

## **Environmental Justice Offsets Working Group – Notes on considered revisions for the ODS protocol**

**September 25, 2024**

Environmental Justice Offsets Working Group members were presented with the six considered revisions to Ecology's adopted Ozone Depleting Substances Protocol and asked to provide their input on potential negative or positive environmental justice impacts, ways to mitigate the negative impacts and ways to increase the positive. Members provided insights on the revisions and, generally, were in favor of the considered changes.

### **General environmental justice concerns of protocol**

- Cumbersome paperwork
- Lack of accessibility for smaller companies to aggregate an economically feasible quantity of ODS to destroy

### **1. Update Global Warming Potentials values from AR4 to AR5**

Environmental justice impact

- One member said they found this change was a positive impact to environmental justice as it aligned the protocol with Ecology rules, was consistent with other registries and made the protocol more conservative in its assumptions about global warming impact of ODS destruction.

### **2. Allow ODS sourced from the federal government**

Environmental justice impacts

- Government procedures can add burdensome paperwork for project developers and could be a barrier for smaller developers.
- There are contaminated federal facilities in the state of Washington. There is potential for communities and workers to be harmed if they are not aware of potential contamination concerns.
- Most of these substances are found in industrial areas and by removing them there will be a benefit to the surrounding communities.
- Methyl bromide, an agrochemical used historically, is not included in this protocol but has health and environmental implications, particularly for rural communities.

General comment on protocol

- Add a clause stating if a legal mandate is put in place for the federal government to destroy their sources of ODS, then Ecology will no longer allow federal sources to be eligible within our protocol.

### **3. Revise substitute emissions factors for refrigerants**

No comments.

#### **4. Restrict invalidation liability**

##### Environmental justice impact

- Three members explicitly stated they are in favor of this change, with one of these members stating that this change makes sense, but it might be worth investigating the facility to ensure it continues to comply with Ecology's guidelines.

##### General comment on protocol

- Methyl bromide, and other substances not being considered for this protocol, leaves the communities where these substances are located (especially rural communities) with health and environmental burdens.

#### **5. Allow credit generation from HCFC-22**

##### Environmental justice impact

- Three working group members were in favor of this change, with one member noting that HCFC-22 is not often used as reclaimed feedstock due to impurity issues.

##### General comment on protocol

- The market ultimately decides whether a substance is worth aggregating and storing. The destruction is not necessarily based on the global warming potential of the substance. If a company figures out how to destroy a lower GWP substance in an economically feasible way that substance could then be considered.

#### **6. Allow credit generation from medical aerosols and unused solvents**

##### Environmental justice impact

- One member was in support saying it would incentivize moving toward more environmentally friendly cleaning and getting rid of some harmful cleaners.