



**APPROVED MECHANISM METHODOLOGY / METHODOLOGICAL TOOL
CLARIFICATION REQUEST FORM
(Version 01.0)**

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INFORMATION TO BE COMPLETED BY ENQUIRERS

Title/Subject of the request for clarification:
(specify the subject of your submission, maximum 200 characters)

Applicability of A6.4-AMM-001 (v01.0) for landfill projects with pre-existing passive gas collection systems

Reference to the approved mechanism methodology or methodological tool to which the request for clarification applies:
(reference number, title and version)

A6.4-AMM-001 – “Flaring or use of landfill gas” (version 01.0)

Name of the submitter:

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Affiliation:

- Activity participant of a planned project or PoA
 Designated National Authority (DNA)
 Designated Operational Entity (DOE)
 Other Stakeholder

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18/03/2026

Clarification request:

(Please provide a description of the issues to be clarified on the application of an approved mechanism methodology or methodological tool.)

Dear UNFCCC Secretariat / Methodologies Team,

We would like to request clarification regarding the applicability of A6.4-AMM-001 – “Flaring or use of landfill gas” (version 01.0), specifically in relation to the baseline scenario provisions for landfill projects.

According to Section 4 (applicability), paragraph 11:

- (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).

This requirement raises a significant concern in the Brazilian context. In Brazil, passive landfill gas collection and flaring systems are often installed primarily for operational safety and environmental compliance purposes, functioning more as a drainage mechanism than as an active capture system. Below are examples of flaring equipment installed and approved by environmental agencies at existing operational landfills.



Under current local regulatory practice, such passive systems are generally not required to have any quantitative monitoring of the volume of landfill gas captured.

As a result, many potential projects will likely lack the necessary historical measurement data and will be unable to establish separate monitoring protocols for these pre-existing passive systems, including all projects already registered under the CDM ACM0001 methodology.

In this context, we would appreciate clarification on the following points:

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? For example, as in paragraph 7.3.2.1.5, 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?

We would greatly appreciate any clarification or guidance on how such cases should be treated under the methodology.

Thank you in advance for your clarification on this matter.

Document information

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