

June 3, 2010

Comment on Climate Action Reserve Draft Organic Waste Composting Protocol v 1.0

I read with interest the draft protocol for Organic Waste Composting, and think that this is a practical and workable approach, and that it will help to foster projects which divert food from landfills and into composting facilities. I believe that the approach to the credits awarded is conservative in light of the many additional benefits which ultimately accrue from these projects, but that the conservative approach is appropriate when defining a protocol in this field.

One aspect of the issue which I did not see addressed in the protocol is the potential of packaging materials other than food-soiled paper. NatureWorks produces Ingeo™, a polylactide polymer (PLA) used extensively in fresh food packaging. Our vision is to see this used as an enabler of more extensive organic waste recycling/composting. The consumer will be able to dispose of both the soiled package and the waste food into a single stream which can then be composted, whereas with the current non-compostable packaging (typically PET or PS), the food contaminated packaging would still be sent to the landfill. Our PLA resins have been extensively tested and certified as compostable according to ASTM D6400 and DIN CERTCO EN 13432. We have also done extensive testing under anaerobic conditions, to enable development of data for landfill simulations. With these data the framework of the existing draft protocol would allow inclusion of compostable packaging materials into the standard.

The direct contribution of emissions of the compostable packaging will be small, but contribution from the enablement of food diversion from the landfill is potentially very large. For the sake of completeness you may want to include language around this topic in the protocol.

Most importantly, I wanted to check on the interpretation of an eligible waste stream, under section 2.2, copied below:

An *eligible* waste stream is one that:

1. Consists of food waste and non-recyclable food soiled paper waste (referred to hereafter as MSW food waste and soiled paper waste, respectively), as defined in Section 3.4.1; and...

I wanted to make sure that this is not meant to exclude materials such as certified compostable packaging. The language “consists of” could be changed to “comprises”,

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which is a somewhat more inclusive term and would more clearly allow for the possible presence of other materials, such as compostable packaging. Alternatively, such recognition could be called out elsewhere in the text.

Again, we fully support this effort, and believe that the adoption of ASTM D6400 certified compostable packaging for food products will ultimately lead to improved rates of diversion of food waste from landfills. In fact, we are already working in a number of venues where “zero waste” is the goal and high rates of diversion via composting are being practiced commercially.

I would be happy to discuss this further, either by e-mail or phone, and my contact information is included below.

Best regards,

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