

Tradewater US – ODS - #11

July 25, 2025

Tradewater, LLC



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A. PROJECT OVERVIEW

A1. PROJECT TITLE

Tradewater US – ODS - #11 (hereinafter referred to as “Project”)

A2. PROJECT TYPE

Ozone Depleting Substances

A3. NON-TECHNICAL EXECUTIVE SUMMARY OF PROJECT

The project activity is the destruction of eligible ODS refrigerant, mainly R-11, for which ownership was transferred to Tradewater for the purpose of destruction. The ODS is sourced from Virginia from a facility owned by DuPont Specialty Products USA.

Under business-as-usual, the refrigerant would have remained in storage until use. In this case, the ODS will eventually vent, through leakage resulting from corrosion of the storage container. The refrigerants included in this project were no longer needed for use, and their risk of venting is thereby mitigated by destruction at Arcwood Environmental, an eligible destruction facility.

The project activity consists of two destruction events where 41,580 lbs of ODS refrigerant are destroyed. It results in 87,275 tCO₂e of emissions reductions.

A4. PROJECT ACTION

Description of Prior Physical Conditions

In the business-as-usual scenario, the ODS refrigerant would have remained in storage until a use can be determined. Under this scenario, the ODS refrigerant will ultimately leak into the atmosphere – either because the containers in which they are held degrade or slowly leak, or the equipment that will ultimately use the refrigerant will suffer from accidental release during handling and transfer.

Description of how the Project will Achieve GHG Reductions

This Project achieves emissions reductions through the destruction of ODS refrigerant instead of allowing the refrigerant to be redeployed into equipment or systems or held in containers at risk of eventual leakage or release. This Project measures the emissions if the ODS were vented under business-as-usual scenario against the emissions prevented by the destruction of the same material. Destruction yields significantly lower net emissions than the business-as-usual scenario.

Description of Project Technologies, Products, Services, and Expected Level of Activity

A large quantity of R-11, the ODS refrigerant included in the project, has been stored in two ISO tanks, at the DuPont Specialty Products USA facility. This refrigerant was stockpiled and was not used.

Upon delivery at Arcwood Environmental, the contents of the ISO tanks are destroyed in the rotary kiln incinerator. A rotary kiln incinerator operates at high temperatures (800°C to 1300°C) in order to ensure complete combustion of waste.

Tradewater anticipates future ODS refrigerant projects for as long as the recovery, reclamation, and eventual leakage of ODS refrigerant remains business as usual.

A5. PROOF OF PROJECT ELIGIBILITY

The project is eligible under the Methodology for the Quantification, Monitoring, Reporting, and Verification of Greenhouse Gas Emissions Reductions and Removals from the Destruction of Ozone Depleting Substances and High-GWP Foam, Version 2.0. Additional eligibility requirements are detailed in Table 2 of the ACR Standard, as well as addressed in Table 2 of this document.

Table 1: Applicability Requirements from the Methodology sections 2 and 3.

Criterion	Requirement	Proof of Project Eligibility
Destruction Facility	For US-based destruction facilities, the ODS must be destroyed at a facility: - with a valid RCRA permit or at a facility that exceeds Montreal Protocol's TEAP standards provided in the Report of the Task Force on Destruction Technologies - that meets all applicable monitoring and operation requirements under CAA and NESHAP standards, as well as all applicable federal, state, and local laws. - With a valid Title V Air permit - For RCRA permitted HWCs , any upsets or exceedances must be managed with an authorized SSMP - Any post-destruction hazardous waste must be managed as required by RCRA	The destruction facility is based out of the US and has a valid RCRA permit and Title V Air permit.
Location	All ODS must be obtained from sources in the United States, Canada, or their territories. All ODS must be	The ODS was sourced at Virginia, United States and destroyed at a RCRA facility located in Ohio, United States.

	destroyed at a RCRA permitted destruction facility in the US or TEAP compliant destruction facilities outside of the US.	
ODS Material	The destruction of the following substances are eligible under the Methodology ODS: - CFC-11 - CFC-12 - CFC-13 - CFC-113 - CFC-114 - CFC-115 - HCFC-22 - HCFC-123 Insulation Foam Sources: - CFC-11 - CFC-12 - CFC-114 - HCFC-22 - HCFC-141b - HCFC-142b - HFC-134a - HFC-245fa - HFC-365mfc Medical Aerosol Sources: - CFC-11 - CFC-12 - CFC-114 - HCFC-22 - HCFC-142b Fire Suppressant Sources: - Halon 1211 - Halon 1301 Solvent Sources: - CFC-11 - CFC-113 - HCFC-123 - HCFC-141b - HCFC-225ca - HCFC-225cb	Mainly CFC-11 was destroyed in this project as shown in the Certificates of Destruction.

Stockpile Limitation	Any refrigerants obtained from a government stockpile or inventory are eligible only if they are not required to be destroyed or converted.	The project does not involve any government stockpile or inventory.
Start Date	Project start date is defined as the date on which the earliest destruction activity of a project commences, documented on a Certificate of Destruction.	The project start date and destruction commencement date are the same date as documented on the included Certificate of Destruction.
Reporting Periods	Reporting period must not exceed 12 consecutive months. Project reporting period begins on the project start date.	Project reporting period begins on the project start date and does not exceed 12 months. This reporting period is provided in the included Monitoring Report.
Crediting Periods	Project crediting period is the same as the reporting period.	The project crediting period is the same as the reporting period as indicated in the Monitoring Report.

Table 2: Applicability Requirements from the ACR Standard version 8.0, Chapter 3 (not already covered in the Methodology)

Criterion	Requirement	Proof of Project Eligibility
Minimum Project Term	The duration of the Minimum Project Term for specific project types is defined in the relevant ACR sector requirements and/or methodology. Project types with no risk of reversal after crediting have no required Minimum Project Term.	There is no risk of reversal for this project, so the minimum project term is not applicable.
Real	ERTs shall only be issued for a GHG emission reduction or removal that has been verified against an approved ACR Methodology to have already occurred. ACR will not credit a projected stream of credits on an ex-ante basis.	The GHG reductions occurred after the ODS refrigerant was destroyed. ERTs will be issued by the ACR after the project is successfully verified against the approved ACR Methodology
Title	The Project Proponent shall provide documentation and attestation of undisputed title to all carbon credits prior to registration. Title to credits shall be clear, unique, and uncontested.	Tradewater, LLC has provided documentation of undisputed title to all carbon credits generated by the project. Title to the credits is clear, unique, and uncontested.

