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3 June 2004

Mr. Jean-Jacques Becker, Chair  
CDM Methodology Panel  
c/o CDM Secretariate  
UN Framework Convention on Climate Change  
[transmitted via E-mail]

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**RE: Change in HFC-23 Emission Reduction Project Baseline Assumptions (AM-0001)**

Dear Mr. Becker,

I am writing to advise you and your fellow Methodology Panel and Executive Board Members that the DuPont Company has formally submitted to the Emissions Factor Data Base of the Intergovernmental Panel on Climate Change, notice of process efficiency emission reductions achieved for HFC-23 emissions in conjunction with production of HCFC-22. Incorporating this information in the prescribed methodology could considerably reduce the baseline and related emission reductions calculated for HFC-23 emission reduction projects. We are aware that there has been close scrutiny of the potential emission reductions attributable to HFC-23 abatement projects, and felt that you and your colleagues should be aware of this new information as you consider possible action on such projects.

The existing IPCC Good Practices Guidance has a 4% default value for the production of HFC-23 as an emission by-product associated with HCFC-22 production. The DuPont IPCC submission and related 3<sup>rd</sup> party Audit Report, documents cost-effective achievement of an HFC-23 production rate of 1.37% at our Louisville Works plant in the United States, the largest such facility in the World. We believe this constitutes the current state-of-the-art in process efficiency for HCFC-22 production, and should be considered as an appropriate baseline in the calculation of emission reductions for HFC-23 projects proposed under approved methodology AM-0001. This could effectively reduce by up to 2/3 the CO<sub>2</sub>-equivalent emissions calculated for HFC-23 reduction by thermal destruction in such operations. The Methodology Panel and DOEs may conclude that this reflects a more appropriate baseline and therefore more appropriate level of creditable emission reductions.

Additionally, this enhanced process efficiency can also contribute to sustainable development benefits, as it enables such projects to utilize smaller thermal destruction capacity and thereby reduces energy use and secondary waste from the thermal destruction phase of such projects.

I am attaching the information from our IPCC EFDB submission and the related 3<sup>rd</sup> party Audit (by ICF Consulting) for your reference. Should you have any questions regarding this matter please feel free to contact me, or to contact our manager for this initiative, Dr. Mack McFarland. Our E-mail contact details are as follows:

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I expect to be in Bonn for the upcoming CDM EB and UNFCCC meetings and look forward to seeing you there as well.

Sincerely,

[transmitted via E-mail]

Thomas R. Jacob  
Senior Advisor, Global Affairs

att.

cc: CDM Methodology Panel  
CDM Executive Board