



30 August 2018

S18.34

Submission to the Environment Committee on the International Treaty Examination - Amendment to the Montreal Protocol on Substances that Deplete the Ozone Layer

Introduction

- 0.1. The National Council of Women of New Zealand, Te Kaunihera Wahine o Aotearoa (NCWNZ) is an umbrella group representing 245 organisations affiliated at either national level or to one of our 19 branches. In addition, about 350 people are individual members. Collectively our reach is over 350,000 with many of our membership organisations representing all genders. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
- 0.2. This submission has been prepared by the NCWNZ Climate Change and Environment Standing Committee based on existing resolutions and submissions. NCWNZ has a long-standing commitment to action on environmental matters and particularly to those that are raised in this amendment.
- 0.3. In 1988 NCWNZ passed a resolution¹ supporting strongly the signing of the original Montreal Protocol and the international effort to reduce the impacts of chlorofluorocarbons on the atmosphere. NCWNZ also has policy in support of the Kyoto Protocol² to limit greenhouse gas emissions. Since 2001, and prior to this, submissions have been made pertaining to the absolute requirement to be working vigorously to reduce carbon emissions and mitigate the effects of climate change. Most recently a submission³ was made to the Productivity Commission on the consultation document "The Low Emissions Economy".

¹ NCWNZ. 2012. 115 years of resolution. 7.13.1. <http://www.ncwnz.org.nz/wp-content/uploads/2013/06/115-years-Register-everything-2.pdf>

² Ibid. 7.13.4

³ NCWNZ. 2018. Submission to the New Zealand Productivity Commission on the Low-emissions economy: Draft Report. S18.25. <https://www.ncwnz.org.nz/wp-content/uploads/2018/06/S18.25-Low-emissions-Economy-Draft-Report.pdf>

1. Detailed Comments

Article 2J

- 1.1 This comes into force on 1 January 2019 and sets out the schedule for reducing both the use and the production of hydrofluorocarbons (HFCs) over the years until 2036. The staged rate of reduction beginning at 10% and then moving within 5 years to a 40% drop and 70% within 10 years from 2018 levels indicates that the atmospheric effects of HFCs in relation to global warming and climate change are being taken seriously and substantive measures are being planned to reduce them significantly. The time period allows for both producing and consuming countries to take appropriate actions to develop alternative technologies for current uses. This could be a fruitful area for investment by governments.

Articles 4 and 4B

- 1.2 These sections state the banning of import and export of the controlled substances, and the requirement for States Parties to set up a licensing system for the controlled substances. Given that the schedule for reduction in consumption set out in Article 2J allows for usage at a level of 15% of current, it is necessary for import/export of the substances to be controlled by licensing so that they can be monitored. Current applications of HFCs for medical purposes such as inhalers means that a total ban is not feasible, and research to find alternatives for therapeutic uses should be continued.
- 1.3 The countries that are major producers of HFCs and those that comprise most of New Zealand's major markets have plans to ratify this amendment to the Montreal Protocol. This will both reduce availability of the chemicals and make them increasingly expensive. Thus it is in New Zealand's interests to do likewise.
- 1.4 One problem that will become evident is that many of the chemicals that may replace hydrofluorocarbons for their present uses are hazardous, which creates problems. There will need to be law changes to control usage, and education around safe handling. This could enable the introduction of materials such as propane or ammonia as replacements.

Article III

- 1.5 NCWNZ has long supported the intention and implementation of the Kyoto Protocol and action on climate change. It is greatly encouraging to read the determination that HFCs will continue to be included within the provisions of this related Protocol and the UN Framework Convention on Climate Change⁴. Given the evidence that HFCs have high global warming potential it would be a substantial backward step to exclude them from the provisions of these other international agreements.

⁴ United Nations. 1992. United Nations Framework Convention on Climate Change.
<https://unfccc.int/resource/docs/convkp/conveng.pdf>

2. Conclusion

- 2.1 Given its history of engagement with environmental matters, NCWNZ submits on this amendment to the Montreal Protocol in support of measures that reduce greenhouse gases while continuing to protect and restore the ozone layer. NCWNZ supports strongly the early ratification and implementation of this amendment.



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