Additional	GHG emission reductions and removals are additional if they exceed those that would have occurred in the absence of the project activity and under business-as-usual scenario.	The project passes the ACR-approved performance standard and regulatory surplus test. There is no mandate for the destruction of ODS CFC refrigerant. In the absence of this project, the ODS would have been vented or leaked into the atmosphere under business-as-usual scenarios. The project sources meet all other requirements of the Methodology.
Regulatory Compliance	Adherence to all national and local laws, regulations, rules, procedures, other legally binding mandates and, where relevant, international conventions and agreements directly related to project activities.	This project maintains regulatory compliance throughout the entirety of the reporting period.
Permanent	For GHG projects with a risk of reversal of GHG emission reductions or removals, Project Proponents shall analyze and mitigate risk, and monitor, report, and compensate for reversals.	There is no risk of reversal of GHG removal enhancements for this project type.
Net of Leakage	ACR requires Project Proponents to address, account for, and mitigate certain types of leakage, according to the relevant sector requirements and methodology conditions. Project Proponents must deduct leakage that reduces the GHG emissions reduction and/or removal benefit of a project in excess of any applicable threshold specified in the methodology.	Leakage is not applicable to this project type.

Independently Validated	ACR requires third-party validation of the GHG Project Plan by an accredited, ACR-approved VVB once during each Crediting Period and prior to issuance of ERTs. Validation can be conducted at the same time and by the same VVB as a full verification; however, the deadline for validation is determined by the methodology being implemented and the project Start Date (see above). Governing documents for validation are the ACR Standard, including sector-specific requirements, the relevant methodology, and the ACR Validation and Verification Standard.	This project is validated and verified by a third-party ACR-approved VVB in accordance with the ACR standard.
Independently Verified	Verification must be conducted by an accredited, ACR-approved VVB prior to any issuance of ERTs and at minimum specified intervals. ACR requires verifiers to provide a reasonable, not limited, level of assurance that the GHG assertion is without material discrepancy. ACR's materiality threshold is $\pm 5\%$.	This project is validated and verified by a third-party ACR-approved VVB in accordance with the ACR standard.
Environmental and Social Impact Assessments	ACR requires that all GHG projects develop and disclose an impact assessment to ensure compliance with environmental and social safeguards best practices. GHG projects must “do no harm” in terms of violating local, national, or international laws or regulations.	The Environmental and Social Impact Assessment for this project is attached as Appendix A to this document.

The United States has established a net zero target by 2050, and the United States Department of State and the United States Executive Office of the President has determined that achieving such a target will require significant emission reductions and removals from non-CO₂ emissions. This project is compatible with and contributes to those net zero objectives.¹

¹ More information can be found here: https://unfccc.int/sites/default/files/resource/US_accessibleLTS2021.pdf

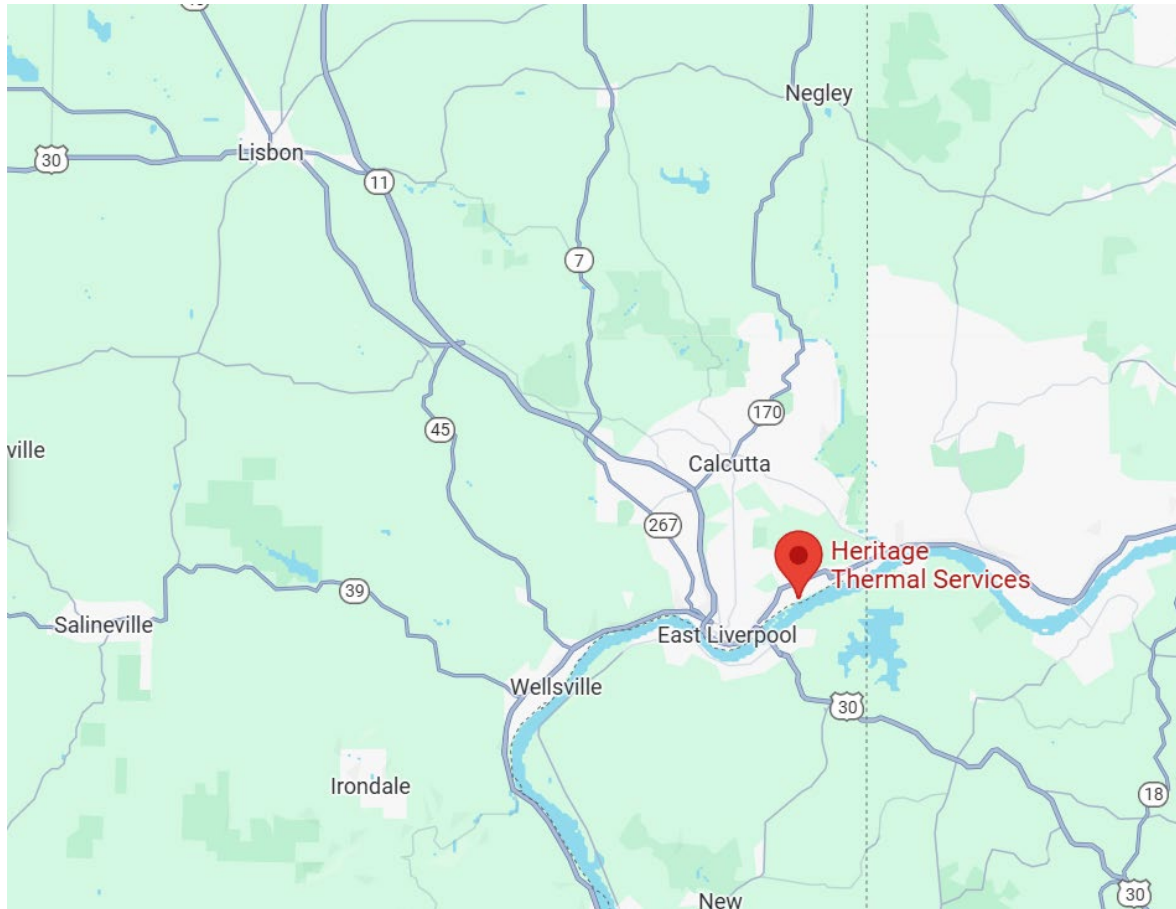
A6. PROJECT LOCATION

All collected ODS refrigerant was destroyed at Arcwood Environmental, located at 1250 St. George St, East Liverpool, Ohio, United States.

