

Interactive comment on “HFC-23 (CHF₃) emission trend response to HCFC-22 (CHClF₂) production and recent HFC-23 emission abatement measures” by B. R. Miller et al.

Anonymous Referee #2

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Paper provides a good analysis of a topic that is currently undergoing considerable discussion, particularly with respect to credits generated by incineration of HFC-23. The thorough analysis of the credits generated from the different CDM projects is important in understanding the reductions in greenhouse gas emissions resulting from the CDM.

I am surprised at the suggested "capacity" of the Venezuelan plant of 10,000 tonnes of HCFC-22 given that a check of the UNEP data base indicates that production of HCFC-22 has never exceeded 2,000 tonnes and that, even if one allows for increased production due to the ceasing of CFC production it would not exceed 7,000 tonnes maximum. This does not have an impact on the quality of the analysis within the

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paper.

Discussion/Conclusions do not appear very well-formed. There has been no analysis within the published paper to justify the statement that "IN THE NEAR FUTURE, the controlling factor determining whether there is resurgence or continued decline in HFC-23 emissions may be the extent to which incineration can keep pace to counteract potential growth in feedstock production." To make such a judgement, factors such as the speed of decline of HCFC-22 dispersive use freeing capacity for feedstock use; whether or not plants with HFC-23 incineration are shifted to produce for feedstock use when dispersive use declines or whether plants without incineration are directed to produce for feedstock. Furthermore, further reductions in HFC-23 could be attained through permitting the CDM or another process such as the Montreal Protocol to put in place projects for those plants that do not have HFC-23 incineration.

Also large increases in HFC-23 emissions could result from changes in the existing CDM during the renewal of projects and if companies consider that that is no financial justification for continuing to operate an incineration facility once the CDM crediting period ends. This financial issue could also result from some trading schemes potentially not accepting HFC-23 credits in future periods.

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