# Feedback & Response Document: Public Consultation

## PM.0006: Use of waste recovery to transition to a circular economy

30 March, 2026

## Overview

This document outlines the feedback received during the public consultation period on version 0.9 of the GHG methodology, detailing how the feedback was addressed and its impact on the methodology, culminating in version 1.

# Consultation process

## Consultation period

The methodology has been opened up for public consultation on our website during the period June 16th to July 16th, 2025.

## Consultation process steps

- The methodology draft document was published for public consultation on https://proba.earth/public-consultation and made available on the methodology-specific page https://proba.earth/waste_recovery_methodology between June 16th to July 16th, 2025 (30 days).
- A Linkedin post was shared on the 17th of June inviting company page followers to visit the methodology page and provide feedback.
- The attempt resulted in receiving feedback from one market participant.
- In addition, an expert review was conducted at the same time by a VVB who is an expert in the topic (see F&R Expert Review document).
- Proba made an additional effort to extend its stakeholder consultation by conducting a comprehensive stakeholder mapping exercise. This process identified and categorized a wide range of relevant industry experts, including those working in companies dedicated to waste reduction and circularity, as well as authors of scientific publications on waste. The experts were grouped into four main categories: sustainability professionals, business strategists, technical experts, and researchers (based on their published scientific work). In total, the mapping resulted in a list of over 72 experts (representatives from 9 NGOs, 30 private companies, and researchers linked to 13 waste-focused scientific articles).
- Proba used direct email and Linkedin direct messages as channels for communication. Emails could be found on company websites, those that did not have emails publically available were contacted through Linkedin. All listed experts were contacted, Proba received 6 responses which were unable to provide feedback, due to lack of capacity for review or lack of expertise. However, two feedback responses were received, for which we scheduled online meetings to discuss their opinion.
- This feedback and response document is published on the Proba website next to the methodology.

## Stakeholders that gave feedback

| Field | Position |
|---|---|
| Technology provider | Technical Expert |
| Circular economy in agriculture | Business/strategy executive |
| Technology provider | Sustainability Manager |

## Channels

| Channel | Description | Feedback received |
|---|---|---|
| Proba website | Open platform for submissions | 0 |
| LinkedIn post | Public announcement and open call for feedback via social media | 1 |
| Email | Direct submissions from stakeholders | 4 |

# Detailed feedback and responses

| | *Section* | *Feedback/comment/suggestion* | *Response* |
|---|---|---|---|
| 1 | 1.1 Background | • Reviewers agreed that it is clear what real-world problem in waste management and resource use the methodology aims to address. | • - |
| 2 | 1.4 Additionality | • On the topic of additionality, participants highlighted the need for careful consideration in cases where waste from one value chain is used as input for another, as applying the additionality logic may be complex in such situations. | • The methodology explicitly acknowledges this issue and requires that potential activity leakage of this kind be incorporated into the emission calculations to ensure that no leakage occurs. |
| 3 | 1.6 Co-benefits & no harm principle | • The co-benefits section is a good idea, but still a bit thin/intangible. A reporting framework or template could be helpful. | • We have now included two templates to assist with this section:<br>○ *Proba's environmental and social do no harm principle Template*<br>○ *Proba's risk Evaluation Template for waste recovery projects* |
| 4 | 2 Project boundary | • It was also noted that showing how the methodology applies to specific waste recovery cases, such as composting or landfill substitution, would help users see its relevance across different contexts. | • This is a decision made regarding the scope of the methodology, which we now try to keep wide, rather than focused on specific cases. Once a few projects have applied the methodology we will update it with more specific examples. |
| 5 | 2.1 Scope of activities | • A few practical examples or case studies (possibly in Appendix) would help to make the whole thing a bit more tangible, such a methodology is quite dry material, especially because you are trying to keep it quite broad.<br>• Perhaps add a visual overview (e.g. flowchart) for the non-technical readers like me | • Project boundary section now includes a comprehensive boundary |

