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BRIEFING

EIA BRIEFING TO THE 97TH MEETING OF THE EXECUTIVE COMMITTEE OF THE MULTILATERAL FUND

INTRODUCTION

The 97th Meeting of the Executive Committee of the Multilateral Fund (ExCom97) presents a critical opportunity to demonstrate the effectiveness of collaborative multilateralism and advance cost-effective climate and ozone mitigation at a time when global action is more urgent than ever.

With the planet already experiencing 1.25°C of warming and the latest forecasts indicating that we will breach the 1.5°C target by the end of this decade, scientific consensus underscores the need for rapid, ambitious action to avert dangerous climate tipping points.[1]

The Multilateral Fund (MLF) remains one of the most effective mechanisms for delivering high-impact, low-cost greenhouse gas emissions reductions, with a proven track record of success. Yet the work is far from over. The phase-out of ozone-depleting substances (ODS) and the transition away from hydrofluorocarbons (HFCs) are not only essential for climate mitigation, but also for adaptation and resilience in a warming world. Cooling demand is rising globally, and without intervention, this could lock in high-emission, energy-inefficient technologies for decades.

The MLF's role in supporting sustainable cooling solutions, technician training and lifecycle refrigerant management (LRM) is indispensable, both for environmental protection and for safeguarding lives from extreme heat.

Now is not the time to hold back. The MLF still has plenty of budget left to make a real difference in this triennium and EIA urges ExCom members to approach the question of its spending with renewed ambition.

Underspend of the MLF budget at this time does not represent prudence, it represents missed opportunities and a failure to respond to the climate crisis with the urgency that all ExCom members know it truly demands.

AGENDA ITEM 5: COUNTRY PROGRAMME DATA

HCFC DATA

While the country programme (CP) data demonstrates that Article 5 (A5) Parties are ahead of the required controls under the accelerated HCFC phase-out, EIA is concerned that HCFC production has exceeded HCFC consumption every year since 2014.

Across all 147 A5 countries, the latest aggregated HCFC consumption level is 12,857 ODP tonnes (218,555 metric tonnes). Over the past eleven years of reported data (2014-24), excess production over consumption of HCFCs amounts to a cumulative 19,976 ODP tonnes. The 2025 control level of 67.5 per cent reduction from the baseline equates to an annual permissible limit of 11,635 ODP tonnes, thus over-production can potentially supply 1.7 years of consumption at the current permissible level.

As the full phase-out of HCFCs approaches at the end of the decade, the refrigeration servicing sector will become increasingly important. In 2024, refrigeration servicing was the largest sector for consumption of HCFCs, measured in ODP tonnes, with 58 per cent of the total, followed by refrigeration manufacturing at 24.2 per cent.

However, if China is left out of this calculation, the refrigeration servicing component of HCFC consumption for the remaining 143 Article 5 countries in 2024 was 93.76 per cent. Ongoing work to improve Lifecycle Refrigerant Management (LRM) and, in particular, options to improve leakage reduction, recovery, recycling and reclamation as outlined in document 97/87 and discussed later in this briefing are critically important at this stage and should be prioritised.

HFC DATA

Of the 122 countries which have established hydrofluorocarbon (HFC) baselines, or have reported data for the baseline years and have reported 2023 or 2024 Article 7 (A7) or CP data, 14 countries reported consumption levels greater than their baseline levels. Eight of these countries have their stage I of Kigali Implementation Plans (KIPs) approved, five have KIP preparation projects approved and one has a KIP preparation project included in the 2026-28 business plan.

Although one of these countries, Saint Lucia, was granted a deferral from non-compliance until 2026 data becomes available (under Decision XXXV/16), EIA is nonetheless deeply concerned by the level of overconsumption that has been reported.

In total, 11 of these 14 countries reported consumption at least 25 per cent above their baseline level in the most recent year, with two reporting consumption of more than 100 per cent above their baselines. EIA urges that assistance be provided to these countries to ensure their HFC consumption does not fall into, or remain in, non-compliance in future years. Further, EIA reminds all parties of the importance of pursuing transition pathways which do not rely on the consumption of high- or mid-GWP HFCs or HFC blends.

CP data shows that R-410A, HFC-134a, HFC-32, R-404A, HFC-227ea, R-507A and HFC-125 account for 93.6 per cent of the total consumption in CO_2-equivalent tonnes (tCO_2e). In particular, EIA wishes to flag the significant use of R-410A in refrigeration manufacturing and servicing. The ongoing use of this high-GWP blend, in a sector where lower-GWP HFCs and non-fluorinated alternatives are proven and available, risks unnecessarily locking in a reliance on high-GWP HFCs to meet servicing demand.

EIA encourages those A5s still developing their stage I KIPs to prioritise the transition away from HFCs in high-impact sectors such as refrigeration, where consumption of high-GWP substances and blends remains high, despite alternatives being more readily available.

EIA remains concerned about the level of consumption of HFC-23. Seventeen countries reported HFC-23 use in 2024, totalling 23.41 million tCO_2e (1,581.62 tonnes) across firefighting, refrigeration manufacturing and servicing, solvents and other sectors. HFC-23 is a very-high GWP substance that has an outsized impact on the climate system. In the context of the wider ongoing discussions around HFC-23 emissions under the Protocol, EIA believes all countries should be actively seeking to reduce any use of the substance wherever possible.

Finally, EIA notes that while four countries (Argentina, China, India and Mexico) reported HFC-23 generation in their 2024 CP data (totalling 43.21 million tCO_2e; 2,919.4 tonnes), only one of these (China) reported any byproduct emissions (13.88 million tCO_2e; 937.8 tonnes).

While EIA commends all efforts to abate HFC-23 byproduct emissions, as required by the Article 2J(6) of the Protocol, we are nonetheless surprised by the reporting of zero byproduct emissions by Argentina, India and Mexico. Recent studies have demonstrated that, even when best practice abatement technologies are in place, HFC-23 byproduct emissions still occur at appreciable levels.[2] This suggests that, wherever HCFC-22 production occurs, some quantity of HFC-23 byproduct emissions should be expect. As such, EIA recommends that the ExCom requests additional information on methodologies used to estimate HFC-23 byproduct emissions..

REFRIGERANT PRICES

Table 1 reports the average price of HCFCs, high-GWP HFCs and alternatives. While the range is large, EIA notes that the average price of hydrocarbon (HC) refrigerants is relatively high compared to high-GWP HFCs, yet it is unclear how this average is calculated. While appreciative of the additional data provided in document 97/8 compared to

previous reports, for completeness, EIA reiterates that it would be helpful for the Secretariat to share additional details on the underlying data used for these calculations and to include prices of refrigerant grade CO_2 and lower-GWP HFC blends that are being used to substitute ozone-depleting and high-GWP refrigerants.

