

Dear Supervisory Board:

19 June 23

Rivotto is grateful for the opportunity to provide feedback on the Article 6.4 Supervisory Body's Information note on Removal activities under the Article 6.4 mechanism Version 04.0.

Rivotto's Nx25 is a CO2 removal technology based on a breakthrough discovery that creates an atomic transition in carbon during energetic processes to yield oxygen and nitrogen in place of carbon.

As few details about Rivotto's methods, and details about the company itself:

- Rivotto's technology is a naturally occurring process that can be intentionally implemented across energy-producing activities to avoid the creation of CO2 from such activities. It most resembles ocean-based removal, but instead is employed in the atmosphere.
- This technology can provide gigatonne scale CO2 remediation across industrial and transportation sectors. It will preserve jobs, create thousands of *new* jobs in geographies around the world, and will most benefit those nations, societies, and peoples that cannot afford to employ expensive climate technology solutions to meet their needs.
- Rivotto is an early-stage company with a record of success on operational platforms. We estimate our impact if we can scale as anticipated, not including direct air removal capability:

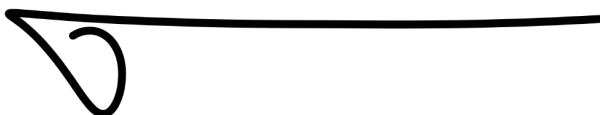
	CO2 Avoidance		
	Low	High	Expected
3 Year Target	132 MTPA	2 GTPA	660 MTPA
10 Year Target	8 GTPA	16 GTPA	10 GTPA
Long Run Target	16 GTPA	25 GTPA	25 GTPA

- Nx25's impact is measurable onsite industrial locations using presently installed, calibrated, and audited equipment that continuously monitors CO2 and GHG emission levels, such as power plants, refineries, desalination plants, cement plants, etc. Levels of CO2 avoidance are calculated comparing ameliorated emission levels against accepted O2 and CO2 ratios in these audited applications. GHGs are also impacted and can be monitored. These applications and those in transportation fuels are to be certified by Gold Standard or another appropriate clearing house.

We find several inconsistencies and problems with the present info note conclusions that would complicate the success of an emerging technology like ours. The info note's conclusions are inconsistent with current IPCC accounting guidance and acknowledgement of the need for gigatonne scale CDR in coming decades. The info note's framing of CDR as either "engineering-based activities" or "land-based activities" is arbitrary and not science-based, and it may exclude definition for technologies like ours. Further, the info note's argument that *engineered CDR solutions* are inconsistent with sustainable development goals for the Global South is arbitrary and does not reflect emerging economic and environmental opportunities presented by emerging CDR solutions. Importantly, our technology is well-suited to deliver actionable solutions to the Global South.

We trust that our response can be of use to the Supervisory Body as it moves forward with its work.

Sincerely,



Steven Shallenberger
CEO, Rivotto