

Oakland, November 13th 2007

Derek Markolf
Senior Policy Manager
California Climate Action Registry
Los Angeles, CA

Re: Comments to the Landfill Project Reporting Protocol

Dear Derek,

Please receive the following comments from our ICLEI team. We are impressed with the quality of this product. Thank you for your efforts in leading this development.

Sincerely,
The ICLEI Protocol Team

General Scope

The Landfill Project Reporting Protocol is extremely useful but nonetheless it has a limitation from our point of view. The protocol's scope of work ideally would include crediting any efforts that reduce fugitive emissions from landfills. The effectiveness (maintenance and management) and type of landfill gas collection systems (passive, active) have an effect on fugitive emissions, and therefore under the optimal reporting for the systems, the fugitive emissions should be quantified, in addition to the metered recovered landfill gas. This would not only provide an incentive for installing landfill gas capture, flare and energy systems, but also for the improvement of the overall collection efficiency. We acknowledge that the methods for quantification of fugitive emissions are still under significant debate and development, and consequently that mechanisms for reporting reductions of these emissions will encounter challenges. As an interim step we propose mentioning the absence of guidance on this topic in the current version of the protocol, and stating that efforts will be made to address it in future versions.

Additionality

There is some difficulty in proving additionality in cases where landfills already have a gas collection system (when it is not required) and they want to register reductions with this protocol (for extensions for example); or in cases where landfills are required by law to capture gas but opt to exceed the regulations. We believe more guidance would help the application of the protocol.

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Gases Included

In the greenhouse gas sources inventory there are occasions where either CH₄ or N₂O are excluded because they are believed to be very small. We believe they are small but not insignificant, and their GWP is high enough to produce an effect. Therefore, we recommend that these gasses be tracked, particularly in cases where the emissions factors are known. Emission factors for CH₄ or N₂O are provided by AP 42 for fossil fuels (<http://www.epa.gov/ttn/chief/ap42/>). For N₂O emissions from combustion of landfill gas the BAAQMD district includes some factors from ARB GHG Inventory, which are available here:

(http://arb.ca.gov/cc/ccei/inventory/4A1_Landfills_LandfillEmissions_LandfillGas_N2OPage15.htm)

Other additional protocols

ICLEI would like to encourage the California Climate Action Registry to develop protocols for other GHG emission reduction projects in the waste sector, such as recycling and composting or diversion measures, to complement the Landfill Project Protocol. We need to incentivize a variety of projects and utilize the market mechanisms for achieving overall goals of climate protection with emissions derived from waste. Furthermore, these project reporting protocols would be part of the joint effort that ICLEI and the CCAR are undertaking in the development of a Local Governments GHG Emissions Protocols (for both community-wide and municipal operations emissions).

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