AGENDA ITEM 7(a)(i): CONSOLIDATED PROGRESS REPORT

The consolidated progress report (document 97/11), summarising progress and financial information provided by the bilateral and implementing agencies, speaks to the ongoing effectiveness and relevance of the Multilateral Fund, which is central to the success of the Montreal Protocol.

To date the ExCom has approved $4.27 billion in projects, with 90 per cent of the more than 10,000 projects completed. Up to the end of 2024, the ExCom has approved 545 HFC-related projects in 140 countries and two regions amounting to $102.5 million (excluding agency support costs) to phase out 8,705 tonnes HFC consumption equivalent to 17,999,535 CO_2e tonnes. If fully implemented, this equates to an abatement cost of $5.86/$CO_2$e tonne which, even considering agency support costs are not included, is highly cost effective. Adding an estimated 10 per cent agency support costs increases the abatement cost to $6.26 per tonne of CO_2e.

While acknowledging that ultimately the abatement cost will depend on the replacement technology chosen, the cost effectiveness is clearly high compared to typical estimates across other sectors. For example, a recent US study estimated marginal abatement costs across 546 sectors of the US economy, with estimates ranging from $27.52 to $16,899 per tonne of CO_2e averted.[3] Moreover, action under the Montreal Protocol provides emissions reductions at costs that are far lower than the estimated social cost of carbon, which studies indicate are as high as $185/$CO_2$ tonne.[4]

The HFC projects include:

- 200 preparation projects
- 117 investment projects (88 projects as part of Stage I KIPs, 19 HFC individual conversion projects, four HFC-23 emission control and six energy efficiency pilot projects)
- 10 demonstration projects
- 218 technical assistance projects (158 enabling activities, seven energy efficiency pilot projects, 52 projects as part of stage I of KIPs under "KIP" and one global project).

EIA highlights the final report on the six investment projects funded using the additional voluntary contributions for fast-start support. The six projects focused on converting domestic and commercial refrigeration technologies. Five of the projects successfully converted from HFC-134a to isobutane and R-290, reporting energy efficiency improvements greater than 10 per cent and as high as 20 per cent.

Challenges including the safe handling of hydrocarbons, the development of flammability standards and the redesigning and higher costs of compressors were dealt with through targeted technical interventions, training and capacity building. In Thailand, with its own resources, Pattana Intercool Co Ltd introduced innovative Internet-of-Things (IoT) design changes in stand-alone commercial refrigeration units. This resulted in a conversion to more affordable refrigerants and components as well as improved equipment performance and energy savings.

In contrast, the domestic refrigeration foam conversion from HFC-245fa to HFOs in Hisense Kelon in China reported challenges including the need to use higher quantities of HFOs to maintain foam strength, additional investments for mixing and storage facilities to address the greater instability of HFOs, as well as the higher costs of HFOs generally.

In this regard, and given increasing concerns over pollution from per- and poly-fluoroalkyl substances (PFAS) related to HFOs, **EIA reiterates previous recommendations that ExCom members prioritise the adoption of sustainable natural refrigerant technologies over HFOs**.

AGENDA ITEM 7(a)(iii): UNDP PROGRESS REPORT

EIA would like to highlight UNDP's Greening Moonshot Target of reducing its corporate carbon footprint by 50 per cent by 2030.[5]

As part of this, UNDP has developed a comprehensive approach to monitoring refrigerant use, with all 149 offices reporting on their cooling assets, in more than 200 facilities, which has demonstrated that refrigerant leaks contributed about four per cent of the total operational carbon footprint in 2024.[6]

UNDP is committed to procuring greener cooling equipment, with low or no GWP refrigerants. EIA notes that the UN Greening the Blue, which documents the UN system's environmental footprint and efforts to reduce it, does not mention the Kigali Amendment, HFCs or cooling in its 2024 annual report.[7]

EIA calls on all implementing agencies to promote greater awareness of these issues at UN level, including through regular reporting on their efforts to 'walk the talk', noting that this would benefit all countries in their implementation of the Kigali Amendment.

EIA encourages the ExCom to consider requiring an update on efforts to reduce emissions from cooling as part of Implementing Agency annual progress reports, in the same way that reporting on gender mainstreaming is included in regular reports.

AGENDA ITEM 9(a): OVERVIEW OF ISSUES IDENTIFIED DURING PROJECT REVIEW

CALCULATION OF THE CLIMATE IMPACT OF KIGALI HFC IMPLEMENTATION PLANS

The discussion regarding the calculation of climate impact is a stark reminder that **the current Kigali Amendment schedule is unfit for the purpose of reducing HFC consumption and emissions this decade**.

As document 97/26 points out, "all KIPs approved so far have included targets to ensure that the Article 5 country concerned is in compliance with the Montreal Protocol; however, few KIPs have included a final target that is below the country's most recently reported HFC consumption." In fact, if the Secretariat calculates the climate benefits on countries' most recent consumption **"…almost all KIP stages approved so far would have an estimated climate disbenefit, which would not reflect the emissions that were avoided from the implementation of the KIP".**

While EIA acknowledges that a certain amount of consumption growth in A5 Parties was appropriately anticipated in the Kigali schedule, due to the ongoing HCFC phase-out and possible phase-in of HFCs, it is evident that the 65 per cent HCFC component of the baseline has drastically over-estimated that growth in most countries. Therefore, although we support an approach that recognises a business-as-usual (BAU) scenario, this must reflect real-world values, not the current over-inflated starting point.

Reported HCFC (Annex CI) data demonstrates that over the Group 1 baseline years (2020-22) A5 Parties had, on average, 41 per cent of HCFC consumption (in ODP tonnes) remaining, rather than the 65 per cent suggested by the HCFC component of the Kigali baseline. By the first control level in 2024, A5 Parties had phased out 68.67 per cent of HCFCs, leaving just 31 per cent remaining. While additional growth in HFC consumption will have occurred outside of MLF-supported technology transitions, this will have been partly offset by the accelerated HCFC phase-out approach, which seeks to avoid high-GWP HFCs and leapfrog to lower-GWP technologies.

