



**GLOBAL STAKEHOLDER CONSULTATION FORM FOR
PROPOSED NEW BASELINE AND MONITORING
METHODOLOGY OR METHODOLOGICAL TOOL
(version 01.0)**

<i>Name of submitter</i>	Christian Alexander
<i>Affiliated organization of submitter (if any)</i>	N/A
<i>Email of submitter</i>	Christianka667@gmail.com
<i>Reference number of proposed new methodology or methodological tool</i>	A6.4-PM008
<i>Based on an assessment of information in the A6.4-FORM-METH-002 and its application in sections A to C of the submitted draft project design document (A6.4-FORM-AC-020), provide your comments to the proposed new methodology using the tabular format below. Please indicate the sections or issues to which your comments refer to.</i>	
<i>Date received by the secretariat</i>	

Section/Para no./Annex/Figure/Table	Type of comment	Comment, including justification for change	Proposed change, including proposed text
General/whole methodology	ge	PMM008 should be strengthened, not rejected. Methane leak detection and repair can deliver fast climate benefits, but Article 6.4 crediting should issue units only where reductions are additional, conservatively quantified, not double counted, independently verifiable, not used to prolong fossil-gas lock-in and not misused in buyer claims.	Add a clear decision rule: “PMM008 supports LDAR crediting only where each issuance is supported by public or DOE-verifiable evidence demonstrating additionality, conservative quantification, no double counting, no fossil-gas lock-in, and transparent claims-use.”
Applicability conditions and exclusions	te	PMM008 contains useful safeguards, including no advanced LDAR in the prior three years, no legal mandate for advanced LDAR, and exclusions for legally or regulatorily required repair, tightening/re-greasing, conventional LDAR and new leaks outside the first-verification boundary. The implementation risk is that these categories may be satisfied through narrative assertions unless the methodology requires evidence fields and no-issuance consequences.	Add: “Each applicability condition and exclusion shall be supported by public or DOE-verifiable evidence. No A6.4ERs shall be issued for reductions from leaks or components for which the activity participant has not demonstrated that the repair was not legally required, not scheduled replacement, not emergency repair, not ordinary maintenance, not tightening/re-greasing, not conventional LDAR, not public-financed repair and not already credited or claimed under another programme.”
CDM/VCS/Article 6.4 transition	te	Transition from CDM or VCS registration into Article 6.4 should not be treated as a project-level integrity reset. Article 6.4 adds distinct requirements for authorisation, corresponding adjustments, no-lock-in, sustainable development, avoidance of double counting and claims-use.	Add a CDM-to-Article 6.4 upgrade table identifying which AM0023 provisions are retained, strengthened, replaced or rejected, and explaining how PMM008 satisfies Article 6.4 requirements on additionality, transparency, conservative quantification, no-lock-in, leakage, sustainable development and avoidance of double counting.
Registry, programme-use and double-counting reconciliation	te	Transitioned LDAR activities may have CDM, VCS/Verra and Article 6.4 histories across overlapping monitoring periods, vintages, serial ranges, issuances, withdrawals, retirements, cancellations, authorisations and claims. This creates a foreseeable double-claiming and claims-use risk even where no misconduct is alleged.	Add: “No A6.4ERs shall be issued unless the activity participant and DOE provide a public reconciliation table demonstrating that no overlapping CDM, VCS/Verra, voluntary-market, CORSIA, host-country or Article 6.4 claim remains active for the same monitoring period, vintage, component set or mitigation outcome.”
Host authorisation, corresponding adjustment and claims-use	te	CDM host approval, CDM transition approval, Article 6.4 registration, authorisation of A6.4ERs, corresponding-adjustment treatment, registry entry, transfer, retirement and permitted claims-use are distinct steps. Methodology and associated Article 6.4 procedures should not allow one step to substitute for the full accounting chain.	Add: “For transitioned activities, PMM008 and the associated Article 6.4 transition, registry and host-Party procedures should require public disclosure distinguishing CDM host approval, CDM transition approval, Article 6.4 activity registration, authorisation of A6.4ERs, corresponding-adjustment treatment, Article 6.4 registry entry, transfer, retirement and permitted claims-use.”

