



CLIMATE  
ACTION  
RESERVE

## **SUMMARY OF COMMENTS & RESPONSES DRAFT LANDFILL PROTOCOL VERSION 6.0**

One set of comments was received from Element Markets during the public comment period for the Climate Action Reserve (Reserve) draft Landfill Protocol Version 6.0. Staff from the Reserve provides responses to the comments below. The public comment period for the draft protocol was from May 16 to May 30, 2022.

The comment letter can be viewed on the Reserve's website at <http://www.climateactionreserve.org/how/protocols/us-landfill/>

### **COMMENTS RECEIVED BY:**

1. Element Markets

### 3.3 Project Crediting Period

1. **The draft Landfill Protocol states:** Projects will be eligible to apply for a renewed crediting period two times, provided the project meets the eligibility requirements of the most current version of the protocol at the time of such application.

**Comment:** EM supports the introduction of a third crediting period option for landfill projects that meet the additionality criteria and monitoring requirements in the latest version of the protocol. Under version 6.0, landfill projects will be granted the much-needed opportunity to continue reporting their voluntary methane emission reductions, resulting in significant climate benefits.

**RESPONSE:** The Reserve thanks Element Markets for their support in this revision to the protocol.

### 6.1 Monitoring Requirements

2. **The draft Landfill Protocol states:** If there are any periods when not all destruction devices measured under a single flow meter are operational, methane destruction during these periods will be eligible provided that the verifier can confirm all of the following conditions are met:

3. For any period where one or more destruction devices within this arrangement is not operational, it must be documented that the remaining operational devices have the capacity to destroy the maximum gas flow recorded during the period. For devices other than flares, it must be shown that the output corresponds to the flow of gas.

**Comment:** EM requests the Reserve's consideration of the following revision to language in section 6.1 on "periods when not all destruction devices measured under a single flow meter are operational." We are proposing an alternative for project developers to demonstrate whether the remaining active devices could destroy methane at a flowrate above the nameplate capacity without a marked decrease in efficiency. The suggested addition is in red below:

3. For any period where one or more destruction devices within this arrangement is not operational, it must be documented that the remaining operational devices have the capacity to destroy the maximum gas flow recorded during the period **or are designed in such a manner that it is physically impossible for gas to pass through at a lower destruction efficiency**. For devices other than flares, it must be shown that the output corresponds to the flow of gas.

**RESPONSE:** The Reserve has processes in place to assess variances from protocol monitoring requirements for project-specific scenarios and does not plan to revise the language in this section at this time.