Table 1: Status of HCFC phase-out in Article 5 Parties

	2019	2020	2021	2022	2023	2024
Number of parties reporting	147	147	126	125	100	84
Baseline (ODP tonnes)	35,813.59	35,813.59	15,223.10	13,961.96	9,644.50	9,268.42
Consumption (ODP tonnes)	22,904.30	17,541.73	5,327.77	5,378.01	3,259.14	2,903.39
Reduction from baseline (%)	36.05	51.02	65.00	61.48	66.21	68.67
Remaining consumption as % of baseline	64%	49%	35%	39%	34%	31%
Average HCFC consumption as % of baseline over baseline years		41%				
Reference	Annex Va, UNEP/33/6	Annex Va, UNEP/34/6	Annex IVa, UNEP/34/6	Annex IVa, UNEP/35/6	Annex IVa, UNEP/36/6	Annex IVa, UNEP/37/6

EIA therefore recommends that the BAU Intermediate scenario be used, noting that the HCFC component would be measured based on actual HCFC consumption over the baseline years in the country (in tonnes, converted to CO_2e). EIA also notes that care should be taken when reporting overall impacts of the MLF that the climate benefits of the HCFC phase-out are not simply added to the HFC phase-down calculations, as this would result in some double counting.

EIA agrees with the Secretariat recommendation to use the 10-year period to communicate the impact of KIPs, up to the last target of stage 1, with additional benefits calculated at a later stage. With respect to GWP, it would make sense to use GWP_{100}, as this is the typical matrix used in other institutions.

Finally, the calculation should also take into account alternative technologies with high-GWP that are either phased out or phased in.

AGENDA ITEM 9(d): PROJECTS RECOMMENDED FOR INDIVIDUAL CONSIDERATION

KIGALI IMPLEMENTATION PLANS (KIPs)

Twelve new KIP proposals have been submitted for individual consideration at ExCom97. Eleven of these concern Group 1 countries, many of which are low-volume consuming (LVCs), while one, that of Oman, concerns a Group 2 country for which an official baseline has not yet been established.[i] Alongside these new proposals, three second tranche requests relating to stage I KIPs have also been submitted, two recommended for blanket approval (Niger and Turkmenistan) and one for individual consideration (Mexico).

EIA welcomes these submissions and particularly commends Angola, Serbia and Guinea-Bissau for proposing 2029 targets which represent real-terms reductions in HFC consumption, committing the countries to reductions of one per cent, five per cent and 10 per cent from their respective baseline average HFC consumption (see Table 2).

PROPOSED CONSUMPTION TARGETS IN NEW STAGE I KIPs (GROUP 1 ONLY)

Overall, EIA remains disappointed by a consistent lack of ambition in the HFC consumption targets being proposed under stage I KIPs. **Of the 73 KIPs so far approved, only 12 have established 2029 consumption targets that represent real reductions in HFC use this decade, when compared to consumption reported during the baseline years` (2020-22)** [ii] Meanwhile, the remaining 61 (constituting 84 per cent of approved KIPs) allow consumption to increase, permitting levels of consumption in 2029 that exceed their country's baseline average, even after the first phase-down step comes into effect.[iii]

The new Group 1 KIPs submitted to this meeting continue this trend, with eight of the 11 proposing 2029 targets that allow HFC consumption to increase from baseline average levels by between 4-114 per cent (see Table 2). Noting that there is a strong correlation between the relative contribution of the HCFC component to a given country's HFC baseline and the level of growth that its proposed 2029 target would permit (see Table 2), EIA asks ExCom members to consider how and to what extent ambition could be equitably increased.

As EIA has discussed in previous briefings, fluctuations in reported consumption continue to frustrate a clear understanding of many countries' actual HFC consumption needs. Two of the countries which submitted KIPs to this meeting have requested revisions to their 2020-22 consumption data, one of which would result in an increase to the country's baseline if approved by the Implementation Committee.[iv]

Meanwhile, several other proponent countries also reported significantly varying and/or anomalously large increases in annual HFC consumption during the baseline period. EIA remains concerned that data uncertainty is contributing to BAU scenarios over-estimating projected HFC growth, resulting in less ambitious phase-down schedules being proposed.

Each of the 11 new Group 1 KIPs submitted to this meeting presented BAU scenarios forecasting significant HFC growth to 2029, most commonly in the range of 3-6 per cent annually. EIA notes, however, that five of these proponent countries reported levels of consumption in 2024 which were actually lower than their average consumption during the baseline years (see Table 2).[v] This suggests that the linear assumption made in BAUs, ie, that HFC consumption will necessarily increase year-on-year without intervention, is not accurate in all cases. Indeed, it may also indicate that more ambitious phase-down targets could be pursued by these countries, avoiding the risk of permitting growth that is not reflective of actual need.

While EIA acknowledges that avoided emissions should be considered when assessing KIPs, and accepts that some phase-in of HFCs is still expected to occur as the HCFC phase-out concludes, we nonetheless urge all ExCom members to hasten the implementation of the Kigali Amendment and maximise its climate benefits wherever possible. Doing so is the only way for ExCom members to secure the real emissions cuts needed to align Kigali implementation with the Paris Agreement's 1.5°C target.[8]

Table 2: Review of HFC baseline data, reported HFC consumption in 2024 and proposed HFC consumption targets for 2029 (All figures in CO_2e tonnes, unless otherwise stated)

Country	HFC baseline*	HCFC component as % of HFC baseline	Average HFC consumption between 2020-22*	% change between average HFC consumption 2020-22 and 2024 HFC consumption (Positive values = increase in consumption)	Reported HFC consumption in 2024*	% change between 2024 HFC consumption and proposed 2029 HFC consumption (Positive values = increase in consumption)	Proposed HFC consumption in 2029	% difference between proposed HFC consumption in 2029 and...	
								... HFC baseline	... average consumption 2020-22 (Positive values = increase in consumption)
Botswana	389,992	60%	154,645	+152%	389,849	-15%	331,493	-15%	+114%
Mongolia	57,309	49%	29,396	+89%	55,608	-7%	51,578	-10%	+75%
Somalia†	1,276,672	44%	708,862	+43%	1,015,385	+13%	1,149,005	-10%	+62%
South Africa	13,843,139	37%	8,677,866	+16%	10,048,744	+18%	11,822,486	-15%	+36%
Ethiopia	347,035	34%	229,385	-13%	199,749	+56%	312,332	-10%	+36%
Fiji	443,528	28%	320,862	-10%	289,332	+38%	399,175	-10%	+24%
Tanzania	218,611	17%	182,400	-21%	143,372	+37%	196,750	-10%	+8%
Eritrea	169,249	14%	146,066	+16%	169,236	-10%	152,324	-10%	+4%
Angola	3,878,000	9%	3,536,815	+10%	3,877,981	-10%	3,490,200	-10%	-1%
Serbia	3,261,874	6%	3,082,346	-6%	2,899,695	+1%	2,935,687	-10%	-5%
Guinea-Bissau	722,391	8%	662,389	-14%	568,512	+5%	596,150	-17%	-10%

■ Countries highlighted blue have proposed plans that reduce or limit consumption ahead of the minimum required for Montreal Protocol compliance.

