

**Climate Action Reserve**

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Dear Leticia,

**Workshop for the Livestock Projects Protocol  
Development of Anaerobic Digestion Projects**

**Recommendation – to think about it**

Many livestock projects are excluded of the CDM because farms don't have lagoons in which anaerobic digestion (AD) could take place and therefore methane emissions baseline couldn't be proved, instead farmers dump wastewater and manure into rivers or drainage. Right away, water bodies are been severely polluted.

These projects could be included in the Reserve if project developers decided to construct an AD facility in order to treat wastewater instead of dumping it into rivers. The CDM does not accept this because it represents generating artificial emissions of CH<sub>4</sub>.

However, it could be an interesting environmental and business opportunity for The Reserve and project developers if the production of such "artificial" biogas (CH<sub>4</sub>) is locked by a condition in which the project developer is obligated to utilize the biogas for electricity generation; if the project activity doesn't start generating electricity after two years, for instance, the Reserve shall withdraw the registration of this project, consequently the issuance of carbon credits for this project will be terminated.

An Annex describing the rules for these **Special Cases** could be included as part of the Livestock Protocol as well as a methodology or recommendations to calculate the possible emission reductions.

It doesn't make sense the construction of an AD facility just to destroy methane in order to obtain carbon credits, the goal must be renewable energy and stop polluting water.

*-Climate Change is just the "tip of the Iceberg", it is the result of all the abuses perpetrated to the ecosystems of the Earth and the solutions to mitigate it should consider all "connections"-*

I hope this can be useful. If more detail is needed don't hesitate to contact me

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