

**WRITTEN VIEWS SUBMITTED BY SWEDEN AND
THE CO-OPTED EUROPEAN FREE TRADE ASSOCIATION (EFTA) MEMBERS
PURSUANT TO DECISION 93/103**

1. The challenges associated with implementation of the Kigali Amendment is an opportunity for the Multilateral Fund to enhance its project implementation and programming modalities to effectively address these and other related issues. In the context of decision 93/103, Sweden and the co-opted EFTA members (Austria, Finland, Iceland, Norway and Switzerland) welcomes a discussion on strategic approaches to Kigali Amendment implementation both informally prior to the 94th meeting of the Executive Committee and as an agenda point during the 94th meeting.

2. Our expectation is that the informal half-day session would provide a better understanding of what challenges Article 5 countries face while implementing the Kigali Amendment, what is needed, and what possibilities are available to leverage the funding provided by the Multilateral Fund.

3. We believe that this informal session provides an opportunity to discuss how the Kigali Amendment can be implemented in an effective way, taking a holistic approach and being cognisant of the triple planetary crisis of climate change, biodiversity loss and pollution prevention by considering the synergies from other initiatives and action taking place outside of the Multilateral Fund, sharing experiences and best practices, to best arrange and strategically adapt the Multilateral Fund guiding directions. Such a session's added value is also to address together issues, that we generally address separately, taking into account their synergies and trade-offs. Anyhow, the Executive Committee should ensure that the ultimate aim for the Multilateral Fund is to continue providing cost-effective support to Article 5 countries and this should be kept in mind in the upcoming discussions.

4. We would also welcome the session to provide a better understanding of sectoral approaches, their advantages and what is needed to develop them. As a discussion basis the experience of the sectoral approach adopted under the HCFC phase-out management plan (HPMP) could be shared.

Holistic approach to policies and regulations

5. We would strongly emphasize the necessity for all countries to ratify and implement the Kigali Amendment and phase down HFCs as early as possible.

6. The development of policies is an important aspect and a precondition to build institutional strengthening and long-term sustainability of the outcomes from Multilateral Fund-funded projects in Article 5 countries.

7. To enhance the fulfilment of the Kigali Amendment, we believe it is crucial to adopt sector approaches and we believe that the Executive Committee should built upon the useful experiences from the sectorial approaches that has been followed within the HPMPs while developing guidelines for implementing the Kigali Amendment.

8. We think that it would be important during the first steps of HFC phase-down that Article 5 countries target and direct attention towards the sectors where HFCs are used the most. We assume that the biggest sectors will be the refrigeration, air-conditioning, heat pumps, as well as the mobile air-conditioning (MAC) sector, in most of the countries. Many of those sectors were not previously addressed during the HPMPs. Therefore, we think that it could be useful for the Executive Committee to discuss how the Multilateral Fund could properly and in a cost-effective way support the Article 5 countries addressing those sectors in their Kigali HFC implementation plans (KIPs).

9. Heating and cooling accounts for 17 per cent of global energy consumption and is expected to rise with an urban population, and warming climate. At the same time, cooling and heating have been recognised as elementary needs in most countries and especially in Article 5 countries.

10. The recent years have witnessed a growing focus on the role of national cooling action plans, demonstrated to be a best practice policy instrument, to enable countries to develop long-term strategies, taking holistic consideration and enhance synergies across sectors and development goals, to ensure sustainable cooling. We believe that such a framework has a great potential to enable an effective implementation of the Kigali Amendment, allowing Article 5 countries to augment synergies from HFC phase-down with refrigerant transition strategies, energy efficiency and life-cycle refrigerant management thus maximizing climate benefits. We would therefore encourage more Article 5 countries to take advantage of this type of policy instrument, and how this could be integrated within KIPs.

11. National cooling action plans offer opportunities to assess and implement different approaches than the common refrigerant transition. In the Nordic countries we have for instance gained good experiences in district cooling and heating as partial solution. These kind of not-in kind-solutions have enhanced energy security, lowered energy costs for users and enabled combining benefits of large heat pumps with new renewable energy production by the Global Cooling Coalition. It could be useful to discuss during the informal session how the Multilateral Fund could help enhancing awareness of the Article 5 countries, for them to be able to take advantages of such initiatives and fora while phasing down HFCs.

12. We would also like to mention the importance of elaborating proper refrigerant transition strategies, by assessing in a broader context, the impact of activities that countries will choose to implement in KIPs, taking into consideration opportunities to additional environmental and climate benefits, embracing a precautionary principle and contribute to avoid a triple planetary crisis.

