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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 chang (including proposed text)
1	7.2.2.2.1. Electricity generated and supplied to the electric grid	Para (104)	The draft version of the methodology requires applying default grid emission factor values according to the share of renewable (including solar and wind) and nuclear energy in the latest available annual grid generation mix: • 0.2 tCO₂/MWh if the share is ≤33% • 0.1 tCO₂/MWh if the share is >33% and <67% • 0.03 tCO₂/MWh if the share is ≥67% or where its proportion is uncertain However, the MEP's 2025 work plan includes the revision of the 'Tool: Emission Factor for an Electricity System'. It is not entirely clear whether activity participants are required to rely only on the default values or if there will be flexibility to apply country-specific grid emission factors. Some countries already publish grid emission factors calculated in line with the existing CDM tool, and the fixed values provided here appear significantly lower than the officially published figures.	Given the wide-ranging impact of these defaults, we request that the MEP provide stakeholders with an opportunity to understand the underlying tool and rationale used to derive them before hard-coding them in the methodology. We recommend limiting the application of these values, without the provision of alternate options, until the tool has undergone stakeholder consultation. Alternate options should be included, for instance, through the use of official host-country figures where available.

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2	8.1.1.Activity emissions from the consumption of electricity	Paras(159) and (160)	Para (160) specifies applying a value of 1.25 for the parameter FTDL_{grid} and a value of 1 for FTDL_{captive}. Para (159) specifies applying a value of 1.3 tCO₂/MWh for EFEC_{captive,y}. These default figures appear overly conservative. For example, it is not clear why an alternative option, such as using the official host-country figures for FTDL_{grid}, is not allowed, nor what the rationale behind the selected figure is.	We kindly suggest revising the default factors or providing alternative approaches, especially given the multiple layers of conservativeness already built into the methodology (e.g., uncertainty provisions, downward adjustment requirements, etc.), as excessive conservativeness overall could affect project viability.
3	7.4. Identification of the conservative BAU scenario	Para (144)	In determining the BAU scenario and quantifying the BAU emissions, activity participants shall identify and incorporate in the BAU: (a) Any policies that are active or scheduled to take effect within the crediting period, unless they refer to or formally integrate the mechanism as an instrument for implementation. All legal requirements shall be deemed to be enforced while recognizing that regulatory environments vary; and (b) Any specific national or sub-national targets for the sector or the type of activity, as long as these are supported by policy frameworks for implementation, but not general goals that are not specific to the sector or type of activity (e.g., national emissions target). The current reference to policies and targets is, however, too broad to be applied consistently or in a manner that adequately reflects a country's NDC implementation plans. We consider it necessary to more clearly define which types of policy instruments should be taken into account or which should be excluded, as not all instruments create direct or indirect legal requirements nor financial incentives for a mitigation activity, particularly in the sector covered by this methodology. Moreover, it remains unclear how legal requirements, policies "scheduled to take effect," and sectoral targets are to be incorporated into the BAU scenario in practice—whether as adjustment factors or through other approaches.	We recommend that more explicit guidance be provided on this requirement to ensure consistent application. In particular, we suggest that such guidance clearly exclude policies of a promotional nature and/or those without a defined enforcement or incentive mechanism. The IPCC AR5 report provides a useful categorization of policy instrument types, which could serve as a basis for further definitions or exclusions. Furthermore, we request clarification on the interpretation of the following line in Paragraph 144: <i>"All legal requirements shall be deemed to be enforced while recognizing that regulatory environments vary."</i>

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4	General	N/A	According to the Mechanism Methodologies Standard (paras. 30–33), methodologies shall include provisions to ensure the equitable sharing of mitigation benefits between participating Parties and require the estimation of mitigation benefits to the host Party. However, the draft version of the methodology does not provide any such guidance.	We kindly request that guidelines be added on this matter. In particular, for new methodology developers, such guidance would be very beneficial in understanding how these requirements are set and applied by the MEP and SB.

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