including pellet plants, stand alone generating facilities.)**

Preserving Paper Options

The PPRC would like to thank those that are sponsors of the Paper Caucus and if you are not we encourage you to do so. Please read the Paper Options talking points page.

Truck Weights

Support legislation to allow states to increase the weight limit on trucks traveling on interstate highways from 80,000 to 97,000 pounds, as long as the combined tractor-trailer is fitted with an additional axle and brakes.

The provisions of the Safe and Efficient Transportation Act included a requirement that the Department of Transportation (DOT) studies the impacts of more productive trucks on safety and road infrastructure. This study is to be completed by August 20, 2014, so that its findings may influence the next highway bill.

The PPRC strongly supports that the study be completed in the required time frame.

Endangered Species Act

The PPRC supports limiting the definition of threatened and endangered “species” to those species that are biologically unique, excluding those that are only geographically isolated from other populations of the same species.

The PPRC is a grassroots organization representing the interests of the nation's pulp, paper, solid wood products, and other natural resource-based workers. The U.S. forest products industry is vitally important to our nation's economy, employing 900,000 people. We rank among the top 10 manufacturers in 47 states and represents 5% of the total Gross Domestic Products (GDP). We are people dedicated to conserving the environment while taking into account the economic stability of the workforce and surrounding community.



PPRC Position Paper on Carbon Neutrality & Biomass / Renewable Energy

The forest products industry is a leader in producing renewable energy; producing nearly two-thirds of our energy needs from sustainable/renewable biomass. We provide nearly 900,000 American jobs.

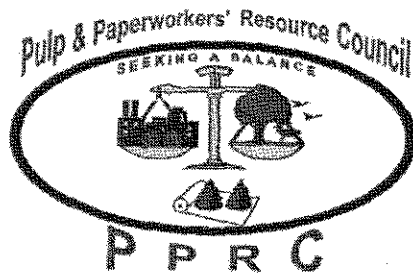
- For a given volume of wood consumption, the forest industry sustains 9 times as many total jobs as the energy sector.(1)
- The paper making process uses the entire tree, producing higher value products from as much of the tree as possible while using the remaining biomass residuals such as bark, spent pulping liquor and other manufacturing residues to produce carbon-neutral renewable energy.
- The existing infrastructure is in place to support expansion of biomass utilization to enhance future energy security.
- The paper industry should not be at a competitive disadvantage with stand alone facilities that produce energy from biomass fuels. The free market, not government mandates and incentives, should determine the highest value use of wood.
- The paper industry's total utilization of trees creates jobs in both paper making and biomass energy production versus the stand alone biomass energy and pellet plants.
- It is the policy of the United States to promote the use of biomass energy. Renewable Biomass Energy, with proper management throughout its life cycle, is carbon neutral.
- EPA should recognize carbon neutral biomass fuel including bark, scrap wood, woody debris from natural disasters, logging residuals, mill residuals, and residuals from the pulping process such as spent pulping liquor instead of diverting some of this waste to landfills where it would decay releasing greenhouse gases.

A biomass/renewable energy policy makes good sense and will stimulate the economies of rural communities by creating and preserving jobs when tied to pulp and paper manufacturing facilities.

(1) RISI, "Jobs Creation in PPI and Energy Alternatives in the United States," June 2010, @page 6.

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And Forest Products Industry Workers
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PPRC Position Paper on Climate Change/Carbon Neutrality

The Forest Products Industry is a major contributor in *OFFSETTING* the accumulation of Greenhouse Gases. Numerous scientists and studies confirm that actively managed, sustainable forests absorb carbon quickly and efficiently.

Irresponsible legislative action would destroy the forest products and manufacturing industries in America and cause the loss of millions of jobs nationwide; therefore Congress must consider the following:

