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Stakeholder Consultation on Grocery Store SSO Waste Documentation Options: Organic Waste Composting Project Protocol Version 1.1

Questions or comments should be submitted to: sosman@climateactionreserve.org
The Reserve encourages questions or comments to be submitted before January 31st 2014.

Overview

Through previous consultation with stakeholders the Reserve has identified specific difficulties that project developers are experiencing in obtaining sufficient documentation for their grocery store waste. These difficulties present barriers to uptake of the Organic Waste Composting (OWC) protocol. This memo outlines a number of potential solutions to these barriers, as well as the data/information requirements that the Reserve believes would be necessary to incorporate these solutions into a future protocol version. The inclusion of these options in this memo is for discussion purposes only and does not imply that the Reserve supports their inclusion in the protocol.

Through this consultation, the Reserve would like to elicit feedback on these proposed options and underlying data requirements, as well as the submission of (or reference to) data/information that may satisfy these requirements. The Reserve also welcomes the submission of alternative options and/or alternative data/information to overcome difficulties in obtaining sufficient grocery store waste documentation. It is envisaged that the options presented in this memo may be included in a future protocol update.

Background

In the OWC Project Protocol, all waste streams must meet the criteria for additionality to be eligible. Most food and food-soiled paper waste (hereafter referred to as “food waste”) streams are assumed to be additional due to the extremely low levels of composting of municipal food waste across the U.S. The additionality of source separated organics (SSO) from grocery stores, on the other hand, must be demonstrated on a per-generator basis.

At the time of protocol development it was understood that very little food waste in the US was being composted (then and now still less than 3% of total food waste) and that this material primarily consisted of SSO from grocery stores. Thus, if food waste being delivered to a compost facility is not from a grocery store, there is an acceptably small risk that this material was previously being

composted. However, if the food waste is grocery store SSO, there is a much higher risk that this material was previously being composted. Since the ~3% represents all food waste generators composting in the entire nation, the actual percentage of grocery stores that were already composting will be much higher. The risk is much larger than the simple percentage of grocery stores that were composting, because those that were composting already make up the majority of grocery store waste streams that exist at project facilities. For this reason, a stringent performance standard was established for grocery store SSO waste.

The Protocol currently requires the project developer (PD) to document that for the 36 months prior to sending SSO grocery store waste to the project, each grocery store was sending its food waste (either as SSO or as a mixed waste stream) to a landfill. Thus, grocery store SSO must be linked to a specific generating facility and the waste management history of that facility must be documented.

Issues:

Stakeholders have indicated that this performance standard creates hurdles to project feasibility, including financial feasibility, which undermines uptake of the OWC protocol. Stakeholders have indicated that compliance with this grocery store SSO requirement is proving difficult for two main reasons:

1. There is often insufficient information available from haulers to identify whether any, and if so which, grocery stores are contributing waste to a particular route. It may be the case that this information doesn't exist, or the waste hauler is unwilling to provide it.
2. Assuming information is forthcoming on which grocery stores contribute waste to the project, additional research is then needed to acquire sufficient documentation to demonstrate the 36 month history of each grocery store prior to first delivery to the project.

The first item may function as an insurmountable barrier to implementation, whereas the second item tends to increase the cost and effort of project implementation.

Options to update the OWC Protocol:

The above issues might be addressed by updates to the Performance Standard and/or to the protocol Monitoring Requirements. Options include:

- **Change the Performance Standard** – Full Version Update (e.g. v2.0 to v3.0)
 - In order to change the Performance Standard, sufficient evidence would have to be provided showing that either the performance standard is no longer warranted or that a conservative alternative option exists. Any updates to the performance standard may also need to account for any recent developments in composting in certain sectors, such as college campuses and professional sporting facilities.
- **Change the Monitoring Requirement** – Incremental Update (e.g. v2.0 to v2.1)
 - There may be other ways to evidence the eligibility of grocery store waste streams in addition to the one currently provided in the protocol. Below is a list of potential alternative monitoring options and associated documentation requirements that have been identified by Reserve staff. The Reserve is open to considering further alternatives.

Potential monitoring options with documentation and/or data requirements

For an alternative monitoring requirement to be acceptable, the PD would need to demonstrate that the project facility was not or could not have been processing any pre-existing grocery store SSO waste streams. It may be necessary to combine the options listed below (and/or other options), in order to meet this standard.

Option 1: Demonstrate the project composting operation lies outside of regions with high levels of composting activity.

- The Reserve could acquire data that defines the geographic area(s) associated with the existing food waste composting activity identified in the EPA waste study. The PD could then demonstrate that their facility does not lie within these areas, or within a certain distance of these areas.
- **Open Questions:** How do we define such areas? Can/should such areas be defined on a city/county/state wide basis? Would such areas need to be defined differently in different parts of the country? Is waste being transported over long distances to these areas, such that we would need to exclude waste originating from a certain distance from such areas? Would such exclusion zones differ in size based on geography?
- **Proposed Data requirements:** The U.S EPA report used by the OWC protocol states that 2.8% of food waste is diverted from landfill. We need to see data that identify the origin and fate of that 2.8% of food waste, preferably at the county level, though state level may be acceptable. The result would show the % of food waste diversion at a particular scale, such that it would be possible to identify areas where diversion is effectively nonexistent. In those areas it may be possible to relax the performance standard.
- **Proposed documentation requirement:** The PD could document that its composting operation does not lie within these areas and/or does not accept waste originating from within areas supplying these hot spots.

