



**Comments to Organics Waste Digestion Project Protocol  
Presented to the Climate Action Reserve  
Waste Management  
June 3, 2011**

Waste Management (WM) appreciates this opportunity to comment on the Climate Action Reserve's (CAR) Revised Organics Waste Digestion Project Protocol. We support CAR's efforts to work towards consistency across its various protocols. Only when emission calculations have been accurately quantified and allocated can we be confident that defensible reduction credits are applied.

While we support the efforts of CAR and its drive towards accuracy and consistency, Waste Management continues to be concerned with some of the basic assumptions made in the OWD Project Protocol. For example, we are concerned about the accuracy of applying the protocol to a project when the organic material may not have even originated from within the boundary of the project. Rather, we would like to see a more balanced calculation of the impacts to the landfill and the project itself as the result of the shift in organics flow from one facility to another.

- **Foodwaste moving across state and watershed boundaries.** WM is concerned about the accuracy of calculating the emission reduction resulting from foodwaste diversion when the organic materials starts out being transported across state lines or from one climate extreme to another. In many instances, organic material is generated in urban areas with wet climates, then transported to distant, dry landfill for disposal. An accurate analysis would consider emissions at the organics digester as well as the landfill. Considerations should be given to emissions associated with digester engines or other equipment, as well as residual digestate management and inventory storage. We would like to see an allocation of emission reduction credits given to each facility.
- **Base reduction calculations.** How does the protocol capture the additionality of landfill emission reductions associated with organics when operators engage in reduction methods at the landfill itself? For example, in California, new regulations mandate landfill methane emission reductions through more comprehensive monitoring and allowable methane concentrations. If the landfill is reducing emissions, is the reduction double-counted when the organic waste flows to a different type of processor? Shouldn't the landfill be allowed to capture reductions for their efforts?
- **Verification.** Verification is important, yet extremely burdensome when material moves across geographic boundaries. This will be an ongoing issue associated with any protocol that considers landfill emissions reduction exclusively, since significant waste movement is prevalent in many parts of the country.

In general, we continue to be uncomfortable with the notion that an OWD project captures all of the emission reduction credits for foodwaste diverted from landfills. We believe that an analysis and allocation may be appropriate in some instances and would like to see language that allows flexibility in this regard.

Should you have any questions, please contact Susan Robinson at (206) 264-3073.