



# Landfill Gas Methodology

Carbon Project Ratings

**Contents**

**Methodology overview ..... 4**

Objective ..... 4

Document description..... 4

**Introduction to carbon project integrity ..... 6**

What is carbon credit integrity? ..... 6

The importance of assessing carbon credit integrity..... 6

The key components of carbon project integrity assessment ..... 7

**Introduction to landfill gas projects ..... 9**

What are landfill gas projects? ..... 9

Market Overview..... 9

Key integrity considerations .....10

**Approach to assessing the integrity of landfill gas projects..... 12**

**Criterion 1 – Additionality .....16**

1.1.1 Financial Attractiveness.....19

1.1.1.1 % of Revenue from Carbon Credits .....19

1.1.1.2 IRR Analysis .....21

1.1.1.3 Prior Consideration.....25

1.2 Common Practice ..... 27

1.3 Legal Considerations.....29

1.5 Baseline Reasonableness.....30

**Criterion 2 – Quantification.....34**

2.1.2 Project Transparency.....36

2.1.3 Project Approach.....37

2.2 Assumption Accuracy .....39

2.2.1 Avoided Methane .....39

2.2.2 Displaced Electricity ..... 44

2.3 Monitoring Performance.....48

**Criterion 4 – Co-benefits .....51**

4.1.2.1 Project Intentions to Activities .....53

4.1.2.1.1 Target Impacts.....54

4.1.2.1.2 Level of Job Creation.....54

4.2.2 Quantification of Outcomes.....56

4.3.2 Local Stakeholder Engagement.....57

**Appendix – Key References.....61**

**Change log.....62**

## Methodology overview

### Objective

MSCI Carbon Project Ratings are composite ratings that independently assess the integrity and risks of carbon credit projects across multiple criteria, including their impacts on the climate, environment and society.

A project with a higher rating reflects a greater likelihood of having a positive emissions impact and a reduced risk of overestimating its emissions impact. It is also more likely that such project would have been implemented in a way that supports positive social and/or environmental outcomes and upholds legal and ethical standards. Consequently, a project with a higher rating would have a lower likelihood of incurring reputational risks.

This methodology evaluates the integrity of Waste Management carbon projects by assessing both the risk that credits do not represent claimed climate benefits and the extent to which projects deliver meaningful environmental and social impacts. It provides a framework for the application of project-level analysis across key criteria—including additionality, quantification, permanence, and co-benefits—to capture both risk and impact dimensions of project performance.

### Document description

This document describes the specific methodology used to assess landfill gas projects within the Carbon Project Ratings and Pipeline Carbon Project Ratings (but not Preliminary Carbon Project Ratings).

This project type-specific methodology is applied in addition to, and partially in replacement of, the methodology that is described in the overall MSCI Carbon Project Ratings methodology document, “MSCI Carbon Project Ratings and Assessments Methodology.” Where an element of the overall methodology is replaced by this project type-specific methodology, it is detailed below. Every element of the overall MSCI Carbon Project Ratings methodology also applies to MSCI Sustainability and Climate’s (MSCI S&C’s)<sup>1</sup> assessment of Carbon Project Ratings and Pipeline Carbon Project Ratings for landfill gas projects unless explicitly excluded in this document.

This methodology is subject to MSCI S&C’s methodology governance and update process, as outlined in the overall methodology note. This ensures that updates and refinements to the methodology align with evolving best practices, stakeholder input, and the latest data insights. For details on the governance process, methodology updates, and review timelines, please refer to Section 12 of the MSCI Carbon Project Ratings and Assessments Methodology document.

Section 2 introduces the core concept of carbon credit integrity and why its assessment is important to the development of the global carbon credit market. Section 3 introduces and defines landfill gas projects. Sections 4-8 provide details on the project type-specific methodology,

---

<sup>1</sup> MSCI Sustainability and Climate products and services are provided by MSCI Solutions LLC in the United States, MSCI Solutions (UK) Limited in the United Kingdom and certain other related entities.

including data sources and assumptions, used in MSCI S&C's Carbon Project Ratings and Pipeline Carbon Project Ratings assessments for landfill gas projects.

## Introduction to carbon project integrity

### What is carbon credit integrity?

Carbon credits have varying quality characteristics. These stem from fundamental differences in project types, but also from which methodologies have been used to define each project and create the credits (these methodologies are among the standards set by carbon crediting programs, and are hereafter called crediting program methodologies) and how rigorously they have been applied. Projects also differ in terms of their potential co-benefits and their legal and ethical characteristics.

This variation in quality was not intended. Standard setting and governance bodies attempted to create a system in which all carbon credits had an equivalent climate benefit (representing a tonne of carbon dioxide equivalent (CO<sub>2</sub>e) removed or avoided) which could be used for voluntary or compliance purposes. This effort dates back to the Clean Development Mechanism (CDM) created under the 1997 Kyoto Protocol and has continued with the evolution of the carbon credit market.

A key challenge lies in the quantification of the climate benefit of a project — i.e., whether the carbon credits calculated for a project are genuinely equivalent to mitigating or removing one tonne of carbon dioxide from the atmosphere. This difficulty stems from the calculation method used to determine what would have happened in the absence of a project, i.e., in the “baseline” scenario (sometimes referred to as the “counterfactual” scenario).

Another difficulty is that projects differ greatly in age, size and technology. The science behind some crediting program methodologies has also evolved over time, as has the enforcement of standards and levels of governance.

Readers should note that, within the carbon markets, the words “quality” and “integrity” tend to be used somewhat interchangeably. Through the rest of this document, the word integrity is used when referring to carbon projects.

### The importance of assessing carbon credit integrity

Corporate climate action is critical in the fight against climate change, and carbon credits represent one of the mechanisms for corporates to mitigate their carbon footprint. However, concerns over carbon credit integrity may have held back, and may continue to hold back, the global carbon credit market from reaching its potential. These concerns center around the perception that many carbon credits are of low integrity and are not delivering the benefits they claim to.

In 2021, the Taskforce for Scaling the Voluntary Carbon Market (TS-VCM) found that credit integrity was at the “heart of buyers’ hesitancy,”<sup>2</sup> with 45% of buyers identifying it as a key pain point. Buyer concerns around credit integrity and the related risk of being accused of

---

<sup>2</sup> “Taskforce on Scaling Voluntary Carbon Markets: Summary of the Public Consultation Report,” ICVCM, June 3, 2021.

greenwashing due to the use of low-integrity credits have only grown since then. For example, some 55% of respondents to an April 2023 survey run by the Science-Based Targets Initiative (SBTi) stated that the risk of a greenwashing accusation was stopping them from buying more credits.<sup>3</sup>

Concerns over carbon credit integrity have been central to the creation of two major initiatives: the Integrity Council on the Voluntary Carbon Market (IC-VCM) and the Carbon Credit Quality Initiative (CCQI). The IC-VCM aims to create minimum standards of integrity with a set of Core Carbon Principles (CCPs), and the CCQI has developed a scoring system for certain project types. Both initiatives primarily assess integrity at the project-type level (primarily based on a project's methodology used) or at the project-registry level (a project registry is an organization that registers mitigation activities and issues carbon credits for the emissions reductions or removals achieved by the mitigation activities). Neither initiative assesses integrity at the individual-project level.

MSCI S&C's assessment methodology draws on the IC-VCM's and CCQI's approach to assessing integrity, building on their principles to apply a more in-depth evaluation of integrity at the individual-project level.

## The key components of carbon project integrity assessment

Market approaches to assessing carbon project integrity typically focus on three main issues:

- A. **Emissions impact integrity:** How much CO<sub>2</sub>e has been reduced/removed?
- B. **Implementation integrity:** How did that project reduce/remove that CO<sub>2</sub>e?
- C. **Usage integrity:** How are the credits then reviewed and used?

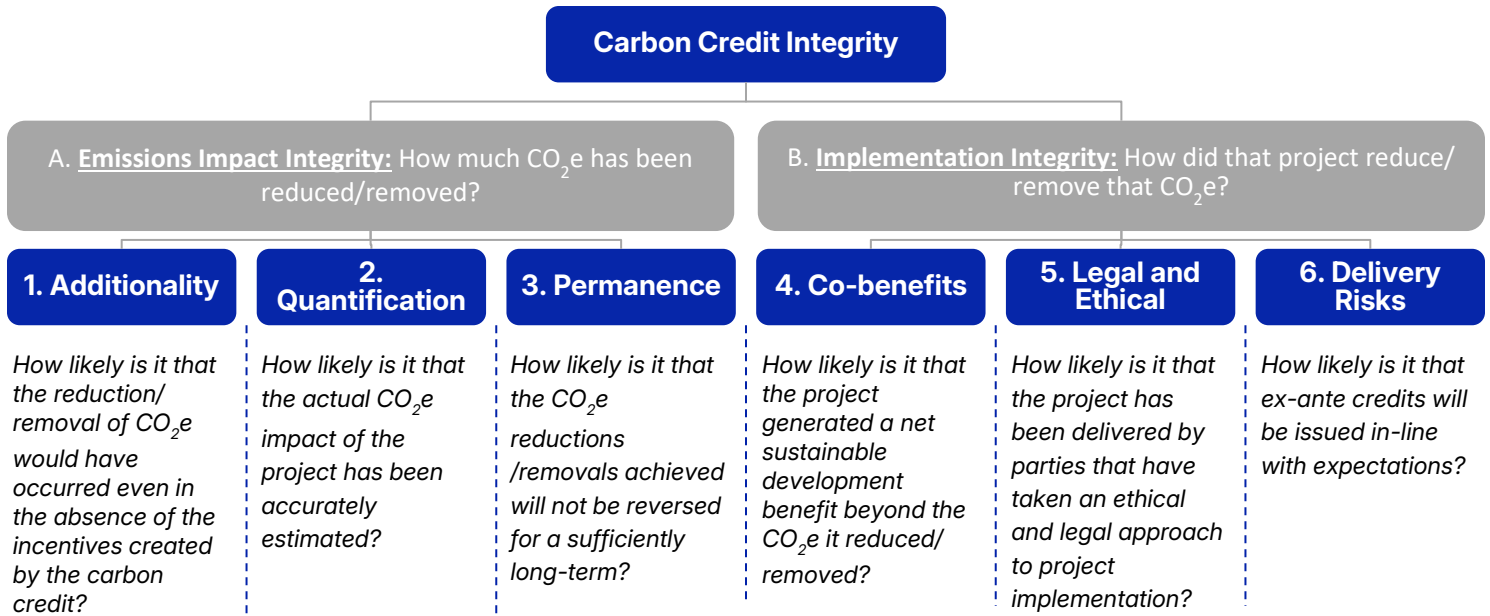
Emissions impact integrity and implementation integrity can each be further broken down into three main areas of common concern. These are summarized in **Figure 1** and outlined in detail below.

Emissions impact integrity, implementation integrity and usage integrity are each described in more detail in the overall MSCI Carbon Project Ratings methodology document, "MSCI Carbon Project Ratings and Assessments Methodology."

---

<sup>3</sup> "Beyond Value Chain Mitigation (BVCM) Research," SBTI\_press\_release, September 1, 2023.

**Figure 1: Key components of carbon project integrity**



## Introduction to landfill gas projects

### What are landfill gas projects?

When waste is deposited in landfills (also referred to as municipal solid waste (MSW) sites), bacteria decompose the organic material. This bacterial decomposition and the oxidation of solid waste produces landfill gas, which is composed of methane (CH<sub>4</sub>) and carbon dioxide (CO<sub>2</sub>). If not collected and destroyed, this landfill gas is released into the atmosphere.

These emissions represent a very significant proportion of some countries' environmental impact. Indeed, landfills are the third-largest source of all methane produced in the United States, accounting for 14% of overall CH<sub>4</sub> emissions. Tackling this source of emissions is therefore crucial to transition to lower-intensity economies.

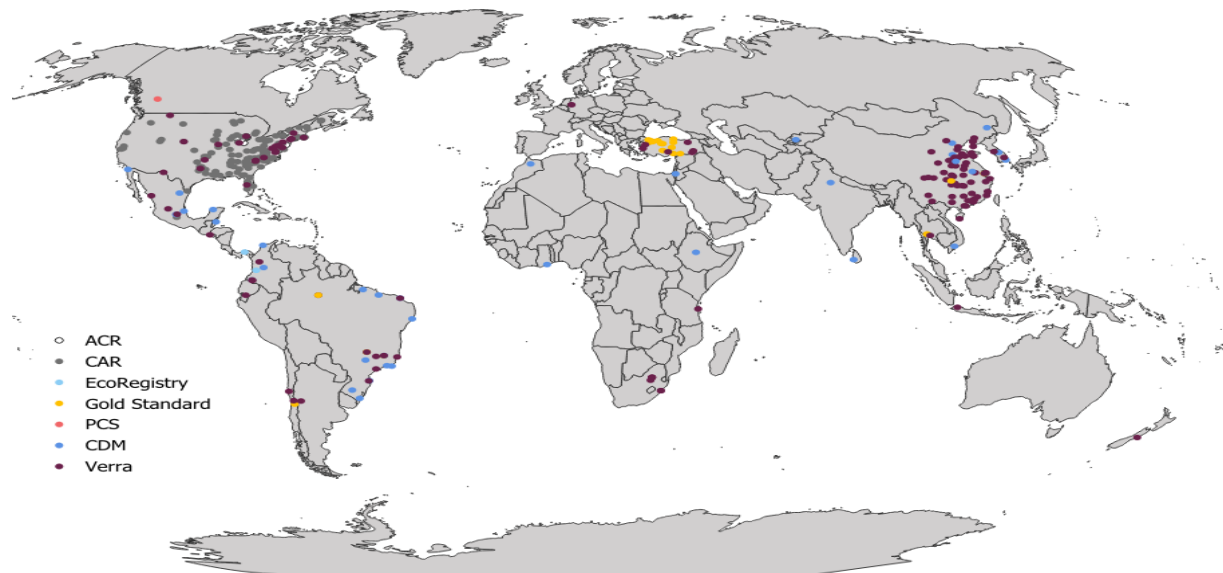
The emissions from landfill sites can be avoided if the right infrastructure and systems are put in place at waste sites, so that the methane can be captured before it is released into the atmosphere. Landfill gas projects can either destroy the methane (flaring only) or utilize the methane by converting it into energy (utilization), which can displace energy that would otherwise have been created by fossil fuels and therefore avoiding CO<sub>2</sub> emissions.

### Market Overview

Landfill gas projects are an important project type within the voluntary carbon market. As of February 2024, there were 318 registered landfill gas projects that had issued over 100 Mt CO<sub>2</sub> of carbon credits. These projects are split between flaring only and utilization projects, with nearly 35% of currently registered projects flaring only.

Unlike renewable energy projects, the distribution of landfill gas projects is heavily skewed towards the United States. There are 153 landfill gas projects in the United States currently registered under the Climate Action Reserve registry, leading to the United States representing nearly 50% of currently registered projects. This geographical distribution of landfill gas projects is illustrated in Figure 2.

Figure 2: Landfill Gas Geographic Distribution



Note: Projects include the following registries: American Carbon Registry (ACR), Climate Action Reserve (CAR), Clean Development Mechanism Registry (CDM, Nationally Determined Contributions-eligible credits only), EcoRegistry, Gold Standard, Pacific Carbon Standard (PCS) and Verra registries. Date: As of October 2024. Source: MSCI Carbon Markets

## Key integrity considerations

The integrity considerations for landfill gas projects primarily revolve around additionality and quantification risks.

Assessing the integrity of landfill gas projects requires a detailed analysis of the project’s financial and legal context, and key assumptions. In particular, risks are primarily found in four areas:

- **Financial Attractiveness:** To be additional, a project should demonstrate both that it would have been financially unattractive without carbon credits, and that the existence of carbon credits was decisive in making it financially feasible. For flaring only projects, financial additionality risks are very low given that few financial incentives exist to implement the project otherwise. However, for utilization projects, earning revenue from the sale of generated electricity can create paths to profitability for projects even without carbon credits.
- **Common Practice:** The market penetration of a practice in a region or country gives an indication of whether a particular type of project would have occurred even without carbon credits. A project located in a region where that technology is already common is considered quite likely to have happened even without carbon credits.
- **Legal Incentives:** Given the significance of methane emissions from municipal solid waste within many regions’ total carbon footprints, some governments may implement measures to incentivize the reduction of methane emissions from landfills. These requirements or policies may incentivize a project to implement the activities even without carbon credits.

