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EXECUTIVE COMMITTEE OF THE MULTILATERAL FUND FOR THE IMPLEMENTATION OF THE MONTREAL PROTOCOL Eighty-seventh Meeting Montreal, 28 June-2 July 2021¹

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, fifth tranche)

UNEP

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¹ Online meetings and an intersessional approval process will be held in June and July 2021 due to coronavirus disease (COVID-19)

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 l)	Year: 2020	0.05 (ODP tonnes)
(II) LATEST ARTICLE / DATA (Alliex C Group I)	1 ear. 2020	0.05 (ODF tollies)

(III) LATEST COUNTRY PROGRAMME SECTORAL DATA (ODP tonnes)									Year: 2020
Chemical	Aerosol	Foam	Fire	Refrigeration		Solvent	Process	Lab	Total sector
			fighting				agent	use	consumption
				Manufacturing	Servicing				
HCFC-22					0.05				0.05

(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) BUSIN	ESS PLAN	2021	2022	2023	Total
UNEP	ODS phase-out (ODP tonnes)	0.01	0	0	0.01
	Funding (US \$)	18,080	0	0	18,080

(VI) PRO	OJECT I	DATA	2011- 2012	2013	2014- 2015	2016	2017	2018	2019	2020- 2021	Total
Montreal Protocol consumption limits		n/a	0.14	0.14	0.13	0.13	0.13	0.13	0.09	n/a	
Maximur (ODP tor		ble consumption	n/a	0.14	0.14	0.13	0.13	0.13	0.13	0.09	n/a
Agreed funding	UNEP	Project costs	44,000	35,000	0	35,000	0	30,000	0	16,000	160,000
(US \$)	ONLI	Support costs	5,720	4,550	0	4,550	0	3,900	0	2,080	20,800
Funds ap	_	Project costs	44,000	35,000	0	35,000	0		30,000*	0	144,000
(US \$)	111	Support costs	5,720	4,550	0	4,550	0		3,900*	0	18,720
Total fun	l for	Project costs	0	0	0	0	0	0	0	16,000*	16,000
approval meeting (Support costs	0	0	0	0	0	0	0	2,080*	2,080

^{*} The fourth tranche should have been submitted in 2018 and the fifth in 2020 instead of 2021.

Secretariat's recommendation: For blanket approval	Secretariat's recommendation:	For 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 fifth and final tranche of stage I of the HCFC phase-out management plan (HPMP), at the amount of US \$16,000, plus agency support costs of US \$2,080.² The submission includes a progress report on the implementation of the fourth tranche and the tranche implementation plan for 2021 to 2022.

Report on HCFC consumption

2. The Government of the Comoros reported a consumption of 0.05 ODP tonnes of HCFC in 2020, which is 64 per cent below the HCFC baseline for compliance. The 2016-2020 HCFC consumption is shown in Table 1.

Table 1. HCFC consumption in the Comoros (2016-2020 Article 7 data)

HCFC-22	2016	2017	2018	2019	2020	Baseline
Metric tonnes (mt)	1.56	1.21	1.00	0.92	0.92	2.48
ODP tonnes	0.09	0.07	0.06	0.05	0.05	*0.14

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

3. The consumption of HCFC-22 has been decreasing due to the implementation of the HPMP activities, including a HCFC licensing and quota system and training on good servicing practices resulting in a reduction in HCFC consumption when servicing equipment, and to the introduction of equipment based on HFCs. The use of R-600a is growing for domestic refrigeration equipment.

Country programme (CP) implementation report

4. The Government of the Comoros reported HCFC sector consumption data under the 2020 CP implementation report that is consistent with the data reported under Article 7 of the Montreal Protocol.

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

Legal framework

- 5. The import/export licensing and quota system has been established and is operational for all ODS, including HCFCs. The Government of the Comoros has banned the import of all ODS, except HCFCs, since 2010 and there is no detected market or illegal trade in the phased-out substances in the Comoros.
- 6. In 2019-2020, 90 customs and enforcement officers were trained in the identification and control of HCFCs and HCFC-based equipment, the monitoring of the licensing and quota system, and record keeping. The national ozone unit (NOU) regularly works with the Customs Department to make sure that customs staff is updated on current ODS controls. The implementation of an online system for the monitoring of HCFC imports has experienced delays but is now at an advanced stage and is expected to launch on 1 January 2022. In the meantime, cross-checking of information in the licensing system is conducted through regular meetings and *ad hoc* consultations.

Refrigeration servicing sector

7. Four workshops in good servicing practices, including the safe handling of flammable refrigerants (R-600a) and the servicing of HCFC air-conditioning (AC) equipment for 84 refrigeration and

² As per the letter of 29 March 2021 from the Ministry of Environment and Fisheries of the Comoros to the Multilateral Fund Secretariat.

air-conditioning (RAC) servicing technicians were carried out in 2019-2020.

