



CLIMATE
ACTION
RESERVE

SUMMARY OF COMMENTS & RESPONSES DRAFT CHINA ADIPIC ACID PRODUCTION PROTOCOL VERSION 1.0

One set of comments were received during the public comment period for the Climate Action Reserve (Reserve) draft China Adipic Acid Production Protocol Version 1.0 (CAAPP). Staff from the Reserve have provided responses to all comments received. The public comment period for the draft protocol was August 18, 2023 to September 18, 2023. In addition to the comments below, a number of typographical comments were submitted not listed below, which were likewise considered by the Reserve for the final version.

The comments received are summarized below. The submitted comment letters can be viewed on the Reserve's website at <https://www.climateactionreserve.org/how/protocols/industrial/china-adipic-acid/dev/>

COMMENTS RECEIVED BY:

1. Alison Tyndall (**ClimeCo LLC**)

Section 3.4.2.1 Legal Requirements Test

1. **COMMENT:** We support the Reserve's commitment to preserving additionality through monitoring regional Emission Trading System (ETS) initiatives, specifically in the Chongqing region. However, we believe that there is potential for crediting emission reductions above regional ETS requirements while preserving additionality. **(ClimeCo LLC)**

RESPONSE: Thank you for your comment. After further review of the Chongqing ETS, the Reserve agrees that the Protocol can credit N₂O emission reduction above what is legally required. The regional program covers N₂O as a part of their system but sets a total tCO₂e cap at the company level. As a result, the use of N₂O control technologies is one of several methods for complying with the ETS, likely at control rates below the 90% baseline abatement efficiency set by the Protocol. AAPs in the region will be required to demonstrate the level of abatement used for compliance under the program.

Paragraph 3 of Section 3.4.2 Legal Requirements Test now reads, "Adipic Acid Projects must achieve GHG reductions above and beyond any GHG reductions that would result from compliance with any federal, provincial, or local law or legally binding mandate. As of the Effective Date of this Protocol, the Reserve identified one program that obligates AAPs to abate N₂O emissions in China. Under this Protocol, only emission reductions resulting from N₂O abatement that are in excess of what is required to comply with the program are eligible for crediting (see Section 3.4.2.1)."

Additionally, more information on the Chongqing ETS has been included in Section 3.4.2.1 China Emissions Trading System. The Reserve will continue to monitor national and regional ETS programs and their impact on project eligibility.