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Vice President, Corporate Affairs

June 24, 2015

Attn: Chad S. Whiteman  
DOE Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building, Room 10102  
735 17<sup>th</sup> Street NW  
Washington, DC 20503

Copy to:  
Attn. Rebecca Peterson  
U.S. Department of Energy  
U.S. Energy Information Administration  
Mail Stop EI-23  
Forrestal Building  
1000 Independence Avenue SW  
Washington, DC 20585

**Re: Collection of Information for Densified Biomass Fuel Report**

Dear Sir or Madam:

MWV appreciates the opportunity to provide written comments to the Office of Management and Budget and the U.S. Energy Information Administration (EIA) regarding its proposal to collect and publish timely data pertaining to the production and sales of wood pellets (a.k.a., densified biomass fuel).

MeadWestvaco Corporation (MWV) is a global packaging company providing innovative solutions to the world's most admired brands in the healthcare, beauty and personal care, food, beverage, home and garden, tobacco, and agricultural industries. The company also produces specialty chemicals for the automotive, energy, and infrastructure industries and maximizes the value of its development land holdings. MWV's network of 125 facilities and more than 15,000 employees spans North America, South America, Europe and Asia.

MWV greatly supports EIA's proposed plan to collect and publish timely data regarding wood pellet production and sales. We believe the data will help policymakers and the public become better informed about U.S. wood pellet production trends -- particularly in the South, where the industry's rapid growth is being driven nearly entirely by exports of pellets to the European Union (EU).

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We support and endorse the changes made to the survey, especially the additional feedstock categories such as pulpwood quality roundwood and bark to the survey form. We also find it useful that the survey form now seeks information regarding the type of forest the wood comes from (natural, planted, public) and how much of the wood going to pellet plants is used to generate process energy to manufacture the pellets.

For further improvement, we urge that the survey form also include a breakout for thinnings that are smaller than pulpwood grade – i.e., trees that are less than five inches in diameter at breast height. Also, the pulpwood quality category should specify that it includes trees that are wider than 5 inches in diameter at breast height. This differentiation is important because it will clearly distinguish between what has traditionally been described as “pre-commercial” thinning versus “commercial” thinning that has traditionally had a market as pulpwood in the pulp and paper sector. This will further strengthen what EIA is trying to achieve with the feedstock portion of the survey.

We believe the collection of this additional information will provide useful information to better estimate the various types of densified biomass fuel production.

Thank you for the opportunity to comment on the proposed survey. If you have any questions about these comments, please contact Ned Massee, Vice President, Corporate Affairs, (804) 444-7210, [ned.massee@mwv.com](mailto:ned.massee@mwv.com).

Sincerely,



Ned Massee  
Vice President, Corporate Affairs