

**TABLE FOR COMMENTS**

0	1	2	3	4	5	6	7
#	Initials	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
1			57-58	Technical	Our analysis shows that an increased amount of waste is buried during the crediting period to increase the amount of captured gas. Some PDDs even predict an increase of 1-3% of landfilling of waste; yet this waste could be recycled or composted. Therefore only closed landfills should be eligible	We propose the following change to lines 57-58: This methodology is applicable to project activities which install a new LFG capture system or make an investment to increase recovery rate at an existing LFG capture system in an existing SWDS that is closed.	
2			129-130	Technical	The work of wastepickers must be considered, since they are integral to waste management systems in cities in the developing world.	129-130 should be expanded: The LFG is partially not regenerated, as the organic fraction of the solid waste is not disposed in the SWDS but it is recycled by the formal or informal (i.e. wastepickers) sector.	
3			222-223	Technical	The composition of waste greatly affects magnitude of CH4 generation. Thus sampling is necessary	Sampling to determine the fractions of different waste types is required.	
4			288	Technical	The recycling of organic waste is not reflected is not accounted for in the determination of $F_{CH_4, BL,y}$	Case E: Non-generation of LFG due to recycling of organic fraction of solid waste formally and informally.	
5			289	Technical	Formula to calculate the lower baseline emissions	$F_{CH_4, BL,y} = F_{CH_4, BL,A,y}$ $f_{ow} = \text{fraction of organic waste that is recycled .}$ $F_{CH_4, BL,FR,y} = f_{ow} * F_{CH_4, used,y}$	

Template for comments

<b>Date: 23<sup>rd</sup> October 2011</b>	<b>Document: Comment to draft revision of ACM0001 "Consolidated baseline and monitoring methodology for landfill gas project activities"</b> <b>Submitted by GAIA – Global Alliance for Incinerator Alternatives.</b>
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6			418	Technical	Determination of $f_{ow}$	<p><b>Data/Parameter:</b> <math>f_{ow}</math></p> <p><b>Data/unit:</b> ---</p> <p><b>Description:</b> fraction of organic waste that is recycled</p> <p><b>Source of data:</b> municipality, waste pickers</p> <p><b>Measurement procedures (if any):</b> survey of current recycling practices, sampling of waste stream, portion of waste stream that is organic waste and fraction of organic waste that is recycled/composted.</p> <p><b>Frequency:</b> seasonally</p>	

GAIA has submitted a thorough and detailed comment on ACM-0001 through the web interface in February 2011. As there is a fundamental problem with the methodology, it cannot be corrected by changing a few lines to the methodology. The methodology does not support the best and cheapest waste management option, which is waste reduction followed by recycling and composting of waste. This methodology does not support minimization of methane releases, rather the maximization of methane capture. Please see our previous comments for further information and explanation.