

## Key Differences between Ecology's Ozone Depleting Substances (ODS) Protocol Version 1.0 and CARB's ODS Protocol (November 14, 2014)

- Ecology's ODS Protocol version 1.0 generally aligns with CARB's ODS protocol
- Ecology's version 1.0 protocol allows credit generation from the destruction HCFC-22 as a refrigerant
  - See section 2.2.1 of the Protocol
- Ecology's protocol adopted a 10-year cumulative rate and substitute emissions factor for refrigerant HCFC-22
  - See Appendix B, table B.1
- Ecology's protocol allows the agency to approve the use of alternate cumulative emissions rates and substitute emissions factors, as described below:
  - In order for Ecology to approve the use of alternative values the proposed alternative values must reflect a conservative business-as-usual scenario as defined by WAC 173-446-510(1)(d)(i), and be supported by official published data, industry studies, project level information, or published methodologies in the voluntary or compliance offset market.
  - Alternative values must be based on publicly available information or information that can be made publicly available
  - See Appendix B
- Ecology's protocol revised the global warming potential (GWP) values in this protocol to use figures from the IPCC's Assessment Report 5 (AR5)
  - See Appendix B, table B.1
- Ecology's protocol allows for solvents and medical aerosols to be eligible for destruction so long as they are produced in the US, are unused, and do not fall under precluding federal guidelines. Destruction of these substances uses the same cumulative emissions rates and substitute emissions factors as refrigerant ODS.
  - See section 2.2(d)
- Ecology's protocol allows for ODS material to be sourced from the federal government so long as the ODS meets all protocol requirements. For ODS purchased from a US Defense Logistics Agency auction, this material must meet specific requirements in section 6.2(d). The federal government may not serve as a project developer for ODS projects.
  - See 2.2.1(d)
- Ecology's protocol revised the date in point of origin definition to reflect commencement of the Cap-and-Invest program. For refrigerant ODS stored in a

stockpile more than 24 months prior to acquisition by the Offset Project Operator to be location of the stockpile for all ODS which became part of the stockpile before January 1, 2023.

- See section 6.2(b)
- Ecology's protocol further revised the point of origin determination for HCFC-22 which is stored in a stockpile. The point of origin for HCFC-22 stored in a stockpile as of the date of the adoption of this protocol (July X, 2025) is the location of the stockpile. This change was made so as to not require previously ineligible materials to provide point of origin documentation from before these materials were eligible for credit generation.
  - See section 6.2(b)(3)
- Ecology's protocol explicitly prohibits credit generation from ODS produced for use as feedstocks in the production of other substances, or ODS with a point of origin at a manufacturing facility that produces eligible ODS.
  - See 2.2(c)
- Ecology's protocol clarified that the requirements of WAC 173-446-520(3)(d) and WAC 173-446-520(3)(e) regarding landowner consent to regulation by Ecology do not apply to ODS projects.

## Frequently Asked Questions

Are Ecology approved offset verifiers or verification bodies required to complete a training on Ecology's ODS protocol in order to verify projects through this protocol?

No, because the differences between Ecology's protocol and CARB's protocol are limited, Ecology does not require an additional training for offset verifiers who have already completed a training on CARB's ODS Protocol. Ecology staff are available to provide assistance to verifiers, registries, or developers upon request to answer any questions related to the updated protocol.

Do new ODS projects have to use this protocol?

Yes. This rule goes into effect 30 days after its adoption date. All ODS projects with a commencement date after the effective date of the rule must use the most recent version of the protocol. For ODS projects the commencement date is the earliest date of destruction.

Can in-progress ODS projects voluntarily use the updated version of the protocol?

In some instances, yes. ODS projects may transition to the new protocol if the reporting period extends after the adoption date of the rule. For ODS projects, this means that some portion of the ODS must be destroyed after the adoption date of this rule.