



The Alliance
for Responsible Atmospheric Policy

April 16, 2015

Manager
Ozone Layer Protection and Export Controls
Chemical Production Division
Environment Canada
Place Vincent Massay
351 Boulevard Saint Joseph, 11th Floor
Gatineau, Quebec
K1A 0H3
Email: OzoneProtectionPrograms@ec.gc.ca

Re: Addendum to Consultation Document on
Proposed Regulatory Measures on
Hydrofluorocarbons

Dear Sir or Madam:

I am writing on behalf of the Alliance for Responsible Atmospheric Policy (“Alliance”) to provide comments regarding the Addendum to the Consultation Document on Proposed Regulatory Measures on Hydrofluorocarbons issued by the Minister of the Environment on March 19, 2015.

The Alliance is an industry coalition organized in 1980 to address the issue of stratospheric ozone depletion. It is the leading voice of manufacturers, businesses and trade associations which make or use fluorinated gases for the global market. Today, Alliance member companies are leading the development of safe, efficient, next generation, climate- and ozone-friendly technologies and applications. The Alliance represents more than 100 companies across several sectors engaged in the development of economically and environmentally beneficial international and domestic policies regarding fluorinated gases. Many of our members are active in the Canadian market. A list of Alliance member companies is attached, some of whom may also submit additional written comments.

The Alliance has appreciated the opportunity to participate in the stakeholder consultation process carried out by Environment Canada. The Department’s willingness to conduct industry-government stakeholder conversations has been notable and will hopefully result in a more environmentally and economically complementary policy.

As we expressed in our comments submitted in January, an effective means of reducing the future climate change contribution of HFCs must be global in nature. To this end, it is preferred that Environment Canada allows Montreal Protocol negotiations of an HFC amendment to play out. However, if Canada does move forward on this issue prior to resolution through the Montreal Protocol, the Alliance believes the cap and reduction approach consistent with projected technology availability provides the best approach for cost effective action.

The Alliance supports the use of a phase-down schedule which reflects actual technology availability or development and accounts for the need to service the existing equipment base. That schedule must provide space for those sectors without readily available alternatives to continue to meet the demands of consumers until those alternatives are developed.

The schedule should also recognize the impact of building codes and safety standards when addressing the deployment of alternatives to high-global warming potential (GWP) HFCs. Existing code and standards restrictions could pose challenges to companies attempting to move towards lower-GWP alternatives, while meeting the demand for their products from Canadian consumers.

The Alliance believes that periodic technology reviews should be used to evaluate the achievability of future targets and guide the phasedown efforts. Such reviews could lead to more or less stringent reductions. Montreal Protocol process and institutions, including the Technology and Economic Assessment Panel (TEAP), provide the best opportunity for fair consideration of technical and economic issues.

The Alliance encourages the use of policies which support the successful completion of the global effort to phase out ozone-depleting substances. The Alliance also supports policies, such as those encouraging proper refrigerant management servicing practices, which facilitate the successful implementation of a global HFC phase-down.

In sum, the Alliance believes that a global cap and phasedown is preferable to sub-global HFC policies. However, if Environment Canada moves forward with a country-level phasedown of HFCs, the considerations outlined above should provide a policy which maximizes environmental benefits and market stability.

The Alliance welcomes the opportunity to consult directly with Environment Canada to answer questions of planning and implementation and to ensure that the phasedown component of the proposed domestic actions on HFCs is consistent with efforts in the Montreal Protocol to achieve such a phasedown. We are ready to work to ensure the avoidance of the rapid global growth scenarios in the use of HFCs, and to promote the development and implementation of substitute technologies that allow for a manageable transition around the globe.

April 16, 2015
Page 3

The Alliance thanks Environment Canada for providing an opportunity to comment and looks forward to continued collaboration to address HFCs. If you have any questions, please feel free to reach me at fay@alliancepolicy.org or +1(703)243-0344.

Sincerely,

A handwritten signature in black ink, appearing to read 'KF' followed by a stylized flourish.

Kevin Fay
Executive Director
Alliance for Responsible Atmospheric Policy