

Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

Comments on the Organic Waste Composting Project Protocol 1.0 to 1.1 Update

The Climate Trust greatly appreciates the opportunity to submit comments regarding the Climate Action Reserve's Organic Waste Composting Project Protocol Version 1.1 update. The Climate Trust is a 501(c)(3) nonprofit organization headquartered in Portland, Oregon. Our mission is to provide expertise, financing, and inspiration to accelerate innovative climate solutions that endure. The Climate Trust was created in 1997 in response to the United States' first regulation of greenhouse gases (GHGs) under the Oregon Carbon Dioxide Standard. Since that time, we have expanded work on behalf of regulated and voluntary offset buyers in Washington, Montana, Massachusetts, and Colorado, among others. In this capacity, The Climate Trust has gained more than a decade of experience supporting project development and offset credit procurement through the management and investment of a carbon project portfolio with \$20 million in dedicated funding.

The Climate Trust is particularly interested in assisting with the successful development of the Reserve's Organic Waste Digestion and Organic Waste Composting protocols, as an active project developer and buyer working with both project types. To date, the majority of our work has been with organic waste digesters, and our comments are therefore focused on the performance standard and baseline assumptions with are similar for both of the organic waste protocols. While piloting the application of the organic waste performance standard on a variety of organic waste digesters, The Climate Trust has consistently struggled with the special treatment of grocery store food residuals. In both versions 1.0 and 1.1 of the Organic Waste Composting protocol (as well as version 2.0 of the Organic Waste Digestion Protocol) developers are required to demonstrate that each grocery store was previously disposing that waste in a landfill for 36 months. This requirement is effort-intensive, impractical and, in some cases, impossible to demonstrate and therefore represents a significant barrier to crediting organic waste projects. While The Climate Trust understands that this minor update from version 1.0 to version 1.1 may not be the appropriate time to revise a performance standard, it is essential that future revisions of the protocol develop a performance-standard approach to assessing the eligibility of grocery store waste.

Recommendation: Adopt a state or regional performance standard for assessing the eligibility of grocery store food waste streams.

Given the structure of the organic waste collection industry, digester and composting projects often cannot determine the specific list of grocery stores whose waste they manage. In many cases, haulers that collect waste from grocery stores consider their client list to be proprietary and confidential information which they will not share. Many times, the initial hauler that picks up waste from a grocery store drops it off at a transfer station; another hauler then picks up the organics, aggregates them and delivers these aggregated feedstocks to projects. Most projects are therefore separated by multiple haulers from the grocery stores themselves.

Because haulers and grocery stores do not directly benefit from the generation of carbon credits they have little incentive to provide the necessary information and it is very difficult to attain.

The Climate Trust believes there is a clear need to create a performance standard to assess the eligibility of grocery store waste. This performance standard should provide conservative assumptions of the portion of grocery store waste which is eligible under the organic waste protocols, rather than relying upon the project to establish the site-specific additionality of each grocery store. Perhaps the standard could be based on state or regional assumptions for the proportion of grocery stores that manage their organics outside of a landfill. This simplification of assessing the eligibility of feedstocks will greatly increase the adoption of organic waste offset projects. The Climate Trust recognizes that the creation of a new performance standard is a significantly update to the protocol that exceeds the scope of this update. This, however, is an essential issue to address in future revisions of the protocol.

Thank you for the opportunity to submit these comments.



Peter Weisberg
Program Manager
The Climate Trust