



Comments on CAR Organic Waste Composting Protocol Public Review

Environmental Credit Corp. (ECC), a leading offset project developer in the US, is pleased to comment on the Public Review Draft of the Climate Action Reserve's Organic Waste Composting Project Protocol. We offer strong support to the reserve in its efforts to produce practical protocols that provide incentives for composting and other organic waste management projects that reduce greenhouse gas emissions.

In general, we strongly agree with and support the detailed comments provided to CAR regarding this draft protocol by the US Composting Council, which include:

- 1. The protocol should include yard waste and industrial food waste as eligible waste streams**
- 2. Community based projects resulting from local food waste diversion mandates should be eligible for carbon credits**
- 3. The baseline and project emissions quantification approach is overly conservative**
- 4. Flexible monitoring requirements should allow oxygen monitoring, in addition to time and temperature requirements, as a BMP**

Additionally, we offer the following comments:

5. Table A.3 – clarification of units

Do you mean per metric ton of "Food Waste (wet)" or "Combined Food and Soiled Paper Waste (wet)"?

6. Equation 5.5 appears to be incomplete or requires further clarification

It is possible that a facility might receive an eligible waste stream and compost only some fraction of the waste received (e.g., for facilities that plan to use anaerobic digestion but may also compost some of the waste stream for timing or capacity reasons). In this case, the total weight of waste delivered to the facility ($W_{T,S}$) multiplied by the food waste fraction of that waste stream ($F_{FW,S}$) would not be equal to the weight of food waste that is composted by the project ($W_{FS,S}$).

An additional parameter should be included that represents the fraction of waste stream 'S' that is composted during the reporting period, or else the definition of parameter $W_{T,S}$ should be modified accordingly. However, the former would be more consistent with CAR's treatment of material flow quantification as in their livestock protocol (i.e., $MS_{AS,L}$ for manure).

(Same thing for soiled paper waste in equation 5.5(b)).