



**APPROVED MECHANISM METHODOLOGY / METHODOLOGICAL TOOL  
CLARIFICATION RESPONSE FORM  
(Version 01.0)**

INFORMATION TO BE COMPLETED BY THE SECRETARIAT OR BY THE METHODOLOGICAL EXPERT PANEL (MEP)

<b>Date and number of MEP meeting:</b>	13 – 17 April 2026 / MEP 013
<b>Title/Subject of the request for clarification:</b>	Applicability of A6.4-AMM-001 (ver. 01.0) for landfill projects with pre-existing passive gas collection systems
<b>Reference number of the request for clarification:</b>	A6.4-AMM-CLA-001
<b>Reference to the approved mechanism methodology or methodological tool to which the request for clarification applies:</b> <i>(reference number, title and version)</i>	A6.4-AMM-001: Flaring or use of landfill gas (version 01.0)
<b>Fast track or Regular track:</b>	<input type="checkbox"/> Fast track <input checked="" type="checkbox"/> Regular track

**Summary of the request for clarification**

The clarification was submitted regarding the applicability of paragraph 11(b) of the methodology in relation to the baseline scenario provisions:

11. *The mechanism methodology is applicable to Article 6.4 activities that involve: (...)*

*(b) Upgrading an existing (active or passive) LFG capture system to increase the recovery rate, where the captured LFG prior to the implementation of the Article 6.4 activity was flared and not used, and:*

*(i) The amount of LFG captured by the existing system is collected and measured separately from the upgrade implemented as part of the Article 6.4 activity; or*

*(ii) The efficiency of the existing system is not impacted by the upgrade implemented as part of the Article 6.4 activity, and historical data on the amount of LFG captured and flared is available (if such historical data is not available, no A6.4 ERs can be claimed).*

This requirement raises a significant concern in the Brazilian context since passive landfill gas collection and flaring systems are often installed primarily for operational safety and environmental compliance purposes, functioning more as a drainage mechanism than as an active capture system and such passive systems are generally not required to have any quantitative monitoring of the volume of landfill gas captured under current local regulatory practice – consequently, many potential projects will likely lack the necessary historical measurement data and will be unable to establish separate monitoring protocols for these pre-existing passive systems, including all projects already registered under the CDM ACM0001 methodology.

Clarification is sought on the following points:

1. Does the existence of a pre-existing passive landfill gas collection/flaring system, without historical measurement data, automatically render a project ineligible under A6.4-AMM-001?
2. Where historical measurement data are unavailable due to the absence of local regulatory requirements, would it be acceptable to apply an alternative conservative approach to estimate the amount of landfill gas captured by the pre-existing system? For example, as in paragraph 7.3.2.1.5, Case 2, scenario D?
3. Should the requirement in Section 4, paragraph 11(b) be interpreted in the same manner for passive systems installed exclusively for safety and environmental compliance purposes, even where no prior energy recovery or structured gas utilization activity existed before the Article 6.4 activity?

**Clarification by the secretariat or MEP**

The Methodological Expert Panel (MEP) would like to thank the author for the submission.

The MEP acknowledges that the current applicability conditions in paragraph 11(b) could be interpreted as not being consistent with the equations to determine the amount of LFG that would have been captured and destroyed (by flaring) in the baseline due to legal or contractual requirements, to address safety and odours, or for other reasons, especially in landfills that have a passive LFG collection system in the baseline and where no historical measurement data is available due to the absence of local regulatory requirements.

The MEP clarifies that the methodology is applicable for Article 6.4 activities that upgrade an existing passive LFG capture system to increase the recovery rate, where:

- a. The captured LFG prior to the implementation of the Article 6.4 activity was flared and not used; and
- b. The baseline scenario includes a legal requirement that mandates a passive LFG system for safety and odour concerns or for reasons, but the legal requirement does not specify the amount or the percentage of the captured LFG that must be flared and does not mandate the measurement of the LFG that is collected.

Further, the MEP clarifies that, when an Article 6.4 activity meets the conditions specified above, activity participants shall apply a default destruction rate of 40 per cent (similar to the requirements of Case 2, Scenario D under the methodology) to determine the amount of LFG that would have been captured and destroyed (by flaring) in the baseline due to legal or contractual requirements, to address safety and odour concerns, or for other reasons. To implement this requirement, activity participants shall set the parameter  $F_{CH4,BL,y}$  in equation (1) as being equal to  $0.4 \times FL_{FG,PJ,cat,y}$ .

The MEP anticipates addressing these issues in subsequent revisions to the mechanism methodology, potentially as part of revisions to incorporate the requirements of the “Methodological tool: Emissions from electricity generation and consumption” (A6.4-AMT-007).

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**Document information**

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