

Comments of Morton Barlaz
Draft Report of August 27, 2015

Preface

My comments are focused on the manner in which the framework would be applied to municipal solid waste (MSW) as that is the area in which I have expertise.

Page i, line 25 (also on page 9, line 14): since municipal waste is not disposed in uncapped industrial landfills, the “(e.g., municipal solid waste)” is not a good example, I think this might apply to biomass waste.

Page i , line 30: this implies that electricity generation offsets are included in the BAF but they are not. The term “avoided emissions” is quite broad and implies a life-cycle analysis so it should be defined carefully or avoid using this term

Page iii, line 30, point 3 (also on page 4, lines 9-20 and page 7, point 3): I do not think that an approach based on changes in carbon stocks will work for municipal solid waste.

Page 2, lines 1-5: This text implies that landfill methane emissions are not considered. This is not the case as described in Appendix N.

Page B-9, line 30: the term “waste” is ambiguous since in some cases it refers to municipal solid waste and in other cases it refers to biomass waste. Since they are managed quite differently, I suggest using MSW and biomass waste each time to eliminate ambiguity as to what is meant by “waste.”

Page B-10 lines 14—15: Lets call it MSW, not “garbage.” MSW does include some woody material but that is OK if the text were to read “whereas MSW is likely to produce ...”

Separate Issue – Appendix N, Section 4.1: Food Waste should be deleted from the title, as it is not addressed in this section.