**Oxidation Factor:** Nearly all landfill gas projects without synthetic covers assume an oxidation factor of 10%. Academic literature indicates that, in reality, this factor varies significantly between landfills, and can reach up to 40%. Emission reductions in these cases may be overestimated.

## Approach to assessing the integrity of landfill gas projects

MSCI S&C's assessment of landfill gas projects builds on the overall MSCI Carbon Project Ratings methodology to provide more in-depth analysis of landfill gas projects. This project type-specific assessment includes sub-criteria that are additional to, and partially in replacement of, the sub-criteria of assessment used in the overall MSCI Carbon Project Ratings methodology, as detailed below. These project type-specific sub-criteria evaluate a deeper set of questions, which are focused on the most important, specific drivers of integrity for landfill gas projects.

These project type-specific assessments are conducted at the individual project level, including a review of each individual project's data and assumptions. In this way, these assessments represent a more granular, project-level review of landfill gas projects than what would be possible using the overall MSCI Carbon Project Ratings methodology alone.

In total, MSCI S&C assesses 16 sub-criteria (see **Figure 3**) under this project type-specific methodology that are either not assessed or are assessed differently in the overall MSCI Carbon Project Ratings methodology, as illustrated in **Figure 4**. These sub-criteria are focused on addressing the key drivers of integrity for landfill gas projects. Each of these sub-criteria align with and replace corresponding sub-criteria scores in the overall MSCI Carbon Project Ratings methodology.

In the following sections, information is only provided on those sub-criteria that are pertinent to the assessment of landfill gas projects and differ from the overall MSCI Carbon Project Ratings methodology. To review the sub-criteria that are shared between both the landfill gas assessment and the overall ratings assessment, please refer to the methodology titled: MSCI Carbon Project Ratings and Assessments methodology.

**Figure 3: MSCI S&C Overall Carbon Project integrity assessment**

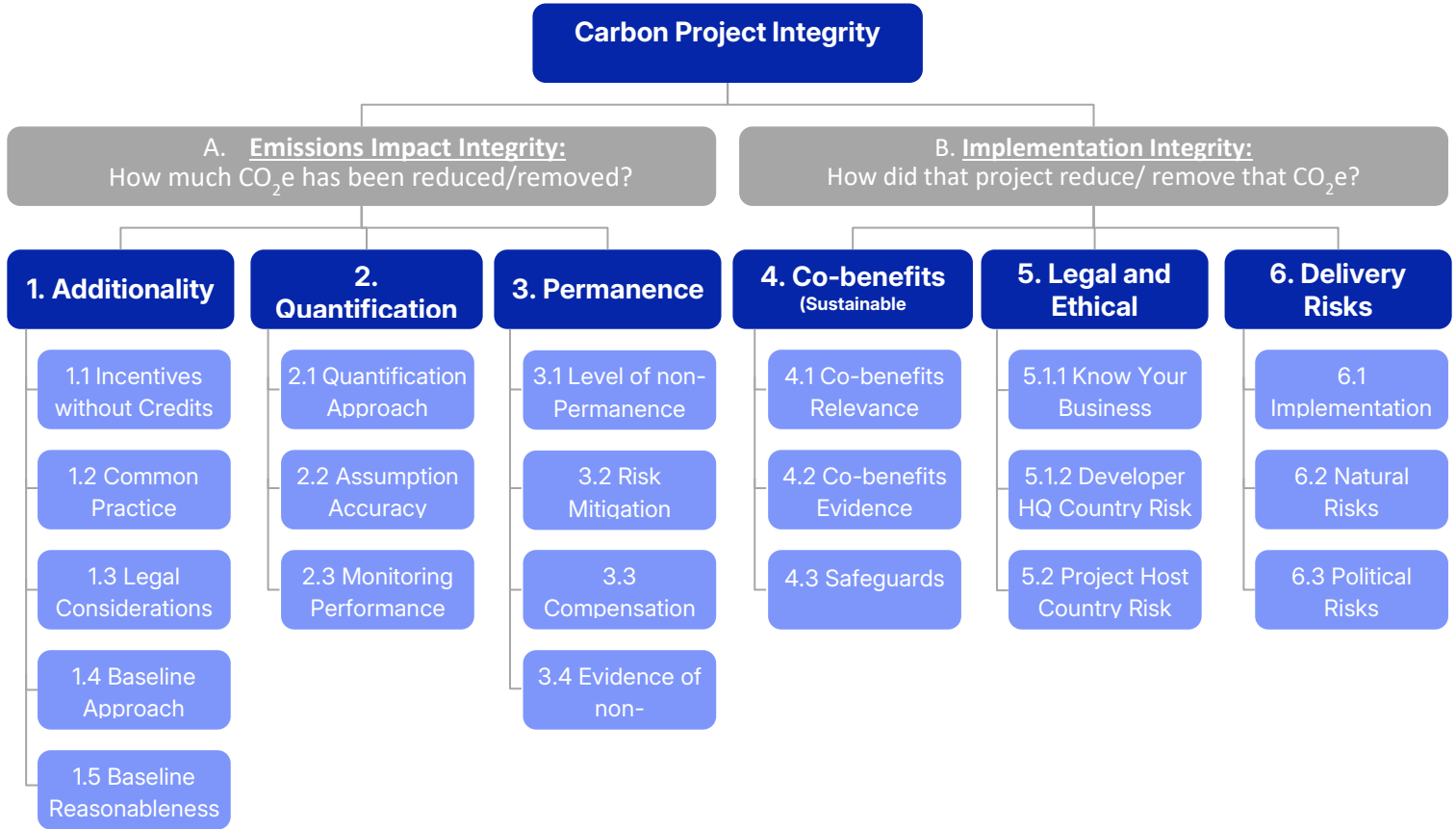
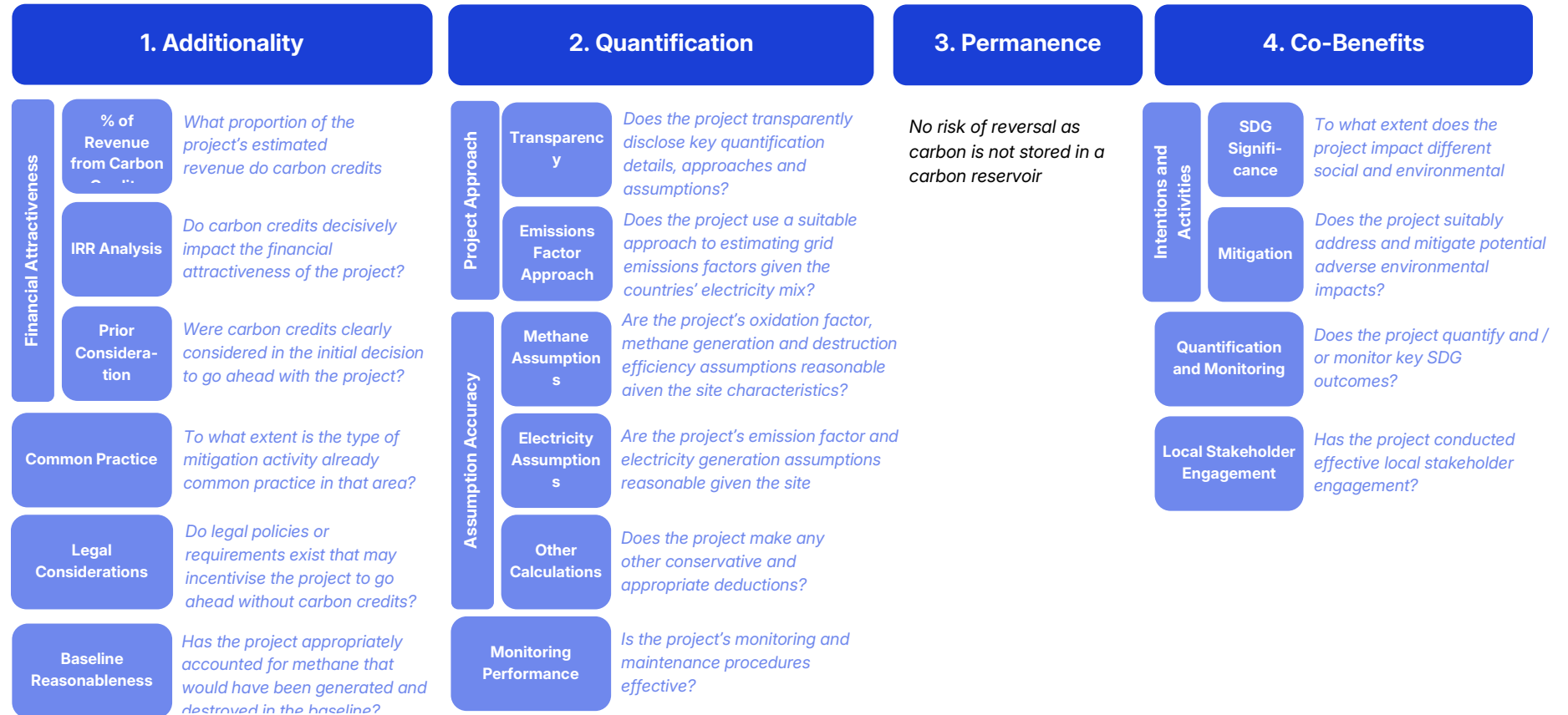


Figure 4: Sub-criteria and metrics that differ in the landfill gas assessment approach



Assessment of all other criteria and sub-criteria, for example, Criterion 5, Legal and Ethical Risks, within the landfill gas analysis use the same metrics and methodology as in the overall MSCI Carbon Project Ratings methodology framework. The granularity of the overarching framework for those sub-criteria, and the fact that their assessment is consistent across all project types (i.e., with no landfill gas-specific characteristics), means that no further enhancement is required.

For a detailed explanation of MSCI S&C's approach to data quality and update processes—including measures to ensure data accuracy, handle missing data, and update data in a frequent and recurring manner—please refer to the overall methodology note. This document outlines the steps MSCI S&C takes to verify data reliability and address any data gaps, ensuring consistency and accuracy across all project types.

## Criterion 1 – Additionality

If a mitigation activity is not additional, then purchasing carbon credits has not led to any additional reduction or removal of emissions. Additionality is therefore a crucial component of the integrity of carbon credits. A non-additional carbon credit has no direct net positive environmental impact given that the emissions reductions/removals would have occurred anyway. However, it is worth noting that funding a non-additional credit may still indirectly help stimulate further investment in the same activity by raising its return.

The additionality of landfill gas projects is primarily determined through an analysis of the financial and legal context in which the project takes place. Many landfill gas projects have been developed without any support from the voluntary carbon markets, particularly for projects that can achieve profitability without carbon credits through selling electricity or where government support or subsidies exist to incentivize the developers of the activity to go ahead. For a landfill gas project to be additional, demonstrating that this same project would not have gone ahead without carbon credits is therefore crucial. The additionality risks differ significantly between flaring and utilization landfill gas projects. For flaring projects, there are few financial reasons why the project might have been implemented without carbon credits.

Further, the additionality of landfill gas projects is not necessarily binary. Projects may be partly additional, where only a portion of emission reductions are additional. For example, if, in the counterfactual scenario, some emission reductions would have been achieved through a partial destruction of methane, but not as much as was achieved by the project, then only this difference is additional.

Figure 5 illustrates the sub-criteria through which MSCI S&C assesses the additionality of the emissions reductions achieved by landfill gas projects, and the overall MSCI Carbon Project Ratings methodology sub-criteria that they correspond to. The detailed sub-criteria are described in Figure 6.

Figure 5: Landfill gas additionality assessment approach

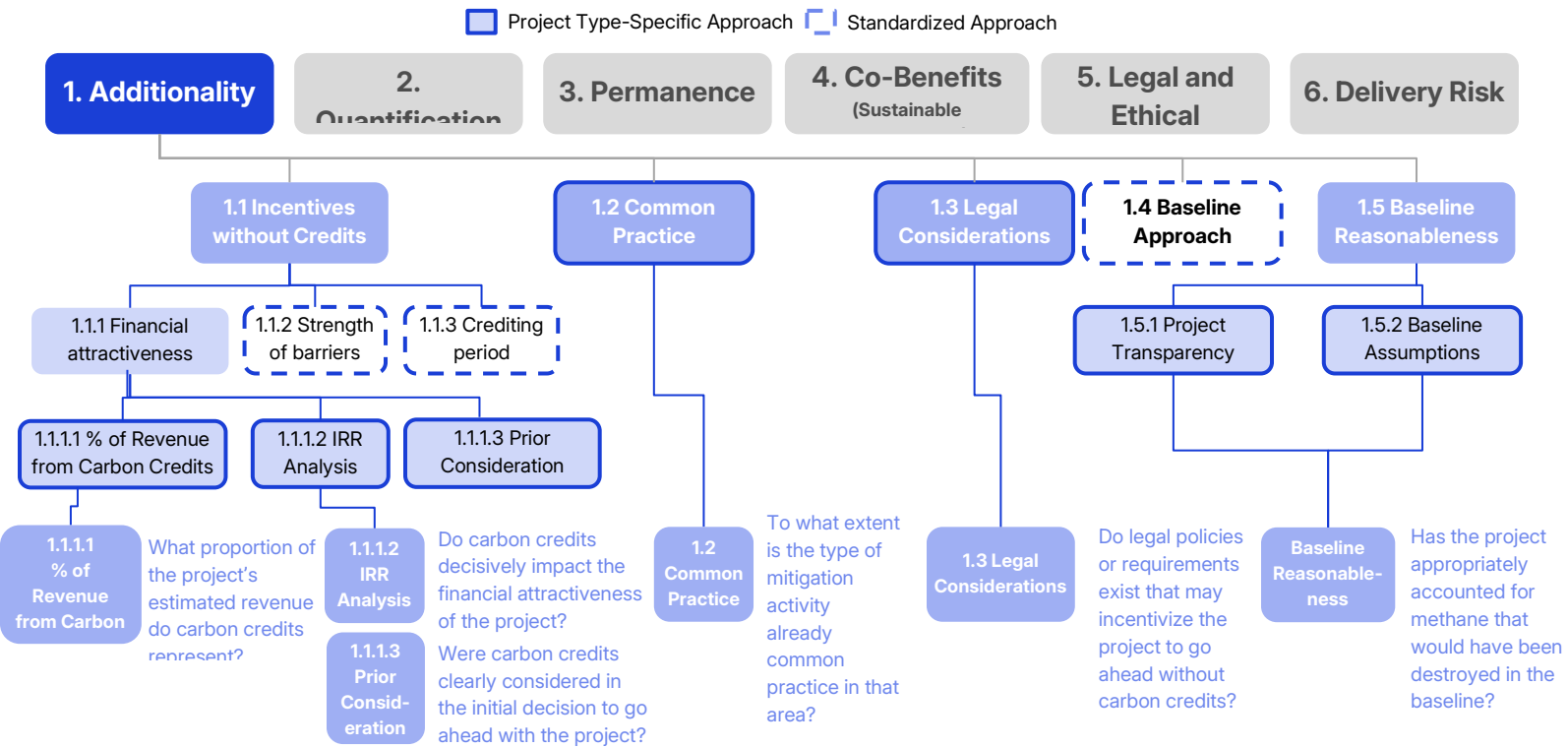


Figure 6: MSCI S&C Additionality integrity assessment framework

Sub-criteria			Metrics	Rationale	REDD+	Renewables	ARR	Cookstoves	Biochar	Landfill Gas	Safe Water	IFM	Waste Mgmt.	Blue Carbon	
1.1 Incentives without Carbon Credits	1.1.1 Financial Additionality	1.1.1.1 % of Revenue from Carbon Credits	The higher the proportion of a project's revenue that comes from carbon credits, the greater the importance of credits to its financial attractiveness.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
		1.1.1.2 IRR Analysis	Credits should play a decisive role in making a project financially attractive that would otherwise have not been.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
		1.1.1.3 Prior Consideration	Carbon credits should have been clearly considered at the time the decision to go ahead with a project was taken.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	1.1.2 Barrier Analysis	Strength of Barriers	Projects that face high barriers to implementation would be less likely to go ahead without the added incentives of carbon credits.	✗	✓	✗	✓	✓	✗	✓	✗	✓	✓	✓	
1.2 Common Practice	Market Penetration	If a practice is already common within a market, it indicates that these types of projects will go ahead without the introduction of carbon credits.	✗	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
1.3 Legal Considerations	Legal Requirements	Projects that are legally required or incentivized are unlikely to be additional. However, if laws are not enforced, they may still be additional.	✗	✗	✗	✗	✗	✗	✓	✗	✓	✓	✓	✓	
1.4 Baseline Approach	Baseline Approach	Each project methodology is scored on the extent to which it mitigates the key risks associated with establishing a baseline scenario.	✓	✗	✗	✗	✗	✗	✗	✗	✗	✓	✗	✓	
1.5 Baseline Reasonableness	Baseline Transparency	Transparent detail on a project's assumptions is required to make an objective assessment of a project's performance and additionality.	✓	✗	✓	✗	✗	✗	✗	✗	✗	✓	✗	✓	
	Baseline Assumptions	MSCI S&C assesses the key baseline scenario assumptions for each project type.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
1.6 Red and Green Flags	News scanning	Review of academic papers, industry sources and the news for Red or Green Flags to project's additionality.	✓ Standardized approach												

✓ Assessed ✗ Not Assessed

## 1.1.1 Financial Attractiveness

Carbon credits fundamentally act as an incentive mechanism. The ability to sell credits should financially incentivize actors to implement mitigation activities that they would not normally pursue. MSCI S&C’s landfill gas assessments consider three main topics that determine whether carbon credits play a critical role in incentivizing the implementation of mitigation activities:

- **1.1.1.1 % of Revenue from Carbon Credits:** Whether carbon credits contribute a significant proportion of expected and secured revenue.
- **1.1.1.2 IRR Analysis:** Whether carbon credits play a decisive role in making the project financially attractive.
- **1.1.1.3 Prior Consideration:** Whether carbon credits were considered prior to the project start.

