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-PMM010
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	

#	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	N/A	ge	Read together with the other Article 6.4 tools and standards, Carbon Direct considers this a strong methodology that aligns well with the Carbon Direct and Microsoft Environmental Attribute Certificate (EAC) criteria. Its additionality and conservativeness requirements are sound, and its dual benefit, displacing fossil fuel while preventing landfill methane, is credible and well grounded. Many elements that could appear as gaps in the methodology alone are addressed by the referenced tools and standards. The comments below are refinements against those criteria, not fundamental concerns.	
2	Section A.3 (summary)	ge	Fuel combustion is roughly 35–40% of cement production emissions, and calcination is roughly 50–55%. This methodology addresses the fuel share, but calcination emissions remain even at full alternative fuel substitution. The summary description does not make this scope explicit.	Add a brief scope statement that the methodology addresses fuel combustion emissions only, and that the methodology is suited as a first layer of a multi-step strategy alongside methodologies addressing calcination through carbon capture, clinker substitution, or novel binders.
3	Section 5 (avoidance of double-counting)	te	The Activity Standard (A6.4-STAN-AC-002) requires verification against overlap with other environmental markets. However, the methodology contains no explicit provisions about Environmental Product Declarations (EPDs). An EPD reports the product's carbon intensity, and a lower-carbon cement carries commercial value through the product itself, not a tradable instrument. Therefore, the product’s carbon intensity as reported in the EPD may fall outside the market-based checks required by the Activity Standard. The same reduction may be sold as a credit and embedded in the EPD.	The methodology should contain an explicit mechanism to prevent double counting between an issued credit and the EPD. Specifically, it should require that any emission reduction issued as a credit be excluded from the carbon intensity reported in the cement or clinker EPD, and require an annual declaration of non-duplication covering EPDs alongside other environmental markets/frameworks. The Carbon Direct and Microsoft EAC criteria apply this test, stating a credit must not be reportable as a reduction by the physical product via an EPD as well as in an EAC.

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4	Section 10.2.2.4 (Baseline emissions from decay, dumping, or burning of waste)	te	Equation 14 on landfill methane baseline emissions uses the oxidation factor and the methane correction factor, physical properties that can change as a landfill is capped, compacted, or drained. However, the methodology defers to the solid waste tool (A6.4-AMT-003) without specifying which determination option applies, so a proponent may adopt static default values and never update them over a crediting period. Therefore, the avoided emissions term may rest on a year-zero snapshot rather than the site's current conditions.	The methodology should include a requirement to revisit the oxidation factor and the methane correction factor at each verification. Where site-specific measurements are available, project proponents should re-establish the oxidation factor using the monitoring or re-measured option offered in 5.3.2.3 of the solid waste tool. Where a default is used, proponents should be required to re-select it at each verification to match the site's current cover and management. The methane correction factor, for which the tool provides no update route, should be treated the same way.

Document information

Version	*Date*	*Description*
01.0	23 May 2025	Initial publication of form template.

Decision Class: Regulatory
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