

TABLE FOR COMMENTS

Name of submitter: _____ GAIA Global Alliance for Incinerator Alternatives _____

Affiliated organization of the submitter (if any): _____

Contact email of submitter: _____ mariel@no-burn.org _____

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#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
			general	The time made available to comment is inadequate – 10 days is much too short. In particular since many communities adversely affected by these projects do not speak English and require translation of the documents.	Provide at least one month for comments.	
		5	general	Of the 5 propojects 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.		
		42	technical	No definition is given for either incineration or gasification, even though both of these technologies have been utilized under AM0025 in the past.	Add definitions for incineration and gasification.	
		72-73	editorial	It is appropriate to exclude industrial and hospital waste streams from the methodology as these often require specialized handling and treatment. However, the sentence “This type of waste is not suitable for being treated by some alternative waste treatment options” is vague and implies that these waste streams are appropriate for non-alternative waste treatment processes – which are not defined.	It would be clearer to state simply that the methodology does not apply to industrial or hospital waste streams.	
		84	technical	As there is some confusion about the definition of “organic” (to a chemist, plastic is an organic, i.e., carbon-based, material), it is better to define organic waste.	It is better to define organic waste in terms of its putrescibility, that is, the ease by which it is decomposed by natural processes.	

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Date: 20 th April 2012	Document: Comment on draft revision AM0025
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		85	editorial	If the methodology intends to exclude industrial waste and hospital waste, it makes no sense to include them in this definition.	Remove mention of industrial waste and hospital waste from the definition.	
		86	editorial	This line contradicts the inclusion of wastewater sludge, which is a byproduct of wastewater treatment.	Remove mention of industrial waste from the definition so that this line doesn't contradict the previous one.	
		90	technical/ editorial	The distinction between stabilized biomass (SB) and refuse-derived fuel (RDF) is imprecise, since the only distinction made is that SB is "mainly" produced from agricultural waste.	SB should be clearly defined as being produced exclusively from agricultural waste; and RDF is produced from mixed or municipal waste.	
		94	technical	The definition of solid waste is weak. If solid waste is unwanted, this means that it excludes all recyclable materials and any other material for which there is a market.	Redefine solid waste as materials which are discarded.	
		126	technical	There is a strong new emphasis on treating wastewater sewage sludge, particularly through co-composting with organic waste. 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.	Do not expand the methodology to allow for the treatment of wastewater sewage sludge through co-composting. Therefore lines 126-128 should be stricken from the methodology.	
		144	general	This is a commonsense but important addition to the methodology and may help avoid some of the additionality problems previously encountered.		

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		155	general	This creates a disincentive for countries to enforce their own laws – for example, India’s Solid Waste Management Rules of 2000, which mandate source separation but are routinely ignored.	This should be removed from the methodology.	
		159	technical/ general	It is excellent that CDM projects cannot result in reduced recycling rates, but project developers should be required to provide evidence that this is not the case.	Proposed text: “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.”	
	Table 1	RDF/SB	technical	The emissions from RDF/SB exported outside the project boundary must be accounted for.		
	Table 1	RDF/SB	Technical	Temperature limit is within range of dioxin formation (200 – 800 degrees)	Temperature should be limited to 200 degrees Celsius.	
	Table 1	Gasification	technical	If syngas is exported outside the project boundary, then its emissions must be counted against the emissions reductions achieved by the project. Syngas utilization should be brought within the project boundary and fully analyzed.		
		189	general	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.	Define recycling of organic waste to mean composting or anaerobic digestion. Require baseline studies to document current recycling rates.	

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		215	general	In many developing countries, demand exceeds supply. Therefore the assumption that electricity generated from such projects would displace other sources of electricity is unwarranted.	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.	
	Table 2		Technical	These emissions are small but not insignificant and should not be excluded from calculation: N ₂ O emissions from on-site electricity generation (particularly if from a diesel generator) N ₂ O emissions from on-site fuel consumption (especially diesel vehicles) CO ₂ emissions from burning of syngas – this is not biogenic in origin and there is no rationale to exclude it. CO ₂ emissions from burning of biogas – this is biogenic in origin but should be included with other biogenic emissions.	Change Excluded to Included for these cases.	
		277	Technical	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.	Lines 277-280 should be removed. Biogenic CO ₂ emissions from baseline and project scenario should be compared. Or a simpler approach is to eliminate the distinction between biogenic and non-biogenic CO ₂ and make all analyses on a total CO ₂ basis.	
		298	General	This appears to be an improvement over the previous way of dealing with unenforced regulations. If a regulation is enforced more than half the time, then the project has a baseline of zero, so effectively cannot generate CERs. If compliance is less than 50%, then the baseline is reduced by the compliance rate.		

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		332	Technical	A baseline campaign to evaluate emissions from the SWDS are welcome. It is always important to tune models to real data. As this data is scarce, the CDM should make publicly available all such data collected.		
	Eqn. 19	439	Technical	Emissions from recyclable material is not accounted for, i.e the increased upstream emissions from displaced recycling	Add a term to eqn - +PE_recyc, where PE_recyc= emissions from displaced recycling calculated through a life cycle analysis.	
		453	Technical	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.	Remove line 553 and account for emissions from syngas.	
		527-551	Technical	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 CO ₂ emissions which are attributable to fossil-based waste, measurements should be required (i.e. frequent radiocarbon stack tests).	
		554	Technical	Although emissions of N ₂ O & CH ₄ 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.	Remove line 554.	