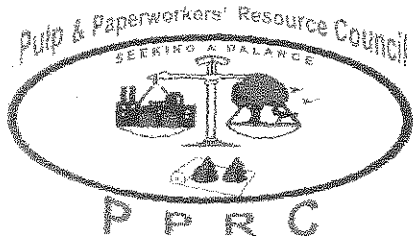
- Trees remove carbon from the air. The use of wood products creates unique advantages in addressing climate change.
- Carbon is locked up in the wood products we produce.
- Wood is used to generate clean energy in biomass and cogeneration facilities.
- Using wood and woody-biomass reduces the need to burn fossil fuels which in turn reduces the amount of carbon released into the atmosphere.
- Open burning produces as much as 100 times more conventional pollutants than controlled combustion in a power boiler. Biomass energy production is carbon neutral.
- Over half of energy produced in the pulp and paper industry today, is generated from wood residuals like bark, spent liquors, fines, etc.
- Harvesting of trees and promoting forest regeneration increases the absorption and storage of atmospheric CO₂.
- Healthy forests are less susceptible to catastrophic wildfires that release alarming amounts of carbon dioxide and carbon monoxide into the air, kill wildlife and destroy their habitat and watersheds.
- Every substitute for wood products requires large inputs of fossil fuels to create the product (up to 300% more than wood) leading to increases in Green House Gases (GHG) emissions.
- Carbon sequestration is 75 tons/acre higher for an actively managed forest versus no management (let-grow).
- Trees are the most powerful concentrators of carbon on earth.
- Since 1972, the industry has reduced its fossil fuel and purchased energy consumption by nearly 50 percent. The industry's average total energy use per ton of pulp and paper has decreased by nearly 25 percent since 1972.
- On average, one ton of paper contains some 1.33 tons of carbon equivalents CO₂.

The PPRC recommends:

- The PPRC strongly urges Congress to recognize biomass based energy as carbon neutral.
- Combustion of biomass fuels (including spent liquor, wood waste, and bark) are carbon neutral and should not be counted as direct emissions.
- Modern forestry will be a key and integral component of any strategy to reduce US carbon emissions.
- Facilities within the Forest Products industry that have already achieved substantial emission reductions should be recognized for those improvements, and not be placed at a competitive disadvantage, to developing countries who do not meet our environmental standards.
- We have the ability to manage forests to further reduce the amount of carbon in our air. We must find economic and regulatory incentives to make it happen.
- Carbon stored in forests and in manufactured forest products reduces atmospheric CO2 concentrations and should be recognized as sequestered carbon.
- Recovery and recycling of forest products reduces landfill greenhouse gas emissions by keeping such material out of landfills and should be recognized as avoiding emissions.
- Establish appropriate incentives and support for technologies that reduce greenhouse gas emissions.
- The most-economically sustainable and environmentally responsible course of action is to manage forests for long-term productivity and sustainability.
- One of the best ways to address climate change is to use more wood, not less.
- In order to offset CO2 released by burning fossil fuels, materials from the forest that aren't appropriate for wood products should be used to produce clean, biomass energy.
- Promote forest management plans that reduce catastrophic wildfires, which release massive amounts of carbon into the atmosphere.
- Replant areas destroyed by wildfires so they quickly begin removing carbon from the air.
- The forest and paper industry strongly believes that any potential climate change policies for the sector should be based on the carbon cycle approach (Life Cycle of a Tree).

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Revised 12/11/13



PPRC Position Paper on Clean Water Act Jurisdictional Regulation

The Clean Water Act and its implementing regulations are one of our nation's most successful and wide-ranging environmental programs. The program regulates pollution at its source and involves a comprehensive Federal and State regulatory system for issuance of water quality standards and permits.

Issuing the Administration's Draft Proposed Rule would radically impact the original intent of the Clean Water Act and would be detrimental to the American way of life.

The PPRC supports the Clean Water Act of 1972 as interpreted by the Supreme Court.

- If the Clean Water Act of 1972 is changed, it should be accomplished through legislation and not through a regulation. As noted by many in Congress, the draft regulation is not based on sound science and would expand Clean Water Act jurisdiction beyond the limits established by the Supreme Court..
- The draft regulation would dramatically expand the number of waters subject to the Act's jurisdiction, and therefore move to standards and permits.
- Even dry features that are occasionally wet could be subject to jurisdiction under the draft regulation.

If the Administration intends to pursue its draft regulation, the PPRC believes the regulation, should:

- Not attempt to obtain through regulation the jurisdictional changes that Congress refused to enact for many years through legislation;
- Maintain the wastewater treatment exemption under existing regulations;
- Follow the proper procedures for rulemaking (e.g., be supported by a proper review by small businesses) and
- Be supported by a thorough economic analysis that considers the impact of any changes on ALL of the Clean Water Act programs.