* Baseline and reported consumption figures are based on Article 7 reported data at time of KIP submission, ie, they do not reflect requested revisions.

† The Government of Somalia has submitted a request to revise its HFC consumption data for 2022, which would increase the country's HFC baseline from 1,276,672 tCO_2e to 1,477,017 tCO_2e. If approved, the Government of Somalia has agreed to maintain its current target for HFC consumption in 2029. This would constitute a 22 per cent reduction from the revised baseline, although it would still represent a 26 per cent increase from actual average consumption during the baseline years.

PROPOSED ACTIVITIES UNDER NEW STAGE I KIPs (GROUP 1 ONLY)

The 11 new Group 1 KIPs submitted to ExCom97 reflect similar emphases to previously approved plans, with most countries focussing on activities to strengthen regulatory frameworks and build technical capacity.

STRENGTHENING REGULATORY FRAMEWORKS

EIA is pleased that all 11 of the KIPs submitted to this meeting include activities to improve licensing and quota systems, which are essential for guaranteeing an effective HFC phase-down and preventing illegal trade.

Eritrea's KIP, for example, proposes a significant enhancement of the country's quota system by introducing differentiated quotas based on the GWP of refrigerants, thus incentivising the adoption of lower-GWP alternatives.[vi]

Meanwhile, EU candidate country Serbia, as a first step towards aligning with the EU F-Gas Regulation, is proposing to update its HFC licensing system to include CO_2 accounting and to strengthen customs enforcement, ensuring tighter control over HFC imports and usage. These measures are critical for creating transparency, preventing illegal trade and facilitating a smoother transition to low-GWP alternatives, although EIA notes that Serbia's KIP presently lacks explicit bans on high-GWP HFCs or HFC-based equipment, which could prove useful backstops to secure phase-down gains secured in specific sectors.

Indeed, prohibitions and bans can be powerful regulatory tools and EIA commends those countries which have proposed relevant bans. Guinea-Bissau, for example, outlines plans to ban the import of HFCs in non-refillable cylinders by 2029, while Angola and South Africa both propose bans on HFC-based stand-alone commercial refrigeration units by the same year. Similarly, Botswana and Eritrea propose to prohibit the import of HFC-based domestic refrigerators by 2029, with Eritrea also banning HFC-23 in marine refrigeration by the same date.

On licensing and quotas, EIA draws attention to Mongolia, which has issued HFC import quotas for 2025 far exceeding its Montreal Protocol control targets. EIA recognises that, under Decision XXXV/16, Mongolia was granted a deferral from non-compliance until 2026 data becomes available, and we acknowledge the particular challenges the country faced during the baseline years due to the impacts of the COVID-19 pandemic. However, EIA encourages Mongolia to make every effort to limit its HFC consumption growth during this deferral period so as not to lock-in future servicing need. We therefore welcome the confirmation that Mongolia's 2026 quota will be issued as per the established HFC baseline.

TRAINING AND CAPACITY-BUILDING

Training and capacity-building activities form the backbone of many KIPs, preparing technicians and stakeholders for the transition to low-GWP refrigerants.

Angola plans to train technicians in hydrocarbon systems, including workshops on CO_2-based technologies, addressing the resistance to hydrocarbons due to a lack of knowledge about safe servicing practices. This focus on hands-on training and awareness-raising is crucial for overcoming barriers to the adoption of natural refrigerants in the country's RAC sector.

Similarly, Botswana is prioritising the development of a competency-based certification scheme for technicians, alongside training modules on the safe handling of R-600a and R-290 in commercial refrigeration. By integrating these alternatives into vocational training curricula, Botswana aims to build a skilled workforce capable of managing the transition away from HFCs.

Ethiopia is taking a comprehensive approach by conducting training and certification sessions for RAC technicians, focusing on good servicing practices and the safe handling of low-GWP refrigerants. The country is also updating its codes of practice to include recovery, recycling and energy efficiency measures, ensuring that technicians are equipped with the latest knowledge and tools.

Somalia, meanwhile, is targeting both formal and informal sectors by organising training workshops for technicians, with a focus on domestic, commercial and industrial refrigeration. These efforts are complemented by plans to upgrade training centres with tools and equipment for handling flammable refrigerants, addressing a critical gap in the country's technical capacity.

TRAINING AND CAPACITY-BUILDING

Demonstration and pilot projects are essential for raising awareness and encouraging the adoption of natural refrigerants.

Guinea-Bissau and Eritrea both propose R-290-based pilot projects in commercial refrigeration, showcasing the feasibility of hydrocarbon alternatives. Eritrea's project will include a comparative analysis, assessing the performance and energy savings of the R-290 system against existing R-404A-based systems. Guinea-Bissau, meanwhile, will use its project as an opportunity to train technicians on the installation and servicing of R-290 units and for awareness-raising, with related workshops planned for commercial refrigeration operators.

EIA welcomes these proposals and is encouraged by the proponent countries seeking to advance their transitions to non-fluorinated alternative refrigerants, overcoming potential resistance and showcasing the environmental and energy-saving benefits.

MANUFACTURING CONVERSIONS

Although South Africa's KIP delays broader manufacturing conversions to stage II, conversion of the country's small commercial refrigeration sector to non-fluorinated alternatives will be completed under stage I.

While EIA understands the need to gather more information from relevant enterprises, particularly in the MAC sector, limiting conversions only to small commercial refrigeration represents a missed opportunity for more immediate and substantial reductions in HFC consumption.

Nonetheless, EIA welcomes South Africa's proposal for manufacturing conversion in the small commercial refrigeration sector, seeing the clear benefits in transitioning its production lines from HFC-134a and R-404A to R-600a and R-290. The proposed initiative targets the country's three manufacturers of small commercial refrigeration equipment, aiming to eliminate HFC use in this subsector by 2029, at which point a corresponding prohibition on import and manufacture will be introduced.

OMAN: STAGE I KIP REQUEST MADE AHEAD OF GROUP 2 PHASE-DOWN SCHEDULE

EIA welcomes Oman's submission of a stage I KIP, as we welcome any proactive efforts by countries to reduce or limit HFC consumption ahead of their compliance obligations.

