



The Alliance
for Responsible Atmospheric Policy

January 16, 2015

Director
Chemical Production Division
Environment Canada
Place-Vincent-Massay
351 Saint-Joseph Boulevard, 11th Floor
Gatineau, Quebec
K1A 0H3
Email: OzoneProtectionPrograms@ec.gc.ca

Re: Proposed Notice of Intent to Regulate HFCs

Dear Sir or Madam:

I am writing on behalf of the Alliance for Responsible Atmospheric Policy (“Alliance”) to provide comments regarding the proposed notice of intent to regulate the manufacture, import and use of hydrofluorocarbons (HFCs) recently issued by the Minister of the Environment of Canada. Canada Gazette, Extra Vol 148, No. 49. (December 6, 2014)

The Alliance is a US industry coalition organized in 1980 to address the issue of stratospheric ozone depletion. The Alliance 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.

The Alliance is proud of its extensive history of working in a constructive manner with the US government and with international bodies on the protection of stratospheric ozone and the mitigation of climate change. A list of Alliance member companies is attached, some of whom may also submit written comments as they see fit.

The Alliance commends the Government on its support in advancing a North American Amendment to the Montreal Protocol to phase down HFCs while transitioning to viable alternatives. Canada’s leadership, together with Mexico and the US, has steadily built international support for an amendment, which is now closer to becoming a reality than ever before.

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An effective means of reducing the future climate change contribution of HFCs must be global in nature. It also must do so in an orderly, flexible fashion which allows companies to continue to fulfill consumers' need for our products and technologies which are vital to public health, food safety, energy conservation, comfort and productivity. The Montreal Protocol has met both of these standards when successfully addressing CFCs and HCFCs. We believe an amendment to address HFCs would do so as well.

The Alliance believes the cap and reduction model reflected in the amendment provides a far better approach for cost effective action than do unilateral national command and control regulations. The Alliance has also advocated this global cap and reduction approach as part of the Montreal Protocol process as a far better mechanism than the use of SNAP de-listing authority in domestic US policy. We encourage Environment Canada to pursue this cap and reduction model rather than a series of command and control restrictions.

The Alliance supports the Government's proposed procedure of consulting with interested stakeholders prior to issuing any regulations. In order to achieve the environmental goal of these potential regulations, it is critical to understand the variety of challenges and opportunities present in the transition from high-GWP technologies. A global phasedown will allow the markets to determine which technologies transition first, providing certainty on the environmental benefits while providing adequate transition time for sectors where alternatives are not yet readily available. The Montreal Protocol has succeeded because it has been able to accommodate these nuances and has relied on long-term management principles to achieve the desired environmental policy objectives.

The membership of the Alliance is proud of the industry contribution to the development of alternatives to high-GWP compounds and their implementation in equipment and products. Government, industry and other stakeholders must remain focused on supporting a global transition to these alternatives. The Alliance thanks Environment Canada for providing an opportunity to comment and looks forward to working in a constructive manner 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