The Pulp and Paperworkers' Resource Council seeks a balanced solution from the Administration to ensure clean water and protect family wage jobs by:

- Ensuring any regulation addresses concerns which would allow our industry to remain operational.
- Assuring water treatment systems established currently covered by exemption, including those established prior to the Clean Water Act of 1972, should not be considered jurisdictional waters.
- Assuring that waters that are not navigable are be regulated at the State level.
- Recognizing that the primary right and responsibility remains with the States to control land and water use decisions.
- **NOT** rushing to change the jurisdictional reach of the Clean Water Act.

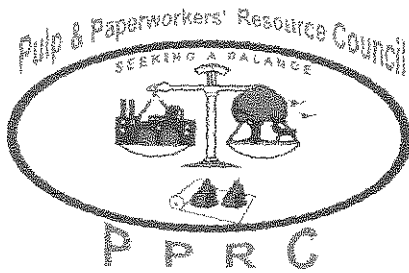
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2/8/13

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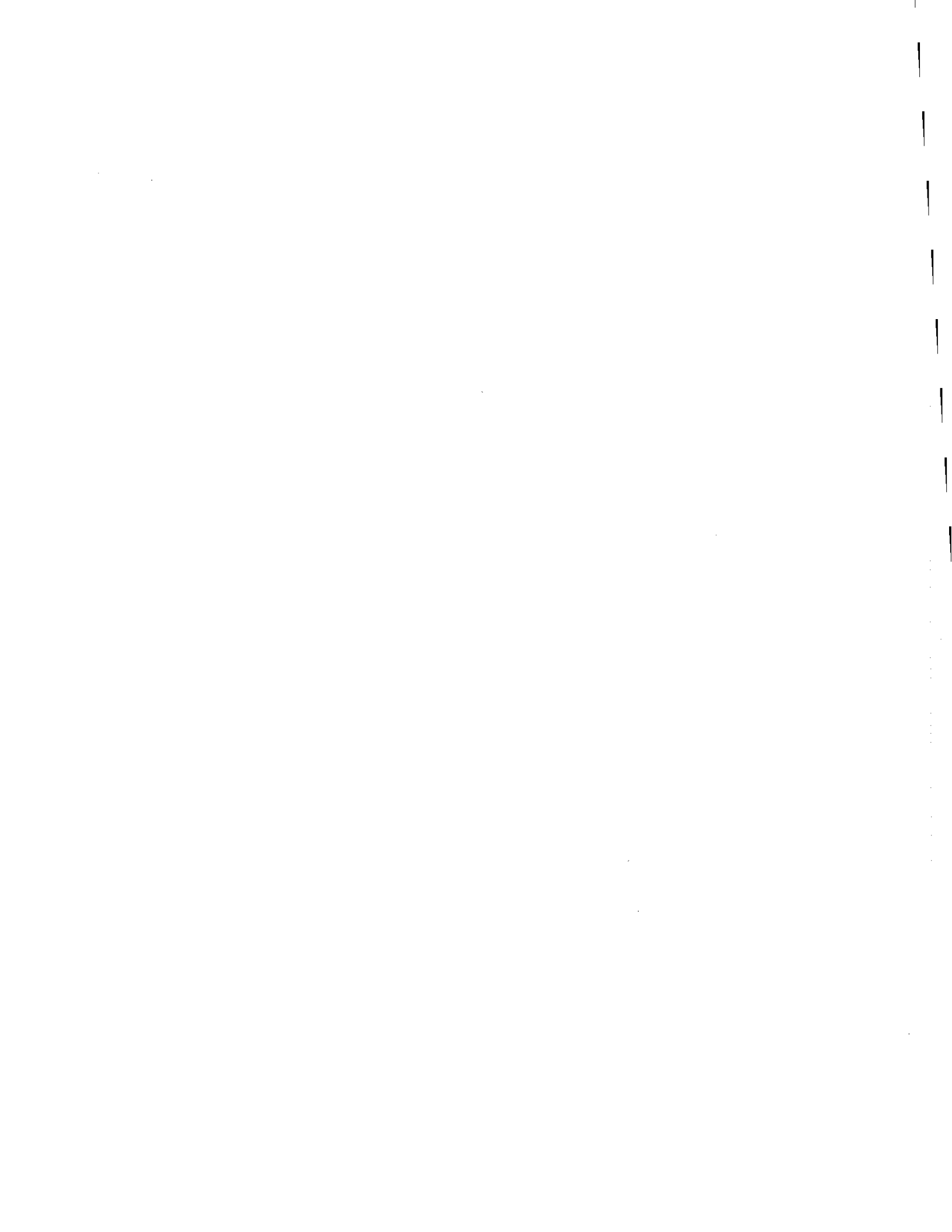