GPS Coordinates:

Latitude: 40.63156

Longitude: -80.5465



A7. REGULATORY COMPLIANCE

There is no law, statute, or regulation which requires the destruction of ODS in the United States.

Handling and transport of ODS is regulated through US EPA and the Clean Air Act, as well as US Department of Transportation. The project only utilizes carriers who have a DOT hazmat license.

The destruction facility, Arcwood Environmental, maintains its regulatory compliance with RCRA and other relevant directives.

A8. PARTIES

<i>Table 3: Parties involved in Project</i>				
Entity	Name	Role/Title	Contact Info	Responsibility
Tradewater, LLC	Timothy H. Brown	Chief Executive Officer	1550 W. Carroll, Suite 213 Chicago, IL 60607 312-273-5122 x 1000	Project Proponent – coordination of validation and verification of project
	Gabriel Plotkin	Chief Operating Officer	1550 W. Carroll, Suite 213 Chicago, IL 60607 312-273-5122 x 1004	Project Proponent – coordination of project implementation
Arcwood Environmental	J.T. Higgins	Product Management Coordinator	1250 St. George St East Liverpool, OH 43920 330-386-2145	Destruction Facility

A9. AGGREGATION AND PROGRAMMATIC DEVELOPMENT APPROACH

Not applicable to this project type.

B. METHODOLOGY

B1. APPROVED METHODOLOGY

The Project uses the Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removal from the Destruction of Ozone Depleting Substances and High-GWP Foam Version 2.0 (hereinafter referred to as “Methodology”).

B2. METHODOLOGY JUSTIFICATION

The Project involves the destruction of ODS refrigerant R-11. There is no requirement in the U.S. that CFC refrigerants be destroyed. Because these refrigerants have been phased out and substituted by lower GWP materials, and their production has been banned, their destruction will not trigger any additional CFC refrigerant production.

B3. PROJECT BOUNDARIES

The geographic boundary of the Project is Arcwood Environmental, located at 1250 St. George St, East Liverpool, Ohio, United States. The reporting period is May 9, 2025 to May 18, 2025, which is the same as the crediting period.

B4. IDENTIFICATION OF GHG SOURCES, SINKS, AND RESERVOIRS

Table 4: The Project’s GHG Sources, Sinks and Reservoirs

GHG Source, Sink, or Reservoir (SSR)	Source Description	Gas	Quantification Method
Transport to Destruction Facility	Fossil fuel emissions from the vehicular transport of ODS from aggregation point to final destruction facility.	CO ₂	$Tr\&Dest = (Q_{ODS} \times EF) + (Q_{BA} \times EF) + (Q_{intf} \times EF)$
Destruction	Emissions of ODS from incomplete destruction at destruction facility.	ODS	$Tr\&Dest = (Q_{ODS} \times EF) + (Q_{BA} \times EF) + (Q_{intf} \times EF)$
Destruction	Emissions from the oxidation of carbon contained in destroyed ODS.	CO ₂	$Tr\&Dest = (Q_{ODS} \times EF) + (Q_{BA} \times EF) + (Q_{intf} \times EF)$
Destruction	Fossil fuel emissions from the destruction of ODS at destruction facility.	CO ₂	$Tr\&Dest = (Q_{ODS} \times EF) + (Q_{BA} \times EF) + (Q_{intf} \times EF)$

Destruction	Indirect emissions from the use of grid-delivered electricity.	CO ₂	$Tr\&Dest = (Q_{ODS} \times EF) + (Q_{BA} \times EF) + (Q_{intf} \times EF)$
Recovered ODS Stockpile	Emissions of ODS from recovered ODS stockpiles and EOL equipment (if not sent for destruction)	ODS	$BE_{refr} = \sum_i (Q_{ref,i} \times GWP_i)$

B5. BASELINE SCENARIO

The baseline scenario selected for the project is the eventual leakage of ODS refrigerant, in which the emissions rate is 100%.

There is no law or regulation mandating the destruction of ODS refrigerant, although the CFC refrigerants have been phased out of production and import since January 1, 1994. The refrigerants still in use in the United States were manufactured prior to the ban and are either used in existing equipment or in storage until a use can be found. As many systems are modernized to accept currently manufactured refrigerants (HFCs), there is less of a need for CFC refrigerants. Many sources are looking for an end solution for stockpiled or otherwise obsolete refrigerant, with destruction being one solution.

Further, excess CFCs without a particular use remain in storage where they risk leaking into the atmosphere. The ultimate fate of these refrigerants is release into the atmosphere, either slowly overtime from leaks in equipment or storage, or in accidental venting during routine maintenance of existing systems. Such use and leaks are accounted for in the emissions rates.

B6. WITH-PROJECT SCENARIO

The project scenario is the destruction of eligible CFC refrigerants which would otherwise be stored indefinitely until a use for the refrigerants could be found. With the ban on production of these refrigerants, more and more systems and chillers are being retrofitted or decommissioned and can no longer support the use of these refrigerant types.