The overall score for 1.1.1 Financial Attractiveness is then determined through weighting **1.1.1.1 % of Revenue from Carbon Credits** 50%, **1.1.1.2 IRR Analysis** 25% and **1.1.1.3 Prior Consideration** at 25%.

For landfill gas flaring projects that have no other revenue sources outside of carbon credits, only criteria **1.1.1.1 % of Revenue from Carbon Credits** and **1.1.1.3 Prior Consideration** are considered, as an IRR analysis with and without carbon credits is less relevant.

### 1.1.1.1 % of Revenue from Carbon Credits

The proportion of expected and secure revenues that carbon credits represent can be an important indicator of the likelihood that a project went ahead because of carbon credits. Two key sub-criteria are used to evaluate this:

- **1.1.1.1.1 Secure Revenue Sources:** Whether the project already has preferential agreements to guarantee future electricity revenue.
- **1.1.1.1.2 % of Expected Revenue:** The proportion of expected revenue that carbon credits represent.

The overall score for 1.1.1.1 % of Revenue from Carbon Credits is determined by weighting Secure Revenue Sources as 33% and % of Expected Revenue as 67%.

#### 1.1.1.1.1 Secure Revenue Sources

Secure revenue sources relate to whether the project already has any preferential agreements (such as Power Purchase Agreements) in place that guarantee future revenue.

<b>Rationale</b>	Projects that have secure revenue agreements in place have more visibility and security over their long-term revenue outside of carbon credits, and are therefore more likely to be able to access financing for the project even without carbon credits.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					

**Scoring Definition**

Each project is scored on a 1-5 scale, where 1 indicates that the project has a very secure revenue agreement in place and 5 indicates that it has no secure revenue sources in place prior to the project start.

**Scoring Approach**

MSCI S&C assesses whether the project has any agreements in place to benefit from power purchase agreements, preferential tariffs, subsidies or grants.

Projects are then scored based on the level of preferential security they provide in the following way:

- 1 = Preferential Tariff
- 1.5 = Power Purchase Agreement
- 2 = Subsidies and/or grants
- 5 = No Revenue Sources

**1.1.1.1.2 % of Expected Revenue**

% of Expected Revenue relates to the proportion of a project’s total revenue that is expected to come from carbon credits.

**Rationale**

The higher the proportion of revenue that carbon credits represent, the greater the importance of carbon credits to the overall financial outlook of the project. If carbon credits represent only a small proportion of revenue, then the project may have been financially viable even without carbon credits.

**Key Sources**

Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Scoring Definition**

Each project is scored on a 1-5 scale, where 1 indicates that a very low proportion of revenue comes from carbon credits and 5 indicates a material proportion of revenue comes from carbon credits.

**Scoring Approach**

Landfill gas projects are categorized as flaring only or utilization, based on whether they utilize methane to generate and sell electricity. Projects that only flare methane have no other available revenue sources for this activity, and therefore score an automatic 5 given that 100% of revenue will come from carbon credits.

For each utilization project, MSCI S&C estimates the expected revenue based on estimating both electricity generation revenue and carbon credit revenue. Electricity generation revenue is determined based on the amount of annual electricity generation multiplied by the tariff price in that country (at the time the project was initiated). Carbon credit revenue is approximated by multiplying the amount of estimated annual credits by the price of carbon credits.

Data on the amount of annual electricity generation and the estimated amount of annual credits is extracted from project documentation. Data on the tariff price is primarily extracted from project documentation but, if that is not available, third-party data for the relevant tariff price in that country is used instead. The price per carbon credit is based on MSCI Carbon Markets' own estimates (rather than any price stated in a project's documentation). These use the average realized carbon credit price since the project started for landfill gas projects based on MSCI Carbon Markets' historic pricing data. Using these four inputs, the estimated revenue from each source is determined, as well as what proportion of total revenue was expected to come from carbon credits at the time the project started.

The % of revenue is then converted into a continuous 1-5 score for the sub-criteria based on the following scale:

- 5 = 100% of a project's revenue comes from carbon credits
- 4 = 90% of a project's revenue comes from carbon credits
- 3 = 50% of a project's revenue comes from carbon credits
- 2 = 10% of a project's revenue comes from carbon credits
- 1 = Less than 1% of a project's revenue comes from carbon credits

### 1.1.1.2 IRR Analysis

Internal Rate of Return (IRR) analysis refers to the likelihood that carbon credits played a decisive role in impacting the financial attractiveness of a project, as measured by a project's internal rate of return. Three key sub-criteria are used to evaluate this:

- **1.1.1.2.1 Transparency:** Whether financial details and assumptions are transparently disclosed.
- **1.1.1.2.2 Accuracy of Assumptions:** Whether project assumptions appear accurate and reasonable.
- **1.1.1.2.3 IRR Attractiveness:** Whether carbon credits decisively impacted a project's internal rate of return.
- **1.1.1.2.4 Project Size:** Whether the installed capacity of the project represents a higher inherent financial additionality risk.

The overall score for 1.1.1.2 IRR Analysis is determined by weighting 1.1.1.2.1, 1.1.1.2.2, 1.1.1.2.3 and 1.1.1.2.4 15%, 55%, 15% and 15% respectively.

#### 1.1.1.2.1 Transparency

Transparency relates to whether the project is transparent in its approach to determining financial additionality.

#### Rationale

Projects that do not provide transparent information regarding their financial additionality prevent a detailed validation and assessment of a project's assumptions and approaches. It is not possible to be as confident in the project's additionality without sufficient transparency.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	<p>Each project is scored on a 1-5 scale, where 1 indicates that the project provided no supporting evidence for its financial additionality and 5 indicates that the project disclosed key assumptions behind its approach.</p>					
<b>Scoring Approach</b>	<p>MSCI S&amp;C reviews key project documentation to understand the type of financial additionality approach used and extract information on seven key input assumptions: pre-credit IRR, post-credit IRR, IRR benchmark, assumed carbon credit price, energy tariff price, total investment cost ('CapEx') and annual operating and maintenance costs ('O&amp;M').</p> <p>The type of financial additionality approach is then scored from 1 to 5 based on the rigor and comprehensiveness of the project's approach:</p> <ul style="list-style-type: none"> <li>- 1 = No financial additionality disclosed</li> <li>- 3 = Investment analysis only</li> <li>- 4 = IRR analysis only</li> <li>- 4.5 = IRR and sensitivity analysis</li> <li>- 5 = IRR and sensitivity analysis, supported by disclosure of the WACC (weighted average cost of capital)</li> </ul> <p>Transparency of key assumptions is then scored from 1 to 5 based on how many of the seven key assumptions the project disclosed.</p> <ul style="list-style-type: none"> <li>- 1 = No assumptions disclosed</li> <li>- 2 = Pre-credit IRR and IRR Benchmark only</li> <li>- 3 = Pre-credit IRR and IRR Benchmark with evidence</li> <li>- 4 = Pre-credit IRR, IRR Benchmark, CapEx and O&amp;M costs</li> <li>- 5 = Pre-credit IRR, Post-credit IRR, IRR Benchmark, CapEx, O&amp;M, energy tariff and assumed carbon credit price</li> </ul> <p>The total score for 1.1.1.2.1 Transparency was then determined through an equal weighting of both of these sub-components.</p>					

**1.1.1.2.2 Accuracy of Assumptions**

Accuracy of assumptions relates to whether the project's key financial assumptions appear appropriate and reasonable given the project's characteristics.

<b>Rationale</b>	<p>Projects that use assumptions that appear higher than benchmark figures within their financial additional analysis may over-state their financial additionality.</p>
------------------	---

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	

**Scoring Definition** Each project is scored on a 1-5 scale, where 1 indicates that there is a very high risk that project’s key assumptions are significantly overestimated compared to benchmark values, and 5 indicates that there is a very low risk that project’s key assumptions are inaccurate.

**Scoring Approach** MSCI S&C extracts the values for key financial assumptions from project documentation and compares these assumptions against a combination of averages for similar projects (i.e., projects of the same subtype located in the same country that started at a similar time) and third-party country-specific benchmarks.

The reasonableness of five key assumptions are assessed: IRR benchmark, total investment cost, annual operating and maintenance costs (O&M), energy tariff price and carbon credit price. The reasonableness of each of these five key assumptions is scored on a 1 to 5 scale based on a comparison of a project’s assumption against benchmark values.

The overall score for 1.1.1.2 Accuracy of Assumptions is then determined by weighting the score of the five assumptions in the following way: 60% weighting for IRR benchmark; 10% for each of total investment cost, O&M, energy tariff price and carbon credit price.

**1.1.1.2.3 IRR Attractiveness**

IRR Attractiveness refers to the likelihood that carbon credits played a decisive role in impacting the financial attractiveness of a project, as measured by a project’s IRR.

**Rationale** Carbon credits should incentivize actors to implement mitigation activities that would not otherwise have been financially attractive without those revenues. Ideally carbon credits will make a mitigation activity that would otherwise have been financially unattractive into a financially viable one. Assessing a project’s internal rate of return is therefore an important indicator of the likelihood of additionality.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	

**Scoring Definition** Each project is scored on a 1-5 scale where 1 indicates low likelihood that carbon credits decisively changed the IRR attractiveness of the project, and 5 indicates very high likelihood that carbon credits decisively changed the IRR attractiveness of the project.

Data on the three components of IRR are extracted (see below) from project documentation and analyzed against an independent benchmark value. Each of these components is then categorized into high, medium, or low bands. High scores on these indicators suggest higher financial additionality.

There are three components of IRR analysis:

**Financial attractiveness without carbon credits (Pre-credit IRR as a % of the IRR Benchmark).** Projects that are not financially attractive without carbon credits are unlikely to have gone ahead without them. A project’s internal rate of return without carbon credits is compared to a benchmark rate of return relevant to that project type and country. If the pre-credit IRR is significantly lower than the required benchmark, then this indicates that the project would not otherwise have taken place.

**Financial attractiveness with carbon credits (Post-credit IRR as a % of the IRR Benchmark).** Carbon credits should make mitigation activities that would have been unattractive into financially viable projects. Comparing a project’s post-credit IRR (IRR with carbon credit revenues) to the required benchmark indicates whether a project is financially viable with carbon credits. The likelihood that the activity is additional is high if the post-credit IRR clearly exceeds the benchmark.

**Change in financial attractiveness due to carbon credits (Absolute Difference between Post-Credit and Pre-Credit IRR).** If the proceeds from carbon credits materially change the financial attractiveness of an activity, it is more likely that the carbon credits have played a decisive role. Alternatively, if carbon credits only mildly impact the financial attractiveness of a project, then higher uncertainty exists. A project’s post-credit IRR is compared to the pre-credit IRR to determine the magnitude of the impact that carbon credits likely have on the project’s profitability.

The overall IRR score for each project is then determined based on the scores for each relevant indicator. A high score is needed on each indicator to achieve a high overall score. The overall score is determined on a 1 to 5 scale:

- 5 = ‘High’ score achieved on all three indicators
- 4 = ‘High’ score on two indicators, and ‘Medium’ score on one indicator
- 3 = ‘Medium’ score on at least two indicators, with no ‘Low’ scores
- 2 = ‘Low’ score on at least one of the indicators
- 1 = ‘Low’ score on at least two of the indicators

**Scoring Approach**

**1.1.1.2.4 Project Size**

Project Size refers to whether the installed capacity of a landfill gas utilization project represents a higher inherent financial additionality risk.

**Rationale**

Smaller projects are typically more financially constrained and may not be economically viable without revenue from carbon credits. As such, these projects are more likely to demonstrate financial additionality. In contrast, larger projects benefit

from economies of scale, higher financial viability, and are more likely to be subject to regulatory mandates. As a result, larger projects may pose a higher risk of non-additionality.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Scoring Definition**

Projects are assigned scores on a 1–5 scale, where a higher score indicates a smaller-scale project. Projects are scored based on their estimated installed capacity (in megawatts (MW)) as outlined below:

MSCI S&C identifies the installed capacity of each landfill gas utilization project through a review of project documentation and, where necessary, estimates it based on electricity output or engine specifications.

**Scoring Approach**

Installed Capacity (MW)	Score
1MW or lower	5
1.1 – 3.0 MW	4
3.1 – 5.0 MW	3
5.1 – 10.0 MW	2
10.1MW or above	1

### 1.1.1.3 Prior Consideration

Projects that can demonstrate that carbon credits were considered prior to their decision to start, provide more evidence that credits acted as an important incentive in starting mitigation activities.

Two key sub-criteria are used to evaluate this:

- **1.1.1.3.1 Evidence of Consideration:** Whether any evidence exists that credits were considered prior to the project start.
- **1.1.1.3.2 Registration Gap:** Whether a significant gap exists between the start of the project's activities and the initial registration and issuance date.

The overall score for **1.1.1.3 Prior Consideration** is determined by an equal weighting of these sub-criteria.

#### 1.1.1.3.1 Evidence of Consideration

Evidence of consideration refers to whether the project has specific evidence that demonstrates that the use of carbon credits was considered prior to the project start date.

<b>Rationale</b>	Evidence that carbon credits were considered prior to the project start date indicates that credits played an important role in this decision process. On the other hand, if no evidence of prior consideration exists, there is a higher likelihood that the decision to go ahead with the project occurred without any expectation of carbon credits.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
<b>Scoring Definition</b>	Each project is scored on a 1-5 scale, where 1 indicates that no evidence has been made available, and 5 indicates that good quality evidence of prior consideration exists.					
<b>Scoring Approach</b>	<p>MSCI S&amp;C identifies whether any evidence exists that carbon credits were considered prior to the project start date. This evidence may include a letter or notification of intent sent to a registry (such as CDM or Verra), the employment of a carbon credit consultant, or board meeting minutes indicating that carbon credits were analyzed.</p> <p>The date of any evidence of carbon credit consideration is then compared to the project start date to determine whether credits were considered prior to the start date or not.</p>					



**1.1.1.3.2 Registration Gap**

Registration gap evaluates the gap between the start date of the project activity and the project being registered with a crediting standard and able to issue credits.

<b>Rationale</b>	A longer gap between the start of project activity and the project's registration suggests the project was able to maintain, at least to an extent, activities, and investment even in the absence of carbon credits. If credits were required for the project to go ahead, then a project would be expected to ensure this time taken in the registration process is minimized.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
<b>Scoring Definition</b>	Each project is scored on a 1-5 scale, where 1 indicates a very significant gap between the initial decision date and the registration date and 5 indicates a short or inconsequential gap.					
<b>Scoring Approach</b>	MSCI S&C assesses the project's start date, the type of start date used and the project's registration date.					



