

## Beth Porter

Good morning, I am Beth Porter, B-E-T-H P-O-R-T-E-R speaking on behalf of the Environmental Investigation Agency or EIA. We appreciate this opportunity to submit oral comment on the proposed update to the ODS offsets protocol. EIA is an independent organization working globally to protect the climate, forest, and threatened species. We've undertaken investigations into the illegal trade in ODS and other fluorinated gases such as HFCS and have been closely involved in international and domestic ozone and climate policies with these substances for several decades. We appreciate Washington's efforts to address the refrigerant banks of ODS that are contained in old equipment, foams, and stockpiles. As we know, there is a significant climate mitigation opportunity by curbing these emissions through the improved recovery for reuse, reclamation and destruction of these. However, we do encourage Ecology to not allow credit generation from HCFC-22 at this time. Reuse and reclamation will be key to meeting the servicing needs in the near term, amidst the national phasedown of HFC refrigerants. This is in order to reduce demand for newly produced refrigerants and to afford system operators the time to transition to those sustainable alternatives. We're concerned that creating incentives now for HCFC-22 destruction could pose challenges to bolstering the recovery of these refrigerants in the state. EIA does agree that the appropriate destruction of these substances is a really important aspect of improved life cycle management for refrigerants. As we have expressed in the prior working group on this topic and written comments, there are some challenges with the use of offsets that we see as threatening to undermine the climate gains from these activities. So we urge Ecology to consider how certain controlled substances like R-22 are still being produced as feedstock, even though their production as an end product has been restricted. So we see when a financial incentive for destruction is attached to a substance still in production, there is a risk of creating a reverse incentive. A primary example of this is the clean development mechanism under the Kyoto Protocol, which offered credits for the destruction of HFC-23, a highly potent greenhouse gas and by product of 22 [HCFC-22] production. We saw that this resulted in an increased production of HCFC-22 solely to boost the byproduct for destruction as the credits were more lucrative than the products themselves. Because of this history, these challenges, we encourage Ecology to refrain from allowing credit generation for HCFC-22 destruction at this time. Instead, we urge the state to pursue other methods to support sustainable proper end-of-life management of these potent gases. We've provided some further details outlining these concerns with additional information and some recommendations for the department in our written comment, and very much continue to welcome discussion on this topic and appreciate Ecology and all that you are doing to try to protect our climate and ozone layer from these substances. Thank you so much for the time today.