Option 2: Demonstrate the project composting operation lies in an area where there are no competing composting operations.

- Require PDs to demonstrate that an absence of composting activity exists within the 'competitive area' of the project, for 36 months prior to each new waste stream being sent to the project. Ideally the Reserve would be able to develop a map which identifies all of the composting operations around the country and sets out the 'competitive area' around such facilities. Project developers could then simply see whether their facility falls within the 'competitive area' of any of the other facilities.
- **Open Questions:** How do we define an appropriate 'competitive area' for each project? What is a reasonable maximum distance for a composting operation to be sourcing waste? If the majority of composting cannot be said to be happening in discrete areas, is this a viable alternative? Would such documentation requirements be more practical to implement than existing requirements? How do we define "absence" of activity? How do we know that such a demonstration is ever complete? Would such an approach only benefit new composting operations?
- **Data Requirement:** If data exists which identifies and maps existing composting facilities accepting food waste, this could be quite useful. Data on factors used to determine 'competitive

area' would be useful, including data on distances traveled by waste received at composting facilities.

- **Documentation Requirements:** Sufficiently document that all of composting being performed in the competitive area is done as part of discrete pilot programs; and/or demonstrate there is no historical food composting being undertaken by competitors in the competitive area. This documentation could come from a source such as the USCC, or using state waste characterization reports, or some other report that would cover the competitive area of the composting facility.

Further information that would be useful

In order to facilitate the inclusion of option 1 (and possibly also option 2) into the protocol, it may be necessary for stakeholders to provide the Reserve with data which would help Reserve staff to understand the current volumes of food waste – grocery store and other – being composted around the country, broken down to as low a level as possible (i.e. county/region/state), and to have a breakdown of the percentage attributable to each source category. Relevant types of source category should include grocery stores, but ideally also newly-emerging potential organics-rich sources such as sports arenas, grocery store distribution centers, large restaurants (and restaurant chains), and university and college campuses. It may also be necessary to have data on how far grocery store food waste is being transported in different parts of the country.

Organic Waste Composting Protocol (OWC) (Sections on grocery store SSO documentation):

Section 3.4.1 Performance Standard Test:

The Reserve's performance standard research indicates that approximately 2.5% of the MSW food waste generated in the U.S. is composted annually as common practice, and that this is limited mostly to MSW food waste from grocery stores and supermarket diversion programs.

Therefore, MSW food waste and soiled paper waste streams are not eligible if they are sourced from grocery stores and/or supermarkets that have historically diverted these waste streams from landfills. Additionally, all grocery store waste streams composted by the project facility prior to the project start date are not eligible.

Projects must demonstrate the eligibility of each new grocery store waste stream composted by the project by documenting that the food and soiled paper component of the grocery store waste was being disposed of in a landfill for a period of at least 36 months prior to the date that the grocery store waste was first delivered to the project composting facility, or documenting that the grocery store waste stream was previously deemed to be an eligible waste stream at another OWC project that is registered with the Reserve. Waste streams originating from new grocery store facilities are deemed eligible. Section 6.2 provides requirements for documenting the pre-project disposal of grocery store waste. All other MSW food and soiled paper waste sources described above are eligible.

Eligible waste streams at the time a project is registered shall remain eligible throughout a project's first crediting period, regardless of changes in any future versions of this protocol. However, projects must demonstrate the eligibility of all new grocery store waste streams composted by the project facility according to the requirements above.

Section 6.2 Monitoring and Documenting Pre-Project Waste Disposal for Grocery Store Waste Streams

Waste streams originating from grocery stores or supermarkets are eligible if, and only if, the project developer can document that:

- For a continuous period of at least 36 months prior to the date that waste sourced from the grocery store was first composted at the project composting facility, food and soiled paper waste generated by the grocery store was sent to a landfill, or
- Food and/or soiled paper waste originating from the grocery store was deemed as eligible waste at an OWC project registered with the Reserve, or
- The grocery store from which the waste originated is a new facility

In order to document the eligibility of the grocery store waste stream, projects must monitor the following information for each grocery store waste stream:

- The initial date the waste stream is delivered to the project composting facility, for all new grocery store waste streams
- The origin of the new grocery store waste stream (by facility)
- The previous waste disposal methods used by the grocery store waste generator, for each new grocery store waste stream
- The opening date of any new grocery store facilities supplying waste to the project

Additionally, documentation demonstrating that grocery store waste was sent to landfill(s) prior to diversion to the project composting facility or that the grocery store is a new facility should be collected and retained by the project for verification purposes. Acceptable documentation includes, but is not limited to:

- Landfill tipping receipts from the grocery store and/or contracted waste haulers
- Waste hauler contracts
- Internal memo's and/or employee training documents detailing waste handling and/or organics separation procedures, goals, and timelines
- Media or marketing campaigns detailing dates related to the grocery store waste diversion program
- Internal documentation, store leasing documents, or media or marketing campaigns announcing the opening date of the grocery store facility

Public Webinar

The Reserve will host a public webinar on Wednesday, February 26, 2014 from 10:00 am to 12:00 pm PDT to discuss the process and the contents of the memo with interested stakeholders. Please register for the webinar here: <https://www2.gotomeeting.com/register/884913322>.

Data Submission

If you have data or information to submit in response to this request, please contact Sami Osman at sosman@climateactionreserve.org or (213) 542-0294.