

INCLUSION OF SOLID BIOMASS THAT IS A WASTE OR BYPRODUCT OF A COMMERCIAL OR INDUSTRIAL ACTIVITY IN THE GREEN-E® CLIMATE PROTOCOL FOR RENEWABLE ENERGY

Summary of and Response to Stakeholder Comments and Board Decision

(Comment Period: December 14, 2009 - February 15, 2010)

This document summarizes the comments received by the Center for Resource Solutions (CRS) on the proposed eligibility of certain types of solid and liquid biomass electricity generation facilities under the Green-e Climate Protocol for Renewable Energy (PRE), provides a summary of CRS' responses, and explains the final decision by the Green-e Governance Board.

Stakeholder Comments:

1. Life-cycle Emissions and the Carbon Neutrality of Biomass

Stakeholder Comments:

One stakeholder emphasized that not all biomass is carbon neutral, and that life-cycle emissions associated with the planting, production, harvest and processing stages must be accounted for. The Stakeholder urged that Green-e Climate consider how the feedstock is produced in order to ensure that the project is carbon neutral, and advised that CRS not assume that the biomass being used in certified projects is surplus.

CRS Response:

CRS Staff agrees with the comments made by the Stakeholder. Proposed language was altered such that it allows Green-e Climate to consider solid and liquid biomass electricity projects for approval which have been certified for a non-electricity generation component through an Endorsed Program that has protocols in place to properly assess lifecycle impacts, and that eligibility will be limited to projects with no or negligible lifecycle impacts based on CRS evaluation of the due diligence performed under this previous certification. The proposed language was also altered to explicitly state that the waste or byproduct biomass must be surplus in the region, and to clarify the criteria for eligible fuel sources.

2. Incorporation of Reference(s) to Existing Voluntary Sustainable Certification Programs for Solid Biomass

Stakeholder Comments:

One stakeholder suggested that Green-e Climate require or recommend that the sources of solid biomass for projects approved under the PRE meet the standards of existing voluntary sustainable certification programs for solid biomass – such as the Forest Stewardship Council, Council on Sustainable Biomass Production, or Roundtable on Sustainable Biofuels – in order to provide added protection against secondary effects and other environmental impacts.

CRS Response:

While CRS Staff felt that including a requirement that all waste biofuels come from a certified source would unnecessarily narrow the number of eligible projects, and that the final proposed language provided adequate protection against secondary effects, CRS Staff recommended pursuing steps to investigate increasing disclosure of biomass source certifications.

3. Exclusion of Construction and Demolition Debris

Stakeholder Comments:

One Stakeholder commented in favor of the inclusion of solid waste biomass in the Protocol for Renewable Energy, but recommended specifically including language excluding the eligibility of construction and demolition debris.

CRS Response:

Construction and demolition debris may be an eligible resource under the PRE, provided that it meets the criteria for eligible waste biomass (i.e. woody waste). Proposed language was altered to clarify and limit the criteria for eligible waste biomass in an effort to address concerns related to construction and demolition debris.

Green-e Governance Board Decision (May 25, 2010)

Board Members provided additional suggestions for amendments to the proposed language. Proposed language incorporating these changes was put before the Green-e Governance Board for a vote on May 25, 2010. The Green-e Governance Board voted to adopt the following change to the Green-e Climate Protocol for Renewable Energy:

In Section 3-A, 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.”~~

In Section 3-A, 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 satisfied:

1. The biomass fuel is a surplus waste or byproduct of a commercial or industrial activity,
2. The project utilizing the waste or byproduct biomass fuel has been certified by another Green-e Climate Endorsed Program for non-electricity generation project components,¹ and
3. The biomass appears on the list of eligible fuels below:²
 - a. Woody waste³;
 - b. Agricultural crops or waste; and
 - c. Animal and other organic waste.”

¹Green-e Climate Endorsed Programs have protocols to assess lifecycle impacts and accounting of emissions associated with reutilization of biomass that is a waste or byproduct of a commercial or industrial activity. Where a project is using the same supply of eligible biomass in multiple and separable project components, one of which is electricity generation (e.g. a combined heat and power (CHP) project producing electricity and steam from the same supply of biomass), it is eligible under this Protocol if it has been certified by a Green-e Climate Endorsed Program for a non-electricity generation project component (e.g. steam generation), and demonstrated through this process no or negligible lifecycle impacts (based on CRS evaluation of the due diligence performed as a part of this certification), provided that the Endorsed Program(s) certifying the facility allows for individual components to be assessed separately and ensures no double counting of carbon impacts.

²Additional sources of biomass not listed here may be considered for eligibility at a later date.

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. Biomass resources excluded from eligibility include: a) wood that has been coated with paints, plastics, or formica; and b) wood that has been treated for preservation with materials containing halogens, chlorine or halide compounds like CCA-treated materials, or arsenic (CCA = chromated copper arsenate). Qualified wood fuels may contain de minimis quantities (less than 1% of total wood fuel) of the above excluded contaminants.