



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

Name of submitter	Karim Kassam - Authorized GDT Representative
Affiliated organization of submitter (if any)	Global Decarbonization Technologies (GDT)
Email of submitter	kkassam@globaldecarb.com - Authorized submitter email
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	A.3 / Section 4 General scope and applicability	ge	Global Decarbonization Technologies (GDT) welcomes the development of A6.4-PM010 and supports rigorous Article 6.4 methodologies addressing municipal solid waste (MSW) diversion, avoided landfill emissions and industrial decarbonization. GDT is developing a non-incineration MSW processing pathway intended to divert mixed MSW from landfill and convert recovered material into commercially usable outputs. Although such a pathway is outside the clinker fuel-switch activity presently defined by A6.4-PM010, several methodological elements - including waste-management baseline determination, avoided landfill methane, activity boundaries, leakage, additionality, monitoring and avoidance of double counting - are relevant across a broader class of MSW mitigation activities. The methodology should therefore distinguish clinker/combustion-specific applicability conditions from general MSW accounting principles that may later be referenced or adapted under other Article 6.4 methodologies.	Add an explanatory statement such as: "The applicability conditions relating specifically to clinker manufacture and combustion define the scope of A6.4-PM010 and shall not be interpreted as determining the eligibility or ineligibility of other MSW treatment, recovery or conversion technologies under separately approved Article 6.4 mechanism methodologies."
2	A.3 / Section 1.1 Sectoral scope	te	The proposed methodology identifies Sectoral Scope 3 (Energy Demand), while the methodology also quantifies baseline methane emissions associated with the diversion of MSW from solid waste disposal sites. Where avoided landfill methane represents a material portion of claimed A6.4ERs, the activity includes a substantive waste-handling and disposal component in addition to the cement fuel-switch component. Clarification is requested as to whether Sectoral Scope 3 alone adequately captures validation and verification responsibilities for the activity.	Add a justification for the selected sectoral scope(s) and consider inclusion of Sectoral Scope 4 (Manufacturing Industries) and/or Sectoral Scope 13 (Waste Handling and Disposal), where applicable, for the portions of the activity associated with industrial production and avoided waste-disposal emissions.
3	Section 4 Applicability condition V	te	The condition stating that use of MSW as an alternative fuel shall not divert waste from other activities is broad when applied to heterogeneous municipal waste. A mixed MSW stream can contain fractions with credible recycling, reuse or composting pathways and other residual fractions whose most plausible fate is disposal. Environmental integrity would be strengthened if eligibility were demonstrated at the level of the relevant waste stream or material fraction rather than through a categorical test applied to MSW as a whole.	Replace or supplement the condition with: "For each waste stream or material fraction included in the emission-reduction calculation, the activity participant shall demonstrate that use of such waste under the Article 6.4 activity does not materially displace an existing or reasonably expected recycling, reuse, composting or other waste-management activity identified as a more plausible baseline scenario."
4	Section 4 Chemical processing restriction	ge	GDT supports retaining the restriction on chemical processing where it is necessary to define the technical boundary of this combustion-based cement methodology. However, the wording could be read more broadly than intended and should not establish an implied Article 6.4 precedent that MSW mitigation is limited to mechanically processed or dried waste followed by combustion. Other physical, chemical or thermochemical treatment pathways may require separate methodologies and should be assessed on their own environmental integrity.	Add: "This applicability condition is specific to activities applying A6.4-PM010 and shall not be interpreted as restricting the development or eligibility of other MSW treatment, material-recovery or conversion technologies under separate Article 6.4 mechanism methodologies."
5	Section 7 Activity boundary	te	The methodology boundary should explicitly encompass all material MSW preprocessing activities attributable to production of the alternative fuel, whether those activities occur inside or outside the cement plant boundary. The draft PDD describes dedicated MSW processing that can include sorting, stabilization, drying and other preparation. If a preprocessing facility is geographically separate, material electricity, fuel, wastewater, residual-handling and transportation	Extend Section 7 to include: "Any dedicated MSW receiving, sorting, preprocessing, stabilization, drying, densification, intermediate storage or residual-management facility necessary to produce the alternative fuel, including associated electricity, fuel, wastewater and transportation emission sources where material."

