



EFCTC Views on International Principles for a regime to control HFC Emissions

The Parties to the Montreal Protocol will discuss at the Open-ended Working Group meeting the proposal submitted by Micronesia and Mauritius to include HFCs within the *Montreal Protocol on Substances that deplete the Ozone Layer*, as well as holding a workshop on [“Dialogue on high-global warming potential alternatives to ozone-depleting substances - decision XX/8”](#) on 14th July 2009,

To contribute to this discussion, EFCTC, the European Fluorocarbon Technical Committee, has developed a number of principles in order to achieve the most efficient technical, economic and environmental control of emissions of HFCs.

- **HFCs should be treated on a global basis under an international agreement.**
- **International co-ordination is essential for technology, economic and environmental reasons, whilst noting that some governments are/have already taken independent initiatives: the EU F-gas regulation and directive, Japanese regulation on emissions, specific recovery and recycling regulations, pending USA and Australian legislative proposals.**
- **It is vital that decisions are taken to enable users and producers of HFCs and equipment using HFCs to plan their future strategies around their product portfolios and to adapt their research, development and deployment of new and existing technologies to meet the required changes and timetables determined. Any new controls on HFCs should be supported through appropriate funding for the transition and must be managed in an orderly and cost-effective manner**
- **HFCs are used for their societal benefits and should be considered separately from other GHGs that are mainly byproducts. The objective is not to reverse but build on any existing regulations, e.g. emissions reductions regulations. As such, HFC regulations should be market-based. However, inclusion in a general Emissions Trading Scheme is not appropriate.**
- **HFCs should remain within the “basket” of greenhouse gases within the Kyoto Protocol and within any post-2012 global agreement to combat climate change. However, within a post-2012 climate change agreement, a separate implementation agreement could be developed for HFCs.**
- **Expertise gained from the Montreal Protocol application for CFCs and HCFCs could be used to implement commitments on HFCs agreed under the Kyoto Protocol or succeeding agreement.**



Rationale

- HFCs are intentionally produced for of a wide variety of applications valued by society whereas most other GHGs controlled under the Kyoto Protocol are waste gases
- Control of emissions of HFCs is the critical factor for impact on the environment. The Kyoto Protocol has a reporting structure for the measurement of HFC emissions and has led to actions in Annex I Parties
- An international regime for HFCs could offer a straightforward post-2012 implementation provision and provide a platform that can be further modified and strengthened
- Growth in HFCs use is connected with the phase out of CFCs and HCFCs under the Montreal Protocol – a coordinated effort between the Montreal Protocol and UNFCCC makes sense

The Use of Emissions Trading Schemes for HFCs

- HFCs contribute to cost effective energy efficiency and energy efficiency is critical to meeting CO₂ emissions reductions goals
- Placing intentionally produced HFCs into emission trading schemes in a “basket with other GHGs” could distort the schemes and could lead to disruption to HFC users and unintended consequences for safety and energy efficiency.
- HFCs contribute to public safety in large commercial refrigeration systems
- As a basis to control HFC emissions, some governments are discussing a mandatory cap and reduction scheme with assigned allocations. Should such a scheme be adopted, elements should include:
 - i. at a minimum, consistency with schedule for CO₂ and a phase-down, not a phase-out
 - ii. a total HFC GWP weighted basis
 - iii. encouragement for improved refrigerant containment and recovery/recycling practices, development of lower climate impacting technologies and allowing orderly transition to them avoiding unjustified product or application bans
 - iv. a fair, equitable allocation scheme
 - v. predictability to industry for planning and to avoid early retirement of equipment
 - vi. regulatory coordination to ensure no interference with ODS phase-out