A6.4-FORM-METH-007

Host-law, routine-repair and current-practice evidence	te	PMM008 should require an activity-specific host-law and current-practice memo. It should not merely ask whether advanced LDAR is legally mandated; it should also test whether the repair would occur for safety, operational, scheduled-maintenance, licence, emergency-response or ordinary-practice reasons.	Add: "The regulatory analysis shall include a host-law memo, in English or official translation, addressing gas safety law, gas distribution rules, energy-regulator licence duties, emergency repair duties, scheduled replacement, maintenance obligations, odourisation and leak-response requirements, regulator directions, enforcement practice and whether repairs would occur for safety, operational or legal reasons without Article 6.4 revenue. Current-practice evidence should distinguish below-ground cathodic protection or safety maintenance from above-ground chronic leak detection and repair, and should disclose detector inventory, repair-material inventory, staff capacity, planned-maintenance schedules, emergency-repair criteria, unsafe-leak thresholds, conventional detection methods and ordinary repair materials."
Financial additionality, saved gas and public finance	te	LDAR crediting can create climate benefits, saved-gas benefits and financial benefits. Those benefits should be visible in the additionality assessment. Comparator evidence from Bangladesh AM0023 LDAR projects and public carbon-rating commentary should be used only as risk/context evidence, not as proof of misconduct or non-additionality by any PMM008 activity.	Add: "PMM008 shall require a financial-beneficiary table showing implementation costs, O&M costs, public finance, saved gas volume and value, tariff or subsidy effects, credit revenue, credit ownership, revenue recipients and beneficiaries of saved gas. The DOE shall assess whether the activity would be financially viable without Article 6.4 revenue and whether crediting creates an incentive to delay adoption or enforcement of fugitive-methane regulation."
Dynamic additionality and common-practice re-testing	te	Additionality should not be frozen at project start where host-country law, public finance, SCADA/GIS, smart or prepaid metering, methane inventories, MACC analysis, LDAR/MRV protocols, utility practice or comparable methane regulation changes during the crediting period.	Add: "Additionality and common practice shall be re-tested before each issuance where host-country law, public finance, SCADA/GIS, smart or prepaid metering, methane inventories, MACC analysis, LDAR/MRV protocols, sector carbon-abatement action plans, regulatory roadmaps, utility practice or comparable methane regulation changes during the crediting period."
Baseline duration, operating hours, GWP and calculations	te	PMM008 calculates reductions from leak flow and assumed baseline duration. Leak-duration assumptions, operating hours, outage deductions, GWP values and CDM/VCS/Article 6.4 conversion rules can materially affect credit volume.	Add: "Each monitoring period shall disclose leak detection date, assumed baseline start/date logic, repair date, monitoring date, operating hours, outage deductions, baseline-duration assumptions, GWP value, GWP source, vintage applicability and conversion rule across CDM, VCS and Article 6.4 contexts."
Measurement QA/QC and direct quantification	te	PMM008 should require leak-level measurement QA/QC for HFS, bag methods and alternatives. Direct quantification should remain the default for crediting; proxy methods or emission-factor substitution should not become a low-effort compliance path.	Add: "PMM008 shall require leak-level measurement QA/QC fields: measurement method, instrument type and serial number, calibration date, calibration status, bag volume and fill time where applicable, operator identity, repeat-measurement rule, uncertainty value, uncertainty deduction, raw file or field-record reference, leak ID and DOE check. Direct quantification should remain the default for crediting. Emission-factor substitution, proxy quantification or

A6.4-FORM-METH-007

			alternative measurement methods should be permitted only where explicitly justified, conservatively adjusted and DOE-verified.”
Source-to-site/network-level MRV reconciliation	te	Source-level or bottom-up records should be reconciled with site-, station-, network-level or independent evidence where feasible. PMM008 should not require impossible satellite proof for every small leak, but it should also not treat absence of satellite detection as proof of no emissions.	Add: “Where feasible, leak-level/source-level records shall be reconciled with site-, station-, network-level or independent top-down evidence. Material discrepancies shall be quantified and explained, including the uncertainty, detection limits and limitations of each method.”
Leak grading, repair timing, recurrence and rechecks	te	Follow-up surveys and recurrence treatment are central to LDAR crediting integrity. A detected leak that is not repaired, repaired late, reappears or is re-repaired should receive clear conservative treatment.	Add: “PMM008 shall define leak categories or equivalent flow/risk classes, maximum time from detection to quantification, repair and post-repair confirmation, failed repair, reappeared leak, recurrence, re-repair and conservative deduction rules for deferred repairs or uncertain recurrence duration.”
Gross, capped, verified, issued, retired and buyer-facing numbers	te	Gross calculated reductions, capped eligible reductions, verified reductions, issued units, transferred units, retired units and buyer-facing or SDG claim numbers can differ. Differences may be legitimate if clearly labelled, but they create claims-use risk. Large-volume activities and portfolio-marketed credits require stronger look-through disclosure.	Add: “Each monitoring period shall disclose gross calculated reductions, baseline cap or downward adjustment, capped eligible reductions, verified reductions, issued units, transferred units, retired units and any SDG or buyer-facing claim number. Where these figures differ, the public record shall explain the difference and prevent larger gross figures from being presented as issued or claimable credits. Where A6.4ERs are marketed, retired or pooled through portfolio products, PMM008 should require look-through disclosure by project, vintage, serial range, retirement purpose and claims-use category.”
Data governance, public datasets and version control	te	PMM008 should require standardised, usable data, not only narrative reports. Monitoring reports, verification reports and calculation workbooks should have clear version histories, data dictionaries and error logs.	Add: “Public evidence fields should be standardised, machine-readable where practicable and updated for each monitoring period, not only at validation. Each monitoring report, verification report and calculation workbook shall include a unique document ID, version number, date, monitoring-period boundary, vintage boundary, active sheets, data dictionary, formula summary, ISO-format dates and change log. Instrument, timestamp, date-format, transcription, spreadsheet, leak-code, cut-off, outage and database errors shall be logged, corrected conservatively and summarised publicly with DOE conclusions.”
DOE verification, sampling and CAR/CL/FAR disclosure	te	Generic statements that a DOE verified the activity are not enough for public confidence where large leak populations, sampling, corrective-action requests, clarification requests and evidence chains are involved. Closed CARs/CLs/FARs do not show unresolved problems; they show why issue-category disclosure is useful.	Add: “Where DOE verification relies on sampling, the verification report shall disclose leak population, sample size, confidence/precision level, randomisation method, selected leak IDs, discrepancy expansion rule and whether any failure triggered wider review. All CARs, CLs and FARs shall be disclosed with issue, response, evidence, DOE conclusion and future-period relevance.”
Stakeholder consultation	te	Public consultation and SD claims should not be boilerplate. No comments received through a web-	Add: “PMM008 shall require public disclosure of stakeholder-consultation dates, languages, affected communities, notification

