



August 27th, 2010

Dear Climate Action Reserve Staff,

Camco International Group, Inc would like to thank you for the opportunity to provide comments on the latest draft version of the Livestock Project Protocol, version 3.0. Camco is extremely familiar with previous versions of the protocol, having registered projects to versions 2.0 and 2.1 and is supportive of the Reserve's efforts to periodically update and modify the protocol to take account of new developments and to learn from the experiences of Project Developers in working with protocol versions.

While Camco generally supports the approach the Reserve takes to create and update Protocols we believe it is important to get input and feedback from current and likely future users of protocols to ensure that they are usable in the field. Camco believes that this is best done prior to a draft's release through the Reserve asking specific questions on aspects of the protocol and/or holding a consultative workshop to gather first-hand input. For instance, Camco would have welcomed the opportunity to provide additional guidance in the monitoring section on data substitution, incorporating variances previously submitted by Project Developers, to avoid the need for costly and time-consuming variances at subsequent verifications.

Camco supports many of the additions and updates to the protocol, particularly the efforts the Reserve is making to lower costs and simplify calculations, and we provide comments below only on proposed changes which we believe may confuse or hamper project development and verification:

1. Section 3.5.1 and 3.5.2 – the Reserve should clarify, to avoid confusion, that although a project will be assessed against the Performance test and Legal Requirement test at the time of registration, the assessment will apply the tests when the project began, not when it was registered.
2. Section 4 – no mention is made of boilers as a destruction device. Boilers should be added to avoid confusion.
3. Section 5.4 and Equation 5.11 – calculating emissions from electricity used by pumps and equipment. The Reserve requires that Project Developers estimate emissions from electricity to determine whether they are material or not. Many dairies have only one electricity meter making accurate estimation of power used by each emissions source difficult. We would like the Reserve to provide further guidance here as to what constitutes an emissions source in Equation 5.11 and the level of detail required to produce an estimate of emissions from electricity. Is Verifier judgement satisfactory or do Project Developers need to provide estimates of usage and power consumption for each electrical load?
4. Equation 5.7 – we notice a mistake in the formula: time, t should be the amount of time the venting event occurred. Although venting events do occur, farms may have multiple tanks. Thus, the formula should allow Project Developers to limit leakage to one tank, rather than the whole system if there is sufficient monitoring available. For instance, MS_{BCS} could equal the volume of gas stored in the affected tank and the biogas flow could be the biogas flowing from the affected tank rather than the whole system.
5. Section 7.1.1 - Camco is concerned about the requirement for Project Developers to produce an additional Monitoring Report at time of verification. Livestock projects are typically small projects



producing between 10,000 – 20,000 CRTs per year. Requiring and maintaining additional documentation increases workload and cost – undermining one of the aims of the new version - and uncertainty – we have not seen a template for the report and it is not clear how the Reserve intends to review the report and how the verification process will change. For example, currently the Reserve takes around two to three weeks to review each verification report and communication is directly with the Verifier. It is not clear whether the new process will run in series or in parallel with the current verification process; if the Reserve will correspond directly with the Project Developer if there are questions concerning the Monitoring Report; whether the Report will duplicate what is already required in the project Monitoring Plan and how any differences between the Monitoring Report and Monitoring Plan will be resolved. If the Reserve would like further information about a project, has it considered asking Verifiers to provide more information in their verification report? Perhaps if it was clearer what information the Reserve was seeking about the project and how it intended to use that information then Project Developers and Verifiers may be able to suggest simpler ways of providing that information.

6. Section 7.3.3 - Camco strongly supports the proposed change to allow desktop verifications. However, further clarification is needed on what constitutes a change to a project's data management system, equipment or site personnel involved. It is unlikely that a project will operate without modification or personnel changes for two years running. For example, new meters may be installed, logging equipment and personnel are likely to change both on the farm and at outside consultants and engineers; what happens if a key person falls sick or moves away half way through the second year? At all of our farms some element of dairy operation and data storage has changed within two years. To avoid unnecessary uncertainty Camco suggests that the Reserve allows changes provided that any changes to system operation or equipment are properly documented and that there is a documented handover of personnel changes – for example a documented end and begin date.

We look forward to working with you on this and subsequent versions of the Protocol and hope that we are able to continue to provide helpful and useful comments going forward.

Yours sincerely,

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