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Document reference number and title: (Recommendation from the MEP to SBM020) **Draft Mechanism Methodology: Flaring or use of landfill gas (version 02.0)**				
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	-	Paragraph 12(d)(iii)	Paragraph 12(d)(iii) restricts kilns to "brick firing only", excluding cement kilns. No justification is given. The restriction appears to be inherited legacy text: in the predecessor CDM methodology ACM0001, brick kilns were added at EB 65 (Annex 13) and glass melting furnaces at EB 67 (Annex 12), each expressly to "broaden the applicability" in response to a request. The parenthetical records the scope of past requests, not an assessment of cement kilns, and has been carried over without being revisited. The restriction also conflicts with the methodology's own reasoning. Paragraph 35(c)(ii) applies the BAT approach where emissions per unit of output are technology-determined and the same output is supplied by other technologies; clinker production meets both tests, its output measurable in tonnes of clinker. Data/Parameter table 9 justifies fd = 0.9 for intermittent brick kilns on combustion temperatures "exceed[ing] 600 degrees C" with sufficient exposure time, and assigns fd = 1 to glass melting furnaces. A cement kiln main burner reaches approximately 2,000 degrees C in the gas phase with residence times of several seconds, exceeding both reference cases; fd = 1 follows from the table's own logic. No alternative route exists. Only two mechanism methodologies are approved under the Article 6.4 mechanism and neither covers cement; nor, to our knowledge, is any such methodology in the pipeline. Participants displacing coal or petroleum coke (approximately 95 to 97 t CO2/TJ, against approximately 56 for natural gas) in cement kilns therefore have no methodology available. We are developing three landfill gas projects in the Dominican Republic for which the cement industry is the principal accessible outlet for the recovered gas, and expect similar pattern across the Caribbean and Central America. Two points we would expect the panel to raise. Raw LFG at approximately 50 per cent methane has low volumetric energy density, and a main burner imposes flame temperature and momentum requirements; eligibility should therefore cover both LFG and upgraded biomethane and assume partial rather than full substitution, credited on the gas actually delivered and measured. Overlap with	Amend paragraph 12(d)(iii) to read: "(iii) Generating heat in a boiler, air heater or kiln (brick firing or cement clinker production only) or glass melting furnace;" Add to Data/Parameter table 9: "1 - Cement kiln", justified on gas-phase temperatures and residence times exceeding both the intermittent brick kiln (fd = 0.9) and glass melting furnace (fd = 1) cases. Add paragraph 12(g)bis: "Where the heat generation equipment is a cement kiln, the baseline quantity of heat shall be determined on the basis of the specific energy consumption per tonne of clinker produced, so that any improvement in the thermal efficiency of the kiln does not increase the emission reductions attributable to the Article 6.4 activity. Activity participants shall further demonstrate that no mitigation activity in respect of the same kiln is registered or credited under this or any other crediting mechanism in a manner that would result in double counting." Consequential amendments: paragraphs 12(f)(iii), 15(a), 27(a)(iii)d and e, 35(c)(ii), and subsections 7.3.2.3 and 8.2.

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			energy efficiency crediting at the same kiln is addressed by the safeguard below.	
2	5. Activity boundary	Paragraph 15(a)	Paragraph 15(a) includes "kiln" in the activity boundary without the "brick firing only" qualifier used in paragraph 12(d)(iii). The boundary therefore contemplates kilns generally while the applicability condition silently narrows them. We submit the inconsistency should be resolved in favour of the broader term.	Retain the unqualified term "kiln" in paragraph 15(a) and align paragraph 12(d)(iii) accordingly, so that both provisions cover brick and cement kilns.
3	4. Applicability	Paragraph 12(f)(iv)	Paragraph 12(f)(iv) fixes a single baseline for the supply component: "the consumption of natural gas from an existing natural gas network". This is counterfactual where the consumer does not use natural gas. Industrial consumers near a SWDS commonly fire petroleum coke, coal, heavy fuel oil or LPG, and in many such markets no natural gas network reaches them. The assumption does not reflect existing actual or historical emissions as required by paragraph 36(iii) of the RMPs and systematically understates reductions, natural gas at approximately 56 t CO2/TJ being far below petroleum coke or coal at approximately 95 to 97. The component is therefore least attractive where fuel switching delivers the most mitigation. Consumers frequently alternate between fuels on price, so a baseline keyed to a single historical fuel would be neither robust nor readily verifiable. We propose a conservative rule insensitive to such switching.	Amend paragraph 12(f)(iv) to read: "(iv) For the supply of LFG or biomethane to consumers through trucks or dedicated pipeline, or the supply of biomethane through a natural gas distribution network (hereinafter referred to as 'supply of LFG or biomethane to consumers component'), the most plausible baseline scenario is the continued consumption by the consumer of the fossil fuel or fuels actually displaced, as documented through the consumer's fuel procurement and consumption records for the three years prior to the implementation of the Article 6.4 activity. Where the consumer used more than one fossil fuel during that period, the CO2 emission factor applied shall conservatively be the lowest emission factor among the fuels so documented. Where the consumer is supplied from an existing natural gas network, the baseline scenario is the consumption of natural gas from that network."

