



June 7, 2010

Dear Mr. Partridge,

Thank you for providing the opportunity to publically comment on the Organic Waste Composting Protocol. Recology offers the following comments on the Protocol:

1. Projects that process waste streams that originate from places where there is a mandate for organics composting are ineligible from reporting GHG emissions reductions with CAR. Recology believed this is inconsistent with other CAR waste diversion protocols that allow projects within jurisdictions that mandate food waste collection to participate. Currently, only 2% of foodwaste is being composted in the country, and we believe that disallowing compost projects from communities with a mandate will become a disincentive for communities to adopt mandatory foodwaste collection programs. This is adverse to the common goal of many greenhouse gas reduction plans that look at diverting organics from landfills as a way to significantly reduce greenhouse gas emissions. A possible solution to the additionality problem this creates could be to allow a project to occur within a certain timeframe, much like the Organic Waste Digestion protocol allows.

1. A food waste stream subject to a local food waste diversion mandate passes the Legal Requirement Test if (and only if):
 1. The project composting the local food waste stream has an operational start date prior to, but no more than 1 year before, the date that the food waste diversion mandate is enacted by the local jurisdiction; or
 2. The project is *implemented* subsequent to, but no more than 1 year after, the date of passage into law of the local food waste mandate.

For the purposes of this protocol, the date of project implementation may be defined with respect to the date at which the project first broke ground, began compost technology installation, purchased the food waste pre-processing equipment, began the permitting process for the facility, or otherwise financially committed to pursue the project.

2. The eligible waste streams that count towards GHG savings are limited to food and soiled paper. There are many other waste streams that are compostable. Recology understands the iterative process of the Protocol development and would like CAR to consider other waste streams; most notable: green waste and soiled cardboard.
3. In the landfill protocol, the SSR4 which establishes the baseline landfill emissions excludes nitrous oxide emissions but the formula for the OWC protocol explicitly includes it in the calculation. Additionally, the factors for nitrous oxide and methane are not consistent with the landfill protocol factors for nitrous oxide and methane. Recology believes that projects should

be able to use site specific emissions data if available. We suggest the following language to be added as a footnote to the equations in the OWC protocol:

1. If available, the official source tested emission data shall be used in place of the default emission factors. Otherwise, project developers have the option to use either the default emission factors provided, or the site specific emission factors as provided by a state or local agency accredited source test service provider, for each factors used in the project case.

4. There are fuel sources that are missing emission factors, like diesel and biodiesel fuel.

If you have any questions or require additional information on any of the comments provided, please do not hesitate to contact me at (415) 875-1223.

Thank you,

Rachel Oster
Government Relations Manager