

Recyclers Global Warming Council

June 7, 2010

Mr. Syd Partridge
Climate Action Reserve
1001 I St.
Sacramento, CA 95814

Re: Composting Protocol Public Review Draft Comments

Mr. Partridge:

The Recyclers Global Warming Council (RGWC) of the California Resource Recovery Association (CRRA) represents interests within the CRRA and overall resource recovery industry to address the issue of climate protection through "Reduce, Reuse, Recycle, and Compost" strategies. The CRRA is the oldest and one of the largest non-profit recycling organizations in the United States dedicated to reducing waste, pollution, and green house gas production through reuse, recycling, composting, and product stewardship.

The RGWC appreciates the opportunity to participate in Climate Action Reserve's work group for the Organic Waste Composting Project Protocol (Protocol) currently under development. Based on our review of the May 7, 2010 Project Protocol Public Review Draft we have the following comments:

- A. We enthusiastically support development of this Protocol, as composting offers a low cost, environmentally sound method of achieving significant greenhouse gas reductions using existing, proven processes.
- B. Additional feedstocks should be added in the future, notably compostable organics that are currently landfilled as Alternative Daily Cover (ADC) such as (1) yard trimmings/green waste; and (2) sewage sludge/biosolids [note: these 2 feedstocks are ideal for co-composting].
- C. Organics feedstocks coming from local collection programs that include a program component requiring generators to separate said organics from other discards should be exempted from the Legal Requirement Test. CRRA's membership consists of many local government decision makers on recycling and waste reduction issues, which gives us a unique perspective on this issue. Local jurisdictions are increasingly finding that a combination of public education, preferential pricing, AND mandated separation are necessary to get residents and businesses to separate organics for diversion from landfills.



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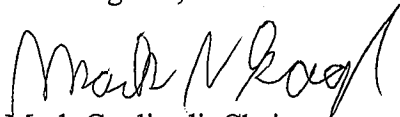
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C. (continued) The Protocol as drafted would provide a significant disincentive for our members to include mandatory separation as a local organics collection program component. This would result in a dampening effect on expansion of food/soiled paper composting and, by extension, greenhouse gas reductions. This is no small matter, as the AB 32 Scoping Plan includes statewide Mandatory Commercial Recycling which will be enacted primarily through the establishment of local ordinances. Local jurisdictions facing the decision of whether or not to include organics in their mandatory commercial recycling ordinances will be influenced, either positively or negatively, by whether they would be disqualifying themselves or their service providers from carbon credits by doing so. The Protocol needs to contemplate the how local mandates for generators to separate discards functions as a local collections program component, rather than the traditional external regulatory compliance requirement (e.g., landfill ban on hazardous waste).

Climate protection is a complex and evolving field which warrants continual re-examination of assumptions and approaches. CRRA's RGWC welcomes the opportunity to participate and learn.

Best Regards,



Mark Gagliardi, Chair
CRRA, Recyclers Global Warming Council

The views expressed by the RGWC do not necessarily reflect the views of the California Resource Recovery Association, its Board of Directors or membership.