#	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)
			emissions could otherwise fall outside the stated boundary.	
6	Sections 7, 10.2.2.4 and 14 MSW mass balance	te	Avoided landfill emissions should be calculated only for the quantity and composition of waste demonstrably prevented from entering the applicable solid waste disposal site (SWDS). Where preprocessing generates recyclables, alternative fuel, stabilized organics, moisture, wastewater residues, inert material or other residual streams, a complete mass balance is necessary. Any material subsequently sent to an SWDS should be deducted from the quantity treated as avoided disposal. This is particularly important because the draft PDD describes preprocessing pathways in which some fractions may be recovered while other fractions are stabilized or otherwise managed.	Require a monitored mass balance covering inbound MSW; source and composition; recovered recyclable fractions; alternative-fuel output; moisture removed; biological/processing losses; residues; material subsequently disposed at an SWDS; and the final destination of each material stream. Define eligible avoided-disposal mass as verified baseline-eligible inbound MSW less all material subsequently disposed at an SWDS and less any material allocated to another credited mitigation activity.
7	Section 10.2.2.4 Equations 12-13; W3 and W7	te	Scenarios W3 and W7 describe materially different physical processes. W3 concerns waste dumped or left to decay mainly under aerobic conditions, whereas W7 concerns uncontrolled burning. The current calculation approach treats both scenarios using an uncontrolled-burning methane assumption. The methodology should demonstrate that this simplification is conservative or otherwise quantify the two baseline processes separately using factors appropriate to the demonstrated baseline condition.	Revise the methodology so that W3 and W7 are quantified separately using emission factors or models appropriate to the demonstrated baseline process. Combining W3 and W7 should only be permitted where the activity participant demonstrates that the resulting calculation is conservative.
8	Section 10.2.2.4 Equation 13; CH4 default factor	te	The methodology provides a default based on tonnes of biomass for CH4 from uncontrolled burning, while the activity is specifically applicable to heterogeneous MSW. Municipal waste can contain materially different proportions of fossil-derived plastics, paper, textiles, organics, wood and inert materials. A generic biomass default may therefore not adequately represent mixed MSW and could introduce uncertainty into the baseline estimate.	Give preference to measured, waste-specific or composition-weighted MSW emission factors. Where a generic biomass-based factor is used, require the activity participant to demonstrate that it is applicable and conservative for the actual MSW composition used by the project.
9	Section 9.2.1 / Draft PDD B.4 Baseline waste destination	te	Where avoided landfill methane is a material component of the claimed emission reductions, the most plausible waste-disposal baseline should be supported by evidence relating to the actual municipal waste catchment and receiving disposal facility or facilities. National-level waste-management practice alone may not establish the baseline conditions, methane capture status, depth, management classification or expected destination of the specific waste used by the project.	Require identification of the specific SWDS, or a statistically justified group of SWDS, to which the waste would most plausibly have been delivered absent the activity. Supporting evidence should include, as available, historical tonnage and disposal records, waste-source contracts, landfill classification and cell characteristics, methane-recovery infrastructure and historical capture, and credible planned changes in waste-management practice.
10	Section 5 Avoidance of double counting	te	MSW value chains can involve several entities capable of asserting environmental claims, including municipalities, collectors, processors, landfill operators, alternative-fuel suppliers and industrial users. Disclosure through sustainability reporting and notification to the Designated National Authority is useful but may not by itself prevent the same avoided landfill methane or waste-diversion benefit from supporting multiple credits or overlapping environmental claims.	Add requirements for unique chain-of-custody documentation for credited waste; contractual allocation of the relevant environmental attributes; declarations from relevant counterparties that the same emission reduction has not been separately credited; checks against applicable registries and domestic schemes; and explicit allocation rules where one activity claims avoided-disposal emissions and another activity claims downstream fuel or material substitution.
11	Section 8.3.3 Common practice analysis	te	For the clinker fuel-switch component, comparison with similar RDF/clinker installations is appropriate. However, where A6.4ERs also arise from avoided disposal of MSW, defining comparable activities only by the same RDF	Consider separate or complementary common-practice assessments for (i) the clinker fuel-substitution activity and (ii) the MSW diversion/treatment activity where avoided-disposal emissions are

