Call for public input – Template for input	ACM0001: Flaring or use of landfill gas

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Legend for Columns
0 = ACM0001: Flaring or use of landfill gas (ACM001)
1 = Section Number in the document
2 = Paragraph number
3 = Comment — the actual feedback or observation, including justification for what needs changing
4 = Proposed change — suggest the text if possible

0	1	2	3	4
ACM0001	**Section no.**	**Para. no.**	**Comment**	**Proposed change** (Include proposed text)
	2.2	3(b)(i)	Currently ACM0001 does not explicitly cover projects that seek to increase recovery rate when the baseline captured LFG is used for e.g. electricity generation. LFG capture and use systems that are installed in a baseline scenario are often inefficient, or inefficiently managed which results in significant volumes of LFG (methane) continuing to be emitted into the atmosphere, as they are not able to be effectively captured by the existing system. This is already recognised within the methodology whereby the default efficiency of an LFG recovery system is 20% in the baseline and 50% in a project scenario (Footnote 4, p17). As a result of these inefficiencies, LFG (methane) emissions remain a large contributor of GHG emission in most countries across the globe. In order to facilitate projects that seek to increase the recovery rate (and efficiency) of capture and use systems beyond the baseline captured LFG, the proposed change would expand the scope of the baseline scenarios eligible under the methodology. This would encourage global uptake of technology and solutions that maximise efficiency of LFG recovery rate (and minimise LFG emissions). For this scenario to be eligible under the methodology, the proposed change would allow projects to make claims based only on the *additionally* captured methane due to the project intervention (the delta between baseline captured LFG and project captured LFG). This proposed change would necessitate an adjustment to the definition and determination of parameter FCH4,BL,y for the calculation of baseline emissions.	*"2.2 Applicability* *The methodology is applicable under the following conditions:* *(a) Install a new LFG capture system in an existing or new (Greenfield) SWDS where no LFG capture system was or would have been installed prior to the implementation of the project activity; or* *(b) Make an investment into an existing LFG capture system to increase the recovery rate or change the use of the captured LFG, provided that: (i) The **additionally** captured LFG was vented or flared and not used prior to the implementation of the project activity;"*
	5.4.1	30		$FCH4,BL,y$ = *Amount of methane in the LFG that would be flared **and/or used** in the baseline in year y (t CH4/yr)*
	5.4.1.3	39 (Table 3)		(table below)

Situation at the start of the project activity	*Requirement to destroy methane*	*Existing LFG capture and destruction **and/or use** system*
Case 1	*No*	*No*
Case 2	*Yes*	*No*
Case 3	*No*	*Yes*
Case 4	*Yes*	*Yes*

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	5.4.1.3.3	45		*If the amount of methane captured with the existing system can be monitored* **and/or modelled** *separately from the amount captured under the project, and the efficiency of the existing system is not impacted on by the project system during the crediting period(s), then FCH4,BL,sys,y is determined as follows:* $FCH4,BL,sys,y = FCH4,sent\_flare,y$ **$+ FCH4,EL,BL,y$** *Where:* $FCH4,BL,sys,y$ = *Amount of methane in the LFG that would be flared* **and/or used** *in the baseline in year y for the case of an existing LFG capture system (t CH4/yr)* $FCH4,sent\_flare,y$ = *Amount of methane in the LFG which is sent to the flare in year y (t CH4/yr)* **$FCH4,EL,BL,y$ = Amount of methane in the LFG which would be used for electricity generation in the baseline in year y (t CH4/yr)** **$FCH4,EL,BL,y$ is determined according to the Tools and procedures outlined in paragraphs 32 and 33 or determined through use of an approved model**

	5.4.1.3.3	44-51	ACM0001 currently does not allow for calculation of FCH4,BL,y for recovery rate improvement projects under Case 3 or Case 4 (which uses the approach under Case 3 for calculation of $FCH4,BL,sys,y$). Recovery rate improvement projects (which are eligible under the methodology - Section 2.2) by default have an existing LFG capture and destruction system in place and would require use of Case 3 or Case 4 to calculate FCH4,BL,y. Approach under paragraph 45 precludes scenarios where "the efficiency of the existing system is not impacted on by the project system". Approach under paragraph 48 assumes "that the fraction of LFG that was recovered in the year prior to the implementation of the project activity will be the same fraction recovered under the project activity", precluding recovery rate improvements to be accounted for. Approach under paragraph 50 is only applicable if "there is no monitored or historic data on the amount of methane that was captured in the year prior to the implementation of the project situation", which is not accurate for all recovery rate projects. There are models that exist that are able to accurately project baseline scenario captured LFG throughout the lifetime of the project, allowing for dynamic baselines to be applied and minimise the risk of any overestimations. These are regularly used in practice by e.g. landfill site owners. In order to reflect current practice in the field, the proposed change would allow for these models to be used to calculate baseline captured LFG. As a requirement under the methodology, these models could be required to be externally validated and verified to further ensure data validity and accuracy.	45. If the amount of methane captured with the existing system can be monitored **and/or modelled** separately from the amount captured under the project~~, and the efficiency of the existing system is not impacted on by the project system during the crediting period(s)~~, then FCH4,BL,sys,y is determined as follows: …