

	<p align="center">CDM: FORM FOR SUBMISSION OF A "LETTER TO THE BOARD" (Version 01.2)</p>
<p align="center">This form should be used only by project participants and other stakeholders for submitting a "Letter to the Board" in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i></p>	
<p>Name of the stakeholder¹ submitting this form (individual/organization):</p>	<p>dock2 klima-consult Mr. Martin Stilkenbäumer</p>
<p>Address and contact details of the individual submitting this form:</p>	<p>Address: Am Kolk 6, 21465 Reinbek, Germany Telephone number: +4915771425490 E-mail address: martin.stilkenbaeumer@gmx.de</p>
<p>Title/Subject (give a short title or specify the subject of your submission)</p>	<p>AM0028 correct application of IPCC default value</p>
<p>Please mention whether the submitter of the form is:</p>	<p><input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify CDM consultant</p>
<p>Specify whether you want the letter to be treated as confidential²:</p>	<p><input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)</p>
<p>Please choose any of the type(s) below³ to describe the purpose of this submission.</p>	
<p><input checked="" type="checkbox"/> Type I:</p> <p style="margin-left: 40px;"> <input checked="" type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules </p> <p style="margin-left: 80px;"> <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input checked="" type="checkbox"/> Others. Please specify reference Approved Methodology AM0028 version 1 </p> <p><input type="checkbox"/> Type II: Request for Introduction of new rules</p> <p><input type="checkbox"/> Type III: Provision of information and suggestions on policy issues</p>	
<p>Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).</p>	

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.

³ Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

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[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 version1 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).

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<i>If necessary, list attached files containing relevant information (if any)</i>	<ul style="list-style-type: none">[replace this bracket with text, the field will expand automatically with size of text]
Section below to be filled in by UNFCCC secretariat	
Date when the form was received at UNFCCC secretariat	3 September 2014
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History of document

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
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