



CLIMATE
ACTION
RESERVE

Organic Waste Digestion Project Protocol Version 2.1 ERRATA AND CLARIFICATIONS

The Climate Action Reserve (Reserve) published its Organic Waste Digestion Project Protocol Version 2.1 (OWDPP V2.1) in January 2014. While the Reserve intends for the OWDPP V2.1 to be a complete, transparent document, it recognizes that correction of errors and clarifications will be necessary as the protocol is implemented and issues are identified. This document is an official record of all errata and clarifications applicable to the OWDPP V2.1.¹

Per the Reserve's Program Manual, both errata and clarifications are considered effective on the date they are first posted on the Reserve website. The effective date of each erratum or clarification is clearly designated below. All listed and registered OWD projects must incorporate and adhere to these errata and clarifications when they undergo verification. The Reserve will incorporate both errata and clarifications into future versions of the protocol.

All project developers and verification bodies must refer to this document to ensure that the most current guidance is adhered to in project design and verification. Verification bodies shall refer to this document immediately prior to uploading any Verification Statement to assure all issues are properly addressed and incorporated into verification activities.

If you have any questions about the updates or clarifications in this document, please contact Policy at policy@climateactionreserve.org or (213) 891-1444 x3.

¹ See Section 4.3.4 of the Climate Action Reserve Program Manual for an explanation of the Reserve's policies on protocol errata and clarifications. "Errata" are issued to correct typographical errors. "Clarifications" are issued to ensure consistent interpretation and application of the protocol. For document management and program implementation purposes, both errata and clarifications are contained in this single document.

Please ensure that you are using the latest version of this document

Errata and Clarifications (arranged by protocol section)

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Section 3

1. Food Wholesalers and Food Distributors (CLARIFICATION – November 1, 2018)

Section: 3.5.1 (The Performance Standard Test)

Context: This section defines eligible waste streams and a specific, additional set of requirements for food waste that is sourced from grocery stores. Food waste is only eligible if it is “non-industrial” in nature. Certain commercial facilities exist that do not process food but also do not provide it directly to consumers. It is not clear whether food waste from these facilities should be considered “industrial” and thus ineligible.

While not specifically addressed in the protocol, the Reserve believes that the intent is for food wholesalers and food distributors to be treated in the same manner as grocery stores. Food waste from food wholesalers and food distributors is therefore eligible, but must meet the documentation requirements applied to grocery stores.

If the activities of a particular food wholesaler or food distributor goes beyond the mere distribution of food products to the processing of food, and food that has undergone such processing then becomes waste, such waste is considered industrial in nature and ineligible. Facilities with multiple waste streams, some eligible and some ineligible, must be able to document the quantity of eligible waste separately from ineligible waste.

Clarification: Food waste originating from food wholesale and distribution facilities shall not necessarily be excluded as “industrial” per the first bullet of Section 3.5.1. The following text shall be added above the second to last paragraph on page 7:

“Food waste originating at food wholesale and food distribution facilities shall not be considered ‘industrial’ for the purposes of eligibility as long as this facility does not process the food in any way (i.e. output a food product that is materially different from the input food product), but simply serves as a link in the distribution of food to commercial customers or consumers. Such facilities are considered akin to grocery stores and subject to the requirements of this protocol applicable to that source category.”

2. Regulatory Compliance at Centralized Digesters (CLARIFICATION – November 1, 2018)

Section: 3.6 (Regulatory Compliance)

Context: This section states that, where a verifier determines that project activities have caused a material violation, no CRTs will be issued during the period(s) when the violation occurred. The guidance in this section does not specifically address:

- whether regulatory compliance issues arising prior to delivery of food and wastewater waste streams to the project facility, should be considered relevant for regulatory compliance requirements; or
- how to address regulatory compliance for projects where manure is received from multiple farms and managed in a centralized BCS.

With respect to manure waste streams, it is unclear whether a violation with respect to one manure source facility would jeopardize the ability of the project to receive credit from emission reductions related to manure from other source facilities. It may be possible for an offset project at a centralized digester to have CRTs issued to it for manure from compliant manure source facilities during a period of time when one or more manure source facilities are materially noncompliant with a regulation.

Clarification: The following text shall be inserted on page 10, at the end of Section 3.6:

“With respect to projects that accept and manage manure from multiple, discrete source facilities (separate from the project BCS in both physical location and management), it may be possible for a project developer to demonstrate that a regulatory violation at one source facility does not affect the eligibility of the entire project under this section. Project developers should contact the Reserve to discuss potential regulatory non-compliance issues.

With respect to projects that accept food waste streams, regulatory compliance violations occurring prior to delivery of such waste to the project site shall generally be considered unrelated to the project.

With respect to projects that accept wastewater streams from offsite sources, regulatory compliance violations occurring prior to delivery of such waste to the project site shall generally be considered unrelated to the project.”

Section 5

3. Calculating Metered Methane Destruction (ERRATUM – November 1, 2018)

Section: 5.3 (Calculating Metered Methane Destruction (Equation 5.21))

Context: The first equation in this protocol, Equation 5.1 provides guidance for calculating emission reductions, following the Reserve’s standard methodology of subtracting project emissions from baseline emissions, to get emission reductions. For this protocol, project developers must calculate the baseline using two alternative approaches (metered vs modelled), and use the lower of these two baseline values in this first equation. Irrespective of which baseline value must be used, Equation 5.1 directs that project emissions (represented as PE), must then be subtracted from the baseline emissions. PE is then calculated in Section 5.2.1, in Equation 5.14, including by accounting for the Biogas Destruction Efficiency (BDE) of the given destruction devices used. BDE is also taken into account in Section 5.3, in Equation 5.21, when calculating the total volume of methane metered during the reporting period (CH_4 destroyed). In effect, the incomplete combustion of methane is incorrectly taken into account twice, instead of just once, via the application of BDE in both of these two equations, when using the metered baseline approach, resulting in erroneously lower emission reductions.

Correction: A BDE value of 1 should be used in Equation 5.21 in Section 5.3, on page 46 of the protocol, when using the metered baseline approach.

Section 6

4. Methane Analyzer Factory Calibrations (CLARIFICATION – November 1, 2018)

Section: 6.2.1 (Biogas Measurement Instrument QA/QC)

Context: The third bullet in the list at the beginning of this section (page 53) states that “[all gas flow meters and continuous methane analyzers must be] calibrated by the manufacturer or a certified calibration service per manufacturer’s guidance or every 5 years, whichever is more frequent.”

The principle underlying this requirement is the need to ensure data integrity. More specifically, the intent of this requirement is that meters meet such requirement every time they are used to gather data that is used in project emission reduction quantification. If a meter was out of conformance with this calibration requirement during a portion of the reporting period when it is not in use, but is brought back into conformance with this requirement before again being used to gather data which is used for project emission reduction calculations, then the underlying intent of this requirement is met.

Clarification: The following text shall be inserted after the third bulleted point at the beginning of Section 6.2.1:

“Conformance with this requirement is only required during periods of time where data gathered by the meter are used for emission reduction quantification. Periods where the meter did not meet this requirement will not cause the project to fail this requirement, provided the meter was not being used for project emission reduction quantification during such periods, and provided the meter was brought back into conformance before being employed to gather data which is used for project emission reduction quantification.”