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EXECUTIVE COMMITTEE OF
THE MULTILATERAL FUND FOR THE
IMPLEMENTATION OF THE MONTREAL PROTOCOL
Eighty-third Meeting
Montreal, 27– 31 May 2019

PROJECT PROPOSAL: COMOROS (THE)

This document consists of the comments and recommendation of the Secretariat on the following project proposal:

Phase-out

- HCFC phase-out management plan (stage I, fourth tranche) UNEP

PROJECT EVALUATION SHEET – MULTI-YEAR PROJECTS

Comoros (the)

(I) PROJECT TITLE	AGENCY	MEETING APPROVED	CONTROL MEASURE
HCFC phase out plan (Stage I)	UNEP (lead)	64 th	35% by 2020

(II) LATEST ARTICLE 7 DATA (Annex C Group I)	Year: 2018	0.06 (ODP tonnes)
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(III) LATEST COUNTRY PROGRAMME SECTORAL DATA (ODP tonnes)								Year: 2018	
Chemical	Aerosol	Foam	Fire fighting	Refrigeration		Solvent	Process agent	Lab use	Total sector consumption
				Manufacturing	Serviceing				
HCFC-22					0.06				0.06

(IV) CONSUMPTION DATA (ODP tonnes)			
2009 - 2010 baseline:	0.14	Starting point for sustained aggregate reductions:	0.14
CONSUMPTION ELIGIBLE FOR FUNDING (ODP tonnes)			
Already approved:	0.05	Remaining:	0.09

(V) BUSINESS PLAN		2019	2020	Total
UNEP	ODS phase-out (ODP tonnes)	0.01	0.01	0.02
	Funding (US \$)	33,900	18,080	51,980

(VI) PROJECT DATA			2011	2013	2014	2015	2016	2017	2018*	2019	2020	Total
Montreal Protocol consumption limits			n/a	0.14	0.14	0.14	0.13	0.13	0.13	0.13	0.09	n/a
Maximum allowable consumption (ODP tonnes)			n/a	0.14	0.14	0.14	0.13	0.13	0.13	0.13	0.09	n/a
Agreed funding (US\$)	UNEP	Project costs	44,000	35,000	0	0	35,000	0	30,000	0	16,000	160,000
		Support costs	5,720	4,550	0	0	4,550	0	3,900	0	2,080	20,800
Funds approved by ExCom (US\$)	UNEP	Project costs	44,000	35,000	0	0	35,000	0	0	0	0	114,000
		Support costs	5,720	4,550	0	0	4,550	0	0	0	0	14,820
Total funds requested for approval at this meeting (US\$)	UNEP	Project costs	0	0	0	0	0	0	0	30,000*	0	30,000
		Support costs	0	0	0	0	0	0	0	3,900	0	3,900

* The fourth tranche should have been submitted in 2018.

Secretariat's recommendation:	Blanket approval
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PROJECT DESCRIPTION

1. On behalf of the Government of the Comoros, UNEP as the designated implementing agency, has submitted a request for funding for the fourth tranche of stage I of the HCFC phase-out management plan (HPMP), at the amount of US \$30,000, plus agency support costs of US \$3,900.¹ The submission includes a progress report on the implementation of the third tranche, the verification report on HCFC consumption for 2013 to 2018 and the tranche implementation plan for 2019 and 2020.

Report on HCFC consumption

2. The Government of the Comoros reported a consumption of 0.06 ODP tonnes of HCFC in 2018, which is 57 per cent below the HCFC baseline for compliance. The 2014-2018 HCFC consumption is shown in Table 1.

Table 1. HCFC consumption in the Comoros (2014-2018 Article 7 data)

HCFC-22	2014	2015	2016	2017	2018	Baseline*
Metric tonnes	2.60	1.80	1.56	1.21	1.00	2.48
ODP tonnes	0.14	0.10	0.09	0.07	0.06	0.14

*The HCFC baseline for compliance is 0.1 ODP tonnes (based on one decimal digit).

3. The consumption of HCFCs in the Comoros is decreasing due to regulatory controls on imports of HCFCs, better servicing practices resulting in reduction in HCFC consumption in servicing equipment and increase in population of non-HCFC-based equipment.

Country programme (CP) implementation report

4. The Government of the Comoros reported HCFC sector consumption data under the 2018 CP implementation report which is consistent with the data reported under Article 7 of the Montreal Protocol.

Verification report

5. The verification report confirmed that the Government is implementing a licensing and quota system for HCFC imports and exports and that the total consumption of HCFCs for 2016, 2017 and 2018 were 0.09, 0.07 and 0.06 ODP tonnes, respectively. The verification concluded that the Comoros has a reliable HCFC licensing and quota system for controlling and monitoring HCFCs in line with the Agreement targets; the verification report confirmed that the consumption for the years 2013 to 2018 are in line with the HPMP targets.