#	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)
			conversion process, feedstock and final use in a clinker plant may be too narrow to assess whether the waste-management service itself is common practice. Competing MSW treatment pathways can provide the same waste-management service without using the same downstream industrial process.	claimed. The second assessment should consider other established waste-management pathways providing a comparable level of waste-treatment service within the applicable geographical area.
12	Sections 9.3 and 14 Regulated Adjustment Factor (RAF)	te	The methodology should clarify the hierarchy and calculation of inputs used for the downward adjustment. Section 9.3 refers to long-term industry pathways, technology trends, economic viability and market incentives, whereas the monitored RAF table states that the value shall align with NDCs and LT-LEDS and excludes voluntary initiatives. Without a clear hierarchy and reproducible calculation method, different activity participants may derive materially different RAF values from similar circumstances.	Specify the authoritative source hierarchy, calculation procedure, update frequency, treatment of new or amended policy requirements, treatment of voluntary industry commitments and technology trends, uncertainty adjustment and Designated Operational Entity verification requirements used to determine and update the RAF.
13	Draft PDD B.7 Pages 18-19; methane GWP	te	The worked example appears internally inconsistent regarding the global warming potential applied to methane. The PDD identifies GWP100 for CH ₄ as 28, while the following calculation table shows GWP_CH ₄ = 21. The worked example should use the applicable Article 6.4 GWP consistently throughout the calculation and identify the governing source.	Correct the inconsistent GWP value in the worked example and explicitly identify the applicable source, assessment report and Article 6.4 regulatory requirement governing the methane GWP used for the crediting calculation.
14	Section 8.1 Regulatory analysis / legal requirements	te	The sentence stating that A6.4ERs cannot be claimed for emission reductions "achieved in excess of legal requirements" appears inconsistent with the surrounding additionality rationale. The intended principle appears to be that reductions that would occur as a consequence of mandatory legal requirements are not additional, whereas reductions beyond the legally required level may still be considered if all other additionality requirements are met.	Clarify the wording, for example: "Where a legal or regulatory requirement applies, A6.4ERs shall not be issued for emission reductions that would occur as a result of compliance with that requirement. Emission reductions beyond the level required by regulation may only be considered where additionality is otherwise demonstrated in accordance with the applicable Article 6.4 requirements."
15	Section 3 / Normative references; Sections 4, 9 and 10.2.2.4 Established alternative-waste-treatment methodology precedent	ge / te	A6.4-PM010 appropriately draws on established CDM methodology for the clinker fuel-substitution component, but the waste-management component also overlaps with established methodological precedent for alternative waste treatment. CDM ACM0022 (Alternative Waste Treatment Processes) addresses baseline landfill methane and project emissions for alternative treatment of municipal solid waste, while A6.4-AMT-003 provides the Article 6.4 tool for emissions from solid waste disposal sites. Recent carbon-standard architecture, including GCC 2.0, has also moved toward explicit adoption of selected CDM methodologies and tools alongside applicable Article 6.4 methodologies and tools. This reinforces the value of modularity, transparent cross-referencing and avoiding unnecessary redevelopment of already established waste-accounting elements. For environmental integrity and methodological clarity, PM010 should distinguish which waste-baseline and monitoring elements are specific to the cement/RDF activity and which are consistent with or derived from broader alternative-waste-treatment and solid-waste-disposal methodology precedent.	Add a normative-reference and applicability clarification such as: "Where waste-management baseline, methane-generation, diversion, project-emission or monitoring procedures materially overlap with approved or previously established waste-treatment methodologies or Article 6.4 methodological tools, the methodology shall identify the relevant source and explain any adaptation. The use of such cross-referenced elements under A6.4-PM010 does not extend the applicability of this cement fuel-switch methodology to non-combustion alternative waste-treatment activities, which may be assessed under separate mechanism methodologies." The Methodologies Expert Panel may also consider whether relevant concepts from ACM0022 should be expressly cross-referenced where they improve consistency of the waste-treatment baseline and monitoring provisions.

(Please add rows as required)

Document information

Version	Date	Description
01.0	23 May 2025	Initial publication of form template.
Decision Class: Regulatory Document Type: Form Business Function: Methodology Keywords: A6.4 mechanism, developing methodologies and tools, stakeholder consultation		