



**GLOBAL STAKEHOLDER CONSULTATION FORM FOR
PROPOSED NEW BASELINE AND MONITORING
METHODOLOGY OR METHODOLOGICAL TOOL
(version 01.0)**

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Reference number of proposed new methodology or methodological tool	A6.4-PMM011
Based on an assessment of information in the A6.4-FORM-METH-002 and its application in sections A to C of the submitted draft project design document (A6.4-FORM-AC-020), provide your comments to the proposed new methodology using the tabular format below. Please indicate the sections or issues to which your comments refer to.	
Date received by the secretariat	

Comments on A6.4-PMM011

Submission under the Article 6.4 Call for Input

Submitted by: CBT- Beijing Carbon Brilliant Technology Ltd.

CBT- Beijing Carbon Brilliant Technology Ltd. (the "Submitter") submits these technical comments on proposed methodology A6.4-PMM011 in response to the call for input launched by the UNFCCC secretariat on behalf of the Article 6.4 Supervisory Body (SBM).

1. Purely technical submission

These comments are provided to the best of the knowledge and belief of the Submitter, based solely on the publicly available draft of PMM011 and applicable SBM standards and approved tools. They are submitted in a purely technical capacity and do not constitute legal advice, financial or investment advice, certification, or endorsement of any kind.

2. No conflict of interest

The Submitter declares that it has no financial, commercial, or other interest in the methodology, the proponent, or any project that may rely on the methodology. The Submitter has not received any payment or other consideration for preparing these comments.

3. Disclaimer of liability

These comments are made in good faith and in the public interest, solely for the purpose of the Article 6.4 call for input procedure. The Submitter disclaims all liability arising from any reliance on, use of, or decisions made in connection with these comments by any party. The comments identify issues and provide direction for revision; they do not constitute binding requirements or approved text. The final disposition of the methodology rests exclusively with the proponent and the SBM.

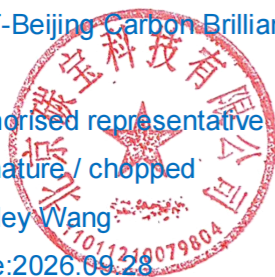
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Date: 2026.09.28



#	Section / Para no./ Annex / Figure / Table	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)
1	B.2.1 Scope	te	The methodology title reads: "Production/Manufacture of Low Carbon Intensive Hydrogen through electrolysis of water powered primarily by renewable electricity." Scope paragraph 1, however, describes the methodology as covering hydrogen production "through renewable or low-emission processes," and paragraph 2 lists only solar, wind, hydro, geothermal, and hybrid renewable systems. The three passages do not use the same scope. The title is limited to renewable electricity electrolysis; paragraph 1 introduces the broader term "low-emission processes"; paragraph 2 narrows it back to renewable energy sources. "Low-emission processes" is not defined anywhere. Nuclear power has life-cycle greenhouse gas emissions comparable to renewables, and fossil fuel with CCS is also a low-emission pathway. Neither is addressed in paragraph 2. If the methodology covers only renewable electricity electrolysis, paragraph 1 should not use the broader wording. If other low-carbon pathways are intended, they need to be listed explicitly with eligibility criteria. These inconsistencies make it difficult for project participants to determine which production pathways are	Restructure the scope so that the title, paragraph 1, and paragraph 2 use consistent wording and follow a clear logic. Clarify whether "low-emission processes" includes nuclear and other non-renewable low-carbon pathways, and ensure consistency with the definitions in B.3, the applicability conditions in B.5, and the baseline and accounting provisions that follow.