B7. GHG EMISSION REDUCTIONS AND REMOVALS

Through this project, greenhouse gas emission reductions are achieved by preventing the inevitable release of the refrigerant ODS into the atmosphere under the baseline scenario—either through leakage from degrading systems and storage, or from accidental venting during routine maintenance. Under the business-as-usual scenario, there is no requirement for ODS refrigerant to be destroyed, so the destruction activities reduces GHG emissions which would otherwise be released. The ODS is destroyed at an eligible destruction facility. These reductions are calculated by subtracting project emissions from baseline emissions.

B8. PERMANENCE

There is no risk of reversal for these project offsets, as once destroyed the associated GHG

reductions are fixed.

C. ADDITIONALITY

C1. BASELINE

The Project uses the performance standard and regulatory surplus test to demonstrate additionality. The offsets generated by the Project yield higher GHG emission reductions than those generated by a business-as-usual scenario.

C2. PERFORMANCE STANDARD

Refrigerant ODS in a business-as-usual scenario is used only when the existing systems are old enough to still process this type of refrigerant. When this is not the case, ODS refrigerant is either stored in their original disposable containers for possible use, recovered and stored in larger containers for possible use, or recovered from existing systems in the process of decommissioning or retrofitting, thereby requiring an end-of-life solution for that material. All ODS sourced for this project came from the United States, not from any government stockpiles or installations for which the refrigerant was required to be destroyed and was destroyed at an eligible destruction facility.

Table 5: ODS and their respective GWPs and Emission Rates

ODS	100-year Global Warming Potential (MT CO ₂ e/MT ODS)	10-Year Cumulative Emission Rate (%/10 years)
CFC-11	4,663	100%
CFC-12	10,239	100%
CFC-13	13,893	100%
CFC-113	5,824	100%
CFC-114	8,592	100%
CFC-115	7,665	100%
HCFC-22	1,764	100%
HCFC-123	79	100%

The GWP for each refrigerant species is above. The GHG emissions generated by the project are significantly less than the business-as-usual scenario for all refrigerant types, and the emissions reductions are greater than those in the baseline scenario.

The ODS sourced for this project, along with the project activities, meet the eligibility requirements:

- This material would otherwise eventually be vented into the atmosphere in the business-as-usual scenario
- The material was destroyed via an eligible destruction facility
- Tradewater has monitored the applicable SSRs within the project boundary

- The emissions have been quantified aligned with Chapter 5 of the Methodology, as indicated in section E.

C3. REGULATORY SURPLUS TEST

In order to pass the regulatory surplus test, a project must not be mandated by existing laws, regulations, statutes, legal rulings, or other regulatory frameworks in effect as of the start date that directly or indirectly affect the credited offsets. CFC refrigerants are regulated under the Clean Air Act, 40 CFR Part 82, Subpart F. Neither these regulations, nor any other existing laws, regulations, statutes, legal rulings, or other regulatory frameworks as of the project start date that require the project activity and its associated GHG emission reductions/removal enhancements. Therefore, the Project passes the Regulatory Surplus test.

C4. COMMON PRACTICE TEST

Not applicable

C5. IMPLEMENTATION BARRIERS TEST

Not applicable

D. GHG MONITORING PLAN

D1. MONITORED DATA AND PARAMETERS

This section only covers monitored data and parameters that are relevant for this project. That is, mass and concentration of ODS or HFC destroyed in enclosed equipment demanufacturing system, and mass of building foam used as source of ODS and high GWP blowing agent are excluded.

Table 6: Monitored Data and Parameters

Data or Parameter Monitored	Legal Requirement Test
Unit of Measurement	N/A
Description	Emissions reductions achieved through this project and methodology must not be required by any existing law or regulation
Data Source	US EPA
Measurement Methodology	N/A
Data Uncertainty	Low
Monitoring Frequency	Once per project
Reporting Procedure	Review of existing laws around ODS refrigerant management
QA/QC Procedure	Regular review of current laws and regulations surrounding ODS refrigerants, particularly CFCs.
Notes	

Data or Parameter Monitored	Mass of ODS mixture in each container
Unit of Measurement	Pounds
Description	The total quantity of ODS refrigerant in a container.
Data Source	Weight tickets taken pre and post destruction for each individual container
Measurement Methodology	Section 5.1 of Methodology
Data Uncertainty	Low
Monitoring Frequency	Once per project
Reporting Procedure	Gross weight of cylinders using calibrated scale, taken before and after destruction
QA/QC Procedure	Scale calibrations performed every two months; CEMS data confirms destruction and weight throughout process
Notes	

Data or Parameter Monitored	Concentration of ODS mixture in each container
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Unit of Measurement	Percent
Description	The distribution of ODS refrigerant in each container (along with any other contaminants, moisture, and HBR)
Data Source	Sample data via lab analysis provided by an AHRI-certified, third-party laboratory.
Measurement Methodology	Appendix C of Methodology
Data Uncertainty	Low
Monitoring Frequency	Once per project
Reporting Procedure	Lab analysis report
QA/QC Procedure	Composition and concentration are analyzed at an AHRI-certified laboratory that is not affiliated with the project proponent using the AHRI Standard 700.
Notes	

Data or Parameter Monitored	$Q_{\text{refr}, i}$
Unit of Measurement	Pounds
Description	The total weight of ODS refrigerant sent for destruction.
Data Source	Weight tickets taken both pre- and post-destruction coupled with lab analysis
Measurement Methodology	Section 5.1 of Methodology
Data Uncertainty	Low
Monitoring Frequency	Once per project
Reporting Procedure	Net weight of cylinders using calibrated scale
QA/QC Procedure	Scale calibrations performed every two months; CEMS data confirms destruction; lab analysis confirms mass percentage and identification of ODS refrigerant
Notes	

Data or Parameter Monitored	Q_{ODS}
Unit of Measurement	Pounds
Description	The total quantity of ODS refrigerant sent for destruction.
Data Source	Weight tickets taken both pre- and post-destruction coupled with lab analysis and quantifications
Measurement Methodology	Section 5.2 of Methodology
Data Uncertainty	Low

Monitoring Frequency	Once per project
Reporting Procedure	Net weight of cylinders using calibrated scale; lab analysis
QA/QC Procedure	Scale calibrations performed every two months; CEMS data confirms destruction; lab analysis confirms mass percentage and identification of ODS refrigerant
Notes	

E. GHG QUANTIFICATION

E1. BASELINE SCENARIO

The baseline emissions are 87,416 tCO₂e. The calculations are delineated in the Appendix of the Monitoring Report.

