

April 2, 2025

Jordan Wildish  
Offsets and Tribal Grants Unit Supervisor  
Climate Pollution Reduction Program  
Washington State Department of Ecology  
Submitted online via <https://ecology.commentinput.com/?id=Aj7DMGYHa>

**Subject: Comments on proposed Compliance Offset Protocol Ozone Depleting Substances Projects Version 1.0**

Dear Mr. Wildish:

Having served as an approved Offset Project Registry for the Department of Ecology's Climate Pollution Reduction Program Compliance Offset Program since 2023 and for the California Air Resources Board (CARB's) Cap-and-Trade Program Compliance Offset Program since 2012, ACR has significant experience with Compliance Offset Protocols and the Climate Commitment Act Program Rule. ACR has also developed its own methodologies for accounting the GHG emission reductions from the destruction of ozone depleting substances (ODS). We appreciate the opportunity to provide comments on the proposed Compliance Offset Protocol Ozone Depleting Substances Projects Version 1.0, released February 12, 2025, which is adapted from CARB's Ozone Depleting Substances Projects Protocol dated November 14, 2014. ACR supports many of the proposed changes, including expanding eligibility to include the destruction of HCFC-22, adjusting the scope of invalidation to align with the project activities, and other clarifications.

ACR recommends that the Department of Ecology consider aligning with the project emissions accounting in ACR's Destruction of Ozone Depleting Substances and High-GWP Foam version 2.0 published in 2023 (ODS Methodology), which does not include substitute emissions. Substitute emissions were removed from ACR's ODS Methodology for the following reasons:

1. The destruction of ODS is not the determining factor in a user switching to a different refrigerant in new or retrofitted equipment. Substitution of ODS is a result of old equipment reaching end-of-life and newer equipment—equipment that does not or cannot use ODS—replacing it. The user switches to different equipment and a different refrigerant based on factors related to the age of the old equipment, including reduction in energy costs, improved features, better functionality, or other demand drivers.
2. Including substitute emissions would overestimate the project emissions. The current without-project scenario for ODS is “no destruction” due to the high cost of destruction and no legal mandate to do so. ODS can be used to service existing equipment or stored indefinitely in the U.S. and Canada, and both scenarios result in release to the atmosphere. Since voluntary destruction of ODS is not common practice, it can be inferred that ODS recovered from

decommissioned or retrofitted (to use non-ODS refrigerant) equipment will either be reused to recharge other existing equipment or stored. This means, in the without-project scenario, both the recovered ODS and replacement refrigerant will be in existence even after a non-ODS refrigerant replaces the ODS.

For these same reasons, we recommend that the Department of Ecology remove substitute emissions from the proposed Compliance Offset Protocol Ozone Depleting Substances Projects Version 1.0.

Thank you for the opportunity to comment. We look forward to continuing to partner with you throughout the protocol adoption process and would be happy to answer any questions about the quantification concerns expressed above.

Sincerely,



Jessica Bede  
ACR Managing Director