



CLIMATE ACTION RESERVE

SUMMARY OF COMMENTS & RESPONSES ON THE DRAFT LANDFILL PROJECT PROTOCOL VERSION 2.1 October 2009

2 sets of comments were received during the public comment period for the Draft Landfill Project Protocol, Version 2.1. The comment letters can be viewed in their entirety on the Reserve's website at: <http://www.climateactionreserve.org/how-it-works/protocols/adopted-protocols/landfill/landfill-project-protocol-development/>

Comments received by:

1. Greenhouse Gas Services (GHGS)
2. Element Markets

Summary of Public Comments:

1. **Data substitution for weekly methane readings.** Our concern is around using this method for the substitution of methane concentrations, when a project is using the allowed option of weekly methane concentration measurements with the appropriate discount. If a project is only monitoring methane concentrations on a weekly basis, then a situation could arise where the methane concentration reading is not done exactly one week from the previous reading due to a variety of unintentional factors (scheduling, operational issues, etc.). We believe that this could lead to projects being unnecessarily penalized, and would suggest that a data substitution procedure for weekly methane monitoring be drafted for inclusion in this appendix. **(Element Markets)**

RESPONSE: Agreed. The Reserve has added a provision to the data substitution methodology which will allow for substitution of a missing weekly methane reading.

2. **Inclusion of bioreactor landfills.** It is recommended that CAR reconsider the eligibility of bioreactor landfills. In general, bioreactor landfills shift gas production up, however it is reasonable to assume that the gas collected by the installed collection system would have occurred in the baseline and would have been fugitively emitted to the atmosphere,

less surface oxidation which is accounted for by the protocol. Therefore the crediting of offsets from a bioreactor landfill project can be done using accounting principals similar to those developed by CAR for other sectors. **(GHGS)**

RESPONSE: At this time the Reserve is not prepared to include bioreactor landfills as eligible projects under this protocol. However, the definition used for a bioreactor has been modified in version 2.1 to quote the EPA definition. Accordingly, any landfill which is deemed a bioreactor according to the protocol will be subject to EPA rules regarding biogas management.