Total Baseline Emissions:

$$BE_{refr} = \sum_i (Q_{ref,i} \times GWP_i)$$

Where		Units
BE_{refr}	Total quantity of refrigerant project baseline emissions during the reporting period	MT CO ₂ e
$Q_{ref,i}$	Total quantity of refrigerant ODS sent for destruction by the offset project	MT ODS
GWP_i	Global warming potential of ODS	MT CO ₂ e / MT ODS

E2. AFOLU PROJECT INVENTORY

Not applicable

E3. WITH-PROJECT SCENARIO

The project emissions are 141 tCO₂e. The calculations are delineated in the Appendix of the Monitoring Report.

Total Project Emissions:

$$PE_t = Rem_f + Tr\&Dest$$

Where		Units
PE_t	Total quantity of project emissions during the reporting period	MT CO ₂ e
Rem_f	Total GHG emissions from removal of high GWP foam in a non-enclosed equipment de-manufacturing system (This is equal to zero as there are no high GWP foams involved in the project)	MT CO ₂ e
$Tr\&Dest$	Total GHG emissions from transportation and destruction of ODS and high-GWP insulation foam/blowing agents	MT CO ₂ e

For this project, Rem_f is equal to zero as the Project is not involved with removal of high GWP foam.

Project Emissions from Transportation and Destruction Using the Default Emission Factors:

$$Tr\&Dest = (Q_{ODS} \times EF) + (Q_{BA} \times EF) + (Q_{intf} \times EF)$$

Where		Units
$Tr\&Dest$	Total GHG emissions from ODS and high-GWP insulation foam/blowing agent transportation and destruction, as calculated using default emission factors	MT CO ₂ e
Q_{ODS}	Total quantity of refrigerant, medical aerosol, and/or fire suppressant ODS sent for destruction in the project	MT ODS
Q_{BA}	Total quantity of high-GWP blowing agent extracted from insulation foam and sent for destruction in the project (This is equal to zero as there are no high-GWP blowing agents involved in the project)	MT BA
Q_{intf}	Total mass of intact foam with entrained high-GWP blowing agent sent for destruction (This is equal to zero as there are no high-GWP blowing agents involved in the project)	MT
EF	Default emission factor for transportation and destruction of ODS or High-GWP Blowing Agent foam (7.5 for refrigerant, medical aerosol, fire suppressant or extracted blowing agent projects, 7.5 for intact high-GWP foam projects)	MT CO ₂ e/ MT ODS/ MT BA or MT

E4. LEAKAGE

As defined by the ACR Standard V 8.0, leakage is a term that refers to secondary effects where the GHG emission reductions of a project may be negated by shifts in market activity or shifts in materials, infrastructure, or physical assets associated with the project. Projects involving the destruction of CFC refrigerant would not encourage the increase of CFC production. Therefore, for this Methodology, leakage is not applicable.

E5. UNCERTAINTY

N/A

E6. QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC)

QA/QC is performed at multiple stages in the project from point of origin through destruction. Hard copy paperwork including bills of lading, source data, and supplementary documentation are checked by multiple parties to ensure consistency and accuracy against digital entries in Tradewater’s electronic database. Container weights are checked at each stage for accuracy and those numbers are then reviewed by third parties for accuracy. All this is done to ensure that data is accurate and precise at every stage and ensure that emission reduction calculations are accurate.

Tradewater ensures due diligence efforts are performed on the destruction facility by conducting compliance checks prior to destruction.

All documents related to the carbon project undergo a QA/QC process for accuracy. The process revolves around peer review, whereby calculations, reports, and other collateral are reviewed by other staff members prior to being shared with third parties. During the review, documents will be checked for:

- Correctly functioning formulas;
- Correct referencing of data sources;
- Justification of assumptions; and
- Use of most up-to-date protocols, standards, and quantification methodologies.

E7. GHG EMISSION REDUCTIONS AND REMOVALS

The emissions reductions are 87,275 tCO₂e. The project emissions are quantified using the below equation indicated in the Methodology, and further details are available in the Appendix of the Monitoring Report.

$$ER_t = BE_t - PE_t$$

WHERE		UNITS
ER _t	Total quantity of GHG emission reductions during the reporting period	MT CO ₂ e
BE _t	Total quantity of project baseline emissions during the reporting period	MT CO ₂ e
PE _t	Total quantity of project emissions during the reporting period	MT CO ₂ e

E8. EX ANTE CARBON CREDIT PROJECTION

Ex-ante estimation methods are not applicable to this methodology as the emission reductions for the crediting period are equivalent to the emission reductions achieved during the reporting period.

E9. *EX ANTE* ESTIMATION METHODS

Ex-ante estimation methods are not applicable to this methodology as the emission reductions for the crediting period are equivalent to the emission reductions achieved during the reporting period.

F. ENVIRONMENTAL AND SOCIAL IMPACTS

F1. ENVIRONMENTAL AND SOCIAL IMPACT SUMMARY

Environmental and social impacts were assessed via ACR’s Environmental and Social Impact Assessment (ESIA) and independently prior to working on the project. This has been attached as Appendix A. Negative impacts were considered but none were identified.

Positive impacts include promotion of terrestrial and marine biodiversity and ecosystems (item 1A of Appendix A), prevention of air pollution (item 2A of Appendix A), prevention of pollutant discharges to water (item 2B of Appendix A), and the release of hazardous materials (item 2C of Appendix A). Additional details can be found in Appendix A. All other environmental impacts are considered neutral.

Social impacts, such as labour rights, involuntary resettlement, and respect for human rights, are not applicable to this project type and the project does not directly or indirectly affect these topics.

