



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

<i>Name of submitter</i>	Ayse Frey
<i>Affiliated organization of submitter (if any)</i>	Energy Changes Projektentwicklung GmbH
<i>Email of submitter</i>	ayse.frey@energy-changes.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>	4 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)
1	2 Scope & 5 Applicability	ge	<p>Destruction Pathway vs Reclamation: Conceptual Considerations</p> <p>The methodology currently focuses on destruction as the principal eligible pathway. Additional discussion on the potential role of reclamation during the transition period could further strengthen the overall rationale.</p> <p>Although the Kigali Amendment supports a progressive transition toward low-GWP refrigerants, this transition is gradual rather than immediate. In many markets, adoption of advanced and natural refrigerants continues to face practical constraints, including:</p> <ul style="list-style-type: none"> • safety considerations related to flammability, • higher retrofit and equipment costs, • availability and compatibility limitations, • established servicing practices and market habits. <p>Under these conditions, HFCs may continue to play a role during the transition period in many developing countries. This context suggests that the treatment pathway for recoverable refrigerants may warrant broader consideration.</p> <p>In practice, recovery of residual gas from ISO tanks can be technically straightforward. More advanced recovery systems are available at costs below 100,000 USD, and relatively simple recovery setups, e.g. basic transfer pumps, are available even at prices as low as 20,000 USD. In the latter case, additional reclamation steps may be necessary due to potential oil contamination.</p> <p>In this context, it may be useful to further explain why carbon finance mechanisms were considered for destruction only, why reclamation is not considered, and how potential interactions with ongoing market demand for HFCs were assessed.</p> <p>In summary, the questions are:</p> <ol style="list-style-type: none"> 1. How does the methodology ensure that HFCs sent for destruction are not effectively replaced by equivalent virgin HFC imports, particularly in 	As this is a conceptual consideration, the proposed change includes the consideration of HFC reclamation as a potential pathway for recovered refrigerants.

#	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)
			countries that are not yet subject to phase-down obligations, or are in the early stages of phase-down? 2. What is the rationale for excluding reclamation as a potential pathway?	

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		