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4	7. Baseline scenario	Paragraph 106, Equation (25), subsection 7.3.2.4, Data/Parameter table 6	Equation (25) determines BENG,y = 0.0504 x FCH4,NG,y x EFCO2,NG,y, and Data/Parameter table 6 defines EFCO2,NG,y exclusively as the "Average CO2 emission factor of natural gas in the natural gas network or dedicated pipeline or in the trucks". The equation admits no other fuel, and the title of subsection 7.3.2.4 hard-codes the same assumption. This is the calculation counterpart of paragraph 12(f)(iv). No new data source is required. The same table already defines EFCO2,BL,j,n for heat generation as "Variable (depends on the type of fuel)", sourced from Table 1.4 of Volume 2, Chapter 1 of the IPCC (2006). Heat generation therefore already accommodates coal and petroleum coke while the supply component does not, an asymmetry between two routes that may apply to the same physical arrangement depending only on whether the consuming equipment sits inside or outside the boundary under paragraph 15(a).	Retitle subsection 7.3.2.4 as "Unadjusted baseline emissions associated with LFG or biomethane supplied to consumers replacing fossil fuel use (BEFF,y)". Generalise EFCO2,NG,y to EFCO2,BL-fuel,y, defined in Data/Parameter table 6 as: "CO2 emission factor of the fossil fuel displaced at the consumer in year y (t CO2/TJ), sourced from Table 1.4 of Volume 2, Chapter 1 of the IPCC (2006). Where more than one fossil fuel is documented in the consumer's records for the three years prior to implementation, the lowest emission factor among those fuels shall be applied. Where the displaced fuel cannot be documented, the emission factor of natural gas shall be applied as a conservative default." Amend paragraph 106 and Equation (25) accordingly.
5	6. Demonstration of additionality	Paragraph 27(a)(iv)	Paragraph 27(a)(iv) provides that the baseline "is assumed to be the supply with natural gas". Unlike subparagraphs (i) to (iii), which each list realistic and credible alternatives to be assessed, it prescribes a single assumed alternative. This is inconsistent with the chapeau of paragraph 27(a), which requires participants to "identify realistic and credible alternative scenarios", and with the additionality tool. Where the consumer demonstrably fires petroleum coke or coal, natural gas supply is not a realistic alternative.	Replace paragraph 27(a)(iv) with a list structured like subparagraphs (i) to (iii): "(iv) For the supply of LFG or biomethane to consumers: a. S1: The Article 6.4 activity is implemented without being registered under the Article 6.4 mechanism; b. S2: Continued supply of the consumer with natural gas from an existing natural gas network; c. S3: Continued consumption by the consumer of the fossil fuel or fuels used in the pre-activity scenario, including coal, petroleum coke, fuel oil or LPG; d. S4: Any other source of energy supply to the consumer."

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6	7. Baseline scenario	Note under subsection 7.4; paragraph 119(c); Equations (29) to (33)	We respond to the Note under subsection 7.4 on adopting a relative rather than absolute initial downward adjustment and annual increase. We support simplification but caution against direct transposition, because the two methodologies address baselines with different time profiles. A grid-connected renewable activity has broadly stationary output, so absolute and relative anchoring give similar results. A landfill gas baseline is not stationary: it is governed by first-order decay of the waste in place and by whether the SWDS continues to receive waste. Generation rises materially at an active site and declines at a closed one. Equations (30) to (33) anchor both the initial adjustment and the annual increase to first-year quantities, so the deduction is a falling share of the baseline at a growing site and a rising share at a closed one, the latter requiring the max{...; 0} constraint already present in Equations (30) and (31). A relative formulation reverses both effects. Neither is conservative across all sites; each is conservative for one class and lenient for the other. Adopting either as a single mandatory rule would introduce a bias determined by site trajectory rather than mitigation performance.	If a relative approach is adopted, we propose it not be applied as a single mandatory rule. Either (i) permit participants to apply the formulation reflecting the documented trajectory of baseline emissions over the crediting period, justified in the PDD on the basis of the solid waste tool projection and fixed at validation; or (ii) differentiate expressly between SWDS that continue to receive waste and SWDS closed at the start of the crediting period. In either case we propose the max{...; 0} constraint in Equations (30) and (31) be retained.

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7	7. Baseline scenario	Notes at paragraph 139 (subsection 7.5.1.1), at subsection 8.6 and in Data/Parameter table 17; paragraphs 110-111; Equations (26) and (29)	We respond to the Notes on aligning the uncertainty analysis with other regulatory documents. For this methodology uncertainty is a direct determinant of crediting volume, not a presentational matter. Under Equation (29) the initial downward adjustment is the higher of the minimum adjustment and the uncertainty-derived adjustment, so wherever overall uncertainty of unadjusted baseline emissions exceeds 10 per cent it governs the adjustment for the entire crediting period through Equations (30) to (33). Paragraph 111 requires uncertainty in all baseline parameters to be propagated by error propagation or Monte Carlo simulation. The dominant parameters are those of the solid waste tool: waste composition, degradable organic carbon content and decay rates. At a SWDS with no pre-activity gas measurement, the ordinary case for a new capture system and expressly contemplated by paragraph 12(c)(i), these are necessarily estimated ex ante with wide uncertainty. The resulting penalty falls where the activity can least reduce it and persists after monitoring has produced data that would substantially narrow the interval.	In aligning the uncertainty provisions we propose that: (i) default uncertainty ranges for the solid waste tool parameters be specified or cross-referenced, so participants need not derive parameter-level uncertainties from first principles for ex ante estimates; (ii) an option be provided to determine the uncertainty term in Equations (26) and (29) using measured data from the first full year of monitoring, with the initial downward adjustment recalculated once at first verification and fixed thereafter; and (iii) the alignment be applied consistently across paragraph 139, subsection 8.6 and Data/Parameter table 17, which presently carry the same Note in three places.