



Submitted By: Thales West

Organization: Independent

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This comment was received via email by the VCS Association.

For whom it may concern,

Public comments on:

Methodology for Complete Substitution of Gasoline and its Blends by Ethanol in Commercial Fleets of Flex-fuel Vehicles, Keyassociados and Ecofrotas: [http://www.v-c-s.org/methodology\\_sgbe.html](http://www.v-c-s.org/methodology_sgbe.html)

As far as I'm concern the gasoline vs ethanol prices aren't stable enough so a long-time based project could guarantee its adicionality during its life-time (ethanol could become economically more interesting than gasoline).

Also, there is already a strong pressure by the community/market to organization reduce their carbon footprint and, one way to do that, would be exactly use ethanol in the vehicles (especially in countries where flex-fuel vehicle are, in general, preferred than non flex-fuel ones), that is why I consider this methodology could become a simple instrument to improve profits with no great efforts beyond the ones that would be already taken by simple sustainability strategies and environmental concerns. It does not changes habits nor contribute to clean development (unless it is implemented in countries where flex-fuel vehicles are not used), it also doesn't implicate in significante risks to the project entity and, I'm guessing, the monitoring plan could be easily rigged.