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Instruction: Enter your input in the table below.

Document reference number and title: A6.4-MEP008-A04. Draft methodology: Flaring or use of landfill gas (version 01.0)				
Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	3,3	9 (b) the proposed new methodology also reduces the risk of lock-in by encouraging the use of the LFG for energy purposes through the application of specific downward adjustment provisions;	If we look at it from a lock-in perspectives, it can also be the opposite. The utilization of gas can be the lock-in situation. A largest part of the investment for the lock-in with flaring should be done anywhere, independent on the final solution.	The approach should be reconsidered.
2	3.5 and 3.6	Many paragraphs	The downward adjustments are hard to read and follow the argumentation. Maybe we try to to mix political ambition in a methodology. Maybe it is not a good mix.	Please reconsider
3	7.2	89	It seems this paragraph is not finalised. Maybe not needed to mention LDCs/SIDS in the table as only options 3 is relevant. It is sufficient to have it in paragraph 182 Maybe explain the hypothetical SWDS, as it is unclear.	Correct table number and delete what is not 100% needed or explain it better.
4	13	182	The default value of 0.1 is proposed for SWDSs with synthetic cover as a conservative assumption. Hypothetical SWDS	Source to justify conservative. Explain relevance or delete

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5	2	Definition “aged SWDS” cell, “Mature SWDS” cell and “Immature SWDS” cell	<p>These definitions are useful, but the definitions are limited to landfill/dumpsites, where we from the establishment of landfill/dumpsite have had clear and well-documented management, so clear boundaries and possibilities to define age of each cell.</p> <p>In most cases the landfills/dumpsites will not have the boundaries horizontal and vertical for these age groups, and it can be a difficult task to make the split in three age groups. It introduces an extra cost and risk. Maybe also reputational risk at a later stage.</p>	Realistic for many landfills/dumpsites it will not be possible to make the split in three groups/cells, so in case it is kept, guidance should be provided to handle the situation with both horizontal and/or vertical uncertainties.
6	3.3	9(b) For Article 6.4 activities that involve only flaring of the LFG in existing SWDSs, the proposed new methodology also reduces the risk of lock-in by encouraging the use of the LFG for energy purposes through the application of specific downward adjustment provisions;	It is political correct to promote utilization of gas and it has been the case for decades. But it difficult to follow when integrate as part of a methodology	<p>Maybe it should not be in a methodology as it makes the methodology to complex, and it introduces significant risks and cost.</p> <p>The downward adjustment provisions are hard to understand, so if it is kept, it could be better explained e.g., in the cover letter.</p>
7	3.4	Table 4 Best available technologies that represent an economically feasible and environmentally sound course of action	<p>Do we have concrete examples of cases where the best available technology has not been chosen to generate carbon credits?</p> <p>Good be good to specific the level of details needed for these analyses</p>	Maybe prepare an example to illustrate the level of details needed for justification of the selection of the best available technology both environmental and economical and how the different technologies shall be compared
8	7.3.2.1	129	Three different values are indicated 1MW, 3MW and 5 MW	Probably one value, how will we define the capacity of electricity for a specific project? It is difficult discussion and can initiate the longer clarification period and with the associated cost.
9	7.3.2.1	130	Option 3 without content	Could be deleted
10	7.3.2.1	128	Table 10. The adjustment factors can have the impact that many projects will not be initiated and implemented.	It is more a political decision whether we wish this development.

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11	Appendix 1	Section 3.1. paragraph 6 and 9	<p>The SWDS should be divided into zones, depending on the expected emissions, to capture any variability among zones and to ensure homogeneity within each zone.</p> <p>For large landfills/dumps the age groups are also vertical – one age group above the other. This situation is not captured in the proposed way forward</p> <p>Maybe elaborate on the expected costs</p>	<p>A solution to cover the vertical differences of the age groups could be explained.</p>

-- (Please add rows as required) -