



Making a difference today for a better world tomorrow.

September 15th, 2023

Rachel Mooney, MPP
Senior Associate
Climate Action Reserve
600 Wilshire Blvd. Ste 202
Los Angeles, CA 90017

RE: ClimeCo Comment on China Adipic Acid Production Protocol Public Comment Draft

Dear Rachel,

Thank you for the opportunity to participate and comment on the development of the Reserve's China Adipic Acid Production Protocol. ClimeCo is a global sustainability firm and we are pleased that the Reserve is designing a protocol to help expand the current adipic acid protocol into China and bring high-quality emission avoidance credits to the market. As a leading project developer, we are especially grateful for the Climate Action Reserve's commitment to managing a public and transparent process and prioritizing a high-quality program. ClimeCo has developed these comments in response to the Public Comment Webinar hosted by the Reserve on September 6th, 2023 along with the China Adipic Acid Production Protocol Public Comment Draft.

I. We support the Reserve's commitment to preserving additionality through monitoring regional ETS initiatives, specifically in the Chongqing region however, we believe that there is potential for credit generation over and above the current ETS requirements in that region.

a. Section 3.4.2.1. states, "Only one municipality, Chongqing, covers N2O emissions as part of their system. AAPs with N2O emissions covered in this municipal ETS are not eligible for crediting. It is expected that the national ETS will supersede regional requirements in the future." We believe credits can be generated in the Chongqing region while preserving additionality. N2O emissions that are included in the current Chongqing ETS will not be eligible for crediting, however, emissions over and above the current Chongqing ETS requirements would be eligible for crediting for those above the 90% minimum abatement efficiency as per the CAR protocol. Credit eligibility must be verified with the reserve and confirmed through discussion with plant personnel familiar with the abatement system and providing supporting data that proves additionality.

Sincerely,

ClimeCo LLC

Alison Tyndall
Senior Manager, Industrial Innovations
Cc: Jessica Campbell