



Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

RE: Comments on Draft Organic Waste Composting Project Protocol Version 1.0

To Whom It May Concern:

While we are optimistic about your development of this protocol, there are some key elements that we feel are areas of concern for the national composting industry. Those areas of concern are: Food Waste Handling BMP Requirements as stated in the Project Definition; The Legal Requirement Test regarding local mandates; Residential SSO Waste Stream Characterization; Project Emissions from the Food Waste Composting Process; and Time, Temperature, and Turning Frequency BMP monitoring.

The California Organics Recycling Council (CORC) is a technical council for the California Resource Recovery Association (CRRA), representing a coalition of organics recyclers, including collectors, processors, end users, and local governments. As a key voice for organics recyclers in the state, the CORC board is committed to supporting the expansion of composting in local jurisdictions statewide; the advocacy of best management practices in all composting operations; and thorough, peer-reviewed research in the area of emissions from aerobic composting practices.

Please consider the following suggestions for further refinement of the Organic Waste Composting Project Protocol. These comments are presented in the order they appear in the draft protocol.

2.2 Project definition - Food Waste Handling BMP Requirements

While we agree that under optimal conditions food waste should be incorporated into the composting process in a timely manner, there are instances where the 48-hour requirement is not feasible. We recommend the protocol be revised to include an exception to this BMP requirement in the case of long weekends or holidays.

3.4.2 The Legal Requirement Test / 3.4.2.1 Guidance on Solid Organic Waste Regulations

To be consistent with the Organic Waste Digestion protocol, section 3.5.2.3 Local Food Waste Diversion Mandates Enacted in Conjunction with an OWD Project, the Organic

Waste Composting protocol should have a clause regarding legitimate exemption for local food waste diversion mandates. CORC is aligned with other CRRRA technical councils in requesting that there would be an unlimited exemption for organics feedstocks coming from local collection programs that require generators to separate organics from other discards.

This exemption is important, not only for California where AB939 started municipalities down the path towards increased waste diversion, but also for cities nationwide. As city governments strive to achieve zero waste to landfills in the coming years, food waste mandates are likely to become a part of a local jurisdiction's waste management plan. As written, the protocol creates a strong disincentive for jurisdictions to divert food waste by way of local mandates. It is counterproductive to establish a protocol that in any way discourages the adoption of local food waste mandates. Additionally, it must be noted that local mandates serve as an outreach tool to encourage participation in recycling efforts and are not a guarantee of 100% diversion of food waste from landfills.

This exemption is equally important for the projects themselves. Disallowing CRTs for projects accepting ineligible feedstocks, as defined under the current Legal Requirement Test, creates a disincentive for compost facilities to enter into contracts with cities that have adopted mandates. Paradoxically, security of feedstock is important to a compost facility and a residential SSO stream from a city curbside program is a steady, reliable source. It is likely that allowing legitimate exemption would benefit the composting industry through encouraging the formation of partnerships between local jurisdictions and local compost producers.

In summary, adding a legitimate exemption to the Legal Requirement Test allows this protocol to encourage, rather than discourage, the adoption of local food waste mandates and to support the infrastructure within which food waste is aerobically processed.

5.1.1.2.1 Residential SSO Waste Stream Characterization

We find 80 residential SSO waste stream characterizations over the 10-year span of a project crediting period to be excessive. While it is imperative that projects determine the amount of eligible feedstock in their waste stream, particularly considering seasonal changes, one can assume that waste streams will maintain consistency from year to year. Therefore, requiring subsequent WCs after the recognition of the seasonal pattern could be considered redundant and pedantic. CORC recommends a mitigated sampling protocol such as 8 samples in the first year to determine seasonal trends, and then once per quarter thereafter when the trends have been established and less frequent calibration is required.

The resources required to conduct perpetual WCs could result in a negative economic impact over the long term for both projects and their clients through increased processing fees and increased costs to end users. This economic effect would be disproportionate depending on the size of the project considering the requirement is a fixed value irrespective of the varying sizes and resources of potential project facilities.

In the event this requirement remains as written, we feel it is necessary to define the WC protocol and reporting procedures required for projects to comply with the

requirement. We would like to applaud the protocol for including the provision that obviates this requirement in the presence of regional WC data.

5.2.2 Project Emissions from the Food Waste Composting Process (SSR 8)

CORC would like to challenge the emission factors assumed from project-specific composting practices as defined in the protocol's Project Emissions from the Food Waste Composting Process (SSR 8). While we are not in the position to offer alternative figures, we recognize there is, to date, insufficient research in this area. As more accurate, peer-reviewed data becomes available, we would like to see that data reflected in the emission factors and similarly incorporated into the calculations for Project Emissions.

We recommend a clause be included in the protocol to allow for updates in emission factors as more accurate, peer-reviewed data becomes available. We believe that creating this type of flexibility in emissions accounting will allow this protocol to remain relevant over time and not become outdated as a result of new data.

6.3.1 Time, Temperature, and Turning Frequency BMP Monitoring

Finally, the time and temperature monitoring requirements exceed those governed by state regulations. We would like to take issue in particular with the requirement stating,

The daily temperature shall be monitored and recorded starting at the beginning of the active composting cycle, and must be monitored and recorded until the temperature drops below 50 degrees C after reaching a temperature of 55 degrees C for the required length of time.

The 50 degrees C requirement is beyond what state regulations stipulate. In the absence of a compelling reason for the 50 degrees C requirement, the protocol's time and temperature monitoring should work with existing state regulations developed to monitor existing compost facilities.

We hope the integration of these considerations into the protocol will help create a stronger, more effective protocol that is easier to implement and one that encourages increased diversion of food waste from landfills nationwide.

Thank you

Michele Young CORC chair, on behalf of the CORC executive board

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