

Agenda item 3.3.

Paragraph 7 of the annotated agenda

**Clarification of
AMM_CLA_001: Applicability of A6.4-AMM-001 (ver. 01.0)
for landfill projects with pre-existing passive gas collection
system**

Methodological Expert Panel – 13th meeting

13 to 17 April 2026

Bonn, Germany



Summary of the Clarification

- **Title:** Applicability of A6.4-AMM-001 (ver. 01.0) for landfill projects with pre-existing passive gas collection systems
- **Submission date:** 18 March 2026
- **Submitter:** Ricardo Esparta



- Paragraph 11(b) of AMM-001:

11. The mechanism methodology is applicable to Article 6.4 activities that involve: (...)

*(b) **Upgrading an existing (active or passive) LFG capture system** to increase the recovery rate, where the captured LFG prior to the implementation of the Article 6.4 activity was flared and not used, and:*

*(i) The amount of LFG captured by the existing system is **collected and measured separately** from the upgrade implemented as part of the Article 6.4 activity; or*

*(ii) The **efficiency of the existing system is not impacted** by the upgrade implemented as part of the Article 6.4 activity, and **historical data on the amount of LFG captured and flared is available** (if such historical data is not available, no A6.4 ERs can be claimed).*



Summary of the Clarification

- Issues with the application of the paragraph:
 - **Passive landfill gas collection and flaring systems** are often installed primarily for operational safety and environmental compliance purposes;
 - Such passive systems are generally **not required to have any quantitative monitoring of the volume of landfill gas** captured under current local regulatory practice;
 - Consequence: potential projects will likely **lack the necessary historical measurement data.**



- Clarifications requested:
 1. Does the existence of a pre-existing passive landfill gas collection/flaring system, without historical measurement data, automatically **render a project ineligible under A6.4-AMM-001**?
 2. Where historical measurement data are unavailable due to the absence of local regulatory requirements, would it be acceptable to **apply an alternative conservative approach** to estimate the amount of landfill gas captured by the pre-existing system (e.g. apply a discount factor of 40% as per Case 2, scenario D)?
 3. Should the requirement in Section 4, paragraph 11(b) **be interpreted in the same manner for passive systems installed exclusively for safety and environmental compliance purposes**, even where no prior energy recovery or structured gas utilization activity existed before the Article 6.4 activity?



Recommendations to the MEP

- A **response will be prepared and finalized** for the clarification request.
- Any necessary revisions to the methodology as a result of this clarification will be included in the ongoing revision of AMM-001.

