



## CALL FOR INPUT

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<i>Date of submission</i>	30/09/2025

Instruction: Enter your input in the table below.

<b>Document reference number and title:</b> <b>A6.4-MEP008-A04. Draft methodology: Flaring or use of landfill gas (version 01.0)</b>					
<b>Item</b>	<b>Section (as indicated in the document)</b>	<b>no. (as indicated in the document)</b>	<b>Paragraph/Table/Figure no. (as indicated in the document)</b>	<b>Comment (including justification for change)</b>	<b>Proposed change (including proposed text)</b>
1	4. Applicability		12 (b)	This paragraph states that “The existing heat generation equipment is used outside of the activity boundary and has a higher efficiency than any equipment it may replace. Evidence of the efficiency of the replaced heat generation equipment outside of the activity boundary shall be provided to the DOE performing the validation”	Clarification/explanation/examples would be needed to confirm examples or what type of evidence should be provided to the DOE to demonstrate the higher efficiency of the existing equipment compared any other potential replaced equipment.

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2	6.1. Regulatory analysis	21	This paragraph states that “Activity participants shall demonstrate and justify, based on a review of legal requirements on environmental and waste management applicable to the host country and the proposed Article 6.4 activity, that the emission reductions resulting from the Article 6.4 activity would not occur as a result of any of these legal requirements (unless the law or regulation refers to or formally integrates the mechanism as an instrument for implementation)” by confirming that these legal requirements do not.”	Clarification/explanation/examples would be needed to describe in more detail this legal scenario “(unless the law or regulation refers to or formally integrates the mechanism as an instrument for implementation)”.
3	6.3.2. Common practice analysis	47 (e)	This paragraph states that “Relevance of scale or capacity in the common practice analysis: the capacity or scale of the different activity types shall be considered relevant for the common practice analysis under this methodology. The scale of output for the SWDS and the output capacity of the technologies involved in the different types of activities are: (i) Activity 1: the capacity does not apply; (ii) Activities 2, 3 and 4: +- [50%][25%] of the daily waste received by the SWDS” It is not clear if 50% or 25% of the daily waste received by the SWDS shall be chosen or if it is a range between 25-50%.	Clarification/explanation/examples would be needed.

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4	7.1. Selection of the baseline approaches from paragraph 36 of the rules, modalities and procedures	49 (a)	In case the project is implemented in a new cell but in an existing landfill, this project would be considered in an existing SWDS or in a new SWDS?	Clarification would be needed to identify new SWDS as Greenfield as this affects to the baseline identification approach.

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5	<b>7.2.1.1.3. Step 3. Identification of the environmentally sound technologies</b>	<b>55</b>	<p>This paragraph states that “Out of the technologies and/or practices identified in Step 2 above, activity participants shall exclude from the analysis those that are not in line with legal requirements in the applicable baseline geographical reference area. For example, this may apply to waste treatment facilities that are not in compliance with limits or thresholds for atmospheric emissions (NO<sub>x</sub>, VOCs, particulates and black carbon, etc), proper management of leachate and wastewater, proper management of odour, proper management of noise, etc.”.</p> <p>In many developing countries or LDC, the environmental regulation is not enforced, this is to say, there is environmental normative but the country makes no effort or lacks the means to monitor its compliance, and environmental regulations are systematically and widely breached. How should these cases be addressed, whether in projects on new SWDS or at existing SWDS that violate certain regulations, as do most sites in the region?</p>	Clarification/explanation/examples would be needed to determine the approach to be followed in these cases.

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6	<b>7.2.2.1.3. Determination of FCH<sub>4</sub>,BL,y</b>	<b>Table 9</b>	In cases where there is not requirement to capture and destroy LFG but the country published programmes and plans to incentivise or require the destruction or use of biogas in the future, without specifying the date when the requirement will entry in force ¿What approach or Case 1 to 4 should be considered?	Clarification/explanation/examples would be needed to determine the approach to be followed in these cases.  Recommendation or specific approaches in these cases would help to reduce risks due to future requirement uncertainty in certain countries as it is very difficult to invest in a LFG project when future requirements during the crediting period are not clear, being this outside the control of the Project Owner or Investor.
7	<b>7.2.2.1.8. Ex ante estimation of FCH<sub>4</sub>,PJ,y</b>	<b>102</b>	This paragraph states that “BECH <sub>4</sub> ,SWDS,y is determined using the <b>solid waste tool</b> . The following guidance should be taken into account when applying the tool”.	“Solid waste tool” to be replaced by “Emissions from solid waste disposal sites tool”
8	<b>7.3.1.1. Step 1. Determine the uncertainty at the lower bound of the uncertainty interval for each baseline emission component i (UNCBE act/hist,i,CP1)</b>	<b>120</b>	Determine the uncertainty	Clarification/explanation/examples/presentation would be needed to determine the approach to be followed in these cases.
9	<b>7. Baseline scenario</b>	<b>49</b>	Determination of the steps of baseline scenario	Clarification/explanation/examples/presentation /Models would be needed to determine the approach to be followed in these cases.

