Comments for:
Methodology for "Greenhouse Gas Emission Reductions By Recovering and Destroying Ozone Depleting Substances (ODS) from Products" prepared by: Energy Changes Projekt Entwicklung GmbH and USG Umweltservice GmbH

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Our comment is aimed at the requirement for an unaffiliated laboratory to perform the composition analysis in section III Monitoring Methodology. We are concerned that this requirement might cause delays for project developers based on our experience in Norway. We have our own laboratory for composition analysis of used synthetic refrigerants. We have a GC-MS and a GC-FID, both for identification and quantification of all components in blends of used synthetic refrigerants.

The equipment and calibration gases are expensive (in Norway); the development of the method was time consuming. Are there laboratories in the developing world with the right equipment (not hand-held devices) for identification and quantification of synthetic refrigerants? In Norway, there is no other facility able to test refrigerants the way we do. During our process for accreditation, we had a hard time finding an external laboratory that would be able to carry out the same tests as we do. This process is yet to be proven successful.

Our suggestion is based on the solution we have found with our authorities for controlling the analyses we carry out. Our authorities have assigned a controller which is always present when transport tanks are sent to destruction. The controller takes samples from the tank and analyses them at our laboratory. The controller is present during final weighing of the tank and sealing of the valves. In addition, the controller practices unannounced visits where he chooses received cylinders with used synthetic refrigerants which have been already analyzed by our staff and he performs his own analyses of the same cylinders in order to check the registered results.

Would a similar practice be acceptable for this methodology if there were no external, unaffiliated laboratories available in the host country?