13. Additionally, we emphasize the importance of ensuring proper monitoring, reporting and verification mechanisms for implementation of Multilateral Fund-funded projects and activities, also ensuring the long-term sustainability of the associated outcomes after project completion. Those are key elements for effective project implementation and fulfilment of the agreements between countries and the Executive Committee. As the Executive Committee has started to approve KIPs, we see opportunities to discuss what can be done to strengthen monitoring, reporting and verification mechanisms building on experiences for HPMP and ensuring an effective and robust implementation of the Kigali Amendment.

14. We also appreciate the constructive dialogue that have been taking place within the Executive Committee, it is key for ensuring mutual understanding of challenges and find appropriate ways to address those. In particular, we value the discussions that have been taking place within the sub-group of the production sector, that have enabled us to better understand and find appropriate ways to control emissions related to the production of controlled substances. This gives us a grasp of potential and existing challenges that will need to be addressed ahead while implementing the Kigali Amendment, and we wish to continue this important work in a constructive and open way, with the aim of reducing emissions.

Life-cycle refrigerant management

15. Recognizing the climate and environmental benefits of the recovery and disposal of ODS banks (CFC, HCFC and halons) as reported by the Scientific Assessment Panel (SAP) 2022, and acknowledging that accumulation of HFC's, in particular high GWP-HFCs to the global bank are largely taking place right now, there are opportunities to achieve greater climate and environmental benefits of enhancing awareness on recovery, reclamation and disposal of all halogenated refrigerants while phasing out the rest of the chlorinated substances and phasing-down HFCs. This way the benefits are achieved also from reducing the need for production of excess amounts of virgin HFCs and avoiding some of the emissions related to production of halogenated substances.

16. Decision XXXV/11 requested the Executive Committee to consider providing a window of funding for countries who have completed their national inventories and plans in accordance with Executive Committee decision 91/66 to support the implementation of the plans; Furthermore, decision 93/104 requested the Secretariat to prepare, for consideration by the Committee at its 97th meeting, a report providing an overview of the report of the Technology and Economic Assessment Panel (TEAP) and the outcomes of the workshop that would be held in line with decision XXXV/11 of the Thirty-Fifth Meeting of the Parties; and of the status of implementation and preliminary outcomes of the projects submitted under decision 91/66 with a view to considering the establishment of a funding window in line with decision XXXV/11.

17. We consider this as a first stage in a stepwise approach and an opportunity to use lessons learned also from earlier pilot demonstration projects on ODS disposal and destruction.

18. In the meantime, we believe that there are also some opportunities to mobilize external funding (e.g. carbon credits) to finance collection, reclamation and destruction systems and facilities, also taking into account for possibilities for regional cooperation. And perhaps it would be useful during the informal session to discuss possibilities and challenges in exploring ways to mobilize such funding.

19. Additionally, we could also discuss what are the opportunities to strengthen the Multilateral Fund-support provided to Article 5 countries towards avoiding emissions from equipment by ensuring better prevention of leaks and proper maintenance, as well as by promoting recycling, recovery, and reclamation of HFCs, while phasing down HFCs.

20. These good practises also promote the energy efficiency of equipment and consequently reduce life cycle emissions.

Energy efficiency

21. Indeed, with the HFC phase-down there are opportunities to also achieve great climate benefits by enhancing energy efficiency. We consider it is important to connect the phase-down of HFCs with measures to increase energy efficiency of appliances and enable that the Multilateral Fund, can positively contribute to it. It needs to be kept in mind that energy efficiency is not compliance-related under the Montreal Protocol. However, the Executive Committee has already taken several decisions, offering incentives and support for additional activities and funding for pilot projects to those countries, which have minimum energy performance standards (MEPS), while continuing discussion on elaborating an operational framework. We think that measures, such as MEPS may contribute significantly to the energy consumption of the world, if they are equally implemented as requirements by both for importing and exporting countries and thus contributing to necessary savings to infrastructure for energy production and distribution as well as avoided emissions.

22. We take note that several Executive Committee members consider that the pace of taking decisions on this matter is too slow, creating a risk to miss out on important opportunities to transition to sustainable technologies. However, we believe that it is crucial for the Executive Committee to gain more knowledge and experiences on how to integrate energy efficiency in Multilateral Fund-funded projects in the most cost-effective way. We see this as an iterative process, which may lead to expanding the scope and extent of activities and funding for projects related to energy efficiency funded by the Multilateral Fund, building on lessons-learned during the course of activities and projects recently adopted. We also look forward to continuing seeking possibilities for co-financing with other CFI's in larger energy efficiency-investment projects.