Re: Letter with respect to next EB Meeting 66: Strong recommendation to NOT accept the final response of the MP to request AM_REV_0227 concerning the approved methodology ACM0019 N2O abatement from nitric acid production and NOT to approve the proposed revision to the approved methodology ACM0019

Dear Mr. Stilkenbäumer and Mr. von Velsen-Zerweck,

Thank you for your letter received on 21 February 2012, which has been made available to the Chair of the Board.

Your letter has expressed concerns regarding the request for revision AM-REV_0227 that was proposed to methodology ACM0019 “N2O abatement from nitric acid production”.

As you are aware, the Board considered a draft revision of ACM0019 at its recent sixty-sixth meeting and discussed issues brought forth in the revision, including the conceptualization of “negative emission reductions” as applied in the context of using the default baseline/benchmark approach, as well as the idea of imposing a time limit to a proposed “zero accounting” of applicable events during which project emissions may be higher than the default benchmark. The Board did not reach consensus regarding the proposed revision and recommendation of the Meth Panel and therefore the proposed revision was not accepted.

Please be informed that your letter has been brought to the attention of the concerned team working on the analysis of this methodology for consideration in its ongoing work. I would also like to inform you that, in addition to the procedures for requesting revisions to the approved methodologies, the secretariat has developed a commenting system, which is available at https://cdm.unfccc.int/methodologies/PAmethodologies/approved (large scale methodologies and tools) and at https://cdm.unfccc.int/methodologies/SSCmethodologies/approved (small scale methodologies and tools), in order to allow the submission and to consider comments from any stakeholder registered in the UNFCCC CDM website. Comments can therefore be submitted on any of the approved...
methodologies and tools (large scale, small scale and A/R). These comments are then considered as part of the prioritized methodology revision process.

Yours sincerely,

Andrew Howard
Secretary to the CDM Executive Board