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Gevalor's position on the open call for input on the tool "emissions from solid waste disposal sites" version 7.0 draft.

The new approach proposed by the board is very simple for new users, thus enabling a wider range of project proponent to submit a project. The calculation doesn't need to be done by an expert and is easily understood by almost anyone.

Gevalor has several waste treatment projects registered with voluntary standards (VCS, Goldstandard) and has been using extensively the latest versions of this tool (v6.01).

Thus we made a comparison of baseline emissions following the last version of the tool and the draft version of the new one.

The calculation has been made with the tropical wet default values, as all the projects we work with have tropical wet climate. It was supposed that all projects treat 10 000 tons of waste per year during 10 years.

Project	Project in Togo	Project in Madagascar	Project in Cameroon	New tool
Baseline Emissions	28 481	64 978	59 318	29 506

The waste characterization (which is not taken into consideration in version 7.0 of the tool), are for the three mentioned projects:

%	Togo	Madagascar	Cameroon
Wood	4.9	9.5	0.7
Paper	7.1	3.7	5.4
Food waste	10.4	69.3	52.1
Textiles	5.8	1.0	5.2
Garden waste	14	5.8	17.5
Inert waste	57.8	10.7	17.6

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Thus comparing the "new" approach with the "old" one we can notice that baseline emissions are calculated in a under estimated way assuming a large part of inert waste in the treated waste.

According to our own waste characterization, as well as other done by the World Bank[1], and others, organic waste in developing countries can represent 50 to 90% of waste:

%	Togo	Madagascar	Cameroon	World Bank
Compostable waste	42.2	89.3	82.4	60
Inert waste	57.8	10.7	17.6	40

The new version of the tool, simpler, would facilitate more projects in developing countries, as wanted by UNFCCC, but would also make less reduction emission than reality thus not encouraging new projects.

What we then suggest is to ask for at least one waste characterization at the beginning of the project (as in application A of the tool) so as countries / projects with a wide part of organics are not prejudiced, and maybe provide a table with multiplication coefficients depending on the waste characterization.

[1] The Growing Complexities and Challenges of Solid Waste Management in Developing Countries Sandra Cointreau, Solid Waste Management Advisor, The World Bank September 2007