



## **EFCTC position**

Brussels, 31 October 2012

### **HFC Producers support action under the Montreal Protocol for a consumption cap and reduction of HFCs**

The European Fluorocarbons Technical Committee (EFCTC), a sector group of the European Chemical Industry Council (CEFIC), would like to take the opportunity to encourage Parties to the Montreal Protocol to move forward with a constructive dialogue to achieve an agreement for a global cap and reduction for HFC consumption on a GWP-weighted basis.

We recognise the important role played by the Montreal Protocol in successfully controlling consumption of CFCs and HCFCs and acknowledge that this could provide the necessary expertise to effectively implement a similar system for HFCs. We believe that including provisions of controlling the placing on the market of HFCs under the Montreal Protocol would complement and strengthen the HFC emissions provisions of the UNFCCC and its Kyoto Protocol.

It is estimated that the overall global warming impact of HFC emissions worldwide currently represents less than 2% of the total global greenhouse gases emissions. While HFCs are the preferred solution for many societal needs because of their safety and performance advantages, without action the demand for HFCs will grow due to the replacement of HCFCs as well as the increasing demand for refrigeration and air conditioning, especially in developing countries. Such growth would result in HFCs becoming a more significant potential source of emissions in the future.

Encouraging progress is being made by HFC producers to find low GWP alternatives for a range of applications including aerosols, mobile air-conditioning, insulating foams and commercial refrigeration. Already an alternative fluid has been developed for mobile air-conditioning; it has a GWP of about 4 compared to a GWP of 1430 for the HFC currently being used. A clear long-term regulatory framework and time frame is needed for research and development to progress at the necessary speed and for manufacturers of equipment and products to undertake the necessary programs to adopt these and other lower GWP alternatives.

The proposals submitted by North America and Micronesia for a cap and reduction of HFC consumption on a GWP-weighted basis, in our opinion form a good initial framework for a dialogue, recognizing that any final agreement needs to be realistic, balanced, flexible and fair, meeting the needs of Parties, and taking into account

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industrial planning timescales and the capacity of industry to invest in new lower GWP products and applications.

EFCTC is encouraged by the declaration in 2010 from the 22<sup>nd</sup> Meeting of the Parties in Bangkok signed by 90 parties, including many developing nations, and the Bali Declaration, from the 23<sup>rd</sup> meeting, identifying low GWP technologies as a replacement for ODSs. Indeed, developing nations have a unique opportunity to “leap-frog” to new alternatives that were not available to the industrialised nations when they were eliminating ODSs, whilst having HFCs available to use where appropriate. The proposals for a cap and phase-down of high GWP HFCs would seem to fit well in the context of these declarations and would result in a measurable and meaningful reduction of the banks of high GWP fluids over time. Some developing nations, however, have expressed concerns on engaging in legally binding commitments at the present stage. We recommend that the OEWG considers if it is appropriate to amend the proposals, submitted by North America and Micronesia, in such a way that developing nations commit to take on legally binding reduction targets by 2020 based upon the experiences gained during the transition to low GWP technologies.

We consider that any final agreement should focus on consumption, which determines use leading to reduced emissions. On this basis, legislative control of production is not necessary as the consumption cap will maintain the required high level of environmental ambition. Furthermore, there should also be a requirement for production reporting from 2015.

We believe that this approach will allow HFCs to be used for their safety and performance where appropriate, encourage innovation for the use of lower GWP alternatives and applications, but without significant disruption to the industries that use HFCs.

We look forward to a constructive dialogue at the 32<sup>nd</sup> meeting of the Parties to the Montreal Protocol in Geneva, November 12<sup>th</sup> – 16<sup>th</sup>, 2012.

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