



**The Alliance**  
*for Responsible Atmospheric Policy*

**STATEMENT OF**

**THE ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY**

**Kevin Fay, Executive Director**

**February 16, 2016**

**US EPA/State Department Montreal Protocol Stakeholder Meeting**

On behalf of the Alliance for Responsible Atmospheric Policy (Alliance), we are providing these comments regarding the continued pursuit of international action on HFCs under the Montreal Protocol.

The Alliance is an industry coalition organized in 1980 to address the issue of stratospheric ozone depletion as well as the production and use of fluorocarbon compounds. It is composed of manufacturers, businesses and trade associations, which make or use fluorinated gases in their course of business. The US fluorocarbon using and producing industries contribute more than \$158 billion annually in goods and services to the US economy, and provide employment to more than 700,000 individuals with an industry-wide payroll of more than \$32 billion. In August 1986, one year before the Montreal Protocol was signed, the Alliance was the first industry organization to call for an international environmental agreement to address ozone depletion when the science demonstrated that the world needed to cooperate on this global environmental threat. Today, the Alliance coordinates industry participation in the development of reasonable international and government policies regarding both ozone protection and climate change. At the same time, Alliance member companies are leading the development of next generation, climate- and ozone-friendly, technologies and applications.

The Alliance is proud of its long history of working in a positive manner with the US government on the protection of stratospheric ozone and climate change.

The Alliance appreciates the leadership shown by EPA and the State Department as the Parties to the Montreal Protocol consider how best to continue the success of that treaty with the management of HFCs. We recognize the diplomatic challenge of finding alignment among such diverse viewpoints and extend our congratulations on the achievement of the Dubai decision in November.

The Alliance commends the US government for its openness to considering alternate approaches in the amendment effort. Administrator McCarthy's participation in the Dubai talks no doubt communicated to the other Parties the priority the US is placing on the achievement of an amendment. We look forward to the Administrator's continued engagement in this process and to working more closely with Senior Advisor Haverkamp as she joins the delegation. Within the US, we encourage the US government to continue to hold discussions at the highest levels on ways to best direct resources in support of an HFC amendment.

The Alliance believes that another development, the two-step amendment adoption proposal, was also helpful in the discussions in 2015, even if not adopted as proposed. The approach showed a good-faith willingness to respond to the apprehensions of some Parties and likely assisted in the achievement of the Dubai Decision. We encourage the delegation to continue its flexibility and creativity in this most important year of negotiations.

The Alliance encourages the delegation to identify any transferrable lessons from the achievement of the Paris Agreement. Success in Paris appears to be due from both an agreement design which accommodated the diverse positions of UNFCCC Parties as well as the creation of immense momentum in the period before COP21. That momentum was facilitated by a variety of event types which built public support, but also harmonization among the Parties. To the extent that such an effort is replicable in the Montreal Protocol, the Alliance would be strongly supportive.

The Alliance welcomes the opportunity to continue our work with the State Department and EPA on this critical effort and to be liaisons with government and industry partners around the globe, including India, China and the Persian Gulf countries, whose support is essential to our success. A component of that effort may be more carefully considering the amendment positions advanced by those Parties, including the Indian amendment proposal and the High Ambient Temperature exception proposed by Saudi Arabia, and what, if anything, in those proposals may be feasible. We also encourage further engagement with other Parties whose views may be in line with the US, including a number of countries in Latin America and the African countries, and with other Parties whose views have differed from those of the US, including Argentina.

It is critical that we achieve an amendment this year. This calls for placing a greater focusing on finding common ground on broad issues before negotiating the finer details of an amendment. The change of administration in 2017 is likely to disrupt a sense of continuity among the other Montreal Protocol Parties. At the same time, the uncertain future of the Clean Power Plan underscores the importance of achieving this amendment for the US to continue its leadership in addressing global climate change.

We look forward to the achievement of this important policy objective by the end of this year.

Thank you.