

## Agenda item 3.4.

Paragraphs 20 and 21 of the annotated agenda

# Clarification AMM\_CLA\_001: Applicability of A6.4-AMM-001 (ver. 01.0) for landfill projects with pre-existing passive gas collection system

**Article 6.4 Supervisory Body – 21st meeting**

Bonn, Germany, 18 to 21 May 2026



## Summary of the Clarification

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- **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

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- 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.**



## Summary of the Clarification

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- 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?



- Acknowledges that the current applicability conditions in paragraph 11(b) could be interpreted as not being consistent with the equations to determine the amount of LFG that would have been captured and destroyed (by flaring) in the baseline due to legal or contractual requirements, to address safety and odours, or for other reasons, especially in landfills that have a passive LFG collection system in the baseline and where no historical measurement data is available due to the absence of local regulatory requirements.
- Clarifies that the methodology is applicable for Article 6.4 activities that upgrade an existing 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;
  - The baseline scenario includes a legal requirement that mandates a passive LFG system for safety and odour concerns or for reasons, but the legal requirement does not specify the amount or the percentage of the captured LFG that must be flared and does not mandate the measurement of the LFG that is collected



- When an Article 6.4 activity meets the conditions specified above, activity participants shall apply a default destruction rate of 40 per cent (similar to the requirements of Case 2, Scenario D under the methodology) to determine the amount of LFG that would have been captured and destroyed (by flaring) in the baseline due to legal or contractual requirements, to address safety and odour concerns, or for other reasons. To implement this requirement, activity participants shall set the parameter  $F_{CH4,BL,y}$  in equation (1) as being equal to  $0.4 \times F_{LFG,PJ,cat,y}$ .
- Anticipates addressing these issues in subsequent revisions to the mechanism methodology, potentially as part of revisions to incorporate the requirements of the “Methodological tool: Emissions from electricity generation and consumption” (A6.4-AMT-007).



## Impacts

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The response clarifies that Article 6.4 developed in existing landfills implemented with a passive collection and flaring system are eligible under the methodology and addresses how baseline emissions are determined.



## Alignment with other regulatory documents

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While considering the revision of the mechanism methodology “A6.4-AMM-001: Flaring or use of landfill gas” (add reference to the recently approved “Methodological tool: Emissions from electricity generation and consumption” (A6.4-AMT-007)), the MEP agreed to seek a mandate to align the methodology with the other regulatory documents approved by the Supervisory Body.



## Recommendations to the Supervisory Body

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- The Supervisory Body may wish to consider the recommendation of the MEP to approve the clarification prepared in response to the request for clarification “AMM\_CLA\_001: Applicability of A6.4-AMM-001 for landfill projects with pre-existing passive gas collection system” (version 01.0). The Supervisory Body may also wish to consider providing a mandate to the MEP to revise the mechanism methodology to incorporate the clarification following the decision by the Supervisory Body.
- The Supervisory Body may wish to consider providing a mandate to the MEP to align the mechanism methodology “A6.4-AMM-001: Flaring or use of landfill gas” with the other regulatory documents approved by the Supervisory Body.