F2. SUSTAINABLE DEVELOPMENT GOALS

The following Sustainable Development Goals (SDGs) are directly contributed to by this project:

SDG 12: Responsible Consumption and Production

SDG 13: Climate Action

The following SDGs are indirectly impacted by the project:

SDG 3: Good Health and Well-being

SDG 6: Clean Water and Sanitation

SDG 14: Life Below Water

SDG 15: Life On Land

The SDG Contribution Report is included under Appendix B. This report explains the SDGs and how the Project directly and indirectly impacts the above listed SDGs.

F3. STAKEHOLDER COMMENTS AND CONSULTATION

The Project did not receive any comments during the public comment period on the ACR website.

G. OWNERSHIP AND TITLE

G1. PROOF OF TITLE

Tradewater, LLC is the Project Proponent. Tradewater possesses the title and rights to all refrigerants destroyed under this Project, which is demonstrated by Refrigerant Purchase Agreements (RPAs) or other similar documentation. As such, the rights and title to all carbon offset credits created by this Project belong to Tradewater, LLC.

G2. CHAIN OF CUSTODY

Chain of custody is not needed in this project because the offsets have not been bought or sold previously, and the Project does not have a forward option contract.

G3. PRIOR APPLICATION

The project proponent has not applied for GHG emission reductions or removal credits for the project through any other GHG emissions trading system or program.

H. PROJECT TIMELINE

H1. START DATE

The project start date is May 9, 2025 -- the date on which the earliest destruction activity of the project commenced. The Project start date determination is consistent with the ACR Standard and Methodology.

H2. PROJECT TIMELINE

Relevant Project Activities	Timeline
Project Listed/Initiation of Project Activities	May 9, 2025
Project Term	N/A
Crediting Period	May 9, 2025 – May 18, 2025
Reporting Period	May 9, 2025 – May 18, 2025
Frequency of Monitoring, Reporting, and Verification	Once per reporting period

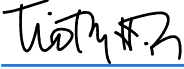
Appendices

List all appendices referenced throughout the GHG Project Plan in the table below, omitting and providing additional rows as needed. Appendices not provided under separate cover must be included within this document. For submission of the final versions of appendices provided under separate cover, provide exact filenames including the correct version and/or date. Where relevant to the project, the appendices marked with an asterisk (*) must be submitted on the ACR Registry, denoted as a GHG Project Plan document type, and maintained as public. All appendices are subject to validation.

Appendix	Document Title	Provided under separate cover? (Yes/No)	Filename <i>if provided under separate cover</i>
A	Environmental and Social Impact Assessment*	No	
B	SDG Contributions Report*	No	

Attestations

The Project Proponent hereby represents and warrants to the American Carbon Registry, its affiliates and supporting organizations, and any assignee of substantially all of the assets comprising the ACR, that all information contained herein and in all appendices is true, correct, and complete to the best of their knowledge, information, and belief and they further agree to notify ACR promptly in the event that the Project Proponent becomes aware that any representation or warranty set forth above or in any appendix submitted under separate cover was not true when made.

Project Proponent Signature:	
Project Proponent Representative Signature	  Timothy Brown (Jul 25, 2025 15:25:04 CDT)
Name	Timothy H. Brown
Title	Chief Executive Officer
Organization	Tradewater, LLC
Date	July 25, 2025

Environmental and Social Impact Assessment

INSTRUCTIONS ACR requires all Project Proponents to prepare and disclose an environmental and social impact assessment per the *ACR Standard*, Chapter 8. To facilitate this requirement, use of this Environmental and Social Impact Assessment template is required. Follow all instructions found within each section and respond as completely and accurately as possible based on project details. If a field is not applicable, respond with “N/A.” The Environmental and Social Impact Assessment may be presented within, or as an appendix to, the GHG Project Plan. If providing as a standalone appendix, the Environmental and Social Impact Assessment must be saved as a PDF prior to uploading to the ACR Registry. Terminology as defined in the *ACR Standard* applies to this document.

THIS VERSION 1.1 OF THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT TEMPLATE IS REQUIRED IF VALIDATION ACTIVITIES COMMENCED AFTER OCTOBER 31, 2024.

SECTION I: GHG PROJECT INFORMATION		
1	Document date	July 25, 2025
2	Project title	Tradewater US - ODS - #11
3	ACR project ID	ACR1173
4	Provide an overview of the project activity. The project activity is the destruction of R-11 ODS refrigerant for which ownership was transferred to Tradewater for the purpose of destruction. The destruction occurred at an eligible destruction facility.	
5	Project location(s) City or county, state, country, and any other relevant identifiers	East Liverpool, OH, United States
6	Provide an overview of the GHG Project’s relevant stakeholders (i.e., individuals or groups that can potentially affect or be affected by the project activities and who may live within or outside the Project area). Stakeholders as defined by the ACR Standard are not applicable to this Methodology.	

SECTION II: ENVIRONMENTAL & SOCIAL RISKS AND IMPACTS

Taking into account the scope and scale of the project activity, provide an assessment of the GHG Project's environmental and social risks and impacts for the project duration for each of the areas below. Categorize each risk/impact as positive, negative, or neutral and substantiate the selected category, noting all defined and defensible assumptions. Responses to 3A-3C and 6C below may be based on company-wide policies, however all other answers must be direct impacts of project activities.

When the GHG Project has a positive impact, describe reasoning in 1.

When the GHG Project poses risks of negative impacts, describe reasoning in 1, how impacts will be avoided, reduced, mitigated or compensated, commensurate with the risk in 2, and detail how risks and negative impacts will be monitored, how often, and by whom in 3.

When the GHG Project has a neutral impact, describe reasoning in 1 or, at minimum, enter "N/A."

1	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES
1A	Terrestrial and Marine Biodiversity and Ecosystems ☒ Positive ☐ Negative ☐ Neutral 1. Describe the reasoning for selection: There is evidence that increased UV rays as a result of deterioration of the ozone has a negative impact on aquatic ecosystems, specifically phytoplankton, and other fauna's reproduction. Therefore, the project indirectly has a net positive effect on aquatic biodiversity as the prevention of ODS entering the atmosphere allows the ozone layer to heal, and ultimately reduce harmful UV rays. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
1B	Habitat of Rare, Threatened, and Endangered Species, Including Areas Needed for Habitat Connectivity ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: There are no impacts to localized habitats that have been identified as a result of the project activity.

