

Climate Action Reserve,

I am concerned that the OWD Protocol as written today is still too restrictive as to what types of substrates will qualify for methane off-set credits. In fact, I believe that the attempt to simplify the protocol has narrowed the window of qualified materials so greatly that it may limit participation of development companies in registering their projects with CAR.

Today, there are many non-hazardous organic materials that are being disposed of in land fills. These materials include: Grease trap waste, meat and fish processing wastes, rendering wastes, glycerin, and other food processing material for primary food manufacturing. These materials are disposed of in land fills and all have significant methane emission potential. But these materials are not currently included in the OWD protocol. While I believe that it is prudent to investigate some substrates such as dead animals more thoroughly to understand how to baseline these materials consistently, confirmation from the primary generator of the substrate that a material is/was going to a land fill prior to going to an organic waste digester should provide sufficient proof to qualify the organic materials for inclusion in our protocols.

Putting the burden of proof on the project owner/developer will also help CAR add qualified materials to protocol as they are approved so OWD working groups can stay focused on larger categories of items (such as dead animals) where more input is needed.

Qualifying a full project will also simplify this process for CAR. For instance, let's say that I am adding OW materials to my digester project from 14 different suppliers. Three of the materials currently meet the approved list of materials specified in the OWD Protocol. There are going to be a lot of questions like:

1. How do I qualify the other 11 sources?
2. When a source is qualified, how far back in time can I get credit for it? I was sequestering methane the entire time vs. putting it in a land fill so I should get 100% credit.
3. How do I validate credits from just 3 sources if part of the validation process looks at total methane production/sequestration? Is using % of OW acceptable? What if these 3 sources are responsible for generating 50% of the methane?

Modifying the OWD protocols to include a "burden of proof mechanism" for non-listed OW materials will still ensure that CAR's basic objectives of achieving transparency, certainty that these credits exist, are additional and can be traded/sold with the highest of certifications will not be negatively impacted.

Thank you and please feel free to contact me if you have any questions.

Best regards,

Michael Hvidos | Executive Vice-President  
Microgy, Inc.