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This comment was received via email by the VCS Association.

Dear VCS representatives,

I had the opportunity to review the methodology about recovery and destruction of ODS from products. The major concern I have regarding the proposed methodology is that the destruction of the ODS is not ensured.

The proposal assumes that all the ODS sent for destruction is completely destroyed, but it does not provide any mean to guarantee it. To address this issue they should monitor the total amount of ODS entering the destruction unit (the amount of ODS could be lower or equal than the amount transported for destruction) and: (a) the amount of ODS that is released to the atmosphere after the destruction (measuring concentration on the stack) or (b) ensuring the destruction unit operated in a range that ensures the destruction of the ODS, this means monitoring temperature, pressure, the operating time of the destruction unit, etc.

Best regards

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