

São Paulo, 22.11.2009

## **Feedback to the US ODS project protocol**

### **To the Working group of the US ODS project protocol**

Dear Sirs and Madams,

First of all, I would like to congratulate you on a comprehensive and well elaborated protocol and I wish the protocol a successful start in the US. In our role as authors of the Swiss Charter approved methodology and project design documents for refrigerator recycling in Brazil, we have been very much exposed to the topic of developing emission reduction schemes where high-GWP GHGs are involved. Our methodology for recycling of refrigerators and freezers in developing countries has been validated according to UNFCCC rules and has successfully passed the double approval process by two DOEs. We therefore might be able to share some interesting aspects from our debate during the validation process as regards ODS-related project protocols.

As regards final discussions on your draft and the stakeholder consultation, I would like to bring up a few technical points that seem to deserve some more attention before finalizing your draft:

- In the protocol, you show detailed data on leakage rates of existing equipment as well as emissions associated to other baseline processes. However, although this might be rather a political question, I did not understand why the protocol moves away from time-consistent comparisons between baseline and project scenario. I am sure this has been a great subject of debate in the working group; however, the 10-year release window chosen for the gas releases in the baseline seems rather arbitrary and might therefore attract criticism because the calculation is certainly not conservative and consistent. It might be recommendable and more appropriate, dependent on the project type, to define an approach where (the same amount of credits) is issued but on a different (fixed and predefined!) time scale according to the actual release of CFCs in the baseline that would have occurred, for example, through leakage in existing equipment. This would still provide a substantial amount of credits in order to provide adequate funding for the ODS destruction activities in the US. Furthermore, well-defined baselines for projects that involve considerable investments as is the case for refrigerator recycling plants, allow for a timely claim of emission reductions within a time-consistent emission reduction determination scheme.
- As regards conservativeness, I would like to raise your attention to the fact that you have chosen the highest GWP values ever published for the ODS. In the same IPCC report you use as a reference, there are lower values stated for the CFCs in a different chapter and in order to be conservative, it would be recommendable to use the (still very high but) lower values such as, for example, 10'600 for CFC-12 and 4'600 for CFC-11.

- By explicitly prescribing only two specific ways of how foam blowing agents can be recovered and destroyed (page 6, chapter 2.3.2), you inhibit the implementation of advanced and new technologies such as on-site CFC destruction solutions. The latter allow for an adequate determination of gas types and gas mass flows when calculating actual emission reductions, provide less sources for process and handling leakage, and can also be more cost-effective solutions compared to the traditional cryogenic or carbon filter based recovery technologies. In any case, I assume the protocol's goal is achieving emission reductions and not protecting individual technological solutions, and as such, there is certainly no need to prescribe the transformation of gaseous CFCs released during foam shredding into liquid form in the protocol.

We wish the working group a fruitful workshop in Washington.  
Best regards,

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