Firstly, the type of start date used by the project is assessed. Project start dates are meant to represent the actual start of the mitigation activity and initial decision date, but landfill gas methodologies do allow some flexibility in the type of start date used. Start dates that represent closer indicators of the initial decision date are scored higher, while start dates that clearly occurred after the initial decision date are scored lower. For example, the type of start date is scored on a 1 to 5 scale as follows:

- 5 = Investment decision date
- 4 = Construction contract signed or project equipment contract signed
- 3 = Construction start date or first commissioning date
- 1 = Plant fully operational or project registered with a registry

Secondly, the project stated start date is compared to the registration date. This gap is then categorized into a 1 to 5 scale:

- 5 = 2 years or fewer
- 4 = 3-4 years
- 3 = 5 to 6 years
- 2 = 7 to 9 years
- 1 = 10 years or higher

Each of these scores for the type of start date and gap between project start date and registration date are then equally weighted to reach an overall score for Registration Gap.

## 1.2 Common Practice

If a technology or mitigation activity was already common practice within a region at the time a project started, then it suggests that the project’s activities could have been implemented without carbon credits. Two main sub-criteria within common practice are considered:

- **1.2.1 Third-Party Common Practice:** The extent to which that project technology was already common practice in that country’s energy mix.
- **1.2.2 Evidenced Common Practice:** Whether the project provides evidence that the project was not common practice in that region.

The overall score for 1.2 Common Practice is calculated by weighting 1.2.1 Market Penetration by 75% and 1.2.2 Evidenced Common Practice by 25%.


### 1.2.1 Third-Party Common Practice

Third-Party Common Practice relates to how prevalent that technology or practice was within a region at the time of a project’s inception.

#### Rationale

If a technology or practice was already common within a particular area, then this indicates that that type of project had high likelihood of happening even without the introduction of carbon credits; i.e., there is a high probability that the project’s credits are not additional. Market penetration assessments evaluate the extent to which a

type of mitigation activity or technology was already implemented in the relevant area. Low market penetration of a particular technology indicates higher additionality.

<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
						

**Scoring Definition**

Projects are scored on a 5-point scale from 1 to 5, where 1 indicates that the mitigation activity technology was common in that region and 5 indicates that it had very low market penetration.

The availability of accurate data on landfill gas practices varies by region. Therefore, three different approaches are used to assess common practice to ensure at least one measure is available for each individual project. The three approaches are:

1. **Landfill Site Penetration:** Evaluating the proportion of landfill sites in that region that are already implementing the project’s activity using carbon credits.
2. **Proportion of MSW:** Evaluating the proportion of municipal solid waste generated in a region that is stored in landfill sites that are voluntary carbon market projects, as a proxy for landfill gas site penetration.
3. **MSW Electricity Generation:** Evaluating the proportion of electricity generation within a region that comes from landfill gas sites.

**Scoring Approach**

Data is used from a range of sources to analyze each of these three factors by region and by year. For the United States, state-level data from the Landfill Methane Outreach Program (LMOP) database is used on the practices of every landfill site to determine landfill site penetration. For MSW electricity generation, data from the International Renewable Energy Agency (IRENA) is used on the amount of electricity generation from landfill gas sites in each country in the year that the landfill gas project started.

Scores of 1 to 5 are then assigned to each project based on the market penetration bandings. The higher the market penetration of a specific technology, the lower the likelihood of additionality.


For example, for landfill site penetration, the following scoring table is used based on the proportion of landfills in the region currently performing the activity, and the proportion of those that already utilize carbon credits:

		% of Landfills Performing Activity that are in VCM				
		Very Low (<20%)	Low (20-30%)	Medium (30-40%)	High (40-50%)	Very High (50%+)
% of Landfills in Region	Very Low (<10%)	4	4.25	4.5	4.75	5
	Low (10-30%)	3.5	3.75	4	4.25	4.5

<b>Performing Activity</b>	Medium (30-50%)	3	3	3	3.5	4
	High (50-70%)	2	2.5	2.5	3	3.5
	Very High (70%+)	1	1.5	2	2.5	3

### 1.2.2 Evidenced Common Practice

Evidenced common practice refers to whether the project provides an evidenced justification that its mitigation activity is not common practice within that region.

<b>Rationale</b>	By providing an effective justification and evaluation that the specific mitigation activity is not common practice in that specific region, projects can demonstrate that the nuances of their activities are unique and uncommon.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
						
<b>Scoring Definition</b>	Each project is scored on a 1-5 scale, where 1 indicates no common practice analysis was conducted and 5 indicates a rigorous common practice was conducted that revealed no similar projects exist in that region.					
<b>Scoring Approach</b>	<p>MSCI S&amp;C reviews project documentation to assess what type of common practice analysis is performed and, if any, how many similar projects were identified.</p> <p>The type of common practice analysis conducted is then scored on a scale of 1 to 5, where 1 indicates no common practice was performed, 2 indicates common practice analysis was a simple attestation or statement, 4 indicates that country analysis was conducted and 5 indicates that a country and industry analysis was performed.</p> <p>The number of similar projects identified is scored from 1 to 5, where 1 indicates over 1,000 similar projects were identified and 5 indicates no similar projects were identified.</p> <p>The overall score for this sub-criterion is then determined by weighting the type of common practice analysis 30% and the number of similar projects score 70%.</p>					

### 1.3 Legal Considerations

Legal Considerations assesses the extent to which legal regulations or policies exist that incentivize the project to go ahead even without carbon credits.

<b>Rationale</b>	Governments may seek to reduce the emissions coming from landfill sites as part of wider environmental strategies. Particularly given that many landfill sites are
------------------	--

government-owned or -managed, the effect of government policies can be particularly important for landfill gas sites. In their extreme, policies may mandate the implementation of certain activities, therefore making any carbon credit claims un-additional (assuming appropriate policy enforcement). Other policies may exist that do not mandate an activity, but still incentivize it, and therefore may influence a project to go ahead even without carbon credits.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	☑			☑	☑	

**Scoring Definition** Each project is scored on a 1-5 scale, where 1 indicates that the project’s activities are mandated by legal regulations, and 5 indicates that no legal policies exist that incentivize the project to go ahead.

MSCI S&C conducts an assessment of each country’s regulations and policies regarding landfill gas methane generation and electricity utilization. In particular, the analysis focuses on identifying the presence of six main types of policy: i) direct requirements for all landfill sites; ii) direct requirements for large landfill sites; iii) feed-in tariffs for electricity generated from landfill gas projects; iv) tax credits; v) grants or funding support for landfill gas projects; vi) technical assistance for the implementation of landfill gas projects. These types are categorized based on their significance to projects, with i) all landfill mandates categorized as High; ii) large landfill requirements, iii) feed-in tariffs, iv) tax credits, v) grants or funding support categorized as Medium, and vi) technical assistance categorized as Low.

**Scoring Approach** Where direct requirements exist for large landfill sites within a region, the relevance of these to each individual project is then evaluated based on how close its site characteristics are to being covered by the regulation. For example, some regulations may exist that only impact very large landfill sites. Projects that are close to being covered by these large landfill site regulations therefore receive a lower score than those sites that are significantly below the regulatory thresholds.

Projects are then scored on a scale of 1 to 5 based on deducting 4 points for the presence of any High factors, 0.75 points for each Medium factor, and 0.5 points for each Low factor from the maximum score of 5. In this way, projects located in areas covered by direct mandates receive a 1, projects located in areas where the reduction in landfill methane is supported by tax credits and feed-in tariffs receive a score of 3.5, and projects located in areas where only large landfills are mandated to reduce their methane emissions receive a score of 4.5.

## 1.5 Baseline Reasonableness

Landfill gas projects must appropriately account for the amount of methane that would have been destroyed in the baseline scenario without their activities.

Two main topics are considered:

- **1.5.1 Baseline Scenario Appropriateness:** Whether a project’s baseline scenario is appropriate given the site history and legal considerations.
- **1.5.2 Baseline Methane Reasonableness:** Whether the amount of methane destroyed in the baseline scenario is appropriate given the site history and legal considerations.

The overall score for **1.5 Baseline Reasonableness** is then determined through an equal weighting of these two factors.

### 1.5.1 Baseline Scenario Appropriateness

Baseline Scenario Appropriateness refers to whether the project’s baseline scenario is appropriate given the site history and legal considerations.

<b>Rationale</b>	Projects that have clearly considered an appropriate baseline scenario will ensure a lower probability of overestimating the baseline emissions.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	
<b>Scoring Definition</b>	Each project is scored on a 1-5 scale, where 1 indicates that its baseline scenario is highly unlikely and 5 indicates that the baseline scenario is highly appropriate.					
	In determining the baseline scenario, landfill gas projects must assess whether any methane would have been destroyed even without carbon credits, and, if so, what proportion would have been destroyed.					
	Registries have different mechanisms for projects to determine their baseline scenario, but all mechanisms rely on evaluating two factors: i) whether an existing collection and destruction system was already in place at the project’s site; ii) whether any legal requirements exist within that region. Both Verra and CAR create four different baseline scenarios for projects based on the presence and absence of these two factors.					
<b>Scoring Approach</b>	MSCI S&C reviews project documentation to determine which baseline scenario the developer considered. This is then independently validated against whether a previous collection system existed, and whether legal requirements exist.					
	Projects are then scored on a scale of 1 to 5 based on the following:					
		<b>Baseline Scenario</b>				
		No Destruction	Destruction from Existing System	Destruction due to Legal Requirements	Destruction due to Both	
<b>Project Type</b>	No previous system or legal requirements	5	5	5	5	

	Previous collection system	4	5	4	5
	Previous destruction system	3	5	4	5
	Legal requirements	2	4	5	5
	Both destruction system and legal requirements exist	1	3	3	5

### 1.5.2 Baseline Methane Reasonableness

Baseline Methane Reasonableness relates to whether the amount of methane destroyed in the baseline scenario is appropriate given the site history and legal considerations.

<b>Rationale</b>	Projects that have appropriately estimated the amount of methane that would have been destroyed in the baseline scenario will ensure a lower probability of overestimating the baseline emissions.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	Each project is scored on a 1-5 scale, where 1 indicates that the project appears to have significantly underestimated its baseline amount of methane destroyed, and 5 indicates that the baseline amount of methane destroyed appears appropriate.					
<b>Scoring Approach</b>	MSCI S&C reviews project documentation to determine what proportion of total emission reductions the project assumes would have been achieved in the baseline scenario, for example, through an existing destruction device. MSCI S&C also assesses the project’s justification for this assumption.					
	Projects are then scored on a scale of 1 to 5 based on two factors: i) the strength of evidence provided to justify the amount of baseline destruction; ii) the reasonableness of this assumption when benchmarked against projects with similar characteristics.					
		<b>Strength of Evidence</b>				
		None Provided	Very Low (Attestations)	Low (e.g., Default Values)	Medium (e.g., Modelled)	High (e.g., Historic Records)
<b>Difference vs Benchmark</b>	Significantly Below (20% or more lower)	1	1.5	2	2.5	3

	Below (5-20% lower)	1.5	2	2.5	3	3.5
	In-line (within 5%)	2	2.5	3	3.5	4
	Above (5-20% higher)	2.5	3	3.5	4	4.5
	Significantly Above (20% or more higher)	3	3.5	4	4.5	5

## Criterion 2 – Quantification

Quantification refers to the likelihood that the emissions reduction or removals claimed by the project are accurate, assuming the baseline scenario is correct. It includes both emissions reductions or removals within a project area, and those that have occurred outside the project area, known as leakage.

Along with the strength of baseline assessment, Quantification is a key determinant of the risks of over-crediting: whether the number of credits issued by the project is equal to the CO<sub>2</sub>e actually reduced/removed. In theory, all carbon credits are worth the equivalent of 1 tonne of CO<sub>2</sub>e reduced or removed. A low carbon quantification score means that the emissions reductions or removals delivered by the credit is likely to be less than 1 tonne. In this case, buyers should be cautious in using one credit to offset 1 tonne of their own CO<sub>2</sub>e emissions, as they are unlikely to be equivalent.

The quantification of a landfill gas project's emission reduction is primarily split into two components: i) the emission reductions from the avoided methane release; ii) the emission reductions from the displacement of electricity. For flaring projects, only the first of these components is relevant.

- **i) Avoided Methane:** Estimating the emission reductions from avoided methane release requires a complex calculation that accounts for the methane generated, the proportion of methane that would not have been oxidized (determined by the oxidation factor) and the global warming potential of methane.
- **ii) Displaced Electricity:** To evaluate the accuracy and conservativeness of a project's quantification of the emission reductions from the displacement of electricity, the approach focuses on estimating the emissions impact from the electricity that was displaced. This comes from two main assumptions: first, the amount of electricity generated; second, the emissions factor of each unit of displaced electricity.

Figure 7 illustrates the sub-criteria through which MSCI S&C assesses the quantification of the emissions reductions achieved by landfill gas projects, and the overall MSCI Carbon Project Ratings methodology sub-criteria that they correspond to. The detailed sub-criteria are described in Figure 8.

Figure 7: Landfill Gas quantification assessment approach

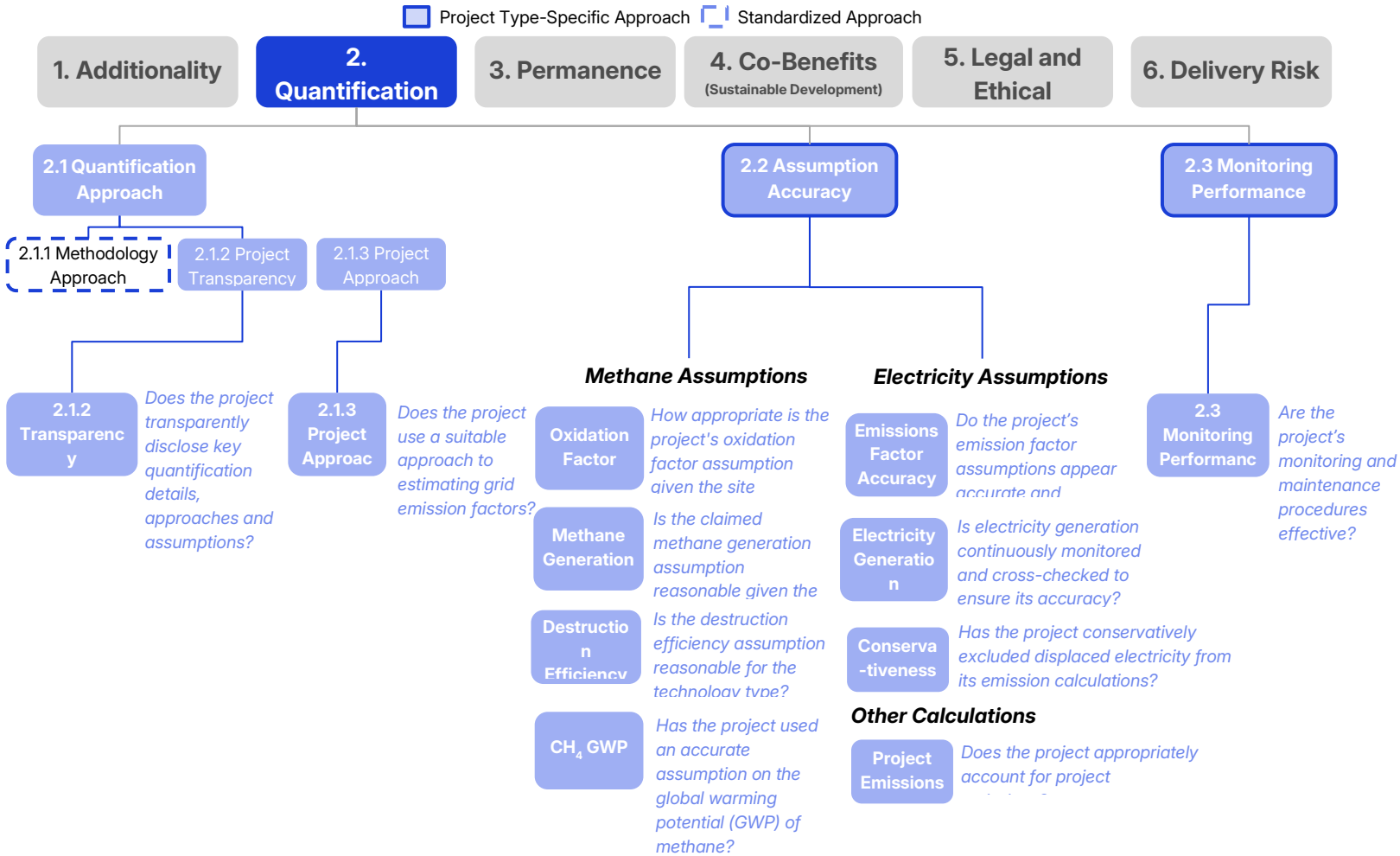


Figure 8: MSCI S&C Quantification integrity assessment framework

Sub-criteria	Metrics	Rationale	REDD+	Renewables	ARR	Cookstoves	Biochar	Landfill Gas	Safe Water	IFM	Waste Mgmt.	Blue Carbon
2.1 Quantification Approach	2.1.1 Methodology Approach	Through setting the assumptions that projects must make, and the sources that can be used to estimate them, crediting program methodologies can play an important role in reducing or even increasing the level of quantification risk.	✓ Standardized approach									
	2.1.2 Project Transparency	Transparent documentation and detail on a project's assumptions are required to make an objective assessment of its approach to carbon quantification.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	2.1.3 Project Approach	Two projects with the same methodology may carry different quantification risks depending on the approach that each uses.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2.2 Assumption Accuracy	Quantification Accuracy	Each project type has a set of key assumptions that determine the accuracy of their carbon quantification. Evaluating the reliability and accuracy of these key assumptions shows whether a project has over- or understated their emissions reductions or removals.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2.3 Monitoring Performance	2.3.1 Monitoring Plan	Projects that have effective processes in place to regularly monitor and measure key quantification inputs and assumptions are more likely to accurately estimate and update their emissions impact.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	2.3.2 VVB Analysis	Projects that use a mix of well-regarded verification and validation bodies (VVBs) will improve the likelihood that key quantification details are accurately checked and validated.	✓ Standardized approach									
2.4 Red and Green Flags	News scanning	Review of academic papers, industry sources and the news for Red or Green Flags relating to project's quantification.	✓ Standardized approach									

## 2.1.2 Project Transparency

Transparency relates to whether the project transparently discloses key quantification assumptions.

