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This comment was received via email by the VCS Association.

To the Secretariat of the VCS organization,

We would first like to congratulate the methodology developers on concluding comprehensive work on ODS-containing wastes. In this regard, we would like to raise the secretariat's attention to the fact that a similar methodology has already passed a double-approval assessment by two DOEs (TÜV Süd and SGS), in accordance with CDM rules, under the voluntary *Swiss Charter* Standard, patronized by Swiss governmental authorities. We would recommend that DOE experts involved in that process should be contacted in order to share some of the information and key learnings they experienced in the interaction with us and the discussions around the validation process - which would be valuable to the VCS methodology, too.

Independent from these experts opinions, we deem necessary to mention that the requirement that “the ODS blowing agent must be extracted from the foam **to a concentrated form prior to destruction** (page 2 applicability; page 16 RAL requirements)” represents an unnecessary technology restriction to cryogenic and/or carbon filter-based technologies. Such restriction would not allow other technologies, such as, for example, direct reactor cracking, combined on-site incineration, or direct catalytic destruction, to be applied under the VCS methodology. However, these technologies are likely to play an important role when it comes to the development of the future project landscape related to ODS destruction methodologies. They feature significant advantages in monitoring via direct online monitoring solutions and a direct linking of waste amounts treated and CFCs recovered and destroyed (without uncontrollable shipments of ODS). Furthermore, such technologies come with additional economic and environmental advantages that are likely to spur their widespread use in association with refrigerator recycling in the next years. Not removing this phrase puts widespread neutral applicability of a VCS methodology at risk.

Last but not least and referring to our comments already shared with the CAR, we would like to point out that the CO₂-equivalents used in the methodology represent the highest GWP values ever published in an IPCC report and other IPCC sources (e.g. same IPCC report but different chapter) state lower values. Using these values might affect the

credibility of the principle of conservativeness we believe to be among the principles on which the VCS is based.

Yours sincerely,

Philipp Bohr

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