Methodology Public Consultation: Feedback and response template

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

Proba is developing a Greenhouse Gas (GHG) methodology, that quantifies and credits greenhouse gas (GHG) emission reductions resulting from the use of waste recovery technologies to transition to a circular economy. Your feedback is crucial in shaping this methodology during the public consultation period.

The public consultation period is open between June 16th to July 16th, 2025.

We appreciate your time and valuable insights in helping us refine this methodology.

You can find the methodology document [here](https://proba.earth/waste_recovery_methodology).

# Introductory section

| Your personal details |
| --- |
| Full name: |  |
| Company/Organization:  |  |
| Country: |  |

| Do you consent to Proba publishing your organization’s name on the Proba website as part of the summary of public comments received? |
| --- |
| Yes, I consent to my organization's name being published. |  |
| No, I wish to provide feedback anonymously. |  |

How to use feedback template

The following section has been organized to make it easier to provide targeted feedback, based on the topics that we believe need more attention. You are welcome to provide any other feedback as you see fit.

# Feedback questions

| **1.2 Applicability of the methodology** |
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| Is it clear which project activities are eligible under the methodology and which are not? |
| Your input: |

| **1.3 Eligibility** |
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| Is the exclusion of unused products from overproduction (i.e. new products that were never used or consumed) appropriate to ensure environmental integrity? Are there specific use cases where such exclusion could be reconsidered without creating unintended incentives? |
| Your input: |

| **1.5 Crediting period**  |
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| Is a maximum crediting period of 10 years appropriate for waste recovery projects, considering the increasing regulatory and market shift toward circular economy practices?  |
| Your input: |

| **1.8 Leakage & permanence** |
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| The methodology applies a tiered deduction (0–10%) based on the assessed risk that a project displaces waste already used in recovery or recycling.Are the definitions and conditions for classifying leakage risk as “low,” “medium,” or “high” sufficiently clear?What types of evidence or criteria should be required for project developers to justify a “low” leakage classification and avoid deductions? Examples might include waste flow audits, material surplus data, or market studies.Please share suggestions for how to make this assessment credible yet feasible for developers and verifiers. |
| Your input: |

| **2.1 Scope of activities** |
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| Are there any potential sources of emissions or additional factors that the methodology has not considered? Please specify any that should be included and explain their significance (with references). |
| Your input: |

| **3 Baseline scenario** |
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| The methodology defines the baseline as the counterfactual emissions pathway based on the business-as-usual (BAU) fate of waste in the absence of recovery interventions. It includes the likely end-of-life treatment of the waste (e.g. landfill, incineration, unmanaged dumping), and—where applicable—the upstream supply chain of virgin materials replaced by waste-derived alternatives.* Is this baseline approach clear and appropriate across different waste streams and project types?

We welcome feedback on:* Whether the expectations for supporting evidence (e.g. historical data, regional practices, market drivers) are feasible to meet in practice
* Any additional guidance, examples, or tools that should be included to help developers define and justify baselines conservatively
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| Your input: |

| **4 Calculation of GHG emissions** |
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| * How clear is the calculation methodology for all included activities?
* Are there any parts that could be better explained or any aspects that might lead to ambiguity?
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| Your input: |

| **4.1 Functional equivalence**  |
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| The methodology requires emission calculations to be based on a functionally equivalent comparison between the baseline and project products. Differences in product function, material quality, quantity, lifetime, or end-of-life treatment must be addressed and adjusted for, particularly when a 1:1 replacement is not appropriate.* Is this approach to functional equivalence and comparative assessment clear and feasible for project developers to implement and for verifiers to assess?

We invite feedback on:* Whether additional guidance or examples are needed to evaluate performance differences, durability, or substitution ratios
* How to approach functional equivalence when dealing with composite products, lower-grade materials, or co-products
* Whether the requirement to document and justify these assumptions in the Project Overview Document is realistic and sufficient for validation
 |
| Your input: |

| **4.3 Uncertainty**  |
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| * The methodology requires project developers to select parameter values from the conservative end of available ranges, typically leaning toward the lower half to avoid overestimating emission reductions.
	+ Is this guidance clear and sufficient?
* Should the methodology define a more explicit rule (e.g. 25th percentile or bottom quartile of values), or is developer justification on a case-by-case basis adequate when reviewed by a verifier?
	+ Are there particular parameters (e.g. avoided emissions, recovery efficiencies) where stricter guidance is needed?
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| Your input: |

| **5 Net reduction of GHG emissions** |
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| * How clear is the guidance on the types of data and parameters required for making accurate calculations?
* Are there any additional data points or parameters that should be collected to ensure robust outcomes?
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| Your input: |

| **Additional feedback** |
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| For other feedback, comments, or proposed changes not pertaining to the above questions, please leave your input here. |
| Your input: |