			eligible.	
2	B.3(d) vs B.3(h)	te	B.3(d) defines "Green Hydrogen" as: "Hydrogen produced through renewable or low-carbon pathways (e.g.), electrolysis powered by renewable energy, biomass/biogas reforming with CCS, PEC or thermochemical cycles), with significantly lower GHG intensity compared to conventional hydrogen production." B.3(h) defines "Low Carbon Intensive Hydrogen" as: "Hydrogen produced with a life-cycle greenhouse gas intensity substantially lower than conventional hydrogen produced via fossil-based processes (e.g. SMR, ATR, or coal gasification without CCS). Under this methodology, it refers to hydrogen produced primarily through renewable-powered electrolysis." The two terms do not line up with what the title and scope say, and it is not clear why both are needed. The title and scope define the project activity as the "Production/Manufacture of Low Carbon Intensive Hydrogen through electrolysis of water powered primarily by renewable electricity." Neither defined term corresponds exactly to this project activity. Yet the main text (Sections 11 and 12, among others) uses "green hydrogen production project" to refer to projects under this methodology. Under B.3(d), "green hydrogen" also covers biomass/biogas reforming with CCS, PEC, and	Review how terminology is standardised and used throughout PMM011 so that the methodology can be understood and applied correctly. In particular, clarify the relationship between "Green Hydrogen" and "Low Carbon Intensive Hydrogen," and make sure the term used in the main text matches the defined project activity.

			thermochemical cycles, none of which are accepted here. This mismatch between the defined term and its actual usage can easily lead to misinterpretation.	
3	B.3(a) vs B.3(i)	te	B.3(a) defines "Autothermal Reforming (ATR)" as: "A hydrogen production process that combines partial oxidation and steam reforming of hydrocarbons, typically natural gas. In the context of this methodology, ATR is considered part of the baseline (grey hydrogen) or BAT (with CCS). B.3(i) defines "Steam Methane Reforming (SMR)" as: "A conventional hydrogen production process using natural gas as feedstock, considered part of the baseline scenario in this methodology." ATR and SMR are technical processes. Their definitions should describe only what they are and how they work. Instead, the second sentence of the ATR definition and the last clause of the SMR definition both pre-judge the baseline. Baseline identification is supposed to go through the procedure in Section 10, based on what technology is available and economic in the host country. It should not be fixed in advance inside a definition. Saying in the definition that ATR with CCS is BAT effectively decides the baseline before Section 10 is even applied, which makes the technical screening and economic feasibility assessment in that section little more than a formality.	Remove the baseline determination language from the ATR and SMR definitions and leave baseline determinations to the procedure in Section 10.

4	B.3(e) Grid Electricity Share	te	PMM011 defines "The proportion of total electricity input to the hydrogen production system that is supplied from the national or regional grid. Under this methodology, it shall not exceed 10%." Issue 1: "Grid Electricity" itself is not defined anywhere in the methodology. PMM011 uses the term "Grid Electricity" throughout (B.3(e), B.5(a)(ii), B.5(b), Section 11, and elsewhere), but never defines what Grid Electricity is. B.3(e) defines "Grid Electricity Share" (a ratio), not "Grid Electricity" itself. Is all electricity drawn from the public grid connection point considered Grid Electricity? Electricity procured through PPAs/RECs under B.5(c) is also physically drawn from the grid connection point. Is that considered Grid Electricity? If yes, the PPA/REC pathway directly conflicts with the Grid Electricity $\leq 10\%$ requirement; if no, what is the distinguishing criterion? Physically, the same grid line delivers mixed electricity, and there is no way to tell which MWh come from renewable plants and which from fossil sources. Issue 2: A 10% cap is an eligibility requirement, not part of a definition. It belongs in B.5 Applicability. Issue 3: The definition also relies on an unstated assumption: that total electricity minus grid electricity equals renewable electricity. This is not necessarily true. The methodology allows backup or auxiliary fossil fuels	Proposed change: Define "Grid Electricity" and clarify its relationship with PPA/REC electricity and physical distinguishability. Move the 10% threshold to B.5 Applicability. Define what "total electricity input" covers, and set a limit on on-site fossil generation to prevent circumvention of the renewable electricity requirement.
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			(diesel generators, for example). Without a limit on on-site fossil generation, a project could increase self-generated fossil power and reduce grid purchases just to keep the grid share below 10%, making the renewable share look higher than it really is. Issue 4: "total electricity input" is not defined. It is not clear whether it covers only the electrolyser main load or also auxiliary systems, compression, and water treatment.	
5	B.5(a)	te	PMM011 text: "The project activity involves the production of low-carbon hydrogen through one or more of the following eligible pathways: (i) Electrolysis of water powered primarily by renewable electricity (solar, wind, hydro, geothermal, or hybrid RE systems); (ii) Electrolysis with partial grid electricity use, capped at 10% of total electricity consumption, with associated emissions accounted for using the applicable grid emission factor." Issue 1: This clause actually sets out two requirements that must both be met, but the wording suggests they can be chosen separately. Subparagraph (i) is a source requirement (renewable electricity), and subparagraph (ii) is a quantity requirement (grid electricity not exceeding 10%). Both must be satisfied. The wording "one or more of the following eligible pathways" suggests that (i) and (ii) can be selected independently. Read literally, a project	Proposed change: Change "one or more of the following eligible pathways" to make clear that (i) and (ii) must both be met. Define "Grid Electricity" and clarify its relationship with PPA/REC electricity. Set a limit on on-site fossil generation. Use the term already defined in B.3 ("Low Carbon Intensive Hydrogen") instead of the undefined "low-carbon hydrogen," and use "total electricity input" consistently with B.3(e).

