



# **The Alliance**

*for Responsible Atmospheric Policy*

## **Energy Efficiency in the Montreal Protocol Process**

- It is important that the Montreal Protocol, via the Kigali amendment, acknowledges the importance of energy efficiency as the HCFC phaseout and the transition to low-GWP technologies and compounds proceeds.
- It is essential to ensure that as part of the HCFC/HFC transition energy efficiency gains, especially from a systems perspective, are not compromised. In many cases, low-GWP products will improve energy efficiency through better insulation, improved equipment design and more efficient fluids.
- Fortunately, significant programs are already underway on energy efficiency, prominently under the UN Framework Convention on Climate Change, through the Technology Executive Committee, the Global Environment Facility (GEF), and potentially, the Green Climate Fund (GCF), as well as other global implementing agencies. Many countries include energy efficiency in their Nationally Determined Contributions submitted under the Paris Agreement. As such, the creation of a supranational energy efficiency regulatory body through the Montreal Protocol would be redundant. Furthermore, it is also far beyond the scope of the Montreal Protocol to assume the burdens of the financial cost of global energy efficiency programs.
- The National Ozone Units are not, however, resourced to master all of the complex issues related to energy efficiency needed for the Montreal Protocol to become a treaty focused on energy efficiency, while ensuring that the schedule commitments of the Kigali Amendment are met.
- A constructive approach would be to establish a system to allow the expertise within the Montreal Protocol to be utilized in the programs referenced above, within the current mechanisms of those programs and their access to finance, which are better designed for addressing energy efficiency.
- Energy efficiency for different equipment is extremely varied depending on regional climate attributes and economic conditions. It is imperative this be considered in any future efforts to avoid unrealistic goals and unintended negative consequences if attempts are made to standardize energy efficiency. These attempts could result in sub-optimized energy efficiency for some regions and the excessive work of trying to manage 196 different national energy efficiency programs and the development of unique solutions for each country.

- It would be helpful to establish dialogues on how to best achieve greater energy efficiency, particularly in the Article 5 (developing) countries. It is especially important to leverage the areas of expertise under the Montreal Protocol, particularly as related to technology and economic assessment processes, but permitting “mission creep” by imposing or assuming new significant regulatory objectives should be avoided as it may interfere with meeting current important commitments under the protocol.
- Industry should be involved in these efforts wherever possible to ensure that cost effective and efficient solutions are readily available in the marketplace.