



Climate

Proposal to amend the Green-e Climate Protocol for Renewable Energy to allow solid biomass

Date of Form: December 14, 2009
Comment Due Date: February 15, 2010
Response Recipient: Green-e Climate at climate@green-e.org
Response Options: E-mail (preferred) to climate@green-e.org
Fax to (415) 561-2105
U.S. mail to address provided below

Background

Currently, non-gaseous biomass electricity generation projects are not eligible under the Green-e Climate Protocol for Renewable Energy, an offset protocol that defines the eligibility and requirements for U.S.-based renewable energy projects to supply Green-e Climate Certified carbon offsets.¹

Green-e Climate's treatment of the eligibility of solid biomass electricity generation projects under the Protocol for Renewable Energy was clarified after the Second Stakeholder Comment Period on the Draft of the Green-e Protocol for Renewable Energy: "Only gaseous biomass will be accepted under this protocol. This includes landfill gas, digester gas and wastewater methane. No biomass in a liquid or solid state will be allowed. Animal waste in a solid state, agricultural waste, energy crops, and municipal solid waste are deemed ineligible under this protocol. While we recognize the benefits of other low emission technologies, such as agricultural waste biomass, animal waste, and renewable thermal energy, *we do not have protocols in place at this time to accurately assess all life cycle impacts and accounting of emissions. However, we will continue to pursue ways to reliably include these fuels in future versions*" (emphasis added).

"Lifecycle impacts" (also called secondary effects) refers to emissions or other relevant environmental impacts associated with the growing, harvesting, processing, and transportation of the biofuel.

New Considerations

Certain types of solid biomass for electricity generation projects have been able to demonstrate no or negligible lifecycle impacts in accordance with other project protocols and standards (for example, Clean Development Mechanism and Voluntary Carbon Standard methodologies), which are endorsed by Green-e Climate. This appears to be the case where 1) the biomass is a waste or byproduct from other processes, 2) there is enough of a surplus of the waste so that its utilization for electricity does not affect the overall supply (and therefore does not affect demand for the waste biofuel), 3) emissions from transportation are small (but accounted for) or non-existent, and 4) there are no other significant environmental impacts associated with the utilization of the biomass. Projects in which these conditions are met appear to satisfy the initial concerns with solid biomass that are cited in the Protocol for Renewable Energy.

¹ The Protocol for Renewable Energy is one of four Green-e Climate Endorsed Programs. To the extent that solid biomass electricity generation projects can be approved through one of the other three Endorsed Programs, they can currently supply Green-e® Climate certified offsets.

Recommended Action

Since Green-e Climate has no protocols or procedures in place to evaluate solid biomass electricity generation projects (specifically, the surplus of waste biofuel available in a region, transportation emissions associated with a project, etc.), relying on the protocols and standards of an Endorsed Program can address these concerns. Under this scenario, the Protocol for Renewable Energy would be amended so that solid biomass electricity generation projects are eligible under the Protocol for Renewable Energy as long as they utilize a waste or byproduct fuel and the project utilizing the waste or byproduct biomass fuel has been certified by another Green-e Climate Endorsed Program.

Offset certification under the Protocol for Renewable Energy would only be allowed for projects that have completed the certification process of another Endorsed Program for project components not related to electricity generation. Where a project involves multiple and separable components (e.g. electricity generation and steam for heat generation), individual components may be assessed separately provided the other Endorsed Program certifying the facility allows this and ensures no double counting of carbon impacts. The project may therefore be certified by multiple project certification programs. The Protocol for Renewable Energy is only applicable to electricity generation.

Green-e Climate is also seeking stakeholder feedback regarding the incorporation of reference(s) to existing voluntary sustainable certification programs for solid biomass, such as the Forest Stewardship Council, Council on Sustainable Biomass Production, or Roundtable on Sustainable Biofuels. Green-e Climate may either require or recommend that the sources of solid biomass for projects approved under the Protocol meet the standards of one or more of these organizations. These certification programs provide added protection against secondary effects and other environmental impacts.

Recommended Change to the Section 3-A of the Protocol for Renewable Energy

Green-e Climate is seeking stakeholder feedback about the following changes to the Green-e Climate Protocol for Renewable Energy:

Strike the following in Eligible Renewable Resource number 5:

~~“No biomass in a liquid or solid state will be allowed. Animal waste in a solid state, agricultural biomass, energy crops, municipal solid waste and waste to energy are ineligible under this Protocol.”~~

Add the following in Eligible Renewable Resource number 5:

“No biomass in a liquid or solid state will be allowed, unless all of the following conditions are true:

1. The biomass fuel is a waste or byproduct of a commercial or industrial activity,
The project utilizing the waste or byproduct biomass fuel has been certified by another Green-e Climate Endorsed Program,²and
2. The biomass appears on the list of eligible fuels below:
 - a. Woody waste;³
 - b. Agricultural crops or waste; and
 - c. Animal and other organic waste.”

² Green-e Climate Endorsed Programs have protocols to assess lifecycle impacts and accounting of emissions associated with biomass electricity generation projects, specifically, the surplus of waste biofuel available in a region and transportation emissions associated with a project. Such projects that are certified by a Green-e Climate Endorsed Program for project components not related to electricity generation are eligible under this protocol. Where a project involves multiple and separable components (e.g. electricity generation and steam for heat generation), individual components may be assessed separately provided the other Endorsed Program certifying the facility allows this and ensures no double counting of carbon impacts.

³ Includes “black liquor” from pulp and paper processing, mill residues, industrial waste wood, and waste wood from woodworking or wood processing, so long as the wood is not chemically treated or coated.