PPRC Position Paper on Cumulative Regulatory Burden

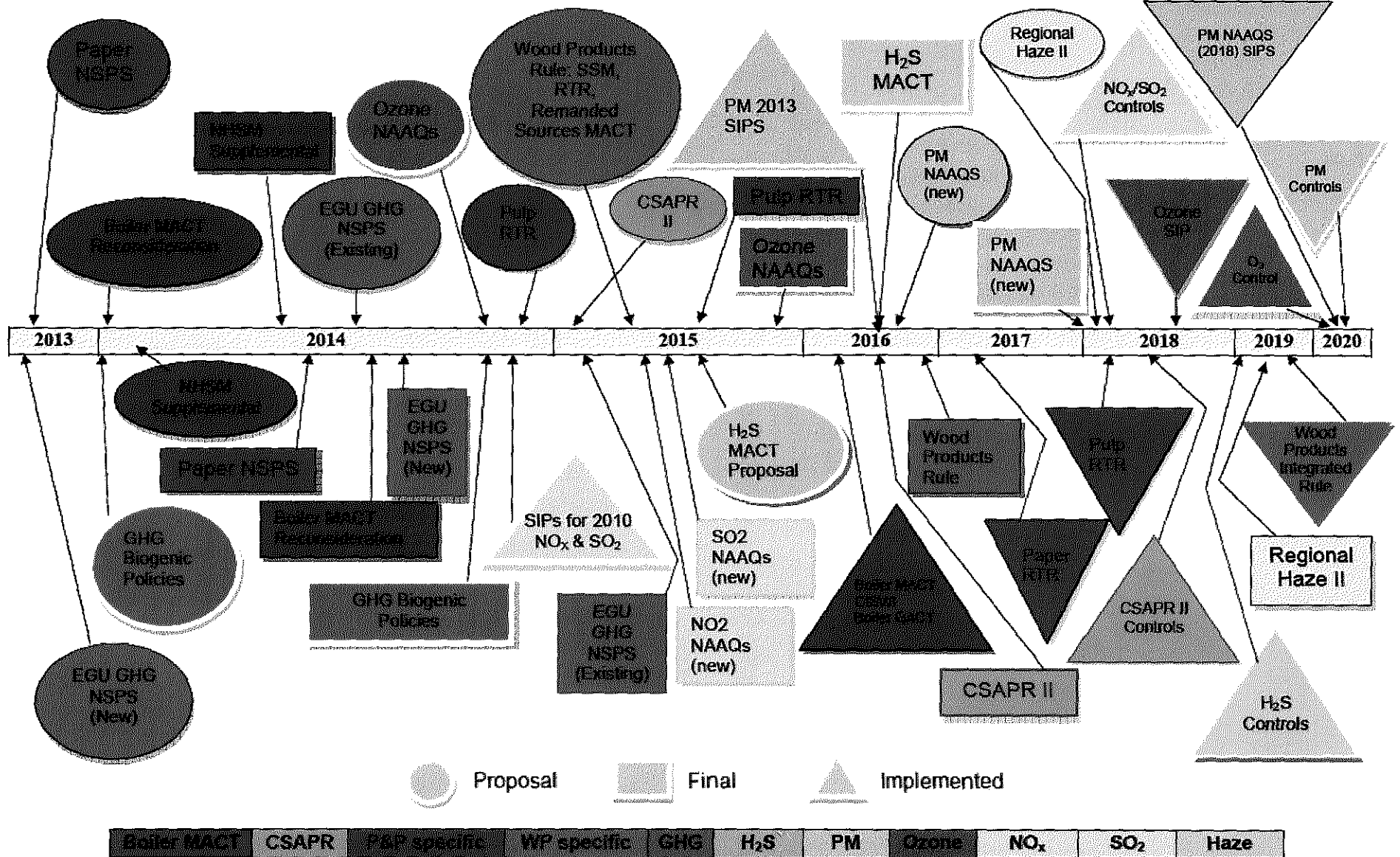
It is imperative that regulation embrace a balanced sustainable approach so costly air and other regulations will protect the public's health while preserving family wage manufacturing jobs.