As a Group 2 party, Oman's baseline will not be formally established until 2026 data becomes available, with the country's first phase-down step due only in 2032. Oman has therefore proposed an "interim" baseline, calculated using 2022-24 consumption data.

While EIA welcomes Oman's initiative, we do not believe that the country's proposed targets would sufficiently curb HFC consumption growth. Under the BAU scenario outlined in Oman's KIP, HFC use is not projected to reach the level of its interim baseline until 2029, by which time the country's freeze will already be in effect. As such, the establishment of an interim baseline, at least at the level currently proposed, would impose no real limit on BAU growth.

Given that Oman faces no immediate compliance obligations, the purpose of an early KIP should be to limit growth, ideally during its remaining baseline years (2025 and 2026) and to accelerate the transition to non-fluorinated alternatives. Instead, the proposed 16 per cent reduction by 2032, while technically ahead of schedule, still permits consumption to remain nine per cent higher than current levels by the end of stage I.

EIA urges Oman to adopt a more ambitious target, recommending a 30 per cent reduction by 2035, which would align its efforts with those of Group 1 countries and demonstrate very strong leadership in its region. Strengthening regulatory measures, such as bans on high-GWP equipment and pilot projects for natural refrigerants, would further reinforce Oman's commitment to a sustainable phase-down. While the KIP's focus on capacity-building and quota systems is positive, greater ambition is needed to ensure meaningful emissions reductions and a smoother transition to climate-friendly alternatives.

MEXICO: REVIEW OF HFC CONSUMPTION DATA IN LINE WITH DECISION 93/68(c)(vii)

At its 93rd meeting, ExCom reviewed Mexico's Stage I KIP and noted a spike in HFC imports in 2022, largely due to two new importers.

As this surge did not clearly reflect actual demand in the country, members could not confirm whether the reported consumption matched Mexico's real market needs. The country was thus asked to monitor HFC consumption further to help future demand, reporting its findings alongside the second tranche request, which has been submitted for ExCom's consideration in document 97/60 at the present meeting.

EIA welcomes the comprehensive analysis, which confirms that the country's 2022 consumption spike did not reflect genuine market demand, but rather temporary distortions caused by over-importation and inventory accumulation. We further note that consumption reported in 2020 and 2021 was also found to be unrepresentative, due to the COVID-19 pandemic, and that both 2023 and 2024 data were likewise affected by abnormal conditions, including unusually high exports and administrative delays linked to Mexico's new quota system.

EIA notes the Secretariat's observation that in comparable cases, countries have adjusted their starting points by excluding abnormal import quantities that did not reflect actual or immediate local market needs. In the case of Mexico, EIA believes that this approach should also be adopted, noting that it is both established and appropriate and that it would ensure MLF support is aligned with genuine servicing and manufacturing demand, rather than one-off market disruptions that inflate consumption.

EIA does recognise, however, that determining a representative baseline requires reliable, distortion-free data. Given Mexico's indication that 2025 consumption is expected to reflect real national demand, EIA accepts that any adjustment to Mexico's maximum allowable consumption limits may need to await review once 2025 data is available.

We therefore recommend that ExCom revisits Mexico's maximum allowable consumption levels at that stage, ensuring they accurately reflect actual need and avoid locking in artificially high levels of consumption for the remainder of stage I.

HCFC PHASE-OUT MANAGEMENT PLANS (HPMPs)

The following section provides a broad overview of the first tranche stage II and stage III HPMPs submitted for individual consideration at this meeting. EIA welcomes these submissions, the implementation of which will phase out the remaining consumption of HCFCs by 2030 in Angola, Argentina, Bangladesh, Cameroon, Djibouti, Egypt and Mali.

STRENGTHENING REGULATORY FRAMEWORKS

Activities aimed at strengthening the regulatory and legal frameworks that support HCFC phase-outs feature prominently in these first tranche HPMPs, including revisions to licensing and quota systems, draft standards for using flammable and toxic substances in RAC equipment and various bans on equipment leading up to the 2030 phase-out.

For example, Djibouti is revising its regulatory framework to include a ban on the import of new and used HCFC-based equipment, to be adopted 30 June 2026, and has committed to establish regulatory measures to control the intended emission of refrigerants during installation, servicing and decommissioning of RAC equipment. Early bans with clear limits and timelines are crucial for a sustainable transition to low-GWP alternatives and provide clarity and certainty for industry and for end users, helping to mitigate the risk of equipment dumping.

Furthermore, EIA strongly supports Mali's commitment to implement a ban on the import of controlled substances in non-refillable cylinders from January 2028 and Egypt's proposal to carry out a study on the market acceptance of refillable cylinders and the effect of banning disposable refrigerant cylinders.

Such controls and bans on disposable cylinders will greatly support efforts to prevent illegal trade and best practices for LRM. EIA recommends that bans on disposable cylinders be paired with requirements for proof of take-back mechanisms for refillable cylinders to ensure containers are returned and to remove any incentive for their use as one-way disposables.

EIA also notes with appreciation that Egypt will make mandatory the use of QR codes for refrigerant cylinders as part of the refrigerant tracking system by 31 December 2026, supporting this with educational workshops to raise awareness of the tracking system among customs stakeholders.

Amid the myriad challenges of the concomitant phase-out and phase-down, illegal trade continues to be a prominent issue and, paired with the rising threat of e-commerce as an avenue for illegal trade, **it is more important than ever to establish comprehensive and verifiable systems that track refrigerants throughout the entire supply chain, including within domestic markets**.

Coordination and transparency between licensing systems and customs authorities is a key element of more effective enforcement and accessible electronic systems can facilitate such cooperation. Noting that Egypt's licensing system is only partially electronic, with the quota system and tracking of imports and exports against issued licenses still manual, EIA supports the Secretariat's suggestion to strengthen the regulatory framework by e-upgrading the quota, import and export tracking system. Further, we support UNIDO in seeking to integrate the reclamation centres and refrigerant tracking system based on QR codes for cylinders.

TRAINING AND CAPACITY-BUILDING

It is crucial for technician training and capacity-building taken under the HPMPs to lay the groundwork for and support activities in KIPs, to guarantee that the transition away from fluorinated refrigerants is as sustainable and efficient as possible.

Each of the first tranche HPMPs submitted to this meeting either already has a technician certification scheme or is taking steps towards establishing one. It is important for technician certification schemes to be strengthened, made mandatory and implemented in a way that ensures sustainability beyond the end of HPMP activities and that activities provide the necessary training and tools needed for the transition to HFC-free technologies using best practices for LRM.