		could meet only (ii) without (i), meaning it is required only to keep grid electricity below 10%, with no requirement to use renewable electricity at all. The remaining 90% could come from coal or gas power. This is plainly inconsistent with the methodology's scope. Issue 2: The term "grid electricity" used in subparagraph (ii) is not defined anywhere in the methodology. What counts as Grid Electricity? Electricity procured through PPAs/RECs is also physically drawn from the grid connection point — is that considered Grid Electricity? If yes, the PPA/REC pathway permitted under B.5(c) directly conflicts with the 10% cap in this subparagraph; if no, what is the distinguishing criterion? (See also comment on B.3(e).) Issue 3: The implicit assumption that "non-grid electricity equals renewable electricity" is not valid. The methodology only limits grid electricity to 10%, but does not limit on-site fossil generation. Project proponents may use on-site diesel generators or other fossil backup power, causing fossil generation to exceed 10% of total consumption. Issue 4: The clause uses the undefined term "low-carbon hydrogen." B.5(a) uses "low-carbon hydrogen," which is not defined in B.3. The methodology defines "Green Hydrogen" and "Low Carbon Intensive Hydrogen," but the applicability condition uses a third term. Because this term	
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			is undefined, project participants cannot determine whether, for example, nuclear-powered electrolysis would qualify. Issue 5: Terminology is inconsistent. Subparagraph (ii) uses "total electricity consumption," while B.3(e) defines "total electricity input." It is unclear whether these are the same concept. If they are not (input meaning only the electrolyser main load, consumption including auxiliary systems, compression, and water treatment), the denominator for the 10% cap differs and the result is different.	
6	B.5(b)	te	PMM011 text: "At least 90% of total electricity input to the hydrogen production process must be sourced from renewable energy. Grid electricity use shall not exceed 10% of total consumption." Issues: Issue 1: Using "grid electricity $\leq 10\%$" as a proxy for "renewable electricity $\geq 90\%$" is not sufficient. The first sentence requires renewable electricity of at least 90%; the second uses grid electricity not exceeding 10% as an indirect verification. This verification method implicitly assumes that whatever is not grid electricity is renewable electricity. But electricity that does not come from the grid	Proposed change: Clarify the logical relationship between the first sentence (renewable $\geq 90\%$) and the second sentence (grid $\leq 10\%$), or directly specify the metering method for renewable electricity. Define "Grid Electricity" and clarify its relationship with PPA/REC electricity. Use consistent terminology for "total electricity input" and "total consumption" and define the scope. Add metering and verification requirements for the renewable electricity share.

