



## CALL FOR INPUT

<i>Name of submitter</i>	Juan Pierre
<i>Affiliated organization of submitter</i>	UN Climate Technology Centre and Network (CTCN)
<i>Email of submitter</i>	pierrejuandidier@gmail.com
<i>Date of submission</i>	07/04/2026

**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. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	DEMONSTRATION OF ADDITIONALITY	Section No.: 7.2.2 — Determination of the BAT baseline N2O emission factor Paragraph No.: 38, Table 3, Appendix paragraphs 11-19, Table 6	The four-test conjunctive additionality structure is operationally incoherent in its current form because the lock-in analysis presents four mutually exclusive unresolved options, meaning a project cannot determine its additionality standard at registration. Paragraph 26(b)(iii) disqualifies activities participating in competitive bidding processes, which in SIDS contexts are the primary planning mechanism for all renewable investment ; not evidence of non-additionality but of functioning procurement governance. A SIDS government with a transparent tender framework is penalised while one with ad hoc bilateral arrangements is not, inverting the intended incentive. Paragraph 28's automatic crediting cessation upon new legal requirements creates an uninsurable investment risk that will deter long-term capital commitment in exactly the markets where financing is scarcest. The common practice thresholds in paragraph 33(f) remain entirely unspecified at [x]%, making the methodology operationally unapplicable in its current form, and the geographical pooling of all LDCs and SIDS under paragraph 33(d)(i) systematically penalises early movers by raising their comparative renewable share against the pooled reference area.	Resolve all four additionality tests to operational completeness before adoption. Insert a SIDS/LDC carve-out in paragraph 26(b)(iii) where investment analysis demonstrates financial non-viability without carbon finance notwithstanding procurement method. Replace automatic cessation in paragraph 28 with a triggered 12-month reassessment before crediting terminates. Specify paragraph 33(f) thresholds at a minimum of 30% for non-LDC/SIDS and 50% for LDC/SIDS, with an explicit safe harbour for first-of-kind technologies in SIDS regardless of pooled threshold. Adopt Option 1 for lock-in analysis for all technologies, satisfying geothermal lock-in through the existing section 8.3 project emissions calculation.

**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. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
2	DEMONSTRATION OF ALIGNMENT WITH THE POLICIES	Paragraph 75	Paragraph 75 reduces the entire NDC/LT-LEDS alignment requirement to a single procedural gate — a DNA confirmation letter; with no minimum content standard, no analytical framework, and no re-assessment requirement across the crediting period. A one-line letter stating the DNA has conducted an assessment satisfies paragraph 75 in full regardless of the quality or conclusions of that assessment. This is structurally indefensible for a mechanism whose Paris Agreement legitimacy depends on demonstrating that credited activities do not constrain host Party mitigation ambition. The asymmetry with section 6, which requires four detailed sequential analyses with financial indicators and sensitivity ranges, is particularly striking — the Paris alignment test receives less analytical rigour than the investment analysis. For SIDS, the LT-LEDS caveat of "if it has submitted one" means the long-term alignment test effectively does not exist for most host Parties, and there is no alternative analytical pathway provided. The absence of any temporal dimension means a project validated as NDC-consistent at registration faces no re-assessment if the host Party submits a more ambitious NDC that materially affects the credited sector during the crediting period.	Replace paragraph 75 with a two-tier requirement. At validation, activity participants must submit a substantive alignment analysis demonstrating the activity does not constrain any quantitative NDC target and that claimed reductions will not be required to meet future nationally mandated obligations. The DNA confirmation must respond specifically to this analysis. At each verification, activity participants must confirm no NDC revision, new mitigation policy, or LT-LEDS submission has been issued that affects the alignment determination, with a supplementary assessment triggered where such changes have occurred. For Parties without LT-LEDS, require reference to the implied mitigation trajectory from successive NDC targets with a conservative assumption of increasing ambition consistent with Article 4.3 of the Paris Agreement.