

Ref No. : ID002
Title : Project of Introducing High Efficiency Refrigerator to a Food Industry Cold Storage in Indonesia

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Comment on the page : criterion 7, page 3

Dear Madame, Sir,

Your methodology AM003 vers 1 mentions that the reference refrigerators have various refrigerants and impose that the old refrigerator's refrigerant is not emitted to the atmosphere. In section D criterion 7 on page 3:

"In the case of replacing the existing refrigerator with the project refrigerator, refrigerant used for the existing refrigerator is not released to the air."

Neither of the 2 JCM projects with industrial refrigerators in Indonesia mention what has been done to prevent that the old refrigerant was released.

Furthermore it would be necessary to identify what the old refrigerant has been, because if it was CFC-11 or CFC-12 it is necessary to ascertain that the old refrigerant is destroyed, and Japanese regulation for the destruction of these substances were used (there are no certified CFC destruction facilities in Indonesia)

Or if the old refrigerant was HCFC-22 or HFC-404 whether it has been recycled.

In comparison to the treatment of the old refrigerant, it is rather non-material what happens to the refrigerant in the project case because the small leaks possible don't involve significant volumes and furthermore because of the low GWP. The clause imposing monitoring the new refrigerant's possible release could be an unnecessary burden for the project.

sincerely
Thomas Grammig