		is not necessarily renewable. A project could use on-site diesel generators, for example, and fossil generation could easily exceed 10% of total consumption. A 10% cap on grid electricity alone cannot guarantee that 90% is renewable. Issue 2: The term "grid electricity" used in the second sentence is not defined anywhere in the methodology. What counts as Grid Electricity? Electricity procured through PPAs/RECs is also physically drawn from the grid connection point, is that considered Grid Electricity? If yes, it directly conflicts with the PPA/REC pathway permitted under B.5(c) and the 10% cap in B.5(a)(ii); if no, what is the distinguishing criterion? Physically, the same grid line delivers mixed electricity, and there is no way to tell which MWh come from renewable plants and which from fossil sources. (See also comment on B.3(e).) Issue 3: Terminology is inconsistent and the scope is undefined. The first sentence uses "total electricity input," while the second uses "total consumption," without clarifying whether these are the same concept. B.3 does not define the scope of either term. If they are not the same concept (input meaning only the electrolyser main load, consumption including auxiliary systems, compression, and water treatment), the denominator for the 90%/10% threshold differs and the result is different. Issue 4: There is no guidance on how the 90% renewable	
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			electricity share is to be metered or verified. The methodology requires renewable electricity of at least 90%, but does not specify how this 90% is metered. DOEs have no standard basis for checking whether a project actually meets the requirement.	
7	B.5(c)	te	PMM011 text: "The project activity shall demonstrate that all renewable electricity used for hydrogen production is sourced from: (i) Dedicated renewable energy installations directly connected to the hydrogen production facility; or (ii) Renewable electricity supplied through contractual arrangements such as power purchase agreements (PPAs), renewable energy certificates, or equivalent instruments recognized by the host Party." Issue 1: This clause is intended to demonstrate that the 90% renewable electricity truly comes from renewable sources. The word "or" means either (i) or (ii) alone is sufficient. Issue 2: Subparagraph (i) (direct connection) works. A direct line can be metered independently and can physically show that the electricity comes from a renewable facility. Issue 3: Subparagraph (ii) (PPA/REC) has a fundamental problem: whether PPA/REC electricity counts as Grid	Proposed change: Define "Grid Electricity" and clarify the relationship between PPA/REC electricity and Grid Electricity, including physical distinguishability. Specify PPA/REC eligibility criteria, covering additionality, temporal matching, geographic matching, and double-counting prevention. Reconcile the PPA/REC provisions with "Not applicable" paragraph (b). Add requirements for metering instruments, including accuracy, installation location, and calibration.

		Electricity is undefined. Electricity matched through a PPA or REC is physically taken from the grid connection point. The same grid line carries mixed electricity, and the meter records only total consumption. There is no physical way to tell which MWh came from a renewable plant and which from a fossil plant. If PPA/REC electricity counts as Grid Electricity, it directly conflicts with the Grid Electricity $\leq 10\%$ requirement in B.5(a)(ii) and B.5(b) — the more PPA/REC electricity a project uses, the higher its grid electricity share, potentially exceeding 10%. If PPA/REC electricity does not count as Grid Electricity, what is the distinguishing criterion? The methodology never defines this. A contract alone does not prove that the electrolyser actually used renewable electricity. Issue 4: There is a conflict with "Not applicable" paragraph (b). "Not applicable" paragraph (b) excludes projects "where renewable electricity supply cannot be independently metered and verified." PPA/REC-matched grid electricity cannot be independently metered at the project boundary. If independent metering is really required, the PPA/REC route does not work. Issue 5: PPA/REC eligibility criteria are missing. The methodology does not specify whether the PPA-matched renewable facility is newly built (additionality), whether generation and consumption match in time and location, or	
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			how double-counting is prevented. Issue 6: Metering instrument requirements are missing. The methodology does not specify meter accuracy, installation location, or calibration requirements.	
8	B.5(d)	ge	B.5(d) states: "Freshwater extraction for the project shall not exceed 5% of locally available renewable freshwater resources. This shall be verified at the initial validation and at each verification of emission reductions using project monitoring data and official hydrological or governmental data sources." The numerator is not defined. It is not clear whether direct river intake, groundwater extraction, and purchased municipal water all count. The metering point is not specified either: is it the electrolyser plant inlet or the water source intake? And transmission losses during water treatment may or may not be included. The denominator is also undefined. "Locally available renewable freshwater resources" could mean the hydrological sub-basin, the catchment area, or an administrative boundary. The time basis is not specified: long-term average, the last 10 years, or a dry year. The data standard is not given either. With neither the numerator nor the denominator defined, the 5% limit cannot be applied in practice. Project	Define the numerator (which water sources count and where the metering point is) and the denominator (spatial scale, time basis, and data standard).