### Rationale

It is more difficult to gain confidence in the accuracy of a project's quantification if it is not transparent with either its quantification approach or assumptions. Projects should transparently disclose these key details of information.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	Each project is scored on a 1-5 scale, where 1 indicates that the project provides no key quantification details and 5 indicates that the project provides information on all key quantification inputs.					
<b>Scoring Approach</b>	<p>Through a detailed review of key project documentation, MSCI S&amp;C collects information on a number of key parameters regarding a project’s quantification approach and assumptions.</p> <p>There are four types of quantification inputs that are assessed: the oxidation factor; destruction efficiency; the emission factor calculations; and electricity generation calculations. Projects that provide transparent information on all four topics (or all two topics for those that are flaring only) receive the maximum score of 5.</p>					

### 2.1.3 Project Approach

Projects that employ more accurate methods to estimate their emissions impact minimize their risk of inaccuracy. Methodologies usually allow for multiple approaches to be used to make these estimations, though some methods are more reliable than others.

In particular, MSCI S&C’s scoring approach focuses on two factors that the project takes to estimating its emissions factor and electricity generation. As part of this, two main factors are considered:

- **2.1.3.1 Operating Margin Method:** Whether the project uses an appropriate method to calculate the operating margin emission factor given its electricity mix.
- **2.1.3.2 Electricity Generation Approach:** Whether the project uses best-practice techniques for estimating and validating the ongoing electricity generation.

Each sub-criterion is assessed independently and scored on a 3 to 5 scale. The overall score for [2.1.3 Project Approach](#) is then calculated by giving an equal weighting to these two factors.

#### 2.1.3.1 Operating Margin Method

Whether the project uses an appropriate method to calculate the operating margin emissions factor, given its electricity mix.

<b>Rationale</b>	There are several methods available to projects to estimate their operating margin (OM) emissions factor. Projects that use more appropriate methods given the electricity mix within their country will improve the accuracy and reliability of this assumption.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets



**Scoring Definition**

Each project is scored on a 3 to 5 scale, where 3 indicates that the simple OM method was used in which low-cost/must-run sources were excluded, 4 indicates that the simple adjusted OM method was used, 4.5 indicates that the average OM method was used and 5 indicates that the dispatch data method was used, in which data is based on measured grid data and no default values are allowed.

**Scoring Approach**

MSCI S&C reviews project documentation to identify which approach method it used to estimate its operating margin emissions factor. This is then complemented with insights from academic studies on the scientific representativeness of these different methods.

Methods are then classified based on their scientific best-practice. In order of best-practice, the different operating margin methods can be ranked as followed from most to least best-practice: dispatch data OM, average OM, simple adjusted OM and simple OM. As simple OM still requires the usage of some national data, projects that used this method received a score of 3, meaning the sub-criterion was based on a 3 to 5 scale.

**2.1.3.2 Electricity Generation Approach**

Electricity Generation Approach relates to whether a project estimates its electricity generation from the power plant on an ongoing basis using measured and monitored grid data.

**Rationale**

Projects that use metered grid data to estimate and monitor the electricity generated by the power plant increase the certainty and accuracy of this estimate.

**Key Sources**

Project Documentation    Geospatial    Project Methodology Documentation    Academic Literature    Third-party Data    MSCI Carbon Markets



**Scoring Definition**

Each project is scored on a 4 to 5 scale, where 4 indicates that no information on the electricity generation approach is provided, and 5 indicates that metered grid data is used.

**Scoring Approach**

MSCI S&C conducts a detailed review of project documentation to understand how each project estimates and monitors its electricity generation.

Projects are then categorized on a scale of 4 to 5 based on their approach. Given that all power plant projects will monitor electricity generation through multiple methods, the lowest score assigned to this sub-criterion is 4, reflecting the relative low levels of uncertainty here. Projects that used metered grid data as part of these calculations received a score of 5.

## 2.2 Assumption Accuracy

Quantification of landfill gas projects is estimated based on two main components: the amount of methane avoided and the emissions impact from the electricity displaced. Other calculation steps that are not relevant to only one of these components are also considered in the evaluation.

In total, three components are considered:

- **2.2.1 Avoided Methane:** Whether the project's estimation of the CO<sub>2</sub>e impact of avoided methane is appropriate given the site's characteristics.
- **2.2.2 Displaced Electricity:** Whether the project's estimation of the CO<sub>2</sub>e impact of the energy generated is appropriate.
- **2.2.3 Other Calculations:** Whether the project makes any other conservative and appropriate deductions.

Each of these criteria are evaluated on two dimensions:

- **A percentage accuracy**, reflecting how closely the project's assumptions align with independent data. Values above 100% indicate conservative assumptions (i.e., underestimation of impact).
- **A 1 to 5 score**, reflecting the level of alignment and uncertainty. A value of 5 indicates very high confidence that the assumption is accurate or conservative.

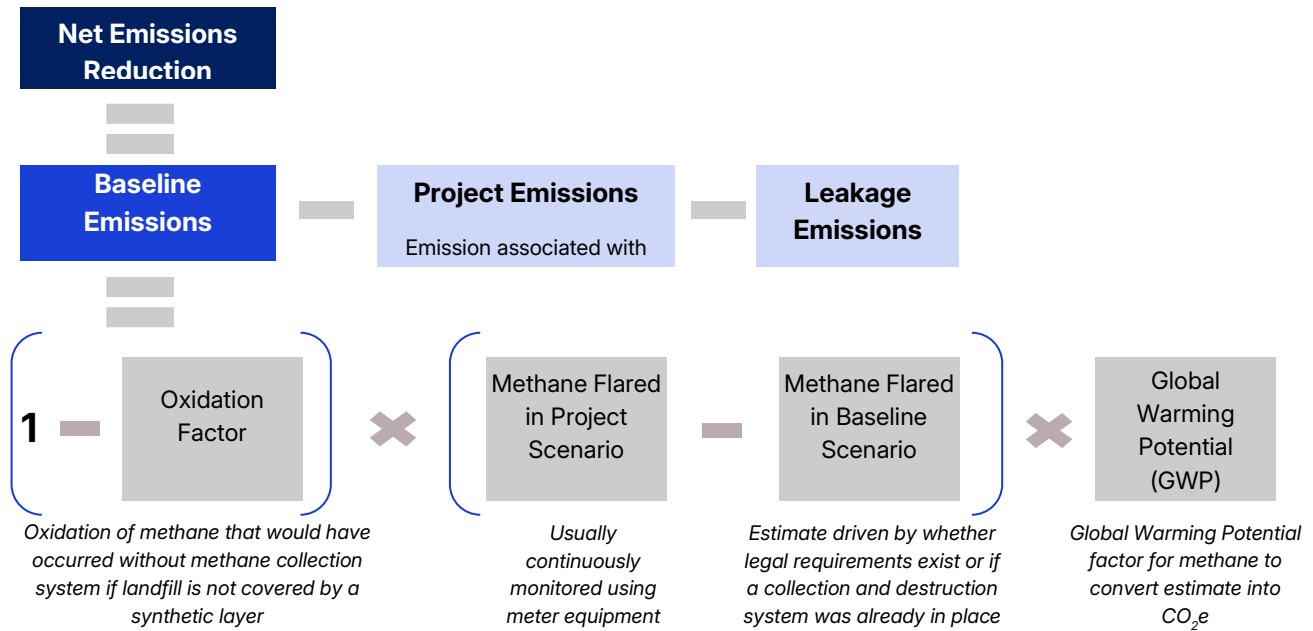
The overall score is reached through a weighted multiplicative approach based on the percentage accuracy of each sub-criterion. A multiplicative approach is applied to the percentage accuracy values to calculate an overall accuracy score. This method reflects consistent alignment across sub-criteria and preserves credit for conservative assumptions where applicable.

Each sub-criterion is assessed independently and scored on a 1 to 5 scale. The overall score for 2.2 Accuracy of Assumptions is then calculated by weighting **2.2.1 Avoided Methane** at 40%, **2.2.2 Displaced Electricity** at 40% and **2.2.3 Other Calculations** at 20%. For 'flaring only' projects, **2.2.1 Avoided Methane** is weighted at 75% and **2.2.3 Other Calculations** at 25%.

### 2.2.1 Avoided Methane

The quantification of the emission reduction impact from avoiding the release of methane into the atmosphere is calculated using four primary inputs as illustrated in **Figure 9**.

Figure 9: Methane Avoidance Quantification Equation



Therefore, in total, four components are considered:

- **2.2.1.1 Oxidation Factor:** Whether the project’s oxidation factor assumption appears reasonable given the site characteristics.
- **2.2.1.2 Methane Generation:** Whether the project’s methane generation estimation appears reasonable given the site characteristics.
- **2.2.1.3 Destruction Efficiency:** Whether the project’s estimation of the destruction efficiency of the project equipment is reasonable given the technology type.
- **2.2.1.4 CH<sub>4</sub> GWP:** Whether the project uses an accurate assumption on the global warming potential of methane.

Each sub-criterion is assessed independently on a 1 to 5 scale. The overall score is then based on weighting **2.2.1.1 Oxidation Factor** at 40%, **2.2.1.2 Methane Generation** at 15%, **2.2.1.3 Destruction Efficiency** at 20% and **2.2.1.4 CH<sub>4</sub> GWP** at 25%. These weightings reflect the relative significance of each component in contributing to over/underestimations.

### 2.2.1.1 Oxidation Factor

Oxidation Factor refers to whether the project’s oxidation factor assumption appears reasonable given the site characteristics.

#### Rationale

Methane generated in a landfill site’s interior passes through a topsoil layer before being released into the atmosphere. For landfills not covered by a synthetic layer, as methane passes through the topsoil layer, the methane will be partly oxidized to carbon dioxide by microorganisms.

The avoided methane impact therefore depends on the amount of methane generated and on how much would have been oxidized in the topsoil. Projects that underestimate the amount of oxidation that would have occurred will overestimate the avoided methane compared to the baseline scenario.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	☑	☑		☑	☑	

**Scoring Definition**

Each project is scored on a 1 to 5 scale, where 1 indicates that a project’s emission factor appears between 75% and 100% higher than the modelled value, and 5 indicates that a project’s oxidation factor is within 5% of the modelled value.

Oxidation factors vary considerably across landfills. The rate is driven by numerous factors, such as the landfill type; the type, thickness, moisture, and organic content of the soil; climatic conditions such as temperature; and the methane flux rate, which in turn is driven by the age of the landfill and type of waste. Therefore, estimating the appropriate oxidation factor for an individual landfill site requires complex modelling of these drivers. The impact of these key drivers on the oxidation rate is summarized below:

**Scoring Approach**

- *Type of Landfill:* Closed landfills can result in oxidation rates 3-11% higher than active or open landfills.
- *Soil Type:* The type of soil impacts the oxygen levels and concentration; coarse sand can result in oxidation rates 20% higher than clay soil types.
- *Soil Organic Content:* Higher organic content soils generally result in higher oxidation rates.
- *Soil Moisture:* Both extremely high (>35%) and extremely low moisture contents (<10%) result in lower oxidation rates.
- *Soil Temperature:* Higher oxidation rates are reported at locations where the soil temperature is between 20°C and 35°C.

Geospatial inputs are leveraged for each of the key drivers of a project’s oxidation for each specific landfill gas site. These inputs are then processed through an internally built oxidation factor model that determines an expected range of oxidation factors given the relevant inputs for each individual site.

This modelled oxidation factor is then compared to the oxidation factor assumed by the project, which is collected through a detailed evaluation of project documentation.

Projects are then categorized on a scale of 1 to 5 based on the similarity of their assumption to the modelled oxidation factor, as follows:

- 1 = Project assumption 50%+ higher than the modelled factor
- 2 = Project assumption 30-50%+ higher than the modelled factor
- 3 = Project assumption 20-30%+ higher than the modelled factor
- 4 = Project assumption 5-20%+ higher than the modelled factor
- 5 = Project assumption within 5% of the modelled factor

### 2.2.1.2 Methane Generation

Methane Generation refers to whether the project’s methane generation estimation appears reasonable given the site characteristics.

<p><b>Rationale</b></p>	<p>Methane emissions from landfill sites come from landfill gas generated by the decomposition of waste in the landfill. The amount of methane generated by a landfill site may not be easy for a project to measure and is driven by a number of other factors. Projects without monitored estimates of the methane generated may not accurately measure this input.</p>					
<p><b>Key Sources</b></p>	<p>Project Documentation</p> <p><input checked="" type="checkbox"/></p>	<p>Geospatial</p> <p><input checked="" type="checkbox"/></p>	<p>Project Methodology Documentation</p> <p><input type="checkbox"/></p>	<p>Academic Literature</p> <p><input type="checkbox"/></p>	<p>Third-party Data</p> <p><input checked="" type="checkbox"/></p>	<p>MSCI Carbon Markets</p> <p><input type="checkbox"/></p>
<p><b>Scoring Definition</b></p>	<p>Each project is scored on a 1 to 5 scale, where 1 indicates that a project’s methane generation assumption appears between 75% and 100% higher than the modelled value, and 5 indicates that a project’s methane generation assumption is within 10% of the modelled value.</p>					
<p><b>Scoring Approach</b></p>	<p>Estimating the methane producing capacity of a landfill site requires complex modelling of a multitude of factors. Seven main factors are assessed: (i) age of the landfill; (ii) fraction of degradable organic carbon in the waste; (iii) oxidation factor; (iv) waste decay rate; (v) fraction of methane in the landfill gas (LFG); (vi) model correction factor; and (vii) methane correction factor. Through the development of a methane estimation model based on these inputs, the reasonableness of a project’s methane generation assumptions is then evaluated.</p> <p>A combination of geospatial inputs and third-party data is leveraged for each of the key drivers of a project’s methane generation to identify the most appropriate input given the specific site location of the landfill project. These inputs are then combined within a methane generation model to determine an expected range of methane generation for the individual site characteristics. Given that the amount of methane generated varies by age of the landfill, the expected range of methane generation is calculated in both the first year of the landfill and the year of the project start.</p> <p>The modelled methane generation at the project start date is then compared to the project estimate for methane generated, which is identified through an evaluation of the project’s key documentation.</p> <p>Projects are then categorized on a scale of 1 to 5, which reflected the similarity of the project’s assumption with the modelled methane generation value:</p> <ul style="list-style-type: none"> <li>- <u>1</u> = Project assumption 75%+ higher than the modelled factor</li> <li>- <u>2</u> = Project assumption 50-75%+ higher than the modelled factor</li> <li>- <u>3</u> = Project assumption 25-50%+ higher than the modelled factor</li> <li>- <u>4</u> = Project assumption 10-25%+ higher than the modelled factor</li> </ul>					

- 5 = Project assumption within 10% of the modelled factor

### 2.2.1.3 Destruction Efficiency

Destruction Efficiency refers to whether the project’s estimation of the destruction efficiency of the project equipment is reasonable given the technology type.