| | Section | Feedback/comment/suggestion | Response |
|---|---|---|---|
| 6 | 2.1 Scope of activities | • When reviewing the graph illustrating the scoping of activities, participants noted that, from an initial viewpoint, it was not immediately clear to non-experts how the processes were interconnected, specifically, how the coproduct from one process feeds into another value stream. | • The accompanying text in the methodology provides a detailed explanation of the graph and its logic, ensuring that readers can fully understand the relationships after reading the relevant section. |
| 7 | 2.2 GHG sources | • The defined boundaries for what's included or excluded in the emission calculations were considered reasonable and appropriate. | • - |
| 8 | 3 Baseline scenario | • The methodology seems to require using the project proponent's historical performance to define the baseline. In some cases, historical performance is already very strong, which could unintentionally penalize front-runners compared to less advanced peers. Could you clarify whether (and how) the baseline can be defined as a market standard/typical practice instead of strictly historical performance? | • The methodology gives priority to historical data, as the baseline must reflect the most accurate counterfactual of what would have happened to the specific waste stream in the absence of the project. This is particularly important in offsetting contexts, where carbon finance should enable additional change rather than reward existing doing good.<br>• At this stage, we do not see another strong justification for applying the regional baseline instead of the historical baseline, unless the project is positioned more clearly within an insetting context. |
| 9 | 4 Calculation of GHG emissions | • Participants highlighted the importance of including practical, category-specific examples with calculations to make the methodology easier to understand and apply. They suggested that real-world demonstrations would help clarify how emission reductions are quantified and make the defined boundaries feel more intuitive and reasonable. | • This is an important point for the public to fully understand how the methodology operates and will be included as part of the update of the methodology. For now, since the main target audience includes project developers and auditors (VVBs), who are experts in reading this type of documents, we will keep the structure as it is. |
| 10 | 4.1 Functional equivalence and | • The approach was seen as capable of delivering real, measurable climate benefits rather than only theoretical ones. | • - |

| | Section | Feedback/comment/suggestion | Response |
|---|---|---|---|
| | comparative basis | | |
| 11 | 5 Net reduction of GHG emissions | • Reviewers emphasized that tangible examples or simple calculation tools (for instance, an Excel-based walkthrough) would make the methodology more credible and accessible to practitioners who may not be experts in carbon accounting. | • The target audience will mainly be people who are already familiar with these topics, so there is no immediate need for specific examples. |
| 12 | List of definitions<br><br>1.2 Applicability of the methodology<br><br>4.3 Uncertainty | • The tiered approach to data and uncertainty is well thought out<br>• The flexibility for both offsetting and insetting projects is useful, which is of course also nice for other initiatives.<br>• The definitions and terminology are clear, which makes it easier to follow | • - |
| 13 | Overall | • The structure is well-designed, and it's clear that the methodology has been thoroughly developed, from eligibility and additionality to MRV and risks. The alignment with the IPCC, GHG Protocol, and ISO standards makes it even stronger, although I don't think that's a clear requirement. | • - |
| 14 | Overall | • The overall logic of the methodology, that recovering waste can lead to emission reductions, was found to make sense and felt convincing. | • - |
| 15 | Overall | • The story and reasoning were viewed as clear and easy to follow, even for people who are not experts in carbon methodologies. | • - |
| 16 | General | • In 1.3.1, your term "waste" was explained. We see that regulations make it very difficult once something is labeled as waste, but that you can still do all sorts of things with the material as long as it's not waste. In your document, is waste only considered waste if it's actually labeled as such by the authorities, or if it would normally be thrown away but something valuable is still done with it? | • Both types of waste are eligible. For instance, *post-production* waste as described in section 1.3 Eligibility are eligible. These might not be classified as waste by the authorities yet, but are still eligible. Some argumentation will need to be made, however, that the normal (baseline) “fate” that they would take would be their EoL. |