



EFCTC position on North American proposal to phase down fluorocarbons under Montreal Protocol

EFCTC supports the concept of the proposal from USA/Canada/Mexico as detailed in <http://www.state.gov/r/pa/prs/ps/2009/sept/129220.htm>; however there is considerable detail that requires further analysis.

The production/consumption allows a "upper limit" which sets the level of ambition. The current EU climate change negotiating positions are tighter than the proposal within the US/Canada/Mexico proposal and would permit the EU to achieve its own level of ambition. The proposal has global coverage and should reflect the needs of individual Parties.

The proposal recognises the primacy of UNFCCC and its role in developing a policies and measures to control emissions of greenhouse gases under a new agreement in Copenhagen in December 2009. The proposal details a methodology that could assist countries in meeting their commitments under a new climate change agreement.

In order to achieve an international agreement around this proposal, EFCTC considers that:

- It is important to focus on a consumption cap, which determines use leading to reduced emissions. A production cap determines where the substance is produced. On this basis a production cap is not necessary, but if a production cap is to be considered then it is better to include HCFCs alongside HFCs in any baseline;
- Emissions of HFCs are already controlled in the EU under the F-gas regulation and MAC Directive;
- The proposal includes products that have global warming potentials of less than the GWP of, for example hydrocarbons - agreement on a threshold GWP, such as in the EU of >150, may be more appropriate, below which only the monitoring of production and consumption levels should be required;
- HFC-23 emissions should be reduced through regulatory requirements or other measures. Some emission reductions are being undertaken as a result of the CDM, which fall under the Kyoto Protocol. Reforms in the CDM process will be discussed in Copenhagen and it is important to ensure that any initiatives to reduce HFC 23 emissions under the Montreal Protocol are coordinated with the Copenhagen process and do not interfere with the emissions reductions that are being currently being undertaken.