	2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
1C	Natural Forests, Grasslands, Wetlands, or High Conservation Value Habitats ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: No impacts to natural forests, grasslands, wetlands, or high conservation value habitats have been identified as a result of the project activity. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
1D	Soil Degradation and Soil Erosion ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: No impacts to soil have been identified as a result of the project activity. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
1E	Water Consumption and Stress ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: Impacts to water consumption have not been identified as a result of this project activity. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A

	3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION
2A	Pollutant Emissions to Air ☒ Positive ☐ Negative ☐ Neutral 1. Describe the reasoning for selection: ODS kept in storage will continue to leak into the atmosphere as the containers are not designed to store the material for long periods of time. By destroying the refrigerant ODS, the negative impact to the ozone layer and the atmosphere is eliminated. Therefore, the net impact is positive. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
2B	Pollutant Discharges to Water, Noise, and Vibration ☒ Positive ☐ Negative ☐ Neutral 1. Describe the reasoning for selection: ODS projects destroy PFAS compounds, which avoids the release of these hazardous chemicals into drinking water sources. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
2C	Generation of Waste and Release of Hazardous Materials, Chemical Pesticides, and Fertilizers ☒ Positive ☐ Negative ☐ Neutral 1. Describe the reasoning for selection: Tradewater ODS projects responsibly collect high GWP refrigerants which are considered hazardous material and hazardous waste due to their harmful environmental impacts, particularly their ability to deplete the ozone layer. Tradewater ODS projects safely destroy these high-GWP refrigerants to prevent further damage to the atmosphere.

	2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
3	LABOR RIGHTS AND WORKING CONDITIONS
3A	Safe And Healthy Working Conditions for Employees ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project activity does not impact working conditions for employees. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
3B	Fair Treatment of All Employees, Avoiding Discrimination, and Ensuring Equal Opportunities ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: The project activity does not contribute to nor work against fair treatment of employees. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
3C	Forced Labor, Child Labor, or Trafficked Persons, and Protections for Contracted Workers Employed by Third Parties ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project type and activity does not impact this item. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A

	3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
4	LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT
4A	Forced Physical and/or Economic Displacement ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project type and activity does not impact this item. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
5	RESPECT FOR HUMAN RIGHTS, STAKEHOLDER ENGAGEMENT
5A	Human Rights and Discrimination ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project type and activity does not impact this item. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
5B	Abidance by the International Bill of Human Rights¹ and Universal Instruments Ratified by the Host Country ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project type and activity does not impact this item. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A

¹ <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

	3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
5C	Consideration and Response to Local Stakeholders' Views ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project type and activity does not impact this item. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
6	GENDER EQUALITY
6A	Equal Opportunities in the Context of Gender ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project type and activity does not impact this item. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
6B	Violence Against Women and Girls ☐ Positive ☐ Negative ☒ Neutral 1. Describe the reasoning for selection: This project type and activity does not impact this item. 2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk: N/A 3. If negative, detail how risks and impacts will be monitored, how often, and by whom: N/A
6C	Equal Pay for Equal Work

☐ Positive ☐ Negative ☒ Neutral

1. Describe the reasoning for selection:
This project type and activity does not impact this item.
2. If negative, describe how adverse impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk:
N/A
3. If negative, detail how risks and impacts will be monitored, how often, and by whom:
N/A

SECTION III: COMMUNITY-BASED PROJECTS

- 1** Community-based projects are those in which project activities engage or otherwise impact one or more communities. A community includes groups of people who live within or adjacent to the project area, including Indigenous peoples and other local communities, as well as any groups that derive income, livelihood, or cultural values from the area.

Is the Project a community-based Project? ☐ Yes ☒ No

- 2** If the project **IS** a community-based project, include a description of the community(ies), stakeholder engagement, and benefit sharing arrangements below.

2A Community and Stakeholder Identification and Consultation

1. Describe the process to identify community(ies) affected by the GHG Project:
N/A
2. Provide detailed information regarding the community stakeholder consultation process undertaken as part of the project design and implementation, including demonstration that the consultations with Indigenous Peoples and local communities were conducted in a manner that is inclusive, culturally appropriate, and respectful of local knowledge:
N/A
3. Provide documentation of meetings held, attendees, and meeting minutes, as well as stakeholder comments and concerns and how those were addressed. These documents can be provided as attachments with file references stated below:
N/A

2B Indigenous Peoples, Local Communities, Cultural Heritage, and Free Prior and Informed Consent

Where the project directly or indirectly impacts Indigenous Peoples and local communities, including livelihoods, ancestral knowledge, and cultural heritage, describe the steps taken to:

	1. Recognize, respect, and promote the protection of the rights of Indigenous Peoples and local communities in line with applicable human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous and Tribal Peoples²: N/A 2. Identify the rights-holders possibly affected (including customary rights of local rights holders): N/A 3. Avoid eviction or any physical or economic displacement, including through access restrictions to lands, territories, or resources: N/A 4. Preserve and protect cultural heritage consistent with Indigenous Peoples and local community(ies) protocols/rules/plans on the management of cultural heritage and/or UNESCO Cultural Heritage Conventions: N/A 5. As applicable, provide evidence of Free, Prior and Informed Consent by describing the process that was conducted to ensure that: consent was sought sufficiently in advance of any project, plan, or action taking place; consent was independently decided upon collectively by the rights-holders without coercion, intimidation, or manipulation; and consent was based on accessible, accurate, timely, and sufficient information provided in a culturally appropriate way: N/A
2C	Relocation or Resettlement 1. Was there/will there be any relocation or resettlement resulting from project design or implementation? N/A a. If yes, describe the circumstances: N/A b. If yes, was the relocation or resettlement a result of voluntary land transaction(s) between the buyer and seller? N/A c. If yes, did the relocation or resettlement change the land use of the affected groups or communities? N/A d. If yes, was relocation or resettlement involuntary (e.g., through eminent domain)? N/A
2D	Robust Benefit Sharing

