



## CALL FOR INPUT

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|--------------------------------------|------------------|
| Name of submitter                    | Nuria Zanzottera |
| Affiliated organization of submitter | Karbon-x         |
| Email of submitter                   | nz@karbon-x.com  |
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### Document reference number and title: (Recommendation from the MEP to SBM020)

#### A6.4 MEP012-A05: Draft mechanism methodology: N2O abatement from nitric acid production (version 01.0)

| Item | Section no.<br>(as indicated in the document) | Paragraph/Table/Figure no.<br>(as indicated in the document) | Comment<br>(including justification for change)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Proposed change<br>(including proposed text)                                                                                                                                                                                                                  |
|------|-----------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | APPLICABILITY                                 | 12 (b) (i)                                                   | The paragraph determines that the secondary or tertiary abatement at the nitric acid production line should have stopped its operation before January 1, 2021. We have knowledge of nitric acid plants which have installed a secondary catalyst in 2020 and that it reduced the N2O emissions during its lifetime until 2023. The average lifetime of secondary catalyst is 3 years. Once the secondary catalyst has been installed there's no reason to remove it, since its operation does not imply an extra cost, on the contrary it results in work to remove it. | Based on the abovementioned, we suggest to replace the paragraph by the following Documented evidence that the secondary catalyst has not been replaced after the due date of its lifetime; and that the due date was prior the approval of this methodology. |
| 2    | APPLICABILITY                                 | 12 (b) (ii)                                                  | The paragraph determines that the secondary or tertiary abatement at the nitric acid production line should have stopped its operation before January 1, 2021. The discontinuation of the project may start after Jan 1, 2021; but prior to the approval of this methodology.                                                                                                                                                                                                                                                                                           | We propose replace the paragraph by the following: "Automatically generated plant recordings are available that demonstrate that a tertiary N2O abatement system has been by-passed continuously prior the approval of this methodology.                      |

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|------|-----------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3    | APPLICABILITY                                 | 12 (c)                                                       | We have knowledge of nitric acid plants which have installed a secondary catalyst in 2020 and that it reduced the N2O emissions during its lifetime until 2023. The average lifetime of secondary catalyst is 3 years. Once the secondary catalyst has been installed there's no reason to remove it, since its operation does not imply an extra cost, on the contrary it results in work to remove it.                                                                                                                                                                                          | Based on the abovementioned we suggest to eliminate the restriction of after 1 January 2021, since could be project activities which have implemented second or tertiary abatement before January 2021. |
| 4    | BASELINE EMISSIONS                            | Table 3                                                      | We propose to split column of Type 1 and 2 in two separates with different values for Type 1 and Type 2; since it should not be the same reference for projects that have never applied an abatement system for those that have. For type 1 we suggest using the values indicated in IPCC2019 Refinement                                                                                                                                                                                                                                                                                          | We propose to split column of Type 1 and 2 in two separates with different values for Type 1 and Type 2. For type 1 we suggest using the values indicated in IPCC2019 Refinement                        |
| 5    | PROJECT EMISSIONS                             | 45 (f)                                                       | We propose to replace the data of N2O or mass flow by the maximum monitored values in case data of N2O or mass flow are not available, independently the time span was less or more than ten days. It is a conservative approach and ACM0019 has this approach. We want to remark that once the secondary catalyst is installed the reactor is not open until the end of gauzes lifetime. The secondary catalyst is not removed if the AMS is not working; and therefore, N2O emissions are still reducing besides the AMS is not working for a period of time regardless the spam of that period | We propose to replace the data of N2O or mass flow by the maximum monitored values in case data of N2O or mass flow are not available, independently the time span was less or more than ten days       |
| 6    | LEAKAGE                                       | 60                                                           | To calculate the leakage an emission source should be identified. Which is the emission source in this equation?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | -                                                                                                                                                                                                       |