For example, Cameroon's HPMP includes activities which provide tools, training and support to RAC servicing technicians using low-GWP flammable refrigerants, including R-290 and R-600a. Mali's HPMP includes capacity-building activities for refrigerant management that include emphasis on HC-based and CO_2-based systems. Egypt similarly includes activities targeting low-GWP and flammable refrigerants, as well as ammonia, and training that focuses on leak reduction, recovery and storage of refrigerant and the safe use of flammables.

Given the significantly high leakage rate of 40 per cent reported in Argentina's supermarket RAC systems, which still consume a high percentage of HCFC-22 in servicing, and given that technologies based on HCs and CO_2 are widely available in Argentina (as noted by UNIDO), it is crucial that the country's proposed incentive scheme for supermarkets holistically approach emissions reductions. This should include the further strengthening of technician training and capacity to safely handle flammable refrigerants and LRM best practices, integrated with other HPMP and future KIP activities, to ensure a cost-effective transition to climate-friendly alternatives.

Technician training and capacity-building must also address the informal sector and EIA appreciates that Egypt and Mali include such efforts to support the informal servicing sector. However, given that a significant portion of technicians operate in the informal servicing sector in the submission countries, EIA recommends additional activities to support training, certification and capacity-building for both the formal and informal sectors, including on best practices for LRM and safe handling of ultra-low GWP flammable or toxic alternatives.

Additionally, EIA notes with concern the significant leakage rates on fishing vessels in Argentina, with refrigeration systems being completely refilled up to six times a year. This concern is compounded by the fact that the alternatives being considered are all fluorinated gases, most with higher GWPs than HCFC-22. EIA notes that natural refrigerant alternatives for fishing vessel refrigeration systems have been piloted in a number of countries and the transition to natural refrigerants such as ammonia and CO_2 is already underway.[9]

Given the challenges in repairing and maintaining systems on fishing vessels, it is of even greater importance that the training and capacity for preventing emissions be strengthened in this sector, including for refrigerant recovery, and that alternatives selected in the transition away from HCFC-22 are low-GWP.

EIA suggests that efforts to reduce leaks and raise awareness on best practices for emissions prevention be paired with periodic inspections and verification to ensure compliance. The fishing sector is a significant end-user in a number of A5 countries and it is essential to maximise information-sharing and increase experience in addressing

these emissions and transitioning to the most sustainable alternatives through the MLF. To this effect, EIA encourages the detailed report from UNIDO for the 99th meeting, which will include updated data and opportunities for leakage reductions, and progress on the retrofit incentive mechanism, be shared with all parties.

As an essential part of compliance and illegal trade prevention, EIA appreciates that each first tranche HPMP includes activities to increase the capacity of customs and enforcement officers, through training workshops, awareness-raising and the provision of tools such as refrigerant identifiers.

Also, noting the importance of inter-agency, regional and global cooperation for effective enforcement, EIA welcomes Mali's addition of meetings to strengthen trans-border collaboration in the West African Economic and Monetary Union sub-region.

The majority of the first tranche HPMPs submitted include activities that build capacity for refrigerant management, including through the establishment of refrigerant recovery and reclamation (RRR) centres and the provision of reclamation equipment, machines and tools.

For example, Angola plans to upgrade an existing refrigerant recovery and reclamation centre, provide additional equipment and training for technical brigades and also begin design of an electronic database to control recovery and recycling activities and raise public awareness. Bangladesh will set up a RRR centre based on a public-private partnership, along with SOPs and training and will develop a business plan for establishing two additional reclamation centres. As noted in Bangladesh's HPMP, the promotion of recovery and reclamation will reduce demand for virgin HCFC-22.

DEMONSTRATION AND PILOT PROJECTS

Demonstration and pilot projects present ideal opportunities for showcasing options to accelerate the uptake of not-in-kind (NIK) cooling technologies and low- and ultra-low- GWP alternatives.

Among the first tranche HPMP projects submitted here, Egypt's includes demonstration projects that promote ammonia and indirect evaporative cooling with a heat exchanger (IEC-H) technology in the industrial refrigeration and hospitality sectors, as well as the introduction of liquid desiccant cooling technology (LD-IED-H cooling) for medium-scale commercial applications.

EIA appreciates that HFC-based equipment beneficiaries will also be included in this project to show the performance and energy use and encourage end users to select ammonia-based chillers and IEC-H units over HFC-based alternatives when replacing HCFC-22 equipment. And while UNIDO confirmed that R-410A will not be used, EIA reminds that HFC-32 should not be considered a low-GWP refrigerant and urges non-fluorinated alternatives be used instead for the direct-expansion component of the IEC-H units.

EIA also notes with appreciation that the demonstration project for LD-IED-H cooling is being developed with the intent to provide publicly available information that can be used to encourage manufacturers in other A5 countries to learn from the experience and replicate the technology if it proves to be successful.

It is important that all demonstration projects be designed in that manner as they provide unique opportunities for trialling and raising awareness of innovative technologies and should be made to be scalable and replicable, especially for non-fluorinated refrigerant use that facilitate the leapfrogging to non-HFC alternatives.

CHINA HPMP REQUESTS

In addition to the first tranche HPMPs reviewed in this briefing, EIA has also reviewed the Government of China's project proposals for later tranches under stage II of its HPMP, providing commentary on the RAC sector proposals below.

RAC MANUFACTURING SECTOR

China has submitted a request for the fifth tranche of its room air-conditioning (RAC) manufacturing and heat pump water heaters (HPWHs) sector plan.

This involves the conversion of RAC manufacturing lines at eight enterprises and four compressor manufacturers from HCFC-22 to R-290. EIA notes with appreciation the ongoing efforts being made to advance the market for R-290 in China and beyond. Nonetheless, we recognise that challenges to the market competitiveness of R-290 do exist. R-32 units have already been widely adopted in the country and so further thought must be given to the policy and market drivers needed to support greater adoption, both within China and across its key export markets.

RAC SERVICING

Also included in China's HPMP submission is an eighth tranche for the refrigeration and air-conditioning (RAC) servicing sector plan and the national enabling programme.

Activities in the implementation plan include steps to strengthen certification policies for servicing technicians, continued support for ODS management and enforcement, and the continuation of work on codes and standards, in synergy with policy research to promote recovery and recycling of refrigerants in China.

EIA appreciates the continuation of training for technicians in the supermarket subsector on good practices and alternative technologies and updates to related training materials. Given that non-fluorinated alternatives are widely available in this sector, additional technician training and capacity-building is key to improving the infrastructure for the safe use of flammable and toxic refrigerant alternatives.