<b>Rationale</b>	Methane destruction devices may not destroy 100% of the methane generated. Projects must therefore appropriately account for the efficiency of the destruction device to ensure they accurately measure the amount of methane destroyed.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	Each project is scored on a 4 to 5 scale, where 4 indicates that a project’s destruction efficiency factor is more than 5% higher than the benchmark for the technology type, and 5 indicates that a project’s destruction factor is appropriate.					
<b>Scoring Approach</b>	<p>A review of project documentation, including design documents and monitoring reports, identifies the project’s assumption regarding the efficiency of the device used.</p> <p>The project assumption is then compared to the assumption of similar projects that used the same type of destruction device. For example, projects that used utility flares are benchmarked against other projects that used the same type of destruction device.</p> <p>Projects are then categorized on a scale of 4 to 5, which reflected whether their assumption appeared in-line with benchmark projects, as follows:</p> <ul style="list-style-type: none"> <li>- <u>4</u> = Project assumption 5%+ higher than the benchmark value</li> <li>- <u>4.5</u> = Project assumption 2-5%+ higher than the benchmark data</li> <li>- <u>5</u> = Project assumption in-line or below the benchmark value</li> </ul> <p>As the benchmark value for most destruction types are regularly close to 95%, the lowest score a project could receive is a 4.</p>					

### 2.2.1.4 CH<sub>4</sub> GWP

CH<sub>4</sub> GWP refers to whether the project uses an accurate assumption on the global warming potential of methane.

<b>Rationale</b>	To convert the emissions impact of avoided methane into a CO <sub>2</sub> value, projects use an estimate of the global warming potential (GWP) of methane from the most recent
------------------	---

Intergovernmental Panel on Climate Change (IPCC) assessment reports. As these values are updated regularly, the use of a low GWP figure may lead to an underestimation of the project’s emission impact.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	

**Scoring Definition**

Each project is scored on a 5 to 6 scale, where 5 indicates that a project’s CH<sub>4</sub> GWP assumption is the current IPCC value, and 6 indicates that a project’s CH<sub>4</sub> GWP assumption is 25% or more lower than the current IPCC value.

**Scoring Approach**

A review of project documentation, including project design documents and monitoring reports, identifies the project’s assumption regarding the global warming potential (GWP) of methane.

The project assumption is then compared to the latest CH<sub>4</sub> GWP value from the IPCC.

Projects are then scored on a 5 to 6 scale, where 5 indicates the project uses the latest assumption from the IPCC, 5.5 indicates that the project uses a GWP factor 10% lower than the current IPCC value, and 6 indicates that the project uses a GWP factor 25% or more below the current IPCC value.

**2.2.2 Displaced Electricity**

In general, the biggest uncertainty in this quantification equation comes from a project’s emissions factor calculation given that this requires an assessment of what electricity sources will be displaced and what the emissions factor of these sources are. The amount of electricity generated is usually a very reliable measure given that it comes from ex-post metered and measured data. However, projects can enhance this reliability through using multiple methods to cross-check and validate measurement accuracy.

To validate the accuracy of assumptions, these two assumptions are evaluated, but the project load factor and estimation of project and/or leakage emissions are also considered.

In total, the following four metrics are considered:


- **2.2.2.1 Emissions Factor Accuracy:** Whether the project’s emissions factor assumptions appear accurate and reasonable compared to other benchmarks.
- **2.2.2.2 Electricity Measurement Accuracy:** Whether the accuracy of the project electricity measurement is cross-checked and validated on an ongoing basis using multiple methods.
- **2.2.2.3 Conservativeness:** Whether the project conservatively excludes the emissions impact from displaced electricity from its emission calculations.
- **2.2.2.4 Project Emission Accuracy:** Whether the project appropriately accounts for project emissions.

Each of the first two sub-criteria are assessed independently and scored on a 1 to 5 scale. The overall score is then calculated by giving a weighting of 50% for **2.2.2.1 Emissions Factor Accuracy** and 50% for

**2.2.2.2 Electricity Measurement Accuracy.** If the project has conservatively excluded the emissions impact from displaced electricity, then the score of 2.2.2.3 Conservativeness is added onto the total score for **2.2 Accuracy of Assumptions.**

**2.2.2.1 Emissions Factor Accuracy**

Emissions Factor Accuracy refers to whether the emissions factor used by the project appears appropriate and accurate when compared to relevant third-party data.<sup>4</sup>

<p><b>Rationale</b></p>	<p>Given that utilization projects are displacing grid electricity, the emissions factor used by the project should broadly resemble the emissions factor of the grid that it is a part of. Projects that use an emissions factor significantly higher than that of the grid are likely overestimating this displacement impact.</p>					
<p><b>Key Sources</b></p>	<p>Project Documentation</p>	<p>Geospatial</p>	<p>Project Methodology Documentation</p>	<p>Academic Literature</p>	<p>Third-party Data</p>	<p>MSCI Carbon Markets</p>
						
<p><b>Scoring Definition</b></p>	<p>Each project is scored on a 1 to 5 scale, where 1 indicates that a project’s emissions factor appears between 75% and 100% higher than the third-party value, and 5 indicates that a project’s emissions factor is within 10% of the third-party value.</p>					
<p><b>Scoring Approach</b></p>	<p>Using a range of international databases on countries (such as that provided by IRENA), MSCI S&amp;C builds up a database of the grid emissions factors across major grid systems over time. Where possible, multiple input sources are used, with an average of these sources taken.</p> <p>The project’s combined margin emissions factor assumption is then compared to the relevant third-party grid data for the associated grid at the time that the project started.</p> <p>Projects are then categorized on a scale of 1 to 5, which reflected the size of the difference between the project estimate and third-party estimate:</p> <ul style="list-style-type: none"> <li>- <u>1</u> = Project assumption 75%+ higher than the third-party data</li> <li>- <u>2</u> = Project assumption 50-75%+ higher than the third-party data</li> <li>- <u>3</u> = Project assumption 25-50%+ higher than the third-party data</li> <li>- <u>4</u> = Project assumption 10-25%+ higher than the third-party data</li> <li>- <u>5</u> = Project assumption within 10% of the third-party data</li> </ul>					

<sup>4</sup> [Greenhouse Gas Emissions from Energy Data Explorer – Data Tools - IEA](#); [IRENA – International Renewable Energy Agency](#); International Financial Institutions Technical Working Group on Greenhouse Gas Accounting. (2022, January). Harmonized IFI Default Grid Factors 2021 v3.1 [Data set]. UNFCCC. Hannah Ritchie, Pablo Rosado, & Max Roser. (2023). Data Page: Carbon intensity of electricity generation [Data set]. In Energy. Our World in Data. Adapted from Ember (2025) and the Energy Institute – Statistical Review of World Energy (2025).

### 2.2.2.2 Electricity Measurement

Electricity Measurement relates to whether the accuracy of the project’s electricity measurement estimate is supported by cross-checks and validation.

<b>Rationale</b>	Projects that use multiple methods to cross-check and validate the metered data on electricity generation increase the likelihood that this data is accurately estimated.																								
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets																			
	<input checked="" type="checkbox"/>																								
<b>Scoring Definition</b>	<p>Each project is scored on a 3.5 to 5 scale, where 3.5 indicates that no information on the project measurement approach is provided, and 5 indicates the use of electricity meters with continuous or hourly monitoring that are cross-checked by multiple sources.</p> <p>A review of project documentation identifies the measurement and monitoring procedures for electricity generation in each project. The assessment focuses on the frequency of monitoring and the use of cross-checks to validate metered estimates.</p> <p>The amount of electricity generation may be cross-checked using invoice data or electricity sales information.</p>																								
<b>Scoring Approach</b>	<p>Projects are then categorized on a scale of 3.5 to 5 based on the following categorizations:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2" rowspan="2"></th> <th colspan="2">Electricity Cross-check</th> </tr> <tr> <th>No</th> <th>Yes</th> </tr> </thead> <tbody> <tr> <th rowspan="4">Frequency of Monitoring</th> <td>Not Found</td> <td>3.5</td> <td>4.25</td> </tr> <tr> <td>Annually</td> <td>3.5</td> <td>4.25</td> </tr> <tr> <td>Monthly</td> <td>4</td> <td>4.5</td> </tr> <tr> <td>Continuously</td> <td>4.5</td> <td>5</td> </tr> </tbody> </table>								Electricity Cross-check		No	Yes	Frequency of Monitoring	Not Found	3.5	4.25	Annually	3.5	4.25	Monthly	4	4.5	Continuously	4.5	5
		Electricity Cross-check																							
		No	Yes																						
Frequency of Monitoring	Not Found	3.5	4.25																						
	Annually	3.5	4.25																						
	Monthly	4	4.5																						
	Continuously	4.5	5																						

### 2.2.2.3 Conservativeness

Conservativeness refers to whether the project excludes the emissions impact from displaced electricity due to the project from its overall calculations of the emission reductions.

<b>Rationale</b>	The impact of displaced electricity can represent a significant proportion of the total emission reduction from landfill gas utilization projects. Projects that exclude this source of emission impact from their calculations can therefore significantly underestimate their overall emissions impact.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets



**Scoring Definition**

Projects that exclude the emissions impact from displaced electricity receive 2 points, otherwise this criterion is not scored.

**Scoring Approach**

Through a review of methodological requirements and project documentation, MSCI S&C determine whether the project does generate electricity that would displace existing grid electricity, and whether the project includes this displaced electricity within its emission reduction calculations.

For example, landfill gas projects under the Climate Action Reserve protocol are not allowed to claim emissions reductions from this displaced electricity.

Projects that do exclude the emissions impact of displaced electricity even though they are utilization projects receive a score of 2 points.

**2.2.2.4 Project Emissions Accuracy**

Project Emissions Accuracy relates to whether the project appropriately accounts for project emissions.

**Rationale**

Landfill gas projects may create emissions during their operation through the usage of fossil fuels to operate the plant (known as project emissions), or lead to fossil fuel usage outside of the project boundary (known as leakage emissions). Though these emissions are usually relatively small, it is important that these emissions are appropriately considered and accounted for. Emissions during construction are not assessed as part of landfill gas methodologies and are not assessed in the Integrity Assessment framework for landfill gas projects.

**Key Sources**

Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
-----------------------	------------	-----------------------------------	---------------------	------------------	---------------------



**Scoring Definition**

Each project is scored on a 2 to 5 scale, where 2 indicates that the project does not account for project and/or leakage emissions despite their high relevance to that project subtype, and 5 indicates that it does appropriately account for project and/or leakage emissions.

**Scoring Approach**

Through a review of documentation, MSCI S&C assesses whether each project considered and accounted for project emissions as part of their emission reduction calculations.

For project emissions, whether emissions have been accounted for within four emission source components are considered:

- Combustion of fossil fuel.
- Electricity consumption.
- Residual emissions from flaring.

- Transportation emissions associated with LFG distribution.

Projects are then scored on a 1 to 5 scale based on the relevance and accounting of these emission sources for the project:

- **1** = Does not account for four relevant project emission sources.
- **2** = Does not account for three relevant project emission sources.
- **3** = Does not account for two relevant project emission sources.
- **4** = Does not account for one relevant project emissions source.
- **5** = Includes all appropriate project emission sources.

## 2.3 Monitoring Performance

Effective monitoring procedures ensure that key quantification inputs are reliably updated and measured on an ongoing basis. More effective monitoring procedures will capture the project’s measured data through regular site visits, while providing adequate and regular maintenance resources to ensure that it is operating reliably and consistently.

As part of this, three factors are considered:

- **2.3.1 Monitoring Frequency:** The frequency of which the project conducts monitoring procedures and site visits to ensure the effective operation of the landfill gas plant.
- **2.3.2 Maintenance and Technical Assistance:** Whether the project includes adequate maintenance and technical assistance to ensure the plant continuously operates.
- **2.3.3 Flow and Methane Monitoring:** Whether the project frequently monitors LFG flows, temperatures and methane fractions.

Each of the above sub-criteria is scored individually. The overall score is determined through an equal weighting of the relevant factors for that project type.

### 2.3.1 Monitoring Frequency

Monitoring Frequency relates to whether the project conducts effective monitoring procedures and site visits to ensure the effective operation of the landfill gas site.

<p><b>Rationale</b></p>	<p>More frequent monitoring increases the likelihood that key inputs represent the most accurate and up-to-date estimates, and the plant will continue to operate in a consistent and reliable way going forwards.</p>					
<p><b>Key Sources</b></p>	<p>Project Documentation</p>	<p>Geospatial</p>	<p>Project Methodology Documentation</p>	<p>Academic Literature</p>	<p>Third-party Data</p>	<p>MSCI Carbon Markets</p>
<p><b>Scoring Definition</b></p>	<p>Each project is scored on a 3 to 5 scale, where 3 indicates that no information on monitoring procedures is provided and 5 indicates that site visits are conducted on a monthly basis.</p>					



The assessment examines the monitoring procedures of each project including the extent to which frequent site visits take place.

Projects are then assigned one of 5 scores between 3 to 5 based on the following scale:

**Scoring Approach**

- 3 = Monitoring frequency not provided or greater than once every 5 years
- 3.5 = Monitoring frequency is once every 4 or 5 years
- 4 = Monitoring frequency is once every 2 or 3 years
- 4.5 = Monitoring frequency is annual
- 5 = Monitoring frequency is at least monthly

**2.3.2 Maintenance and Technical Assistance**

Maintenance and Technical Assistance relates to the extent to which the project includes adequate maintenance and technical assistance to ensure the plant continuously operates.

**Rationale**

Projects that more frequently provide available technical and maintenance support improve the reliability of the power plant, reducing the risk that problems arise.

**Key Sources**

Project Documentation    Geospatial    Project Methodology Documentation    Academic Literature    Third-party Data    MSCI Carbon Markets



**Scoring Definition**

Each project is scored on a 3 to 5 scale, where 3 indicates that no information on maintenance and technical procedures is provided and 5 indicates that frequent maintenance and technical support is provided as part of the project.

**Scoring Approach**

Through a review of project documentation, MSCI S&C assesses the maintenance and technical support procedures of each project.

Projects then receive a score of either 3 or 5 based on the transparency of this information and whether plans were in place to provide maintenance and technical support as required. Projects that provided technical support on an ongoing basis receive a score of 5. Projects that did not disclose that they provided any technical support receive a score of 3.

**2.3.3 Flow and Methane Monitoring**

Flow and Methane Monitoring relates to whether the project frequently monitors LFG flows, temperatures, and methane fractions.

**Rationale**

Projects that more frequently monitor key methane factors improve the reliability of these estimates and assumptions.

Key Sources	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
<b>Scoring Definition</b>	<input checked="" type="checkbox"/>					
<b>Scoring Approach</b>	<p>Each project is scored on a 1 to 5 scale, where 1 indicates that no key methane factors are monitored and 5 indicates that the project continuously monitors all key methane factors.</p> <p>Through a review of project documentation, MSCI S&amp;C assesses whether three key factors are monitored by the project: i) LFG flow; ii) temperature; iii) methane fraction in LFG flow.</p> <p>Projects are then scored depending on how frequently each of these three factors are monitored. Projects are scored as follows:</p> <ul style="list-style-type: none"> <li>- <u>5</u> = All three factors are continuously monitored.</li> <li>- <u>4</u> = At least two of the three factors are monitored.</li> <li>- <u>3</u> = At least one of the three factors are monitored.</li> <li>- <u>1</u> = None of the three factors are clearly monitored.</li> </ul>					

## Criterion 4 – Co-benefits

Co-benefits reflect the sustainable development benefits (and safeguards) of a project beyond the CO<sub>2</sub>e it saves; in other words, its “externalities.” These environmental and societal externalities are typically positive but can, on occasion, be negative.

Carbon projects have the potential to reduce/remove CO<sub>2</sub>e, and simultaneously have a broader positive societal impact via issues such as development, adaptation and biodiversity.

