

Head and Members of the CDM Executive Board
Mr. Maosheng Duan Chairman
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Subject: Call for public input on "Issues included in the annotated agenda of the sixty- eighth meeting of the CDM Executive Board and its annexes"

Honorable Members of the CDM Executive Board,

Dear Mr. Duan,

GAIA would like to thanks the CDM Executive Board for the opportunity to comment on the annotated agenda to the 67th meeting of the CDM EB. Please find our comments on the following pages.

Best regards,



Mariel Vilella

MUNICIPAL SOLID WASTE TREATMENT IN THE CDM: AM0025

Annotated agenda for the 68th CDM EB meeting:

74. ▶ *Action:* The Board may wish to approve the revision/amendment to the following approved methodologies and tools:

(b) AM0025 “Avoided emissions from organic waste through alternative waste treatment processes”.

The draft revised methodology is contained in annex 5 to the report of the fifty-sixth meeting of the Meth Panel;

We welcomed the opportunity to comment on the draft revision of AM0025. We carefully examined the proposed changes and GAIA made several key observations on why the methodology revision was still problematic. You will find GAIA’s input in the Annex to this submission.

Likewise, the Meth Panel has mentioned GAIA’s input in its 55th meeting report, paragraph 13:

13. AM0025 “Avoided emissions from organic waste through alternative waste treatment processes”

One input was received with regard to the call, which was considered by the panel when finalizing the revision to the methodology.

The revised version that has been recommended for the CDM EB’s approval has improved few elements but is far from being satisfactory and it is **GAIA’s consideration that the revision should not be passed without further scrutiny.**

A number of both technical and broader issues remain, as follows:

1. The time made available to comment was inadequate – 10 days was much too short. In particular since many communities adversely affected by these projects do not speak English and require translation of the documents.

2. Of the 5 projects that proposed baseline methodologies, one (Lucknow) is non-operational; another (GALFAD) never implemented the second and third phases. This is not a basis for a successful methodology.
3. No definition was given in the draft revision 1.0 for either incineration or gasification, even though both of these technologies have been utilized under AM0025 in the past. They are now included, which is an improvement.
4. Industrial and hospital waste streams have in principle been excluded from the methodology, as lines 72-72 in the draft revision 1.0 have been deleted. However, the definition of 'fresh waste' only excludes 'old and hazardous' waste, which is ambiguous and may not necessarily mean a practical exclusion of industrial and medical waste. Moreover, in Table 2, in regards to waste types that can be treated with incineration and gasification, only 'fresh waste' is mentioned, without further specification of which types of wastes should be excluded as it is presented for other types of waste treatment. This is a clear window of opportunity for incineration of industrial and hospital waste, which is completely inappropriate for AM0025.
5. GAIA recommended the exclusion of the definitions of industrial and hospital waste, understanding that these types of wastes would be excluded from the methodology. Now not only industrial and medical wastes have not been clearly excluded, but the definitions have been deleted as well.
6. After GAIA recommended removing the mention of industrial waste in line 86 (in draft revision 1.0), this has now rightly disappeared.
7. Likewise, the definitions of stable biomass (BS) and RDF are much more appropriate (line 90 in draft revision 1.0).
8. Solid waste is now defined as discards, which is also an improvement (line 94 in draft revision 1.0).
9. The methodology still includes the treatment of wastewater sewage sludge through co-composting. This is a problem as sewage sludge contains high levels of chemicals, oils (from street runoff) and pharmaceuticals, and renders any resulting compost inappropriate for land application. It would be more appropriate to have a distinct methodology and approach for wastewater and sewage sludge treatment.
10. Line 155 in version 1.0 has been removed which is a clear improvement.
11. It is an excellent change that those projects that negatively impact recycling rates will not be eligible. GAIA proposed specific text to make sure that

project developers could implement this provision, and it should be as follows: “The project does not reduce the amount of waste that would be recycled in the absence of the project activity; a survey of current recycling rates by the formal and informal sector shall be undertaken followed by an analysis of how the proposed project would affect recycling rates.” Unfortunately, the text as it stands now only requires ‘detailed justifications’ to demonstrate that the project activity does not reduce the amount of waste that would be recycled in the absence of the project activity, which is open to a wide range of interpretations and it may be very challenging to monitor and approve. Moreover, it does not specify that both formal and informal sectors need to be considered, especially as the informal recycling sector has such an organized presence in municipal solid waste systems in developing countries.

12. In Table 1, no specification of temperature limits is provided for combustion of RDF and SB. Version 1.0 mentioned 300 °Celsius, which GAIA pointed out as problematic, as the temperature range for dioxin forming is 200-800°C. Now the reference has disappeared which is a serious mistake.
13. In Table 1, for gasification - Syngas utilization should be brought within the project boundary and fully analyzed. If syngas is exported outside the project boundary, then its emissions must be counted against the emissions reductions achieved by the project.
14. Line 189 – revision 1.0. It is commendable that the range of baselines has been expanded to reflect reality. However, since it is not mandatory to analyze these alternatives, it’s unclear if this change will have much effect. Also, it is unclear what is meant by recycling organic waste. GAIA recommended to define recycling of organic waste to mean composting or anaerobic digestion, and require baseline studies to document current recycling rates. This problem still remains unaddressed.
15. Line 215 – draft revision 1.0. In many developing countries, demand exceeds supply. Therefore the assumption that electricity generated from such projects would displace other sources of electricity is unwarranted. This is still not addressed in the new version. Developers wishing to claim credit for electricity generation must provide an analysis showing displacement of electricity generation from current or currently proposed sources. A new methodological tool may be required.
16. Line 277 – draft revision 1.0. The blanket assumption that the combustion of biomass will not affect biogenic carbon stocks is not appropriate and recent scientific literature (Searchinger et al., 2009) indicates that this accounting rule is likely to lead to wide scale deforestation. Recycling of paper and wood helps reduce deforestation; recycling of metals does, too (as deforestation is

often a result of mining); composting of organic waste for its return to agricultural soil improves soil carbon content. All of these can be displaced by poor waste disposal projects. As already mentioned by GAIA in our comment to the draft revision, lines 277-280 should be removed. Biogenic CO₂ emissions from baseline and project scenario should be compared. Or a simpler approach is to eliminate the distinction between biogenic and non-biogenic CO₂ and make all analyses on a total CO₂ basis.

17. Line 453 – revision 1.0. Syngas is the product of waste gasification and includes both biogenic and fossil fuel based waste. Thus it should be treated like RDF and MSW, whose biogenic proportions are calculated. Emissions from syngas should be included.
18. Line 527 – 551 – revision 1.0. The proportion of biogenic emissions in municipal waste is subject to widely varying estimates, with little verification in the published literature. Rather than calculating the proportion of CO₂ emissions, which are attributable to fossil-based waste, measurements should be required (i.e. frequent radiocarbon stack tests).
19. Line 554 – revision 1.0. Although emissions of N₂O & CH₄ are minor from combustion of RDF/SB, their high GWP means that minor emissions have a major impact on the environment, so they should be included. Line 554 should be removed.

On the light of the above comments, GAIA urges the CDM Executive Board not to approve the draft revision of AM0025 before the identified issues have been carefully evaluated and addressed.

Best regards,



Mariel Vilella