



End-of-Pipe Credits Not Enough - Invest in Organics Diversion for Real Climate Impact

From: Chris Sparnicht

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To: The Honorable Danny Werfel

Commissioner of Internal Revenue Service

1111 Constitution Ave. NW

Washington, DC 20224

Subject: Formal Comment - [Section 45V Credit for Production of Clean Hydrogen](#)

While the proposed Section 45V Clean Hydrogen Production Credit represents important progress in incentivizing climate-friendly technologies, I believe a more comprehensive approach is needed to align incentives with upstream opportunities that prevent emissions at the source.

Specifically, I advocate for increased policy attention to *waste prevention through organics diversion from landfills*. Landfilled organic waste represents a major source of methane emissions that can be directly avoided through composting, anaerobic digestion, and other separation techniques.

While end-of-pipe solutions have a role to play, a systemic approach that targets upstream prevention has potential for greater emissions reductions and sustainability benefits. Incentives for organics diversion would complement downstream clean energy investments, creating synergies that optimize climate impact.

As you develop clean energy strategy and policy, we urge consideration of how preventing avoidable emissions upstream through organics diversion and the circular economy can work hand-in-hand with clean energy technology deployment for lasting emissions reductions. A comprehensive approach is needed to address the climate emergency at scale.

Sincerely,

Chris Sparnicht

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