REVIEW OF SELECTED PILOT PROJECTS

Among the proposals submitted to this meeting, EIA draws particular attention to several innovative demonstration and pilot projects for their potential to accelerate the transition to energy-efficient, ultra-low GWP cooling technologies.

Projects proposed by Bosnia and Herzegovina, Serbia, Sierra Leone and Togo will replace high-GWP R-404A and R-410A systems with R-290 stand-alone cabinets and air-conditioning units, while collecting energy consumption data and boost capacity for proper installation and safe handling of these refrigerants.

Another notable proposal is Panama's replacement of a R-410A chiller with a R-744 (CO_2) transcritical cooling plant in a major market complex, providing new data on CO_2 system performance compared to HFC systems in warm climates. As Panama City Council manages six municipal markets, short-term replicability of this project is expected to bring greater reductions in direct and indirect emissions.

Other pilot sites include three supermarkets in Bosnia and Herzegovina, a fully hydrocarbon-based supermarket conversion in Sierra Leone (projected to reduce energy consumption by 40 per cent and save over $31,000 in annual electricity costs) and the replacement of more than 200 air-conditioning units across three public hospitals in Togo. Reports from Panama and Togo show an increased reliance on R-410A, including a steep uptick in Togo where R-410A consumption grew from 128.82 tonnes in 2023 to 238.02 the following year.

This underscores the need to demonstrate efficient, scalable, ultra-low GWP alternatives. All projects include technician training activities, for example, Bosnia and Herzegovina's programme for 40 RAC technicians, Serbia's sessions for 60 technicians supported by a new R-290 installation simulator and Togo's capacity-building on measurement and verification and system maintenance.

Beyond the direct and indirect emissions reductions associated with these pilots, the projects are designed to strengthen national policy and regulatory frameworks on energy efficiency through measured performance data, informing Minimum Energy Performance Standards (MEPS) and labelling development and by enhancing government capacity to integrate low-GWP technologies into long-term RAC sector planning and standards.

These efforts will provide new data on the energy performance of natural refrigerants across a range of climates and contribute important insights to inform parties' implementation of the Kigali Amendment.

AGENDA ITEM 9(e): UNEP COMPLIANCE ASSISTANCE PROGRAMME BUDGET FOR 2026

Document 97/83 outlines the UNEP Compliance Assistance Programme (CAP) budget and work programme for 2026 and a progress report on 2025 activities.

The CAP is a vital part of the institutional strengthening support offered by the MLF, in particular through the regional networks of national ozone officers (NOOs) which enable regular detailed discussions, trainings and information sharing on a regional basis to enhance implementation. The broad range of issues outlined in the CAP report and the 2026 work programme reflect the complex and increased responsibilities of NOOs since the adoption of the Kigali Amendment.

Prior to MoP37, a day-long informal meeting on implementation of the Montreal Protocol covered many of these issues, with discussions on how to strengthen the institutions of the Protocol in the areas of licensing systems, illegal trade, data collection and capacity.

Overarching challenges raised included the simultaneous HCFC phase-out and HFC phase-down, the volume and number of blends of HFCs without specific HS codes, the lack of an adequate information technology infrastructure in many A5 Parties, the wide use of e-commerce platforms to sell controlled substances and the lack of capacity and basic monitoring and enforcement tools (including unique HS codes and refrigerant analysers).[vii]

Having monitored and tracked the illegal trade since the early 1990s, EIA believes that these gaps and challenges provide significant opportunities for smuggling and that there is a significant risk of large-scale illegal trade in HFCs and HCFCs in the coming years.

A number of steps to strengthen the institutions were identified in the meeting, which will continue to be discussed next year.

For example, participants emphasised the need to develop fully digital and automatic single window systems that allow sharing and access of all stakeholders, including the national ozone unit, regulators and customs office. Efforts to strengthen institutional coordination, implementation of additional national customs codes of up to 12 digits, improved supply chain tracking, equipment licensing and bans on disposable cylinders were other issues explored.

The final key take-aways of the one-day discussion included four cross-cutting issues:

1. the value of information sharing
2. the need to transition to an online digital system such as a single-window system
3. the central place of a robust legal framework for an effective licensing system, for addressing illegal trade and for data collection and reporting systems
4. whether the role of iPIC can be strengthened.[10]

The work of the CAP is closely related to all these issues and EIA fully supports the proposed 2026 budget and the recommendations of the Secretariat.

AGENDA ITEM 10: UPDATE ON THE OPERATIONALISATION OF CENTRES OF EXCELLENCE FOR SUSTAINABLE COOLING AND TESTING CENTRES FOR ENERGY EFFICIENCY (DECISION 95/87(e))

Regional centres of excellence for sustainable cooling, or thematic regional centres, represent a logical outgrowth of support for Kigali implementation.

ExCom decisions 97/85 and 97/86 identify various drivers for establishing thematic regional centres. These include the limited capability and expertise at the national level to undertake in-depth market assessments of technology trends, limited capacity to adopt low-GWP energy-efficient technologies and limited local technical capacities in conducting in-depth analysis on technological issues and market dynamics; challenges which consistently beset the HCFC phase-out and Kigali implementation.

In response, thematic regional centres have filled the void, providing three broad categories of services: (i) technical assessment, data management and market-driven policies; (ii) market uptake and interventions for faster adoption of low-GWP technologies; and (iii) attracting and mobilising co-financing on sustainable cooling.

The most well-known thematic regional centre is perhaps the Africa Centre of Excellence for Sustainable Cooling and Cold Chain Systems (ACES), located in Kigali, Rwanda, a pioneer of the hub-and-spokes model, although many other examples exist.

EIA fully supports providing funding for the preparation of project proposals for the development of thematic regional centres. In terms of the guidelines suggested by MLF secretariat to inform proposals, EIA makes the following recommendations:

Firstly, ExCom should encourage a representative sample of projects across the regions to enhance coverage, preferencing those with a track record of activity and impact as well as models to opportunities and broader regional ambitions.

Secondly, while a minimum of five years of support (with a possible additional one year to facilitate start-up arrangements and recruitment of staff) is suggested, the upward limit on MLF contributions during that time (a maximum 30 per cent of overall costs for the first three years followed by 15 per cent for the fourth and fifth years) are premature and arbitrary, especially given the potential cost-effectiveness and benefit of this delivery model to Kigali implementation.