- EPA should examine the sustainability of its regulatory program on paper mills, balancing the social, environment, and economic parts of its decisions.
- The regulatory pipeline affecting paper mills includes:
 - Revisions to Cluster MACT
 - Tougher ambient air quality standards for ozone and particulate matter
 - Regulating hydrogen sulfide
 - Revising standards for new sources at mills
 - Restrictive water standards
 - Changing hazardous waste definitions
 - Control green house gas emissions from biomass
- The Cumulative Regulatory Burden of many pending Air Regulations, such as Ozone NAAQS (National Ambient Air Quality Standards) could threaten our jobs.
- The Cumulative Regulatory Burden and other regulations could cost tens of thousands in American manufacturing jobs and billions in capital expenditures according to the 2011 Fisher Study.
- Industry needs ample time to implement upgrades and distribute the capital expenses to meet any new requirements.

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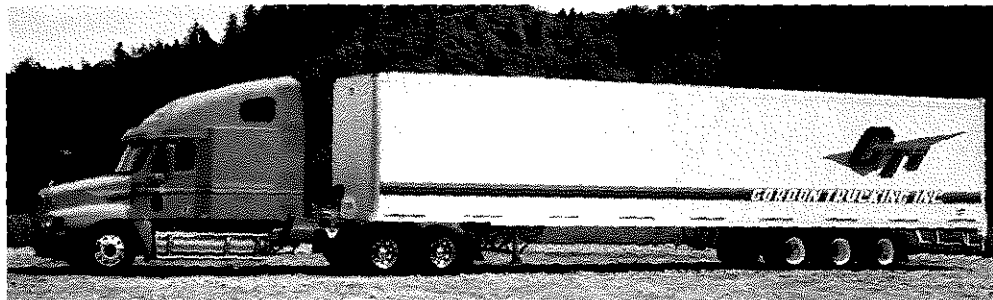


Potential Air Regulations Affecting Forest Products (2014-2020)



The Safe & Efficient Transportation Act (SETA)

Safely Modernizing American Truck Shipment without Making Trucks Larger



Above: Five-axle truck traveling at 80,000 pounds. **Below:** Six-axle truck traveling at 97,000 pounds. Trucks are the same size.

The U.S. gross vehicle weight limit – which governs interstate commerce – has not been updated since 1982. As a result, the U.S. trails all other developed countries in cargo mass productivity and is at a severe competitive disadvantage.

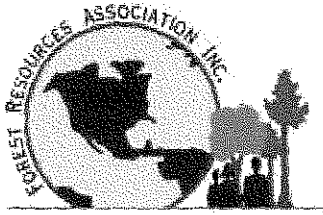
If equipped with six axles, trucks can safely ship more freight. The sixth axle does not make the truck bigger or longer. It simply maintains – and even improves – current braking, handling and weight-per-tire characteristics.

Further, 44 states currently allow heavier trucks on some portion of their state road networks. SETA would allow these states to safely optimize their network by opening select interstate routes to higher productivity trucks as well. Interstate routes are the safest, most efficient means of truck shipment.

Stopping Distance in Feet Using Standard S Cam Brakes at 60 mph		
Vehicle Weight (lbs)	5-Axle	6-Axle
80,000	240	191
90,000	271	220
97,000	295	241

Weight Displacement Per Tire (lbs)		
Vehicle Weight (lbs)	5-Axle (18 Wheels)	6-Axle (22 Wheels)
80,000	4,444	3,636
90,000	5,000	4,091
97,000	5,389	4,409





Forest Resources Association FACT SHEET on TRUCK WEIGHT REFORM

Efficiencies in wood supply chain management have improved dramatically in the past generation, due to technical innovation and the incorporation of information technology in logging and procurement logistics. However, **one cost item that technical solutions have been unable to lower is the cost of hauling forest products from the point of harvest to the first point of processing.** In the case of pulpwood and forest biomass, that phase of wood supply management literally accounts for a *minimum of 30%* of the cost of the delivered raw material.

FRA supports the Safe & Efficient Transportation Act (HR 612). This bill **would permit each state—at its option—to allow conventional semi-trucks, equipped with a sixth axle, to have access to the federal Interstate system with gross vehicle weights up to 97,000 pounds, authorizing a supplement in the current federal Heavy Vehicle Use Tax to trucks applying for such access.** Current rules on most Interstate corridors allow *five-axle* trucks to haul up to *80,000 pounds*.

