

June 10, 2013

Climate Action Reserve

Subject: Comments on draft OWC Protocol revisions

Environmental Credit Corp. (ECC) is a leading carbon offset project developer and supplier of verified carbon offsets to both voluntary and compliance markets in the US. ECC served as the project developer for the only two composting projects to be successfully registered with the Reserve to date, and therefore has considerable direct experience with the implementation and verification requirements (and challenges) associated with Climate Action Reserve's Composting Project Protocol Version 1.0. We support the Reserve's efforts toward continual improvement of offset protocols and appreciate the opportunity to comment on the Reserve's draft revisions to its OWC Protocol.

ECC is also a member of the US Composting Council (USCC) and both contributed to, and strongly support, the comments provided by the USCC regarding the current composting protocol revisions. Therefore, herein we adopt and refer to the USCC comments in their entirety, rather than being redundant.

One additional comment would be to emphasize the importance of aligning the protocol's best management practice (BMP) language with federal and state regulations as they are currently codified and implemented (and to avoid overly prescriptive language); this would help avoid conflicts between protocol requirements and existing regulations, which in most cases adequately ensure that anaerobic activity is minimized during the active phase of composting under currently permitted monitoring regimes.

Thanks again for the opportunity to provide input to your process.

Sincerely,



Scott Subler, Ph.D.  
President, Environmental Credit Corp.