Project implementation and monitoring

8. The NOU monitors the implementation of activities. Two consultants have been employed to assist with day-to-day monitoring and data collection (US \$6,000 for consultants and US \$2,000 for monitoring-related travel).

Level of fund disbursement

9. As of March 2021, of the US \$144,000 approved so far, all of the funds had been disbursed.

Implementation plan for the fifth and final tranche of the HPMP

- 10. The following activities will be implemented between July 2021 and December 2022:
 - (a) Completion of the process of launching the online licensing system; and organization of two workshops for 60 customs and enforcement officers on the control and identification of HCFCs and HCFC-based equipment and on illegal trade of controlled substances (US \$6,000);
 - (b) Inclusion of a training module on good servicing practices and safe handling of flammable or toxic refrigerants into the main vocational school by the end of the fifth tranche, two workshops to train 70 refrigeration technicians in good practices in refrigeration, HCFC alternatives and the servicing of AC equipment; UNEP, through its Compliance Assistance Programme, will provide technical support and facilitate discussions on certification models among the countries of the region (US \$6,000); and
 - (c) Recruitment of national consultants to support the NOU in delivering training activities (US \$4,000).

SECRETARIAT'S COMMENTS AND RECOMMENDATION

COMMENTS

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

Legal framework

11. The Government of the Comoros has already issued HCFC import quotas for 2021 at 0.039 ODP tonnes, which is lower than the Montreal Protocol control targets.

Completion of stage I

12. The completion date for stage I of the HPMP is 31 December 2021. The late submission and approval of the fourth tranche coupled with the constraints imposed by the COVID-19 prevented the submission of the last tranche request due in 2020. Activities have gradually restarted in 2021 and the Government of Comoros was able to submit the funding request to the 87th meeting. Accordingly, the Government is requesting an extension of the date of completion of stage I to 31 December 2022. The Secretariat supports this extension on the understanding that no further extensions will be requested, and notes the efforts by the Government and UNEP to implement activities under the HPMP notwithstanding

the challenges brought about by the COVID-19 pandemic. Stage II of the HPMP will be submitted by the 88th meeting.

Gender policy implementation³

13. The NOU has informed the relevant stakeholders about the Multilateral Fund's gender policy to encourage women's participation in all aspects of HPMP implementation. Furthermore, the NOU will discuss with vocational training institutions ways to promote gender balance and encourage women to become RAC technicians under the fifth tranche of the HPMP, and the NOU will also collect gender-disaggregated data, specifically related to technician and customs training.

Sustainability of the HCFC phase-out

14. To ensure the sustainability of the HPMP activities and the HCFC phase-out, the NOU is working with the main RAC training school to introduce into its curriculum good refrigeration practices and the safe handling of flammable or toxic refrigerants. While the current situation of the RAC sector in the country does not allow for the establishment of a certification scheme, which is being planned for stage II, the Government will continue strengthening the technicians' capacity. The training and capacity building of customs and enforcement officers is an ongoing activity, being implemented in cooperation with the Customs authorities.

Conclusion

15. The Secretariat noted that the Comoros' import licensing and quota system was operational; the 2020 consumption level was below the Montreal Protocol control limits and the maximum allowable consumption; and the quota set for 2021 was already 72 per cent below the HCFC baseline consumption. The capacity of customs and service technicians will continue to be strengthened to sustain the HCFC phase-out in the country. The HPMP is progressing, with all approved funds disbursed and with the gradual restart of activities in 2021, the Government and UNEP committed to implementing HPMP activities in an efficient manner to complete stage I by 31 December 2022. The activities already implemented and those planned under the fifth tranche, such as launching the online licensing system, enhancing the capacity of customs officers and RAC technicians, and providing support to training institutions, will further strengthen enforcement and the performance of the servicing sector.

RECOMMENDATION

- 16. The Fund Secretariat recommends that the Executive Committee:
 - (a) Takes note of the progress report on the implementation of the fourth tranche of stage I of the HCFC phase-out management plan (HPMP) for the Comoros; and
 - (b) Approves, on an exceptional basis, the extension of the date of completion of stage I of the HPMP for the Comoros to 31 December 2022, given delay in implementing phase-out activities due to the COVID-19 pandemic, and noting that no further extension of project implementation would be requested.
- 17. The Fund Secretariat further recommends blanket approval of the fifth and final tranche of stage I of the HPMP for the Comoros, and the corresponding 2021-2022 tranche implementation plan, at the

³ Decision 84/92(d) requested bilateral and implementing agencies to apply the operational policy on gender mainstreaming throughout the project cycle.

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funding level shown in the table below:

Project title	Project funding (US \$)	Support cost (US \$)	Implementing agency
HCFC phase-out management plan (stage I, fifth tranche)	16,000	2,080	UNEP