Permitting states to modernize truck-weight limits on portions of the Interstate within their borders will enable **cost-effective, safe, and timely transport and distribution of forest products.** Enabling a log truck to increase its payload by one sixth **could reduce the final cost of a delivered ton by 2.8% to 5%.** With approximately 400 million tons of wood harvested in the U.S. each year and trucked an average 55 miles to the first point of processing, **these savings are immense.**

The reform of gross vehicle weight limits on the federal Interstate system, through the next Highway Reauthorization Bill, will:

- **Conserve fuel.**
- **Reduce total emissions,** including carbon.
- **Increase productivity** of forest products transport and wood supply management.
- **Enhance safety and reduce traffic congestion** by reducing the volume of trucks now forced to use state roads as primary hauling arteries, due to their exclusion from the Interstate system.
- **Prevent the loss of more U.S. jobs to other countries,** due to our uncompetitive truck weight restrictions.

As trucks continue to grow in importance in our country's economy, it is essential to reform truck weight limits on the federal Interstate system. **The benign safety and infrastructure impacts have been the object of thorough study throughout the world and in some U.S. jurisdictions,** and the improvements in productivity are also well documented.

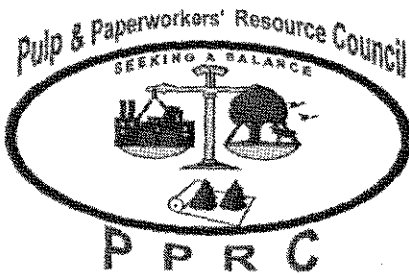
The 2012 Surface Transportation Reauthorization bill, known as MAP-21, failed to enact truck weight reform but **required the federal Department of Transportation to conduct a two-year study of the various potential impacts of more productive trucks,** specifically including the configuration proposed in the Safe & Efficient Transportation Act. FRA is monitoring the progress of this study, to ensure that its interim and final reports represent forest product trucking impacts fairly, as truck weight reform re-emerges in discussions of the terms of the next Surface Transportation Reauthorization, expected to begin as early as spring 2014, for a Bill that is due by September 30, 2014.

Forest Resources Association Inc.
January 2014

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Sensible Truck Weight Reform will:

- *Close an important efficiency gap in the wood supply chain;*
- *Reduce congestion and accident-exposure on local roads;*
- *Save fuel and reduce emissions;*
- *Improve the U.S. forest industry's global competitiveness.*



PPRC Position Paper on the Endangered Species Act

Wood Products Industry employees support ESA reform

Protecting truly endangered species is in the best interests of the public. The regulations established to implement these interests should be based on sound science, not political science. The impact on people, property and jobs should be evaluated when making the regulations.

The ESA needs to be modernized and updated after thirty years.

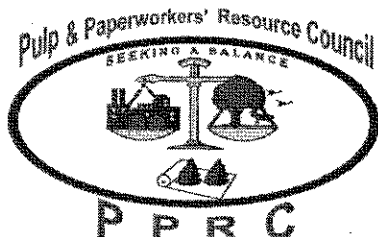
- The ESA mandate system is not working.
- There should be Congressional oversight on the social and economic cost of an ESA listing.
- The ESA should be on equal footing with, not superior to, all other laws.
- The ESA needs to be absolutely based in objective and verifiable science.
- The ESA should be a flexible and rational Act and apolitical in all decisions.
- There should be a greater role for states and local governments in all ESA decisions.
- State constitutional authority over plants and animals should be restored.
- There should be compensation for private property owners when the ESA diminishes property values.
- The act should be amended to ensure that the species will not be listed until a recovery plan is developed and appropriations are approved.

The PPRC believes the time for reform is now and only "real reform" will help plants animals and preserve the American way of life.

- The PPRC supports limiting the definition of threatened and endangered "species" to those species which are biologically unique, excluding those that are only geographically isolated from other populations of the same species.
- The PPRC believes the ESA is about recovery of a species, not only about preventing extinction.
- The PPRC wants to conserve the nation's endangered species act but wants it done in partnership with affected parties and the federal government, not under the command-and-control authority of federal agencies.
- The PPRC supports access to information used by the government in the ESA decision-making process.
- The federal government should be allowed more time to verify species that are being threatened, to avoid costly lawsuits and needless compensation.
- The PPRC feels that in order to simplify the process and make the Act work, ESA decisions should be based on sound science and include a peer review of listing and recovery decisions.
- The PPRC feels that true scientific facts and field data should be weighed more heavily than computer modeling.

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Pulp and Paperworkers' Resource Council
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Western Region

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**** Denotes Elected Officers for the 2014 National Steering Committee ****

Denotes Founding Members

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