6. There was a minor difference in Article 7 data and customs data on import of HCFCs for 2013 (0.012 ODP tonnes) and 2014 (0.03 ODP tonnes) due to errors in data recording. UNEP has agreed to request the Government to submit the revision in 2013 and 2014 data based on the verification report to the Ozone Secretariat. The verification report also noted 12 instances where HCFC imports by individual importers were larger than the quota allocated. This was mainly due to manual record keeping of import quotas; the training of importers on record keeping and an online system for monitoring of HCFC imports that would be implemented no later than December 2019 would address this issue.

¹ As per the letter of 14 March 2019 from the Ministère de l'Énergie, de l'Agriculture, de la Pêche et de l'Environnement of the Comoros to the Secretariat.

Progress report on the implementation of the third tranche of the HPMP*Legal framework*

7. The import/export licensing and quota system has been established and is operational for all ODS, including HCFCs. The Government has amended the legislation to include the accelerated phase-out schedule for HCFCs. The Government of the Comoros has banned import of all ODS, except HCFCs, since 2010 and there is no use of the phased out substances in the Comoros.

Refrigeration servicing sector

8. The following activities were implemented:

- (a) Two training workshops for 36 customs officers on control and identification of HCFCs and HCFC-based equipment, and on HCFCs illegal trade issues. The National Ozone Unit (NOU) has included a module on ozone layer protection and Montreal Protocol implementation in the curriculum of customs training school; this has resulted in the increase in capacity of customs officers to identify suspicious ODS imports;
- (b) Two workshops for 51 refrigeration technicians on good refrigeration practices, safe handling of hydrocarbon (HC) and servicing of air-conditioning equipment. The NOU has signed a memorandum with the main refrigeration training institute in Domoni; this is the main institute for training technicians and in their curriculum, good servicing practices and safe use of alternatives have already been included.

Project implementation and monitoring unit (PMU)

9. The NOU recruited two consultants (one on refrigeration and one customs expert) to assist in collecting data and monitoring the implementation of all the HPMP activities. The institutions involved in implementation of the phase-out programme in the Comoros include the NOU, the National Ozone Committee, the Association of Refrigeration Technicians and the Ministry of Trade.

Level of fund disbursement

10. As of March 2019, of the US \$114,000 approved so far, US \$109,000 had been disbursed as shown in Table 2. The balance of US \$5,000 will be disbursed in 2019.

Table 2. Financial report of stage I of the HPMP for the Comoros (US \$)

Agency	First tranche		Second tranche		Third tranche		Total	
	Approved	Disbursed	Approved	Disbursed	Approved	Disbursed	Approved	Disbursed
UNEP	44,000	44,000	35,000	35,000	35,000	30,000	114,000	109,000
Disbursement rate %	100.0		100.0		85.7		95.6	

Implementation plan for the fourth tranche of the HPMP

11. The following activities will be implemented between July 2019 and June 2020:

- (a) Three workshops for the training of 36 customs officers on monitoring and control of import and distribution of HCFCs in the country, including HCFC quotas (US \$11,000);
- (b) Three workshops for the training of 60 refrigeration technicians on good refrigeration practices (US \$11,000); and

- (c) Monitoring the implementation of all HPMP activities including outreach on improved record keeping of imports (US \$8,000).

SECRETARIAT'S COMMENTS AND RECOMMENDATION

COMMENTS

Progress report on the implementation of the third tranche of the HPMP

Legal framework

12. The Government of the Comoros has already issued HCFC import quotas for 2019 at 0.05 ODP tonnes, which is 61 per cent lower than the Montreal Protocol control targets.

Refrigeration servicing sector

13. UNEP indicated that the late submission of the fourth tranche was due to the delays in completing the verification report, which has now been submitted.

14. UNEP reported that there are no regulations on HC use in the country and neither the Government nor UNEP are promoting retrofitting of HCFC-based refrigeration and air-conditioning equipment to flammable or toxic refrigerants.

Conclusion

15. The Secretariat noted that the country's import licensing and quota system is operational; the 2018 consumption level was below the maximum allowable consumption in the Agreement with the Executive Committee; and the quota set for 2019 is already 64.3 per cent below the HCFC baseline consumption. Capacity of customs and service technicians would continue to be strengthened to sustain the HCFC phase-out by the Comoros. The HPMP is progressing and 95.6 per cent of the funds approved so far have been disbursed and the Government and UNEP are committed to cost-effectively implement HPMP activities. The activities already implemented and those planned under the fourth tranche, including implementing the online system for monitoring of HCFC import, capacity building support to training institutions, will further strengthen the servicing sector training and enforcement activities and ensure the long-term sustainability of the HPMP.

RECOMMENDATION

16. The Fund Secretariat recommends that the Executive Committee takes note of the progress report on the implementation of the third tranche of stage I of the HCFC phase-out management plan of (HPMP) for the Comoros; and further recommends blanket approval of the fourth tranche of stage I of the HPMP for the Comoros, and the corresponding 2019-2020 tranche implementation plan, at the funding level shown in the table below:

	Project title	Project funding (US \$)	Support cost (US \$)	Implementing agency
(a)	HCFC phase-out management plan (stage I, fourth tranche)	30,000	3,900	UNEP