			participants and DOEs have no way to tell whether a given project is in compliance.	
9	B.5(e)	ge	B.5(e) states: "Where surplus freshwater availability cannot be demonstrated, potential leakage associated with freshwater diversion or displacement of other users shall be identified and addressed in accordance with the latest version of the 'Standard: Addressing leakage in mechanism methodologies'." This clause is meant to deal with water resource competition leakage when surplus freshwater availability cannot be shown. The problem is that PMM011 refers to the UNFCCC A6.4 standard "Addressing leakage in mechanism methodologies" for water leakage assessment, but that A6.4-STAN-METH-005 does not have a specific water leakage assessment method. It sets out general procedures for identifying, avoiding/minimising, calculating, and subtracting leakage, but gives no specific formula or default values for water leakage. PMM011 itself gives a formula in Section 12.1 ($LE_{y,Water} = W_{additional,y} \times EF_{baseline,Water}$), but neither parameter is defined. It is not clear how $W_{additional,y}$ (additional water use elsewhere) or $EF_{baseline,Water}$ (baseline water supply and treatment emission factor) should be calculated.	Please confirm whether the standard "Addressing leakage in mechanism methodologies" contains procedures for water leakage assessment. Add definitions and calculation guidance for both parameters of the water resource competition leakage formula.

10	B.5(g)	te	B.5(g) states: "For retrofit (brownfield) project activities, any co-located grey hydrogen production facilities, including SMR, ATR, or coal gasification facilities without CCS, shall be: (i) Permanently decommissioned; or (ii) Capped at baseline production levels with appropriate monitoring provisions to prevent leakage from continued fossil-based hydrogen production. " Issue 1: Retrofit and brownfield are incorrectly conflated. PMM011 directly states "retrofit (brownfield)," conflating the two concepts. However, retrofit is an engineering concept (modifying existing facilities), while brownfield is a site concept (new build on previously industrial land). These are two different concepts. This clause should apply only to brownfield projects. Issue 2: Requiring permanent decommissioning changes the nature of the project. If the existing facility must be decommissioned, the project becomes "a new electrolyser replacing an existing fossil hydrogen facility." In this case, the emission reduction mechanism and baseline accounting logic may be fundamentally different from this renewable electricity hydrogen methodology. Whether the existing facility remains or expands depends on market and other complex factors; the proponent should revisit the relationship between the existing fossil hydrogen facility and the project activity.	Distinguish retrofit and brownfield as two different concepts. Correctly understand and use the leakage concept. The proponent should revisit the relationship between the existing fossil hydrogen facility and the project activity.
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			Issue 3: Incorrect use of the leakage concept. Clause (ii) states "to prevent leakage from continued fossil-based hydrogen production." Using leakage as a basis for capping fossil hydrogen production is an incorrect understanding and use of the leakage concept. Continued fossil hydrogen production or expansion is not project leakage. Whether the existing facility remains or expands depends on market and other complex factors; the proponent should revisit the relationship between the existing fossil hydrogen facility and the project activity.	
11	B.9.2 Lock-in Risk	ge	A6.4-AMT-008 sets out a three-step procedure for assessing avoidance of lock-in: Step 1 assesses technology/operational lifetime (facilities with a lifetime of 10 years or less are exempt from further assessment); Step 2 assesses GHG intensity (compared with comparable activities); Step 3 assesses resource efficiency. The tool requires methodologies that reference it to specify: the main technology, lifetime type, relevant region, GHG intensity calculation method, comparable activity scope, resource type and indicators, resource intensity threshold, and no-lock-in lifetime threshold. PMM011 says lock-in is handled "at the methodology level through mandatory eligibility conditions" and uses six conditions (a) to (f) instead of the three-step procedure. But it does not explain how these six conditions (mandatory	Provide further clarification and justification. Explain how the six eligibility conditions relate to AMT-008's three-step procedure, and state whether project participants still need to follow AMT-008 if the six conditions are satisfied.

