



**GLOBAL STAKEHOLDER CONSULTATION FORM FOR  
PROPOSED NEW BASELINE AND MONITORING  
METHODOLOGY OR METHODOLOGICAL TOOL  
(version 01.0)**

<i>Name of submitter</i>	MORGAN BOVE
<i>Affiliated organization of submitter (if any)</i>	ALSTERN SPECIALIST PTE LTD
<i>Email of submitter</i>	morgan@alstern-specialist.com
<i>Reference number of proposed new methodology or methodological tool</i>	A6.4-PMM007
<i>Based on an assessment of information in the A6.4-FORM-METH-002 and its application in sections A to C of the submitted draft project design document (A6.4-FORM-AC-020), provide your comments to the proposed new methodology using the tabular format below. Please indicate the sections or issues to which your comments refer to.</i>	
<i>Date received by the secretariat</i>	5 March 2026

#	Section / Para no./ Annex / Figure / Table	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)
---	--	--	---	--

#	Section / Para no./ Annex / Figure / Table	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)
1	<b>Financial Additionality and technical barrier</b>	ge & te	<p>The additionality demonstration would benefit from further clarification in light of current technical and economic practices in the refrigerant sector.</p> <p>Recovery systems such as pneumatic recovery pumps combined with condensing units are already commercially available and used by refrigerant importers. These systems can allow recovery of residual HFCs from ISO tanks from approximately 600-500 kg down to less than 50 kg, meaning that around 450 kg per tank may potentially be recovered under normal operating conditions. Using this technology, the recovered refrigerant remains within AHRI-700 quality specifications and may be reintroduced into the commercial market.</p> <p>From a practical perspective, investment requirements for such recovery systems appear relatively moderate:</p> <ul style="list-style-type: none"> <li>• CAPEX for this advanced Pump skid is in the range of USD 100k;</li> <li>• Operation may require two operators for less than one day per isotank;</li> <li>• Depending on refrigerant value assumptions (e.g., ~USD 6/kg),</li> </ul> <p>Return on investment may occur within a limited number of ISO tanks.</p> <p>These observations suggest that recovery can, under certain circumstances, generate economic value and may not always represent a purely cost-only activity.</p>	<p>The comment relates more to the analytical additionality approach rather than to a specific wording amendment.</p> <p>The additionality assessment should reflect local market conditions, including the existing HFC market value and the technologies available to recover residues from ISO tanks, as these factors influence whether such recovery activities would already be economically viable without carbon finance.</p>

#	Section / Para no./ Annex / Figure / Table	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)
			<p>At the same time, the methodology assumes that there are no viable utilization options for recovered gas and that no revenues exist beyond carbon credits. Additional explanation on how this assumption reflects market practice would help strengthen the additionality assessment.</p> <p><b>Question :</b> On what technical or market evidence is the assumption based that recovered refrigerant from ISO tanks cannot generate revenues or cost savings, despite existing recovery technologies and established refrigerant market value?</p>	
2	Baseline Assumption	ge & te	<p>Further clarification may be helpful regarding the use of a fixed 6% residual loss assumption derived from IPCC guidance. Given that residual quantities in ISO tanks can often be determined through standard operational measurements (e.g., weighbridge or cylinder weighing), it would be useful to understand the rationale for applying a default factor rather than relying on direct measurement where feasible.</p> <p><b>Question :</b> Could the methodology clarify the rationale for applying a fixed 6% residual loss assumption derived from IPCC guidance, given that residual quantities in ISO tanks can be determined through standard operational measurements such as weighbridge-based tank mass balance or recovery cylinder weighing?</p>	Rather than requiring a methodology wording amendment, this could be addressed through a technical approach by considering direct mass measurement of ISO tank residues instead of relying on a fixed default factor.

*(Please add rows as required)*

-----

**Document information**

---

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	23 May 2025	Initial publication of form template.

---

Decision Class: Regulatory  
Document Type: Form  
Business Function: Methodology  
Keywords: A6.4 mechanism, developing methodologies and tools, stakeholder consultation

---