

# Response to public consultation comments on Methodology M/WM-SW001 For Landfill Biogas Destruction and Utilization Projects, version 2.2



Version 2.2

## **Response to Public Consultation Comments on Methodology M/WM-SW001 For Landfill Biogas Destruction and Utilization Projects for the of from Sites**

**Dear Participants,**

Cercarbono extends its most sincere gratitude for your participation in the public consultation of the Methodology M/WM-SW001 For Landfill Biogas Destruction and Utilization Projects, version 2.2, conducted electronically from September 23, 2024, to November 12, 2024.

Your valuable feedback allows us to generate a more comprehensive, robust methodology document, enabling holders and developers of GHG reduction initiatives implementing projects or programs in landfills and participate in Cercarbono's voluntary carbon certification program.

You will be informed once the final version of this methodology, incorporating the applicable comments, is published and made available on our website.

The attached table includes a compilation of all comments received, along with the corresponding clarifications and responses developed by our technical team. This table will also be available on our website under the "Consultations" section.

Sincerely,



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**Alex Saer**  
CEO, Cercarbono

| No. | Comment                                                                                                                                                                                                                                                                                                              | Document Section                                                                                         | Answer/clarification                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 1   | For GHG Reductions' CCMP<br>In this type of CCMP, no significant leakage emissions are expected; however, those resulting in CH <sub>4</sub> emissions due to the displacement of agricultural or livestock activities must be considered.                                                                           | Page 50                                                                                                  | Writing of leakage section will be analyzed to ensure situations such as the described ones are considered by CCMPs when applying the methodology.                                                                                                                                                                                                                                                                                                     |
| 2   | Consideration for the Software Industry (Data Centers, SaaS, Communications, etc.)                                                                                                                                                                                                                                   | Not applicable                                                                                           | The methodology scope does not apply to these activities. However, solid wastes from these industry likely to generate methane emissions when sent to landfill sites are included in such scope.                                                                                                                                                                                                                                                       |
| 3   | Good morning, I would like to discuss carbon certificates and my recycling process with you.                                                                                                                                                                                                                         | Not applicable                                                                                           | Action:<br>The commenter is referred to the commercial area.                                                                                                                                                                                                                                                                                                                                                                                           |
| 4   | Today, the country is facing a situation where various forest plantation owners, grouped into a project under a "Umbrella" scheme by a developer, wish to withdraw from the project they are part of, seeking transparency. This is due to the developer's repeated failure to fulfill the commitments made to them. | Not applicable                                                                                           | Response / Action:<br>None.<br>This is presented as a comment or opinion non-related to this methodology, without requiring any response or action to be undertaken by Cercarbono.                                                                                                                                                                                                                                                                     |
| 5   | The protocol mentions the materiality threshold for Validation/Verification processes. Therefore, could you consider and define a threshold or an acceptable margin of sampling error obtained during carbon monitoring in CCMPs? Or will this percentage be defined independently by each CCMP?                     | Referred to the Cercarbono Protocol for Voluntary Carbon Certification, not to the specific methodology. | Given the diversity of measurement methods, counting techniques, or other approaches for determining parameter magnitudes involved in the monitoring of a CCMP, as well as the characteristics of the measurement technologies involved, it is not possible to indicate a minimum or maximum sampling error value. This should be case-specific. What is essential is that this value is reported using reliable sources and that it is conservatively |

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|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                           | considered when presenting the environmental results of the respective CCMP. This ensures the avoidance of overestimating reductions or removals of GHG emissions to be verified and, if applicable, certified.<br>Therefore, no action applies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6 | <p>Dear All,</p> <p>First of all, on behalf of ALLCOT, we would like to thank you for the opportunity to provide comments on the document under review. Below, we propose the inclusion of the following aspects:</p> <ol style="list-style-type: none"> <li>1. Reference to the United Nations Framework Convention on Climate Change and the principles of the Climate Change Agreement.</li> <li>2. Clarification on double counting and the use of offsets.</li> <li>3. Clarification on the handling of sensitive and/or confidential information.</li> <li>4. Inclusion of a new category for a Program of Activities, allowing a coordinating entity to manage project activities independently. This would enable the inclusion of new activities (in accordance with an eligibility requirements list) throughout the crediting period of the program, without cross-implications (design changes, monitoring plan modifications, etc.) among the various project activities. The objective is to facilitate and streamline the registration and validation process of project activities, aligned with the already existing PoA figure in the CDM. Similarly, the possibility of creating</li> </ol> | Referred to concepts or procedures mentioned in the regulatory framework documents of the Cercarbono Carbon Program, which are referenced in the methodology but not developed within it. | <p>Response:</p> <p>Point 1: The reference to the UNFCCC or climate change agreements does not apply in the methodology, as the relevant references regarding these are found in the documents and tools within Cercarbono's regulatory framework.</p> <p>Point 2: It is presumed that this refers to the related principle indicated in section 4.2 of the Cercarbono Protocol for Voluntary Carbon Certification, version 4.4. Please refer to section 7 of the Certification Program Procedures of Cercarbono, version 2.2, for a more detailed explanation on the concepts and procedures aimed at avoiding double counting issues.</p> <p>Point 3: Please refer to sections 12, 13, and 14 of the Certification Program Procedures of Cercarbono, version 2.2.</p> <p>Point 4: The main elements of Programs of Activities (PoAs) have been included in section 7.6 of the Cercarbono Protocol for Voluntary Carbon Certification, version 4.4. Please refer to that section.</p> |

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|  | <p>multi-country programs is proposed to facilitate technology and knowledge transfer. Additionally, we suggest including retroactive application for compliance with the project start rule dating back to 2016, in line with common practices in other carbon markets.</p> <p>5. Clarification on the concept of "intentional error": The concept is unclear (e.g., data manipulation, use of non-corresponding factors for calculations, omission of information) as well as the process for demonstrating the intentionality of the error (e.g., transcription errors, miscalculations, unsubmitted annexes).</p> |  | <p>The multi-country requirement is not accepted at this time for this type of program; therefore, its regional scope remains limited to the territory of the country where it is implemented.</p> <p>acceptable retroactivity for CCMPs' start date and Carboncer issuance of is clearly indicated in section 7.2 of the Cercarbono Protocol for Voluntary Carbon Certification, version 4.4. Please refer to that section.</p> <p>Point 5: An intentional error is one where incorrect data or information is provided to obtain a benefit related to carbon credit certification. In general, errors will be considered unintentional unless an investigation, initiated with due justification, indicates otherwise. In such cases, measures or sanctions could apply according to Cercarbono's regulatory framework. The nature of the information is independent of the intention when reporting it, so no association like those mentioned can be inferred.</p> |
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