

PUBLIC COMMENT TRANSITION TO ADVANCED FORMULATION BLOWING AGENTS IN FOAM MANUFACTURING AND USE 3.0



Version 3.0 of ACR’s *Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions from the Transition to Advanced Formulation Blowing Agents in Foam Manufacturing and Use* was posted for public comment from November 17, 2021 – December 17, 2021. Public comments and responses are provided via the below table.

Following public consultation, the methodology will be submitted to an expert scientific peer review panel.

1. General

Comment	Commenter	Author Response	Author Changes to Methodology
<p>This pragmatic and warranted change to the FBA methodology is a more realistic view of the blowing agent released into the environment in the foam segments covered by this methodology in 2.1. Voluntarily changing to more costly blowing agents and systems will be further encouraged by the 100% emission factor reduction that will allow for 3 to 5 times more credit revenue to offset as much as 20% of the new low GWP systems cost increases.</p>	<p>Global Chemical Consultants, LLC</p>	<p>As described in the “Summary of Proposed Modifications”, these changes bring the GHG accounting in line with the most recent EPA U.S. Inventory of Greenhouse Gas Emissions 2000-2019 (2021).</p>	<p>None</p>