



Submitted By: Uwe Hermsdorf

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Country: Germany

This comment was received via email by the VCS Association.

Dear Sir or Madam,

I like to introduce short our company MeWa Recycling Maschinen und Anlagen GmbH (Germany).

Our company is a manufacturer of different kinds of recycling plants. Amongst others we deliver fridge recycling plants to catch and destroy there the hazardeous cooling and blowing agents (ODS) like cfc and hydrocarbons.

Now we had engaged also with the scope of the carbon credits and seen on your homepage that to this topic already exist a VCS methodology elements under development with the title "greenhouse gas emission reduction by recovering and destroying ozone depleting substances (ODS) from products" appr. 2 weeks ago.

There was unlikely not enough time to check all things and calculations in detail to the end of the comment period. But our impression is that here is only described one possible technology to recycle fridges or other insulations with ODS. In the described technology will caught the ODS on the plant and then transport for example in drums to any other place/facility in the world to destruction. But there exist allready today technologies to destroy the ODS direct on the plant (to thin acid or salt water) without the risk of ODS losses during filling and transportation. So it is not obligatory necessary to concentrate the ODS. To measure the mount of destroyed ODS on the plant we had developed a measurement system proposal (pre checked from german TÜV) to measure the quantity of cfc in the raw and in the clean gas. The difference of both is the destroyed mount direct on the plant. Additional to this the plant is continous to check of leak tihtgness to secure that no ODS will lost during operation the plant.

The here described method to check the plant to the "RAL Quality Assurance and Test Specifications" is in our opinion not scientifical clean. In a lot of countries especially in Europe is a discussion to that and the most of them unacknowledged this standard. The reason for this is that the contain of cfc in the fridges or general in insulations is very different and depend from a lot of conditions. By an 1000 unit test to calculate the absolut mount of cfc there can only be a vague estimation. Better is to install there on the critical points of the plant a emmission measurements or a regulary check. On the end it should be a general accepted standard to check the plant efficiency.

I ask friendly on consideration of this thoughts.

kindly regards

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