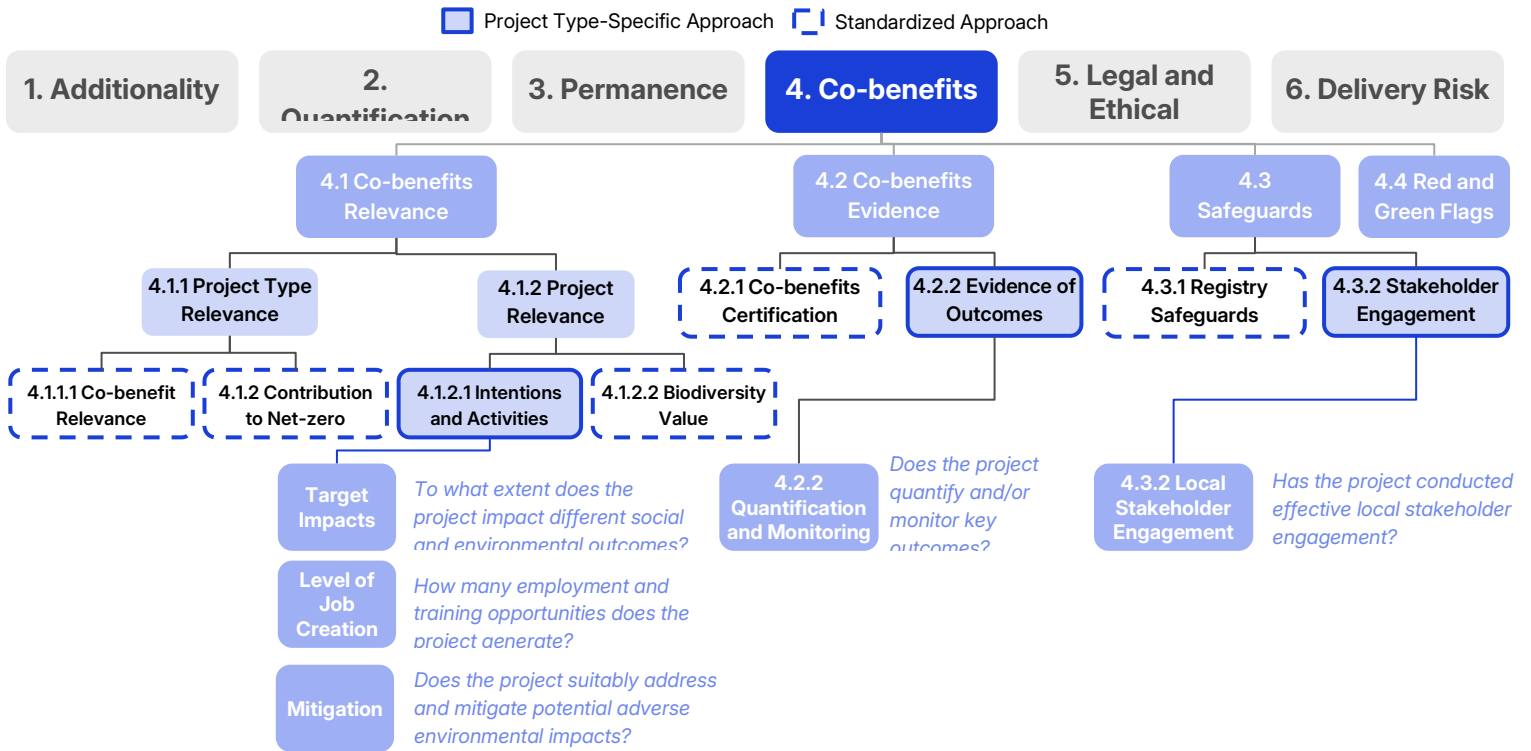
In general, the sustainable and environmental positive impacts of landfill gas projects are limited to their economic effects. Through their construction and then operation, landfill gas projects can create employment and training opportunities within local communities, supporting the development of the local economy.

Some landfill gas projects risk having some negative environmental consequences due to their impact on local fauna and flora. It is important that these projects, to the greatest extent possible, properly mitigate these risks.

MSCI S&C’s approach to co-benefit assessment builds on the United Nations’ Sustainable Development Goals (SDG) framework. The assessment focuses on understanding both the SDG significance of a project and the extent to which it provides evidence of these outcomes being achieved through effective monitoring.

Figure 10 illustrates the sub-criteria through which MSCI S&C assesses the co-benefits of landfill gas projects, and the overall MSCI Carbon Project Ratings methodology sub-criteria that they correspond to. The detailed sub-criteria are described in Figure 11.

Figure 10: Co-benefits integrity assessment approach



**Figure 11: MSCI S&C Co-benefits integrity assessment framework**

Sub-criteria		Metrics	Rationale	REDD+	Renewables	ARR	Cookstoves	Biochar	Landfill Gas	Safe Water	IFM	Waste Mgmt.	Blue Carbon	
4.1 Co-benefits Relevance	4.1.1 Project Type Relevance	4.1.1.1 Relevance to Project Type	Different project types have an inherently different impact on each sustainable development impact.	✓ Standardized approach										
		4.1.1.2 Contribution to Net-zero	Some project types create “carbon lock-ins” of technologies or practices that are not compatible with a net-zero economy.	✓ Standardized approach										
	4.1.2 Project Relevance	4.1.2.1 Project Intentions to Activities	The specific design and implementation of a project’s activities are critical drivers for whether a project generates positive sustainable development impact.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
		4.1.2.2 Biodiversity Value	Nature-based projects that enhance or protect areas of rich biodiversity have greater environmental value.	✓		✓						✓		✓
4.2 Co-benefits Evidence	4.2.1 Certification	Achieving certification involves more stringent project verification. This improves the likelihood that a project’s co-benefits have been realized.	✓ Standardized approach											
	4.2.2 Evidence of Outcomes	Projects can increase the confidence that co-benefits are attributed to their actions through measuring, monitoring, and quantifying the outcome.	✓		✓	✓	✓			✓	✓		✓	
4.3 Safeguards	4.3.1 Registry Safeguards	More effective environmental and social safeguards required by registries reduce the likelihood of projects causing harm.	✓ Standardized approach											
	4.3.2 Local Stakeholder Engagement	Projects that successfully engage with local stakeholders reduce the likelihood of any negative impacts occurring.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
4.4 Red and Green Flags	News scanning	Review of academic papers, industry sources and the news for Red or Green Flags relating to project’s co-benefits.	✓ Standardized approach											

### 4.1.2.1 Project Intentions to Activities

The specifics of a project’s design and implementation play an important role in determining both the relevance and significance of each sustainable development impact of the project. Projects that target certain impacts through additional activities increase the positive co-benefits that they create.

There are three metrics used to evaluate this sub-criterion:

- **4.1.2.1.1 Target Impacts:** The social and environmental benefits that the project explicitly identifies and targets through its activities.
- **4.1.2.1.2 Level of Job Creation:** The number of temporary and permanent jobs that the project creates as a proportion of their credit generation.
- **4.1.2.1.3 Access to Electricity:** Whether the project is located in an area that has low access to electricity, and therefore may help to address a significant supply gap in that region.

These sub-criteria are all scored on a 1 to 5 scale, and then equally weighted to reach an overall score.

### 4.1.2.1.1 Target Impacts

Target Impacts refers to whether the project explicitly or implicitly targets specific SDGs with their project activities.

<b>Rationale</b>	Projects which implement specific activities targeted at a sustainable development impact or SDG increase the likelihood that this SDG is relevant and significant.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	Each project is scored on a scale of 1-5, where 1 indicates that the project's activities do not target any sustainable development goals and 5 indicates the project's activities targets seven or more SDGs.					
<b>Scoring Approach</b>	<p>MSCI S&amp;C reviews the project's activities to identify the number of SDGs both explicitly and implicitly impacted and targeted by the project. For projects that do not reference the SDGs themselves, all of the sustainable development impacts mentioned by the project (such as improved air pollution and local economic development) are identified and mapped onto the number of SDGs that they relate to.</p> <p>The overall score is then based on both the quantity of SDGs or sustainable development impacts identified by the project.</p>					

### 4.1.2.1.2 Level of Job Creation

Level of Job Creation relates to the amount of permanent and temporary jobs created by the project, in proportion to its emissions reduction impact.

<b>Rationale</b>	Projects which generate more permanent employment and training opportunities will have a larger and longer-term impact on the local economy. Employment opportunities can have multiplier effects on the economy as a whole, as supporting businesses and infrastructure are developed to support this employment, and cater to the local income it generates.
------------------	--

**Key Sources**

Project Documentation    Geospatial    Project Methodology Documentation    Academic Literature    Third-party Data    MSCI Carbon Markets



**Scoring Definition**

Each project is scored on a 1 to 5 scale, where 1 indicates no quantified job information is provided by the project and a 5 indicates that at least 5 jobs are created per thousand tonnes of estimated annual emissions reductions.

MSCI S&C reviews key project documentation in detail to assess how many permanent and temporary jobs were expected to be created from the project. The number of jobs is then divided by the project’s estimated annual emissions reductions. This ratio is then categorized into scoring bands as shown below, which reflected higher scores for the greater proportion of job creation.

**Scoring Approach**

Points Scoring	# Jobs per kiloton CO <sub>2</sub> e
1	0
2	0-1
3	1-2.5
4	2.5-5
5	5+

**4.1.2.1.3 Access to Electricity**

Access to Electricity assesses whether a project is located in an area with low access to electricity. Projects situated in areas with limited electricity access may contribute meaningfully to local energy availability by supplying power to underserved populations.

**Rationale**

Landfill gas utilization projects, which convert methane to electricity, may contribute to alleviating electricity shortages, particularly when located in countries with low electricity access.

**Key Sources**

Project Documentation    Geospatial    Project Methodology Documentation    Academic Literature    Third-party Data    MSCI Carbon Markets



**Scoring Definition**

Projects are scored on a 1 to 5 scale where a higher score indicates a lower national rate of electricity access and a higher potential development impact. This sub-criteria is not assessed for ‘flaring-only’ landfill gas projects.

MSCI S&C uses World Bank data on national electricity access rates.

The proportion of the population that has access to electricity is converted into a 1 to 5 score for each project, based on the level of electricity access in the year in which the project started, as follows:

**Scoring Approach**

Points Scoring	Proportion of Population with Access to Electricity
1	90-100%
2	80-89%
3	70-79%
4	60-69%
5	Lower than 60%

### 4.2.2 Quantification of Outcomes

Quantification of outcomes relates to whether the project monitors and/or quantifies the impact of the project on targeted sustainable development goals.

**Rationale**

Assessing the evidence of co-benefit impacts is crucial to evaluating the degree to which co-benefits are achieved and can be attributed to a project. Projects that measure, quantify, and monitor their co-benefit impacts provide greater evidence in support of the targeted social and environmental benefits being achieved.

**Key Sources**

- Project Documentation
- Geospatial
- Project Methodology Documentation
- Academic Literature
- Third-party Data
- MSCI Carbon Markets



**Scoring Definition**

Each project is scored on a scale of 1 to 5, where 1 indicates there is no quantification or monitoring of SDGs and 5 indicates that benefits are quantified and monitored.

MSCI S&C reviews each individual project's key documentation, such as its design document and monitoring reports, to assess the level to which both specific sustainable development goals and other economic indicators, such as job creation, have been quantified or monitored by the project.

Scores ranging from 1 to 5 are assigned to each project based as per the scoring matrix below:

**Scoring Approach**

		Economic Benefits Quantified		
		None	Single Metric	Multiple Metrics
SDG Metric Quantification	None	1	2	3
	Identified	2	3	4
	Quantified and Monitored	4	5	5

### 4.3.2 Local Stakeholder Engagement

When landfill gas projects are developed, it is important that developers engage with the local community to understand any local context or concerns. Projects with high levels of stakeholder engagement are more likely to avoid harm (and instead positively contribute) to the local community or environment.

MSCI S&C evaluates this through the following sub-criteria:

- **4.3.2.1 Effective Consultation:** How effective is the consultation conducted?
- **4.3.2.2 Representation and Inclusivity:** Has the project ensured proper and inclusive representation of stakeholders?
- **4.3.2.3 Access to Information:** Has the project relayed the relevant information to the stakeholders?
- **4.3.2.4 Feedback and Grievances:** Does the project display effective feedback and grievance redressal mechanisms?
- **4.3.2.5 Worker Relations:** Whether the project provides training and employment opportunities to stakeholders.

Each project is scored on a 1 to 5 scale for each of these sub-criteria and an overall score is reached through a straight average of these five scores. Projects scoring a 5 will represent projects with a detailed stakeholder consultations which are representative of the target users. These stakeholders will be informed on the project and provided with the opportunity to voice their opinions and have an influence on the project.

#### 4.3.2.1 Effective Consultation

Effective consultation relates to whether the project uses effective techniques to engage and consult with stakeholders.

<b>Rationale</b>	Projects that use multiple methods of in-person consultation provide more open and effective channels to engage with stakeholders and receive any feedback.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	Each project is scored on a scale of 1 to 5, where 5 indicates that the project conducts multiple in-person engagements and 1 indicates that very limited in-person stakeholder consultation is performed.					
<b>Scoring Approach</b>	<p>MSCI S&amp;C assesses the types and range of consultation conducted. The types of consultation may include surveys/questionnaires, in-person meetings, signed documents or interview calls.</p> <p>Projects then receive a score from 1 to 5 based on both the type and in-person level:</p> <div style="text-align: center; background-color: #0056b3; color: white; padding: 5px; display: inline-block;"><b>In-person Consultation</b></div>					

		No	Yes
<b>Number of Consultation Activities</b>	0	1	1
	1-2	2	4
	3-5	3	5

### 4.3.2.2 Representation and Inclusivity

Representation and Inclusivity relates to whether the project has ensured that it consults with a representative and inclusive range of stakeholders.

**Rationale**

Projects which consult a greater number of stakeholders tend to have a lower permanence risk as more of the local community are involved in the planning process. This allows more end users to voice their opinions on the project and have greater involvement.

**Key Sources**

Project Documentation    Geospatial    Project Methodology Documentation    Academic Literature    Third-party Data    MSCI Carbon Markets



**Scoring Definition**

Each project is scored on a scale of 1 to 5, where 5 indicates that the project transparently consults with a representative group of stakeholders, including women, while 1 indicates that no information is provided on the which stakeholders were consulted.

MSCI S&C assesses if the number of stakeholders in attendance has been provided. In particular, if the total number of stakeholders and the gender breakdown of attendees is disclosed. This is then scored as shown in the table below.

**Scoring Approach**

		# Stakeholders Consulted		
		Unknown	<50	50+
<b>Transparency of Disclosures</b>	Total, with gender breakdown disclosed	3	4	5
	Total	2	3	4
	None	1	n/a	n/a

### 4.3.2.3 Access to Information

Access to Information refers to whether the project provides transparent information to stakeholders regarding the project’s activities.

**Rationale**

Through providing greater access to information, stakeholders will be informed on the project’s activities and more able to provide feedback to the project to ensure the project meets their needs.

	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
<b>Key Sources</b>	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	Each project is scored on a scale of 1 to 5, where 5 indicates that the project provides very transparent access to information through both documentation and in-person meetings, and 1 indicates that limited access to information is provided to stakeholders.					
<b>Scoring Approach</b>	<p>MSCI S&amp;C assesses whether in-person meetings were conducted to present project information or whether clear documentation is provided.</p> <p>For in-person meetings, projects receive a score of 2 if they have conducted meetings to present information on the projects, and 0 otherwise. For documentation, MSCI S&amp;C assesses if any documentation has been provided to local communities, and projects receive a score of 3 if Project Design Documents and/or pamphlets are provided, and 1 otherwise.</p> <p>The overall scores are based on adding each of these to reach a score from 1 to 5.</p>					

#### 4.3.2.4 Feedback and Grievance

Feedback and Grievance refers to whether the project has procedures in place to receive and act on feedback received from stakeholders.

