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SUMMARY OF COMMENTS & RESPONSES **DRAFT ARGENTINA LIVESTOCK PROTOCOL VERSION 1.0**

One set of comments were received during the public comment period for the Climate Action Reserve (Reserve) draft Argentina Livestock Protocol Version 1.0 (ARG LSP). Staff from the Reserve have provided responses to all comments received. The public comment period for the draft protocol was July 22, 2024, to August 22, 2024.

The comments received are summarized below. The submitted comment letters can be viewed on the Reserve's website at:

<https://www.climateactionreserve.org/how/protocols/waste/argentina-livestock/dev/>

COMMENTS RECEIVED BY:

1. Benjamin Kling (**Beta Analytic**)

Section 4 GHG Assessment Boundary

- 1. COMMENT:** Our recommendation is that the Protocol should include direct biogenic content testing requirements following the ASTM D6866 Method B standard for any biogas seeking recognition of biogenic content. While the Reserve's GHG Assessment Boundary currently excludes biogenic CO₂ emissions, it's impractical to exclude biogenic content from the protocol because of the SSRs that are included. It's critical to quantify biogenic content for the use of biogas for upgrading to renewable natural gas or biomethane fuels (SSR 11), injection into pipelines or other end uses (SSR 13), and the use of biogas for electricity generation (SSR 10) to require routine testing to verify biogenic content. While Argentina does not have a clean fuel program, the testing requirement would bring the protocol in line with existing international programs (e.g., RFS, RED, US and Canada GHGRP, EU ETS).
(Beta Analytics)

RESPONSE: Biogenic carbon is excluded from the GHG Assessment Boundary because carbon dioxide emitted during combustion represents the carbon dioxide that would have been emitted during natural decomposition of the manure. Emissions from the biogas control system do not yield a net increase in atmospheric carbon dioxide because they are theoretically equivalent to the carbon dioxide absorbed during plant/feed growth.

Additionally, while electricity generation for delivery to the grid, injection into a pipeline or other end uses, and use of biogas for thermal energy are eligible project activities under the ARG LSP, the Protocol credits the biogas destruction associated with the activity rather than the use of the biogas or displacement of fossil fuels. Thus, CO₂ biogenic emissions are excluded from the boundary and biogenic content testing is not required.

The Reserve will include a footnote in Section 4 GHG Assessment Boundary that for livestock operations that upgrade biogas for low-carbon fuels, pipeline injection, or electricity, it is recommended they conduct biogenic testing to ensure that the content of the biogas is sufficient for its end use; however, it is not a requirement of the carbon project.