

# Imported Ozone Depleting Substances Project Protocol

## Destruction of Ozone Depleting Substances from Article 5 Countries

UNEP ROAP Public Comment

### Observations:

Section	Page	Protocol Reference	Remarks
The GHG Reduction Project- ODS Refrigerants	5	<p>Eligible ODS under this protocol are limited to those listed under Annex A, Group I of the Montreal Protocol and used in refrigerant applications. With the exception of certain critical uses, these CFCs have been fully phased out of production as of January 1, 2010. The Annex A, Group I CFCs used in refrigeration applications and eligible under this protocol are:</p> <ul style="list-style-type: none"> <li>☐ CFC-11</li> <li>☐ CFC-12</li> <li>☐ CFC-113</li> <li>☐ CFC-114</li> <li>☐ CFC-115</li> </ul>	<p>Protocol ideally should cover other ODS as well. In many countries other ODS quantities were seized, which if not taken for destruction will leak in due course of time leading to GHG emissions increase. Hence protocol may be revised to include these gases as well (under specific conditions so that perverse incentive of additional production could be avoided)</p>
Eligibility Rules- Location	6	<p>For an ODS destruction event to be eligible as a project under this protocol, all ODS must be sourced from Article 5 countries, imported in compliance with EPA rules as defined in 40 CFC 82, and destroyed within the United States or its territories. Project developers seeking to register projects from the domestic destruction of domestically-sourced ODS must use the Reserve's U.S. Ozone Depleting Substances Project Protocol. Projects that destroy ODS outside of the United States and its</p>	<p>Climate change is a global problem, and hence its mitigation should place anywhere where it is possible. In this context protocol should allow destruction of ODS in other countries as well in case other rules/standards given in protocol are followed properly. This will definitely expedite emission reduction. In many countries export of seized ODS stock would take long process of approvals, and hence there is a significant chance of leakage of ODS leading to increased emissions.</p>

		territories are not eligible for registration with the Reserve.	Also in various low income countries, stock of ODS is very small making shipping costs very high and hence non-viability of destruction in US. Instead mobile destruction units required standards should be used (or other cheaper means such as retrofitting of existing cement kilns) for destruction. This will lead to significant savings in emissions.
Regulatory Compliance	8	For projects under this protocol, the regulatory compliance requirement extends particularly to the operation of destruction facilities. Destruction facilities have the potential to contribute to environmental problems beyond ozone depletion and climate change. For example, emissions from destruction facilities may contribute to criteria and/or toxic pollutants. However, compliance with existing EPA regulations greatly reduces or eliminates these pollutants. Accordingly, all destruction facilities must meet the full burden of applicable regulatory requirements during the time over which destruction occurs.	The last para is a repeat of a para above on the same page.
Regulatory Compliance	8	If a verifier finds that a project is in a state of significant non-compliance or non-compliance that is the result of negligence or intent, then CRTs will not be issued for GHG reductions that occurred during the period of non-compliance	Definition of Significant and Non-significant Non-compliance with examples would help in avoiding any conflict with Verifiers during verifications.
Quantifying baseline emissions	14	Equation 5.2	It is not clear how Q_end and Q_seizure shall be monitored. It is imperative to avoid any foul play during the years of seizure before start of destruction process.