² https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

1. Describe how a benefit sharing plan (that includes arrangements that are appropriate to the context and consistent with applicable national rules and regulations) was or will be designed and implemented:
N/A
2. Has a draft or final benefit sharing plan been shared with affected communities in a form, manner, and language understandable to them?
N/A
3. Has/will the benefit-sharing outcomes be made public (subject to legal restrictions)?
N/A

2E Negative Impacts and Mitigation Measures

Identify any risks or claims of negative environmental and/or social impacts other than those listed in Part II:

1. Describe the negative impact, risk, or claim:
N/A
2. Describe how any negative impacts will be avoided, reduced, mitigated, or compensated commensurate with the risk:
N/A
3. Detail how negative risks and impacts will be monitored, how often, and by whom:
N/A

Sustainable Development Goals (SDGs) Contribution Report

INDUSTRIAL PROJECTS

This report, as required in the *ACR Standard v8.0*, provides a qualitative assessment of the positive impacts the project is delivering to the United Nations Sustainable Development Goals (SDGs). The identified contributions are based on the standardized *ACR SDG Contributions Reporting Tool*.

ACR Project #: ACR1173

Project Name: Tradewater US – ODS - #11

1. Select the applicable ACR project type from the drop-down menu below. This will auto populate the UN SDG targets to which project implementation is likely to positively contribute, directly or indirectly, as conservatively identified in the ACR SDG Contributions Reporting Tool.
2. If your project positively contributes to any additional SDG targets (i.e., the "conditional" direct and indirect targets identified in the ACR SDG Contributions Reporting Tool), please include those in the extra rows provided for Direct and Indirect impacts.
3. Provide a description of how the project contributes to each of the SDG targets identified.
4. Where the SDG objectives of the host country are relevant and such is feasible, provide information on how the project activity is consistent with the SDG objectives of the host country.
5. Hide any unused rows, save the completed template as a PDF, and upload it to the ACR Registry with the GHG Project Plan.

Project Type: Destruction of Ozone Depleting Substances (ODS) and High-Global Warming Potential (GWP) Foam

DIRECT POSITIVE IMPACT TO SDG TARGETS	DESCRIPTION OF PROJECT'S CONTRIBUTION(S) TO SDG TARGET
SDG 12: Ensure sustainable consumption and production patterns 12.4 By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment	By eliminating harmful CFCs and HCFCs, entities requiring refrigerant for their operations will need to shift to a more sustainable and climate-friendly approach. Consumers will naturally move in the direction of lower impact refrigerants as old systems utilizing CFCs break down or CFC sources become harder to find.
SDG 13: Take urgent action to combat climate change and its impacts 13.2 Integrate climate change measures into national policies, strategies and planning	By eliminating ODS refrigerants through destruction, these high GWP and ozone depleting substances will not be released into the atmosphere, whether through accidental release via maintenance or mishandling, or from storage degradation overtime. The reduction of greenhouse gas emissions is a key step to reach the goals of the Paris Agreement, namely keeping global temperature increase under 2 degrees Celsius above pre- industrial levels.
INDIRECT POSITIVE IMPACT TO SDG TARGETS	DESCRIPTION OF PROJECT'S CONTRIBUTION(S) TO SDG TARGET

SDG 6: Ensure availability and sustainable management of water and sanitation for all 6.3 By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally	Chlorofluorocarbons are in a category of compounds known as per- and polyfluoroalkyl substances (PFAS). PFAS are forever chemicals that have been found in the atmosphere and in drinking water resources, and they cannot be removed by existing water filtration techniques. International ODS projects destroy these PFAS compounds, which avoids the release of these hazardous chemicals into drinking water sources.
SDG 3: Ensure healthy lives and promote well-being for all at all ages 3.9 By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.	Ozone layer depletion increases the amount of ultraviolet B (UVB) radiation that reaches the Earth's surface. UVB causes non-melanoma skin cancer and plays a major role in malignant melanoma development, causes cataracts, and suppresses the immune system. ODS destruction projects developed under this methodology that destroy ODS (i.e., do not only destroy HFCs) may claim this positive indirect SDG contribution.
SDG 14: Conserve and sustainably use the oceans, seas and marine resources for sustainable development 14.1 By 2025, prevent and significantly reduce marine pollution of all kinds, in particular from land-based activities, including marine debris and nutrient pollution	Fluorinated synthetic compounds like chlorofluorocarbons, hydrochlorofluorocarbons, hydrofluorocarbons, and halons are in a category of compounds known as per- and polyfluoroalkyl substances (PFAS). PFAS are forever chemicals that are found in terrestrial and freshwater ecosystems. ODS projects destroy these PFAS compounds, which avoids the release of these hazardous chemicals into terrestrial and freshwater ecosystems.

SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss 15.1 By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements.	Fluorinated synthetic compounds like chlorofluorocarbons, hydrochlorofluorocarbons, hydrofluorocarbons, and halons are in a category of compounds known as per- and polyfluoroalkyl substances (PFAS). PFAS are forever chemicals that are found in terrestrial and freshwater ecosystems. ODS projects destroy these PFAS compounds, which avoids the release of these hazardous chemicals into terrestrial and freshwater ecosystems.
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INFORMATION ON HOW THE PROJECT ACTIVITY IS CONSISTENT WITH THE SDG OBJECTIVES OF THE HOST COUNTRY, WHERE THE SDG OBJECTIVES ARE RELEVANT, AND SUCH IS FEASIBLE.

The United States has already committed to the SDGs laid out by the 2030 Agenda for Sustainable Development, as such the project activity is aligned with the effort and spirit for working toward those goals.

ACR_GHGPP_TWUSODS11_07252025_WApp

Final Audit Report

2025-07-25

Created:	2025-07-25
By:	VL Tradewater (requests.dvl@tradewater.us)
Status:	Signed
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-  Document created by VL Tradewater (requests.dvl@tradewater.us)
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