A6.4-FORM-METH-007

and sustainable-development claims		hosted public-comment period does not prove meaningful stakeholder engagement. Saved gas, jobs, pressure, access, productivity and safety benefits should be monitored and verified where claimed.	method, comments, response table, grievance route and unresolved concerns. SD co-benefits shall disclose baseline/project values, data sources, monitoring frequency, responsible entity, verification status and benefit-sharing, including whether claimed saved-gas benefits reached customers, communities, utilities or project participants.”
No-lock-in and claims-use	te	Gas-system LDAR can be climate-beneficial if it reduces methane without extending fossil-gas dependence. However, improved pressure, reliability, availability, revenue or network legitimacy can support lock-in if not assessed.	Add: “The no-lock-in assessment shall address whether crediting extends asset life, increases throughput, expands service area, improves pressure/reliability in a way that supports expansion, delays retirement or replacement, duplicates public-financed network upgrades, or enables buyer claims that fossil gas or gas expansion is Paris-aligned.”
Project-family, participant and registry-authority disclosure	te	Related LDAR activities may share country context, methodology, actors, validators/verifiers, consultants, templates, buyers, monitoring contractors or assumptions. A material finding in one related activity should trigger review of comparable assumptions in others.	Add: “PMM008, or associated Article 6.4 activity and registry procedures, should require each activity to disclose related project families, shared methodology, shared proponents, consultants, validators/verifiers, monitoring contractors, calculation templates, buyers or credit-right holders. Where related LDAR activities share country context, project developers, validators/verifiers, consultants, templates, calculation workbooks, buyers, monitoring contractors or assumptions, a material finding in one activity should trigger review of comparable assumptions in related activities.”
Review, correction, suspension and reasons for deviation	te	PMM008 should include a consequence pathway if later information shows error, overlap, over-issuance, double issuance, non-additionality, public-finance overlap or misleading claims-use. If safeguards are not adopted, reasons should explain how equivalent integrity is maintained.	Add: “PMM008 and associated Supervisory Body, registry and activity-cycle procedures should include review, correction, suspension, cancellation, replacement, future-issuance deduction or account-restriction procedures where units are later found to be non-additional, over-issued, double-issued, wrongly authorised, based on material data error, affected by public-finance overlap, or used in misleading claims. Where the MEP or Supervisory Body rejects proposed safeguards, it should publish reasons explaining how equivalent or stronger integrity is maintained. The Supervisory Body should review PMM008 after the first issuances or first two monitoring periods, whichever comes first.”
Minimum fallback	ge	If the MEP/Supervisory Body does not adopt the full package, there should still be a minimum effective safeguard set. Without a fallback, partial adoption could become too weak to preserve integrity.	Add: “If the full package is not adopted, the MEP/Supervisory Body should at minimum require: CDM–VCS–Article 6.4 period, vintage and serial-range reconciliation; host authorisation and corresponding-adjustment status disclosure; host-law, legal-repair and routine-repair exclusion evidence; gross, capped, verified, issued, transferred, retired and claimed number reconciliation; measurement QA/QC, uncertainty and calibration evidence; public-finance and dynamic-additionality re-testing; and review, correction and suspension triggers for new information, overlap, non-additionality, material data error or

			misleading claims-use. If these seven minimum conditions cannot be met, PMM008 should not be approved in its current form.”
--	--	--	---

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	23 May 2025	Initial publication of form template.
Decision Class: Regulatory Document Type: Form Business Function: Methodology Keywords: A6.4 mechanism, developing methodologies and tools, stakeholder consultation		