			water electrolysis; no fossil fuel combustion; no new fossil capacity; existing facilities must be decommissioned or capped; renewable electricity share of at least 95%; no long-term fossil fuel contracts) map onto AMT-008's lifetime assessment, GHG intensity assessment, and resource efficiency assessment. It also does not say whether project participants still have to go through AMT-008's three-step procedure if the six conditions are met.	
12	B.9.3.1 Investment Analysis	te	In the list of alternative scenarios for renewable electricity hydrogen projects, PMM011 Section 9.3.1(b)(III) says: "Conversion of the existing facility to renewable electricity-based hydrogen production." This alternative is not technically feasible. Fossil hydrogen production (SMR, ATR, coal gasification) and water electrolysis are completely different processes using completely different equipment. An existing SMR or ATR unit cannot be converted into an electrolyser; it must be demolished and replaced. The fact that a technically infeasible alternative is included suggests that the proponent may not have worked from the actual engineering of hydrogen production.	Correct this. Revise the brownfield alternative scenarios so that every listed alternative is technically feasible, for example "decommissioning the existing facility and building a new electrolyser on the same site" instead of "conversion."
13	B.9.3.2 Barrier Analysis	ge	PMM011 follows STAN-METH-003, which says barrier analysis "may only be applied to activities implemented at the level of individual households or small public or private entities that typically do not have access to commercial or	Clarify what constitutes "typically do not have access to commercial or public third-party finance" and give a verifiable definition or threshold, such as an investment size limit or

			public third-party finance." PMM011 does not explain what "typically do not have access to commercial or public third-party finance" actually means in practice. This is something DOEs struggle with during validation, because the methodology gives no threshold or criteria for deciding whether an entity meets the condition.	financing availability criteria.
14	B.9.3.3 Common Practice Analysis	ge	The methodology excludes "pilot-scale or demonstration facilities" from the common practice assessment without defining what a pilot-scale or demonstration project is. In practice, this is impossible to apply.	Define "pilot-scale," and "demonstration facilities" .
15	B.10 Baseline Identification	te	PMM011 uses three terms throughout the methodology ("greenfield," "brownfield," and "retrofit") without defining any of them. This is a significant gap in the baseline identification section. The three terms mean different things: - Greenfield is a site concept: new build on land that has not been developed before, with no prior industrial facilities. - Brownfield is also a site concept: new build on land that has been used industrially before, with the question of what happens to the existing facilities. - Retrofit is an engineering concept: upgrading or modifying an existing facility. In PMM011, "retrofit" seems to mean modifying an existing fossil hydrogen facility, which is not	The proponent should revisit the engineering basis of water electrolysis, clarify how greenfield, brownfield, and retrofit relate to each other, and revise the baseline identification section accordingly.

			engineering-feasible. SMR, ATR, coal gasification, and water electrolysis are entirely different processes with different equipment. The term "retrofit" has no real application here. Greenfield and brownfield projects generally have different baseline identification and emission reduction accounting, and are usually covered by separate methodologies. PMM011 lumps them together without clear definitions, which is a major deficiency in the baseline section.	
16	B.10.1 Greenfield Baseline Approach	te	PMM011 says: "For this methodology, Option (a) Best Available Technology (BAT) shall apply to greenfield projects, and Option (c) Existing Actual or Historical Emissions shall apply to brownfield or retrofit projects." It also says: "This approach shall be applied to greenfield projects where no historical operational data exist." The methodology requires greenfield projects to use BAT because, it says, greenfield projects have "no historical operational data." Note the word "operational." STAN-METH-004 uses "historical data" or "historical emissions" without that qualifier. By adding "operational," PMM011 narrows the data available under the Historical approach to plant-level operational data from existing facilities on the project site. Sectoral or national historical data are effectively excluded. But STAN-METH-004 paragraph 61 allows Historical	Follow STAN-METH-004 in selecting the greenfield baseline approach. Any departure from STAN-METH-004 must be clarified and justified.

			emissions to be quantified in four ways: (a) site-specific historical data (plant-level); (b) control group comparison (similar facilities in the sector); (c) modelling (sectoral models); and (d) default factors (national or international defaults). Options (b), (c), and (d) do not need site-specific data and can use sectoral or national data. A greenfield project may not have plant-level operational data, but it may well have sectoral or national historical data. Ruling out the Historical approach on the grounds that "no historical operational data exist" misunderstands what the Historical approach under STAN-METH-004 allows. Issues relating to Option (c) Historical for brownfield projects are discussed elsewhere and are not repeated here.	
17	B.10.2.1 Baseline Geographical Reference Area	te	STAN-METH-004 paragraph 21 says the baseline geographical reference area should be defined taking into account the main baseline sources and sinks, and may be global, regional, national, sub-national, or site-specific. PMM011 fixes it at the national level. This is not consistent with STAN-METH-004. The justification given is that "hydrogen production technologies, feedstock availability, regulatory standards, and energy market conditions are determined primarily at the national level." This justification focuses only on national-level policy and regulatory factors. It ignores sub-national regulation and	The baseline geographical reference area should follow STAN-METH-004 paragraph 21. It should be chosen based on local policy and regulatory factors as well as renewable resources, grid conditions, and hydrogen market conditions, rather than being fixed uniformly at the national level.