<b>Rationale</b>	Projects are more likely to satisfy the needs of stakeholders if there is a clear feedback mechanism and projects disclose and take actions as a result of the feedback.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
	<input checked="" type="checkbox"/>					
<b>Scoring Definition</b>	Each project is scored on a scale of 1 to 5, where 5 indicates that the project transparently discloses and acts on stakeholder feedback and has an ongoing feedback mechanism in place, and 1 indicates that no feedback procedure has been disclosed either at the project start or during its operation.					
<b>Scoring Approach</b>	<p>MSCI S&amp;C assesses three aspects of a project's feedback procedure:</p> <ul style="list-style-type: none"> <li>- <b>Feedback Mechanism:</b> Whether the project has a feedback and grievance procedure in place.</li> <li>- <b>Feedback Disclosure:</b> Whether the project transparently discloses any feedback received.</li> </ul>					

- **Feedback Response:** Whether the project has clearly taken action on any feedback received.

Projects receive a score of 3 if they have a feedback mechanism in place, and 1 otherwise. Projects receive a score of 1 if they satisfy the other 2 factors. The overall scores are then based on adding each of these components to reach a score from 1 to 5.

#### 4.3.2.5 Worker Relations

Worker Relations refers to whether the project provides training and/or employment opportunities to stakeholders.

<b>Rationale</b>	Through the provision of training opportunities there may be more benefits to the local community through increased employment opportunities and improved knowledge.					
<b>Key Sources</b>	Project Documentation	Geospatial	Project Methodology Documentation	Academic Literature	Third-party Data	MSCI Carbon Markets
<b>Scoring Definition</b>	Each project is scored as a 1 or a 5, where 5 indicates training opportunities are provided to local stakeholders and 1 indicates there is no mention of training opportunities.					
<b>Scoring Approach</b>	MSCI S&C assesses whether the project will employ and provide training opportunities for local stakeholders.					



## Appendix – Key References

Scharff, Heijo, et al. "The Impact of Landfill Management Approaches on Methane Emissions." *Waste Management & Research: The Journal for a Sustainable Circular Economy*, Oct. 2023, p. 0734242X231200742, <https://doi.org/10.1177/0734242X231200742>.

Ramprasad, C., et al. "Quantification of Landfill Gas Emissions and Energy Production Potential in Tirupati Municipal Solid Waste Disposal Site by LandGEM Mathematical Model." *MethodsX*, vol. 9, Sept. 2022, p. 101869, <https://doi.org/10.1016/j.mex.2022.101869>.

Zeng, Yunmin, et al. "Performance of an Intermediate Soil Cover for Landfill Sites." *Earth and Environmental Science Transactions of the Royal Society of Edinburgh*, vol. 109, no. 3–4, 2018, pp. 429–36, <https://doi.org/10.1017/S175569101800052X>.

Majdinasab, Alireza, et al. "Modelling of Landfill Gas Generation: A Review." *Reviews in Environmental Science and Bio/Technology*, vol. 16, no. 2, 2017, pp. 361–80, <https://doi.org/10.1007/s11157-017-9425-2>.

Bakkaloglu, Semra, et al. "Carbon Isotopic Characterisation and Oxidation of UK Landfill Methane Emissions by Atmospheric Measurements." *Waste Management*, vol. 132, 2021, pp. 162–75, <https://doi.org/10.1016/j.wasman.2021.07.012>.

Chanton, Jeffrey P., et al. "Methane Oxidation in Landfill Cover Soils, Is a 10% Default Value Reasonable?" *Journal of Environmental Quality*, vol. 38, no. 2, 2009, pp. 654–63, <https://doi.org/10.2134/jeq2008.0221>.

Thompson, Shirley, et al. "Building a Better Methane Generation Model: Validating Models with Methane Recovery Rates from 35 Canadian Landfills." *Waste Management*, vol. 29, no. 7, 2009, pp. 2085–91, <https://doi.org/10.1016/j.wasman.2009.02.004>.

Sadasivam, Bala Yamini, and Krishna R. Reddy. "Landfill Methane Oxidation in Soil and Bio-Based Cover Systems: A Review." *Reviews in Environmental Science and Bio/Technology*, vol. 13, no. 1, 2014, pp. 79–107, <https://doi.org/10.1007/s11157-013-9325-z>.

Abushammala, Mohammed F. M., et al. "Methane Oxidation in Landfill Cover Soils: A Review." *Asian Journal of Atmospheric Environment*, vol. 8, no. 1, Mar. 2014, pp. 1–14, <https://doi.org/10.5572/ajae.2014.8.1.001>.

Karidis, Arlene. *What Landfill Operators Should Know About Methane Oxidation*. <https://www.waste360.com/landfill/what-landfill-operators-should-know-about-methane-oxidation>. Accessed 8 Mar. 2024.

Njoku, Prince Obinna, and Joshua Nosa Edokpayi. "Estimation of Landfill Gas Production and Potential Utilization in a South Africa Landfill." *Journal of the Air & Waste Management Association*, vol. 73, no. 1, Jan. 2023, pp. 1–14, <https://doi.org/10.1080/10962247.2022.2072976>.

## Change log

Version #	Date	Key Changes
1.0	01-Dec-2024	Initial publication
1.1	25-Nov-2025	<ul style="list-style-type: none"> <li>- Incorporation of new sub-criteria within additionality related to the financial risks given project size (1.1.1.2.4 Project Size)</li> <li>- Incorporation of new sub-criteria on the access to electricity of the population (4.1.2.1.3)</li> </ul>

## Contact us

### About MSCI Inc.

MSCI (NYSE: MSCI Inc.) strengthens global markets by connecting participants across the financial ecosystem with a common language. Our research-based data, analytics and indexes, supported by advanced technology, set standards for global investors and help our clients understand risks and opportunities so they can make better decisions and unlock innovation. We serve asset managers and owners, private-market sponsors and investors, hedge funds, wealth managers, banks, insurers and corporates.

To learn more, please visit [www.msci.com](http://www.msci.com/msci.com/contact-us)  
[msci.com/contact-us](http://msci.com/contact-us)

The process for submitting a formal index complaint can be found on the index regulation page of MSCI's website at:  
<https://www.msci.com/index-regulation>.

### About MSCI Sustainability and Climate Products and Services

MSCI Sustainability and Climate products and services are provided by MSCI Solutions LLC and certain related entities, and are designed to provide in-depth research, ratings and analysis of environmental, social and governance related business practices to companies worldwide. ESG ratings, data and analysis from MSCI Sustainability and Climate are also used in the construction of MSCI Indexes.

### AMERICA

United States	+ 1 888 588 4567 *
Canada	+ 1 416 687 6270
Brazil	+ 55 11 4040 7830
Mexico	+ 52 81 1253 4020

### EUROPE, MIDDLE EAST & AFRICA

South Africa	+ 27 21 673 0103
Germany	+ 49 69 133 859 00
Switzerland	+ 41 22 817 9777
United Kingdom	+ 44 20 7618 2222
Italy	+ 39 02 5849 0415
France	+ 33 17 6769 810

### ASIA PACIFIC

China	+ 86 21 61326611
Hong Kong	+ 852 2844 9333
India	+ 91 22 6784 9160
Malaysia	1800818185 *
South Korea	+ 82 70 4769 4231
Singapore	+ 65 67011177
Australia	+ 612 9033 9333
Taiwan	008 0112 7513 *
Thailand	0018 0015 6207 7181 *
Japan	+ 81 3 4579 0333
* toll-free	

## Notice and disclaimer

The data, data feeds, databases, reports, text, graphs, charts, images, videos, recordings, models, metrics, analytics, indexes, ratings, scores, cases, estimates, assessments, software, websites, products, services and other information and materials contained herein or delivered in connection with this notice (collectively, the "Information") are copyrighted, trade secrets (when not publicly available), trademarks and proprietary property of MSCI Inc. or its subsidiaries (collectively, "MSCI"), MSCI's licensors, direct or indirect suppliers and authorized sources, and/or any third party contributing to the Information (collectively, with MSCI, the "Information Providers"). All rights in the Information are reserved by MSCI and its Information Providers and user(s) shall not, nor assist others to, challenge or assert any rights in the Information.

Unless you contact MSCI and receive its prior written permission, you must NOT use the Information, directly or indirectly, in whole or in part (i) for commercial purposes, (ii) in a manner that competes with MSCI or impacts its ability to commercialize the Information or its services, (iii) to provide a service to a third party, (iv) to permit a third party to directly or indirectly access, use or resell the Information, (v) to redistribute or resell the Information in any form, (vi) to include the Information in any materials for public dissemination such as fund factsheets, market presentations, prospectuses, and investor information documents (e.g. KIID or KIDs), (vii) to create or as a component of any financial products, whether listed or traded over the counter or on a private placement basis or otherwise, (viii) to create any indexes, ratings or other data products, including in derivative works combined with other indexes or data or as a policy, product or performance benchmarks for active, passive or other financial products, (ix) to populate a database, or (x) to train, use as an input to, or otherwise in connection with any artificial intelligence, machine learning, large language models or similar technologies except as licensed and expressly authorized under MSCI's AI Contracting Supplement at <https://www.msci.com/legal/supplemental-terms-for-client-use-of-artificial-intelligence>.

The intellectual property rights of MSCI and its Information Providers may not be misappropriated or used in a competitive manner through the use of third-party data or financial products linked to the Information, including by using an MSCI index-linked future or option in a competing third-party index to provide an exposure to the underlying MSCI index or by using an MSCI index-linked ETF to create a financial product that provides an exposure to the underlying MSCI index without obtaining a license from MSCI.

The user or recipient of the Information assumes the entire risk of any use it may make, permit or cause to be made of the Information. NONE OF THE INFORMATION PROVIDERS MAKES ANY EXPRESS OR IMPLIED WARRANTIES OR REPRESENTATIONS WITH RESPECT TO THE INFORMATION (OR THE RESULTS TO BE OBTAINED BY THE USE THEREOF), AND TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, EACH INFORMATION PROVIDER EXPRESSLY DISCLAIMS ALL IMPLIED WARRANTIES (INCLUDING ANY IMPLIED WARRANTIES OF ORIGINALITY, ACCURACY, TIMELINESS, SUITABILITY, NON-INFRINGEMENT, COMPLETENESS, MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE) WITH RESPECT TO ANY OF THE INFORMATION. Without limiting any of the foregoing and to the maximum extent permitted by applicable law, in no event shall MSCI or any other Information Provider have any liability arising out of or relating to any of the Information, including for any direct, indirect, special, punitive, consequential (including lost profits) or any other damages, even if notified of the possibility of such damages. The foregoing shall not exclude or limit any liability that may not by applicable law be excluded or limited.

The Information, including index construction, ratings, historical data, or analysis, is not a prediction or guarantee of future performance, and must not be relied upon as such. Past performance is not indicative of future results. The Information may contain back tested data. Back-tested performance based on back-tested data is not actual performance but is hypothetical. There are frequently material differences between back tested performance results and actual results subsequently achieved by any investment strategy. The Information may include "Signals," defined as quantitative attributes or the product of methods or formulas that describe or are derived from calculations using historical data. Signals are inherently backward-looking because of their use of historical data, and they are inherently inaccurate, not intended to predict the future and must not be relied upon as such. The relevance, correlations and accuracy of Signals frequently change materially over time.

The Information may include data relating to indicative prices, evaluated pricing or other information based on estimates or evaluations (collectively, "Evaluations") that are not current and do not reflect real-time traded prices. No evaluation method, including those used by the Information Providers, may consistently generate evaluations or estimates that correspond to actual "traded" prices of any relevant securities or other assets. Evaluations are subject to change at any time without notice and without any duty to update or inform you, may not reflect prices at which actual transactions or collateral calls may occur or have occurred. The market price of securities, financial instruments, and other assets can be determined only if and when executed in the market. There may be no, or may not have been any, secondary trading market for the relevant securities, financial instruments or other assets. Private capital, equity, credit and other assets and their prices may be assessed infrequently, may not be priced on a secondary market, and shall not be relied upon as an explicit or implicit valuation of a particular instrument. Any reliance on fair value estimates and non-market inputs introduces potential biases and subjectivity. Internal Rate of Return metrics are not fully representative without full disclosure of fund cash flows, assumptions, and time horizons.

The Information does not constitute, and must not be relied upon as, investment advice, credit ratings, or proxy advisory or voting services. None of the Information Providers, their products or services, are fiduciaries or make any recommendation, endorsement, or approval of any investment decision or asset allocation. Likewise, the Information does not represent an offer to sell, a solicitation to buy, or an endorsement of any security, financial product, instrument, investment vehicle, or trading strategy, whether or not linked to or in any way based on any MSCI index, rating, subcomponent, or other Information (collectively, "Linked Investments"). The Information should not be relied on and is not a substitute for the skill, judgment and experience of any user when making investment and other business decisions. MSCI is not responsible for any user's compliance with applicable laws and regulations. All Information is impersonal, not tailored to the needs of any person, entity or group of persons, not objectively verifiable in every respect, and may not be based on information that is important to any user.

It is not possible to invest in an index. Exposure to an asset class or trading strategy or other category represented by an index is only available through third party investable instruments (if any) based on that index. MSCI makes no assurance that any Linked Investments will accurately track index performance or provide positive investment returns. Index returns do not represent results of actual trading of investible assets/securities. MSCI maintains and calculates indexes but does not manage assets. The calculation of indexes and index returns may deviate from the stated methodology. Index returns do not reflect payment of any sales charges or fees an investor may pay to purchase securities underlying the index or Linked Investments. The imposition of these fees and charges would cause the performance of a Linked Investment to be different than the MSCI index performance.

Information provided by MSCI Solutions LLC and certain related entities ("MSCI Solutions"), including materials utilized in MSCI sustainability and climate products, have not been submitted to, nor received approval from any regulatory body. MSCI sustainability and climate offerings, research and data are produced by, and ratings are solely the opinion of MSCI Solutions. MSCI India Domestic ESG Ratings are produced by MSCI ESG Ratings and Research Private Limited and offered domestically in India. Other MSCI products and services may utilize information from MSCI Solutions, Barra LLC or other affiliates. More information can be found in the relevant methodologies on [www.msci.com](http://www.msci.com). MSCI Indexes are administered by MSCI Limited (UK) and MSCI Deutschland GmbH. No regulated use of any MSCI private real assets indexes in any jurisdiction is permitted without MSCI's express written authorization. The process for applying for MSCI's express written authorization can be found at: <https://www.msci.com/index-regulation>.

MSCI receives compensation in connection with licensing its indexes and other Information to third parties. MSCI Inc.'s revenue includes fees based on assets in Linked Investments. Information can be found in MSCI Inc.'s company filings on the Investor Relations section of [msci.com](http://msci.com). Issuers mentioned in

MSCI Solutions materials or their affiliates may purchase research or other products or services from one or more MSCI affiliates, manage financial products such as mutual funds or ETFs rated by MSCI Solutions or its affiliates or are based on MSCI Indexes. Constituents of MSCI equity indexes are listed companies, which are included in or excluded from the indexes according to the application of the relevant index methodologies. Constituents in MSCI Inc. equity indexes may include MSCI Inc., clients of MSCI or suppliers to MSCI. MSCI Solutions has taken steps to mitigate potential conflicts of interest and safeguard the integrity and independence of its research and ratings.

MIFID2/MIFIR notice: MSCI Solutions does not distribute or act as an intermediary for financial instruments or structured deposits, nor does it deal on its own account, provide execution services for others or manage client accounts. No MSCI product or service supports, promotes or is intended to support or promote any such activity. MSCI Solutions is an independent provider of sustainability and climate data. All use of indicative prices for carbon credits must comply with any rules specified by MSCI. All transactions in carbon credits must be traded "over-the-counter" (i.e. not on a regulated market, trading venue or platform that performs a similar function to a trading venue) and result in physical delivery of the carbon credits.

You may not remove, alter, or obscure any attribution to MSCI or notices or disclaimers that apply to the Information. MSCI, Barra, RiskMetrics, and other MSCI brands and product names are the trademarks, service marks, or registered trademarks of MSCI or its subsidiaries in the United States and other jurisdictions. The Global Industry Classification Standard (GICS) was developed by and is the exclusive property of MSCI and S&P Dow Jones Indices. "Global Industry Classification Standard (GICS)" is a service mark of MSCI and S&P Dow Jones Indices. Terms such as including, includes, for example, such as and similar terms used herein are without limitation.

MSCI and its Information Providers may use automated technologies and artificial intelligence to help generate content and output incorporated in the Information.

Privacy notice: For information about how MSCI collects and uses personal data, please refer to our Privacy Notice at: <https://www.msci.com/privacy-pledge>. For copyright infringement claims contact us at [dmca@msci.com](mailto:dmca@msci.com). This notice is governed by the laws of the State of New York without regard to conflict of laws principles.