**Name of the stakeholder** submitting this form (individual/organization):

- dock2 klima-consult
- Mr. Martin Stilkenbäumer

**Address and contact details of the individual submitting this form:**

- Address: Am Kolk 6, 21465 Reinbek, Germany
- Telephone number: +4915771425490
- E-mail address: martin.stilkenbaeumer@gmx.de

**Title/Subject (give a short title or specify the subject of your submission):**

AM0028 correct application of IPCC default value

**Please mention whether the submitter of the form is:**

- [ ] Project participant
- [X] Other stakeholder, please specify CDM consultant

**Specify whether you want the letter to be treated as confidential?**

- [ ] To be treated as confidential
- [X] To be publicly available (UNFCCC CDM web site)

**Please choose any of the type(s) below to describe the purpose of this submission.**

- [X] **Type I:**
  - [X] Request for clarification
  - [ ] Revision of existing rules
    - [ ] Standards. Please specify reference
    - [ ] Procedures. Please specify reference
    - [ ] Guidance. Please specify reference
    - [ ] Forms. Please specify reference
    - [X] Others. Please specify reference Approved Methodology AM0028 version 1

- [ ] Type II: Request for Introduction of new rules
- [ ] Type III: Provision of information and suggestions on policy issues

**Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).**

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1. DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.
2. As per the applicable modalities and procedures, the Board may make its response publicly available.
Dear Mr. Sealy,

Honorable members of the CDM Executive Board,

The approved methodology AM0028 demands under certain circumstances the application of an IPCC default value to calculate the baseline emissions in a conservative manner. This is the case in situations when the nitric acid production plant operates outside the pre defined limits for certain operational parameters.

In this context Version 1 of the methodology AM0028 provides a IPCC default value of 4.05 kg N2O/tonne nitric acid to be used for calculation of baseline emissions. However, the exact source of this value is not further mentioned and it is not explained how this value was derived.

Version 2 and all later versions of the methodology AM0028 provides a value of 4.5 kg N2O/tonne nitric acid for application in the same context. Furthermore version 2 provides now a source for this value. In footnote 4 of AM0028 version 2 the value is referenced to:

Pre-publication Draft 2006 IPCC Guidelines accepted by the 21st Session of the IPCC, the conservative IPCC default value of Nitric Acid Plants is based on the default emission factor for low-pressure plants.

The 2006 IPCC Guidelines for National Greenhouse Gas Inventories in its chapter 3 table 3.3 mentions default emission factors for N2O emissions from Nitric Acid plants. The lowest value for nitric acid plants without N2O destruction facilities being 5.0 kg N2O/tonne nitric acid +/- 10%. After taking the uncertainty of 10% conservatively into account the default factor results in 4.5 kg N2O/tonne nitric acid.

As both versions of the methodology AM0028 refer to the same IPCC value and taking into account that version 1 of the methodology mentions no clear source of the value, it should be clarified if it was the intention to use the same value and that it was corrected with version 2 of the methodology.

If it was the intention to use the same value of 4.5 kg N2O/tonne nitric acid for both versions of the methodology please clarify if a project that was registered under AM0028 version 1 could also use the value of 4.5 kg N2O/tonne nitric acid in the above mentioned context.

We are available to further discuss this issue if the EB or the secretariat requires.

Kind regards

Martin Stilkenbäumer
dock2 klima-consult

Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).
### History of document

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Nature of revision</th>
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<td>08 February 2012</td>
<td>Editorial revision.</td>
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<tr>
<td>01.1</td>
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<td>Editorial revision.</td>
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<td>01</td>
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**Decision Class:** Regulatory  
**Document Type:** Form  
**Business Function:** Governance

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**If necessary, list attached files containing relevant information (if any):**

- [replace this bracket with text, the field will expand automatically with size of text]

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**Section below to be filled in by UNFCCC secretariat**

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