			the site-specific physical factors that really drive the baseline for renewable hydrogen projects: renewable resource availability and grid conditions. Renewable resources, grid emission factors, and grid absorption capacity vary a lot within a country. In China, for example, wind and solar resources and grid conditions differ significantly even between counties in the same province. Hydrogen markets are also regional (produced and consumed locally), not national. Fixing the reference area at the national level smooths over internal variation for large countries and over-specifies for small ones. The justification is not sufficient, and the provision is not consistent with STAN-METH-004.	
18	B.11 System Boundary Inconsistency	te	PMM011's emission reduction formula is: $ER_y = BE_{y,Crediting} - AE_y - LE_y$ Baseline emissions ($BE_{y,Crediting}$) are calculated on a life-cycle basis (well-to-gate). Section 10.2.1 (the BAT step) requires emission factors to use life-cycle carbon intensity (cradle-to-gate or well-to-gate), covering natural gas extraction, transport, and SMR conversion. IEA data shows that the SMR value of 9 to 12 tCO₂e/tH₂ is a life-cycle figure that includes upstream emissions. Activity emissions (AE_y) cover only the operation stage. Section 11.1 lists only grid electricity consumption (up to 10%), auxiliary/backup fossil fuels, water treatment, and	The proponent should reconsider the emission reduction accounting logic and methodology so that baseline and project activity emissions use consistent system boundaries. If life-cycle accounting is retained, the methodology should specify the system boundary scope, which upstream emissions are included, and the applicable data sources and default values.

			hydrogen leakage. Upstream emissions from renewable power plant construction, electrolyser manufacturing, and equipment manufacturing are not included. Section B.1 (the introduction) says "Life-cycle emissions are considered for both the baseline and project activity emissions." But Section 11.1 in practice counts only the operation stage and does not include project-side upstream manufacturing emissions. The result is that emission reductions equal life-cycle baseline emissions minus operation-stage project emissions. The two sides do not use the same system boundary: the baseline includes upstream emissions and the project side does not. This can overstate emission reductions. Two further points are not addressed. First, it is not clear whether life-cycle accounting is necessary at all. The common practice in carbon market methodologies is for both project-side and baseline emissions to use operation-stage emissions with consistent boundaries. Second, if life-cycle accounting is required, the scope of the system boundary and the accounting method may differ across countries and even within a country. PMM011 should give normative guidance on where the boundary is drawn, which upstream emissions are included, and what data sources and default values apply.	
19	Peer-reviewed	ge	PMM011 uses "peer-reviewed" in several places:	Define "peer-reviewed scientific literature"

	definition	- B.4(f): peer-reviewed publications on electrolyser technologies; - Section 10.2.1 (BAT data sources): peer-reviewed literature providing verified process-level GHG intensities; - Section 10.2.1 (Historical data sources): peer-reviewed studies or technical reports; - Leakage, water footprint, and other sections also cite peer-reviewed literature. The normative references in B.4 also include two reports from CEEW (Council on Energy, Environment and Water), an Indian think tank: "Renewable Energy–Green Hydrogen–Land–Water Nexus in India" (2023) and "Green Hydrogen Testing Infrastructure and Facilities in India" (2022). The methodology never says what counts as "peer-reviewed." This is a real problem for DOE validation and verification, because there is no definition to apply.	clearly. This may require guidance from the SBM.
	Note: Owing to the structural deficiencies inherent in the current draft, these comments are limited to issue identification and directional guidance. Specific textual amendments are not provided, as piecemeal revisions would be inappropriate given the fundamental restructuring required.		