EIA recommends tethering any decision on MLF contributions to more objective criteria, such as the actual services provided to support Kigali implementation and their related costs. Moreover, while thematic regional centres should ultimately seek to be self-sustained and funded as a core of their business models, it is unclear why MLF contributions would sunset after a specified number of years if the function they are fulfilling continues to support Kigali implementation and advance shared objectives beyond that date.

Finally, in terms of technologies, a primary challenge of the HCFC phase-out and HFC phase-down is the uptake of low-GWP energy-efficient technologies, in particular those relying on natural refrigerants. To this end, ExCom should prioritise supporting services within the thematic regional centres that focus on this specific segment of the market, with additional benefits of avoiding costly and challenging end-of-life recovery and destruction of fluorinated refrigerants.

AGENDA ITEM 11: REPORT PURSUANT TO DECISION 93/104 ON LIFECYCLE REFRIGERANT MANAGEMENT

EIA welcomes the Secretariat's report on LRM, prepared in response to decision 93/104, and urges ExCom members to accept its recommendations.

The report underscores the critical need for sustainable financing and robust regulatory frameworks to address the long-standing challenge of ODS and HFC banks. Its emphasis on the importance of strong regulation, stakeholder engagement and infrastructure development aligns with EIA's long-standing advocacy for comprehensive LRM strategies.[11] Without these elements, even well-funded projects risk failing to deliver lasting environmental benefits.

First and foremost, EIA strongly supports the prospect of establishing a dedicated funding window for countries that have completed their national inventories of banks of used or unwanted controlled substances and a plan for the collection, transport and disposal of such substances, including consideration of recycling, reclamation and cost-effective destruction of banks. Such a funding window is essential to ensuring that the momentum generated by decision 91/66 is not lost and that countries are equipped to implement their plans for collection, transport and disposal effectively.

EIA also endorses the Secretariat's exploration of regional approaches to refrigerant reclamation and disposal, recognising that many A5 countries lack the infrastructure or financial resources to establish dedicated reclamation or destruction facilities. Regional cooperation could provide a cost-effective solution by pooling resources and sharing expertise across borders and is discussed in EIA's forthcoming report "Sustainable financing for ODS and HFC bank management", which outlines possible regional models for sub-Saharan Africa, the Caribbean and Pacific Island small island states (SIDS) and South and South-East Asia.[12]

Such a regional approach would not only reduce costs but also ensure that smaller countries, which often struggle with limited bank volumes, can access the infrastructure necessary for reclamation and destruction. To ensure the success of such models however, there would be a significant need for harmonised regulatory frameworks and robust monitoring systems, to prevent illegal trade and ensure transparency.[13] EIA urges ExCom to prioritise funding for pilot projects that test these regional approaches as they may offer a scalable solution to this global challenge.

The Secretariat's report also raises the potential for mobile destruction units, which could provide an alternative to fixed facilities, particularly in regions where used or unwanted controlled substances are classified as 'waste' and their transboundary movement is consequently restricted. This innovation could be particularly valuable for low-volume-consuming (LVC) countries, where the accumulation of sufficient quantities for destruction represents a persistent challenge that undermines economic viability. EIA recognises the potential of this approach and supports its further exploration.

EIA further commends the Secretariat's recognition of the role of extended producer responsibility (EPR) schemes in enhancing LRM.

In EIA's upcoming report, mentioned previously, successful EPR examples are highlighted, including Japan's Home Appliance Recycling Law and Australia's Refrigerant Reclaim Australia programme.[14] Such schemes demonstrate that industry-led stewardship can achieve high recovery rates when combined with regulatory requirements, stable funding mechanisms and clear governance structures.[15]

EIA encourages ExCom to support the integration of EPR programmes into national LRM strategies, particularly in countries with established manufacturing sectors. These programmes not only incentivise recovery and recycling but also foster industry accountability, which is critical for long-term sustainability.

Finally, EIA wishes to draw attention to the Secretariat's important caveat, that support for bank management activities provided through the MLF must be contingent on the understanding that there would be no additional funding from other sources, including carbon credits or offsets.

Carbon markets do not provide a viable solution for sustainable bank management. The inherent instability of both voluntary and compliance markets, coupled with their potential to undermine regulatory efforts and delay real mitigation, makes them unsuitable for financing activities that require predictable, long-term funding.[16]

In their place, EIA calls for multilateral and bilateral funding, national levies and industry contributions which offer

more reliable and equitable financing mechanisms. The concerns around carbon financing for ODS and HFC bank management are discussed in EIA's 2024 briefing, *Polluting the Protocol*, while ideas for alternative approaches are elaborated in our upcoming report *Sustainable financing for ODS and HFC bank management*.[17]

EIA urges ExCom to act on the Secretariat's recommendations. The Montreal Protocol has a proven track record of delivering environmental success through binding obligations and assured financial support. By building on this legacy, ExCom can ensure that the management of ODS and HFC banks remains a priority, safeguarding both the ozone layer and the climate.

Notes

i The 11 Group 1 countries that have submitted new KIP proposals for consideration at ExCom97 are: Angola, Botswana, Eritrea, Ethiopia, Fiji, Guinea-Bissau, Mongolia, Serbia, Somalia, South Africa and the Republic of Tanzania

ii Note, the 73 approved KIPs referenced excludes Indonesia, pending the country's full KIP being re-submitted for approval in 2027.

iii Calculations based on Article 7 reported data (https://ozone.unep.org/countries/data-table?q=countries/data, accessed 20/11/2025) and on approved schedules for stage I KIPS (https://www.multilateralfund.org/resources/decisions, accessed 20/11/2025)

iv These two countries are Somalia (revision would raise baseline) and South Africa (revision would lower baseline). In the case of Somalia, EIA appreciates the country's commitment to maintaining its current target for HFC consumption in 2029, even if the revision is approved. We note, however, that this target would still represent a 26 per cent increase from the country's revised average consumption during the baseline years.

v These five proponent countries are: Ethiopia, Fiji, Tanzania, Serbia and Guinea-Bissau.

vi EIA notes that South Africa's proposed conversion of one enterprise in the commercial and industrial AC subsector from R-410A to HFC-32 has been removed from stage I, with the aim of including a sectoral approach under stage II. EIA urges South Africa, when developing its plans for the full sectoral conversion, to prioritise the transition to non-fluorinated alternatives, as it has done in its proposed refrigeration conversion projects.

vii See summary outcomes for each group under Session 8, accessible at: https://ozone.unep.org/meetings/informal-meeting-facilitating-implementation-montreal-protocol/presentations (accessed 25/11/2025)

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