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10	<b>3.4 Baseline scenario</b>	<b>Table 4</b>	The text stating that “the baseline shall be determined based on BAT.” Does not specify how to determine the baseline scenario based on BAT. Does this mean that the baseline scenario would be the one in which it is implemented the BAT that is economically feasible? Would it only be ex-ante estimations?	Clarification/explanation/examples/presentation would be needed to determine the approach to be followed in these cases.
11	<b>6.2. Data and parameters monitored</b>	<b>Data / Parameter table 10.</b>	Regarding parameter fy “Fraction of methane captured at the SWDS and flared, combusted or used in another manner that prevents the emissions of methane to the atmosphere in year y”, for Application A, this table states that fy is determined once for the crediting period (fy = f).  However, this contradicts paragraph 23 of the methodology “A6.4-MEP008-A04_Flaring or use of landfill gas” which requires that “activity participants shall update the regulatory analysis annually to reflect any changes in legal requirements and update the parameter FCH4,BL,y as per section 7.2.2.1.3 below accordingly.”	The proposed change activity participants shall update the regulatory analysis <b>by the end of crediting period</b> to reflect any changes in legal requirements and update the parameter FCH4,BL,y

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12	6. Demonstration of additionality	<p>Paragraph 19: To demonstrate additionality, activity participants shall apply:(a) A regulatory analysis (section 6.1 below) ;(b) A lock-in analysis (section 6.2 below) ;(c) An investment analysis (section 6.3.1 below); and(d) A common practice analysis (section 6.3.2 below)</p> <p>Paragraph 20. The proposed Article 6.4 activity shall only be considered additional if all four analyses are concluded positively.</p>	<p>Our understanding is that all PACM project activities will be required to demonstrate additionality if they wish to use the PACM LFG methodology. However, this is likely to be a significant challenge for projects that have transitioned from the CDM. Consider for example where CDM projects were registered, using the provisions for automatic additionality provided for by ACM0001, over 10 years ago. Project developers may not have kept the records to demonstrate additionality using Para 19 (c)investment analysis in such cases as the requirements for this provision were not known at the time. This would unfairly prejudice good projects that have received host Party approval to transition to PACM.</p> <p>In addition, similar barriers may apply when trying to demonstrate that the project complies with Para 19 (d). Such records may not be easily accessible in the case of CDM projects that have transitioned to PACM</p>	<p>Proposed changes to Para 20:The proposed, new Article 6.4 activity shall only be considered additional if all four analyses are concluded positively. In the case of CDM project activities that have transitioned to PACM, the demonstration of additionality at the time of registration with the CDM will remain valid and will not need to be reassessed in order to apply the PACM LFG methodology</p>

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13	7.3.1.3. Step 3. Determine the minimum downward adjusted baseline emission  7.3.2.1. Downward adjustment in subsequent years for the methane component	Equation (24), Equation (26) and Equation (27)	As noted above, the methodology and tools should allow for provisions to calculate accurate baseline emissions. Furthermore, as noted in previous requests for input on the PACM Baseline Standard, the specified minimum 10%downward adjustment option is detrimental to the economic viability of carbon credit project activities. Such an option is a punitive measure on activities that have high environmental and social benefits, over and above the GHG mitigation impacts. Punitive measures, such as carbon taxes or budgets, should rather be applied to activities that generate material GHG emissions and not on activities that reduce GHG emissions. We recommend raising the matter with the SB for discussion with Parties, with a view to revising the RMP principles to establish a balanced approach that considers the principles of conservativeness as well as accuracy in baseline setting and avoids limiting the scope of the mechanism through a narrow interpretation of its 'ambition raising' role.	