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To: "cdm-info@unfccc.int" <cdm-info@unfccc.int>
cc:
Subject: FW: Baseline methodology AM0001 "Incineration of HFC 23 waste streams"

With reference to the current possible revision of the baseline methodology AM0001 we would like to give the following comments:

1. Alternative baseline approaches

With reference to the different possibilities to determine the baseline for a CDM HFC 23 project activity we are of the opinion that taking into account existing actual or historical emissions is the most appropriate approach. As the emission factor is set at the lowest monthly actual value during the three years prior to the start of HFC 23 destruction up to a maximum IPCC default value of 4 % or at max 2 % for new plant or plants without historical data possibilities of manipulation to increase the quantity of waste are virtually excluded.

2. Common practises in industry

Although HCFC 22 production plants may be somewhat similar HFC 23 emissions in European plants vary between 2 and 4 %. This is due to the fact as this factor depends on local production conditions, capacity utilization and other plant specific factors. HCFC plants are operated in a way to maximize the production of HCFC 22 and at the same time to minimize the related HFC 23 emissions (values between 2 and 4 %) . In order to completely eliminate the remaining byproduct HFC 23 most of the EU HCFC 22 production units are equipped with additional abatement technologies which enable complete destruction of HFC 23 by incineration.

3. additional aspects

In case that the current baseline methodology would be revised we insist on fact that all CDM HFC 23 projects would have to be treated equally and existing projects to be treated accordingly.