

SUMMARY OF PUBLIC CONSULTATION

VMR0014 Revision to AMS-III.C.: Emission Reductions by Electric and Hybrid Vehicles v1.0

A draft of *VMR0014 Revision to AMS-III.C.: Emission Reductions by Electric and Hybrid Vehicles v1.0* was open for public consultation between April 24, 2025 and May 26, 2025. This document includes a list of all comments received and the developer's response.

GENERAL FEEDBACK

Section 2 Summary Description of the Methodology

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#	Organization	Comment	Developer's Response
1	Coordinator ApS	<p>1) It is excellent to have Electric Mobile Machinery included (EMM) included.</p> <p>2) It is recommended only to allow self-propelled EMMs. To have units without self-propelling opens up for interpretation and all non-mobile units can be included or discussed.</p> <p>3) Please explain why hybrid electric mobile machinery is not included, as it could be with environment benefits.</p> <p>4) Do we need to measure/monitor the number of kilometers for each car or make samples ? and do we need to measure/monitor the number of hours of</p>	<p>1) Thank you for your comment.</p> <p>2) This is already addressed in the definition: EMM must be self-propelled, except when the drive carriage is removed to secure the unit during operation (e.g., mobile cranes at ports.) We propose to retain this definition as it clearly outlines the sole exception.</p> <p>3) Please note that plug-in hybrid EMMs are included. Non-plug-in hybrids are excluded since they do not consume electricity. A revision may be proposed to include them by submitting a Methodology Idea Note following the Methodology Development and Review Process.</p> <p>4) Approach 2 of the methodology permits the use of electricity charged for EMMs, similar to EVs. Monitoring aligns with AMS-III.C and allows for sampling.</p>

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		<p>operation for each EMM or make samples.</p> <p>Could it be sufficient with value from the charger station and make the calculation based on this ? The purpose should be to simplify monitoring and make it even more accurate.</p> <p>5) The sites for EMM could be very different from the classic vehicle project, how will this be reflected in the additionality test ?</p> <p>6) Could the proposal also be integrated in VM0038?</p>	<p>5) The additionality procedure also follows AMS-III.C and can be based on barriers or market penetration (including annual sales).</p> <p>6) This revision applies to AMS-III.C only, not VM0038."</p>

Section 3 Definitions

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2	Anonymous	<p>Definition of electric mobile machinery (page 4): Suggest changing the wording to be consistent with the wording of VMR0004, which is a similar revision that adds mobile machinery to the project scope. In VMR0004, mobile machinery is defined as a "vehicle category consisting of equipment that is not fixed at a specific site but can be moved around either under its own power or with assistance when engineering specifications or logistics dictate.</p>	<p>Thanks for your comment. The definition of EMM is based on the one provided in VMR0004, retaining the concept of self-propelled or assisted where engineering specifications or logistics dictate. We have added specific wording to account for the electric component, which is not included in the definition under VMR0008.</p>

Section 8 Quantification of Estimated GHG Emission Reductions and Removals - Overall Section Feedback

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3	Anonymous	<p>Equations 3, 7, and 8 (pages 7, 10, 11):</p> <p>Suggest providing flexibility in the units for activity data and factors (e.g. fuel consumption, net calorific value, emission factor)</p> <p>Currently, the formulas state that:</p> <ul style="list-style-type: none"> • Fossil fuel data must be collected in weight (kg, or kg/hour) • NCV must be collected in MJ/kg • EFCO2i must be collected in gCO2/MJ <p>This introduces restrictions in terms of how data is collected - some project proponents may find it easier to track fuel consumption in volume (e.g. liters, liters/hour).</p> <p>This also introduces an extra step to project proponents who have access to activity data in "liters" and EFCO2i in "gCO2/liter", which renders the NCV factor irrelevant.</p> <p>Currently, the formulas convert fossil fuel into energy, then into CO2 emissions. (kg --> MJ --> CO2)</p> <p>Proponents who have who have access to activity data in liters and EFCO2i in gCO2/liter could simply convert fossil fuel into CO2 emissions (liters --> CO2), without the need for NCV</p> <p>Equation 8 (page 10, 11):</p>	<p>PPs may collect fuel data in liters and convert it to kilograms using a density factor. NCV can also be reported in other units and converted as needed. We prefer not to revise the equation involving fuel, NCV, and EF_CO2, as it follows IPCC and standard methodologies.</p> <p>Equations define the final units for emission reductions, but monitoring can use different units (e.g., liters, miles, minutes) as long as data is converted for the Monitoring Report.</p> <p>"Service Unit" covers both EVs and EMMs, measured in km for EVs and hours for EMMs.</p>

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		Confirm that variable ""SU"" should be in units of ""hours per mobile machinery""?	