

Comment to the approved methodology AM0001

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- Possible impacts of such project activities on the supply and demand of HCFC 22.

Methodology of the CDM projects should take into account for the impact of not only GHG emission reductions but also other environmental problems.

As well known, the project to destruct HFC23 creates huge credits because of high GWP (11,700), and that could put the project to produce HCFC22 more profitable than ever. Although developing countries are allowed to produce and consume HCFC22 without any regulation under the Montreal Protocol until 2015, any countries are urged to phase-out ozone depleting substances as early as possible. In this regard, developed countries have responsibility to show good example of phasing out and transfer proper technologies. However, such project activities could give significant advantage of HCFC22 productions and encourage more reliance of HCFC22. Considering greater demand for refrigeration in developing countries, refraining from accelerate usage of more ozone depleting substances in this stage is crucial, and early switching to not-in-kind technologies without using any F gases is inevitable. The project would have adverse effects to those efforts.

Methodology, therefore, should fully take into account for the impact of host countries' HCFC phase-out, which is necessary within next 10 years and avoids adverse effects of other global environment protection.

- Possible Impacts of weak baseline

Baseline of such projects is basically comparison of zero destruction. This additionality criteria seems very weak and it should be more severe. Usually countries like China have plans to expand HCFC22 production. That leads the phenomenon that companies produced more HCFC22 could get more credits from HFC23 destruction projects. It isn't really additional in terms of the environmental integrity, but rather worse concerning accelerating HCFC22 productions that harm ozone layer protection. To avoid wrong incentive of HCFC22 production and make the countries' early shift toward NIK technologies firm, additionality approved here should not be allowed as common methodology. Regulation for early HCFC22 phase-out and also HFC23 destruction in the host countries should be encouraged and support from developed countries apart from CDM projects must be followed. Those efforts should also be taken into account for the baseline.