



terrapass

restore the balance

TerraPass is pleased to be able to offer the following comment on the draft Organic Waste Composting Project Protocol. Our experience working with hundreds of municipal waste authorities suggests that an offset protocol for composting projects will be a welcome addition to CAR's growing list of project types.

On composting and digestion. A number of recent conversations with waste management entities suggest that successful food waste composting operations may sometimes serve as an interim step toward more beneficial and expensive organics digestion projects. In other words, a waste management entity might begin a food waste collection program -- adding the food waste to an existing compost operation and then later decide that the collection volume warrants more advanced treatment methods. Under the current language in the OWD protocol, a digestion project which follows a successful food waste composting operation that has been in operation for more than one year would not be creditable.

We propose that CAR make a specific exception, either as part of this protocol or as an addendum to the OWD protocols, which allows food waste composting offset projects to install organic waste digesters and be eligible to generate offsets under the OWD protocol for the remaining OWC crediting period for waste streams migrated from composting to digestion; and for the full ten years for any new eligible waste streams.

TerraPass Inc.